



Draft London Plan 2026

Consultation

Response by the London Borough of Hillingdon

October 2026

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1 Foreword

- 1.1.1 Hillingdon supports the ambition for sustainable growth across London and recognises the importance of delivering new homes, jobs and infrastructure to support the capital's future prosperity. We are an open and ambitious borough that is already embracing growth through our own Growth Plan, which sets out a clear vision for how growth can create opportunities for residents, businesses and communities.
- 1.1.2 Our position is that growth should be evidence led, infrastructure enabled and shaped through genuine partnership with boroughs. We support growth in the right locations, where it builds on established economic strengths, responds to local need and can be supported by the necessary transport, utilities, social infrastructure and environmental improvements. Equally, we believe the Green Belt remains a strategically important asset for London and should only be released where there is a compelling strategic case and where all reasonable brownfield opportunities have been fully explored.
- 1.1.3 Hillingdon is already accommodating significant growth pressures and faces an unprecedented concentration of competing demands on its limited land supply. Alongside some of the highest housing expectations in outer London, the borough is expected to accommodate major strategic infrastructure, multiple large scale data centre proposals, industrial growth, logistics activity, and the potential expansion of Heathrow Airport. While each of these may support London's wider economic ambitions, the cumulative impact of these pressures on land, infrastructure, utilities, transport networks and communities is not yet sufficiently recognised within the Draft London Plan. Future planning for growth must take a more holistic view of how these competing demands interact and how they can be balanced.
- 1.1.4 There is significant alignment between the Draft London Plan and Hillingdon's ambitions. We welcome recognition of Hayes as a major growth location and see further opportunities to strengthen its role as a creative and cultural hub, alongside investment in Stockley Park as a new mixed-use neighbourhood that encompasses frontier innovation and advanced business sectors. We also believe Uxbridge, Brunel University and the emerging WestTech London corridor should be recognised as one of London's most significant opportunities for innovation-led growth in west London, while the wider Heathrow Economic Activity Zone provides a unique opportunity to connect a nationally significant economic asset more directly with local businesses, skills, employment and innovation.
- 1.1.5 As growth is planned, equal weight must be given to protecting and enhancing the assets that make Hillingdon distinctive. The Green Belt, Colne Valley Regional Park, waterways, open spaces and natural environment are part of London's wider environmental infrastructure and should be viewed as assets that support sustainable growth, health, biodiversity and quality of life.

- 1.1.6 Hillingdon stands ready to work constructively with the Mayor and the London Plan team to help deliver London's housing and economic ambitions. However, future success will depend on a more collaborative approach that shares key evidence, recognises local evidence, local priorities and the cumulative pressures facing growth boroughs. Growth is most successful when it is planned with places rather than imposed upon them, ensuring that local communities, the London economy and the environment all benefit.

Councillor Steve Tuckwell
Leader of the London Borough of Hillingdon

2 Strategic Failure: Ineffective Engagement

2.1 Regulatory Compliance

- 2.1.1 Regulation 7 of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000 prescribes the public participation and consultation procedure for the London Plan. It requires a minimum of 12 weeks for public consultation on the proposed spatial development strategy. While the regulation identifies at regulation 7(3) what is required to be made available for inspection (the proposed SDS and the sustainability appraisal), this is not expressed as an exhaustive or exclusive list and, absent any such restriction, the common law principles of fairness in consultation apply – i.e., the *Gunning* principles, endorsed by the Supreme Court in *R (Moseley) v London Borough of Haringey* [2014] 1 WLR 3947; these require, in part, that sufficient information (or reasons) must be given to “permit of intelligent consideration and response” (*Moseley* [25]). The importance of providing adequate information is reiterated in the Planning Inspectorate (PINS) publication, *Procedural Practice in the Examination of Spatial Development Strategies*, which was last updated in July (2023): this is addressed at 3.3.1 below.
- 2.1.2 The Council notes that several key evidence documents that accompanied previous draft London Plans have not been published as part of the current consultation. In earlier iterations of the Plan, evidence of this nature formed an important component of the supporting evidence base and assisted stakeholders in understanding and scrutinising the justification for proposed policies. The absence of equivalent material at this stage raises concerns that significant elements of the evidence and reasoning upon which the Mayor may ultimately rely on at Examination in Public are not available for public review and comment during the consultation process. The Council as an interested party is unable to fully assess and respond to the evidential basis underpinning the draft London Plan. Such a position is procedurally unfair and undermines the principal need for transparency and completeness in the plan-making process.

2.2 NPPF Requirement

- 2.2.1 Policy PM6 (Part 1(6)) of the NPPF (2026) outlines that all plan-makers should, in preparing plans, engage positively with communities and other key stakeholders, at appropriate points during their preparation and using a range of methods, so that relevant issues are identified and addressed as early as possible during the plan-making process.
- 2.2.2 The Council considers that withholding evidence from London boroughs and the wider public is contrary to facilitating positive engagement. It is not possible to fully engage with the substance of issues if key evidence is

withheld. This includes the spatial strategy, housing apportionments and industrial growth sites.

- 2.2.3 Policy PM14 (Part 2(a)) of the NPPF (2026) outlines that a sound spatial development strategy must set out a positive approach to delivering growth which is based on effective joint working on cross-boundary strategic matters. Housing need and capacity is a cross-boundary strategic matter. Not only has the Council not been engaged on the Green Belt BLGs prior to publication, but the key evidence that is supposed to justify them has been withheld from publication. The full extent of the missing information is summarised below and detailed within the relevant policy sections. On this basis, the draft London Plan should be considered unsound based on it not meeting the 'positive' test of soundness.
- 2.2.4 Policy PM14 (Part 2(c)) of the NPPF (2026) outlines that a sound spatial development strategy must set out effective policies for development and that there must be a reasonable prospect that local plans will be capable of identifying site allocations to implement its spatial strategy. The evidence that underpins the capacity led allocations has not been published in full and therefore it is not possible for the public to comment on whether they are suitable or deliverable. Furthermore, in the absence of clarity on which sites are within strategic areas, it would not be possible to know if one was correctly implementing the policies in the Local Plan or as part of decision-making on planning applications.
- 2.2.5 Policy PM8 of the NPPF (2026) outlines the requirements around evidence for all plan-makers. Part 2 (b and c) outline the plan-makers should consider using relevant evidenced produced by other plan-makers and working jointly with relevant plan-makers to prepare evidence, particular relating to cross-boundary matters. Clearly, read in the context of this part of the NPPF, the decision to not share critical evidence with London boroughs is unsound.
- 2.2.6 The Council therefore consider that the extent of the missing information is itself grounds for the draft London Plan being considered unsound.

2.3 Procedural Practice in the Examination of a Spatial Development Strategy

- 2.3.1 The PINS publication, *Procedural Practice in the Examination of Spatial Development Strategies* provides the procedural guidance for the examination in public of all Spatial Development Strategies, including the London Plan.
- 2.3.2 On the issue of submitting evidence, it outlines that as a minimum it should include all documents referenced in the submitted plan. It also outlines that if the Spatial Development Strategy is submitted without adequate evidence, the examination is likely to be delayed.
- 2.3.3 As is required, the draft London Plan is supported by a Strategic Housing Land Availability Assessment (SHLAA). This is referenced in Paragraph 3.15

of the draft London Plan (2026). It is therefore clear that the SHLAA would, as a minimum, form part of the Examination in Public.

- 2.3.4 Chapter 13 of the SHLAA refers to land that was subject to a sieving process which underpins the housing targets that have been apportioned for London boroughs. Paragraph 13.7 of the SHLAA states:

'The land caught by the sieve then had constraints exclusions applied, as with the Land4LDN approach, reflecting various suitability, availability and achievability considerations.'

- 2.3.5 The brownfield sites that were subject to sieving through the Land4LDN approach, referred to above, is available to London boroughs to review. However, the Green Belt sites referred to in Chapter 13 which was also subject to a sieving exercise has not been published. Clearly, the rationale to providing the brownfield sites to London boroughs is that is key information that is required to provide a view on the soundness of this part of the apportionment. However, this same logic applies to the Green Belt sites and London boroughs need this information to be able to provide a view on the soundness of the apportionments based on this exercise.
- 2.3.6 The Council consider that it would be prejudicial for the Mayor of London to only publish the missing information as part of the Examination in Public. It must form part of the 12-week statutory consultation period to allow the public time to review the information and subsequently make associated comments on the soundness of the draft London Plan.

2.4 Useability

- 2.4.1 The above provides unequivocal rationale for why the missing data must be published as part of a new public consultation on the draft London Plan. It is critical for London boroughs to be able to provide input on the soundness of the spatial development strategy for London.
- 2.4.2 However, the Council would also outline that this information is required for decision-making purposes. Policy DM4 of the NPPF (2026) outlines that when preparing and considering development proposal, relevant policies in emerging development plans may be given weight according to three criteria.
- 2.4.3 In the absence of the information, it is not possible to conclusively say what land does and does not constitute a BLG. This is not the only policy where this is an issue and needs to be rectified promptly.

2.5 Extent of Missing Information

- 2.5.1 The missing information referred to in this section of the response relates to the following.
- 2.5.2 The **site sieving exercise for residential Green Belt** sites that is referred to in Chapter 4 of the Strategic Approach document and Chapter 13 of the SHLAA.

- 2.5.3 The Council were provided with a detailed site schedule for the portion of the 10-year housing target related to large brownfield sites. However, for Green Belt sites, this was aggregated to only the data that is already published in the Draft London Plan (e.g. East of Ickenham: 7,000 homes).
- 2.5.4 The **site sieving exercise for industrial Green Belt** sites that is referred to in Chapter 4 of the Strategic Approach document and Chapter 4 of the London Plan Industrial Evidence Paper.
- 2.5.5 The Council were not provided any additional information beyond what is already in the public domain. The Green Belt Strategic Approach (2026) document makes it clear that a sieving exercise was undertaken and provides a distorted map (Figure 9) showing 'potential suitable land'. From this one can estimate what land might be included but cannot know for sure. More importantly though, the scores and assessments of all the land (both concluded as suitable and unsuitable) within 2.5km of the junctions has not been provided for review.
- 2.5.6 It is understood that for the small sites housing capacity, for change of use; conversions; and industrial redevelopment, have been calculated based on historic completion data using datasets from the Planning London Datahub (PLD). The Council only received the **datasets of completion data** which underpin the aggregated findings on the 8th October 2026, despite these being requested on 4th August 2026.
- 2.5.7 For single-unit infill; multi-unit infill; and intensification, the calculations appear to rely on a dataset of sites and capacity which do not appear to be published. Footnote 26 has a hyperlink that leads to the website of a private architecture practice (RCKA). The Council is not in receipt of full **datasets of sites and any associated analysis** which underpin the aggregated findings. This information is key to allow London boroughs to opportunity to review the soundness of the estimated capacities, including whether there is a reasonable prospect of delivering these numbers. This is particularly pertinent noting they result in significant increases above small sites targets if they were derived from historic trends.

2.6 Data Requests and Responses

- 2.6.1 The Council first made a written request for the missing information on the 4th August 2026. The requested missing information was that outlined within Section 3.5 of this response.
- 2.6.2 The Council received a response from officers at the Greater London Authority on the 9th September 2026, which confirmed that site specific outputs from internal modelling would not be shared with the Council.
- 2.6.3 On the 28th September 2026, the Council requested a further written explanation on the nature of the data that exists but cannot be shared and the rationale for withholding the requested missing information.

- 2.6.4 On the 6th October 2026, following a meeting with officers from the Greater London Authority, the Council requested again for a written position on why the missing information could not be shared. In the absence of the information being forthcoming, the Council also requested the shapefiles or more detailed versions of Figures 7 and 9 published in the Green Belt Strategic Approach (2026). These have also not been provided.
- 2.6.5 On the 8th October 2026, the Council did receive the historic completion data using datasets from the PLD. However, as outlined within Section 8.2 of this response, analysis could not be incorporated into this response due to the limited time prior to the consultation closing.

2.7 Required Change

- 2.7.1 It is critical that the information outlined in Section 3.5 is published as part of the evidence for the draft London Plan. Once published, the Mayor of London must restart the 12-week consultation period to allow organisations and individuals to comment on the full set of evidence.

3 Strategic Failure: Strategy v Prescription

3.1 Strategic Purpose, Evidence and Proportionality

- 3.1.1 There is a recurring disconnect between the strategic choices the draft London Plan makes, the evidence used to justify those choices, and the level of prescription through which they are then applied. In some areas, the Plan does not provide sufficient strategic direction on matters that can only effectively be resolved at a London-wide level. In others, it moves beyond establishing a strategic framework and prescribes outcomes or detailed requirements without demonstrating that this degree of prescription is justified, proportionate or represents the most appropriate approach.
- 3.1.2 This is important because the NPPF envisages a Spatial Development Strategy as being genuinely strategic - establishing the broad spatial framework for growth, resolving matters that require consideration across administrative boundaries, and providing the strategic context within which Local Plans can undertake detailed evidence-led place-shaping. The issue is therefore not that the London Plan should avoid making strategic choices. On the contrary, making clear choices about the broad location and distribution of growth is one of its most important functions. The question is whether those choices are strategically derived, proportionately evidenced and expressed at the appropriate level of prescription.
- 3.1.3 The proposed Broad Locations for Growth illustrate this distinction particularly clearly. Identifying broad locations for major growth is an entirely legitimate strategic function of the London Plan. However, the draft London Plan goes materially further by attributing substantial housing capacities to them and, on the basis communicated to Hillingdon, mandating those capacities to be delivered through borough Local Plans as a matter of general conformity. By apportioning undeliverable greenfield targets to Broad Locations for Growth, in reality a Local Plan will never be able to be in conformity with the London Plan, nor is there any material decision-making devolved to the Local Plan process.
- 3.1.4 The concern is therefore not that the Plan has made a strategic choice, but that it has converted that choice into a highly prescriptive growth requirement without publishing the strategic evidence necessary to justify either the location or the scale of growth proposed.
- 3.1.5 This exposes a wider weakness in the Plan. A genuinely strategic approach should bring together capacity and place-shaping. It should establish where growth should occur by considering economic and regeneration objectives, infrastructure capacity and investment, environmental constraints, cross-boundary relationships and reasonable spatial alternatives, before determining the broad geography and appropriate scale of growth. Capacity is an important part of that exercise, but capacity should inform the spatial strategy rather than become the spatial strategy. Where the Plan moves directly from

theoretical capacity to a prescribed growth outcome, it risks predetermining the detailed Local Plan exercise without first demonstrating why that outcome represents good strategic planning or good place-shaping. For example, prescribing the delivery of 7,000 homes in the East of Ickenham Green Belt BLG without sufficient evidence would, if accepted at the Examination in Public, lead to a clear contrast of the Local Plan being required to conform to the London Plan, but in doing so not being appropriate or effective.

- 3.1.6 At the same time, there are other areas where the Plan does not make the strategic choices that only a London-wide plan can realistically make. Questions concerning strategic infrastructure capacity and investment, competing demands for energy and water, Heathrow expansion, cross-boundary transport, industrial land and data-centre growth are frequently deferred to boroughs, infrastructure providers, future strategies or collaborative processes. The result is an uneven approach to strategic planning: highly prescriptive where the evidence and detailed place-shaping should allow greater local judgement, but insufficiently directive where London-wide coordination and prioritisation are essential.

Where the London Plan should be strategic	Where it becomes unnecessarily prescriptive
Location, scale and sequencing of major growth	Detailed building design, internal standards and operational requirements
Strategic infrastructure capacity, funding and delivery	London-wide development management matrices and technical methodologies
Utilities capacity and prioritisation between competing demands	Detailed engagement, reporting and monitoring processes
Heathrow expansion and its implications for west London	Matters capable of being addressed through Local Plans, design codes or national standards
Distribution of industrial, data centres and Use Class E growth	An expanding catalogue of applicant assessments and compliance documents
Cross-boundary transport, land and infrastructure choices	Uniform prescription that reduces scope for locally responsive place-shaping

- 3.1.7 These are therefore not simply separate criticisms of too little strategy and too much detail. They reflect a common soundness issue concerning whether the Plan is operating at the right strategic level and whether its interventions are proportionate to the evidence supporting them. Where the Plan prescribes a strategic outcome, particularly one that materially constrains subsequent Local Plan choices, the evidential burden should increase accordingly. Conversely, where an issue genuinely requires London-wide resolution, the Plan should not defer the substantive choice to boroughs or future processes.

- 3.1.8 The central concern is therefore that the Plan does not consistently distinguish between what should be determined strategically at London level and what should be enabled and resolved through evidence-led local place-shaping. This affects both justification and effectiveness. The BLGs provide the clearest example of a strategic choice becoming an insufficiently justified prescription, while utilities, transport, housing, industry, data centres, aviation and infrastructure demonstrate the converse problem of genuinely strategic questions remaining unresolved. The following sections consider how this imbalance affects the soundness of the Plan in practice.

3.2 Broad Locations for Growth: Capacity is not Spatial Strategy

- 3.2.1 **Hillingdon supports the principle of strategic planning for London's long-term growth. However, the Council is concerned that the proposed Broad Locations for Growth go beyond the genuinely strategic role envisaged for an SDS by national policy and, more fundamentally, reverse the proper sequence of good spatial planning. In particular, this relates to the assignment to the Green Belt BLGs of undeliverable housing targets which have had key evidence withheld.**
- 3.2.2 The NPPF establishes a clear distinction between the role of an SDS and that of a Local Plan. The SDS should establish the strategic spatial framework: identifying broad locations for growth based on an understanding of economic geography, regeneration priorities, infrastructure, environmental constraints and opportunities, and cross-boundary relationships. The Local Plan should then undertake the more detailed place-shaping exercise: testing reasonable alternatives, identifying specific sites, establishing infrastructure requirements and determining the appropriate scale, form and distribution of development.
- 3.2.3 The NPPF requirement that broad locations should 'extend over' strategic site allocations in adopted Local Plans reinforces this distinction. It suggests that a broad location should operate at a larger strategic geography than an individual allocation, providing the strategic context within which detailed site selection takes place. It does not suggest that an SDS should identify relatively tightly defined areas, attribute substantial housing capacities to them and then require boroughs to reproduce those capacities through their Local Plans.
- 3.2.4 As outlined within Section 6 of this response, if a SDS is to take such a prescriptive approach, it becomes even more important that this is produced with engagement from boroughs and that key supporting evidence is not withheld. This is essential to allow boroughs to have a right of response on the soundness of growth locations and supporting evidence.
- 3.2.5 We believe that national policy envisages the opposite sequence. An SDS should first establish a genuinely strategic spatial framework, informed by economic, environmental, regeneration and infrastructure considerations. It should identify broad locations within that framework. Local Plans should then undertake the detailed place-shaping, infrastructure and site-selection

exercise necessary to determine specific allocations and appropriate development capacity.

- 3.2.6 In Hillingdon, the BLGs appear principally to derive from station catchments, Green Belt land availability, constraint filtering and density assumptions. If published, these exercises may provide useful evidence of theoretical capacity, but they do not themselves demonstrate that the identified locations represent the most appropriate spatial strategy for growth. There is no clearly published evidential chain showing how the BLGs derive from London's wider economic, regeneration or infrastructure strategy, how they relate to Hillingdon's Growth Plan and spatial priorities, what strategic infrastructure will support development at the scale proposed. Principally, they are not informed by engagement with London boroughs or key infrastructure providers, who are likely to have other reasonable alternatives that must also be considered.
- 3.2.7 This concern is materially heightened by the position communicated to Hillingdon by the Deputy Mayor and GLA officers that a failure to identify capacity consistent with the BLGs would mean that the borough's Local Plan was not in general conformity with the London Plan. If that is the intended operation of the policy, the BLGs cannot reasonably be regarded merely as general areas of search. Their geography and capacity would in practice become prescriptive strategic requirements which substantially predetermine the outcome of the borough's Local Plan process.
- 3.2.8 The London Plan cannot reasonably have it both ways. If BLGs are genuinely broad and indicative, boroughs must retain meaningful scope to test their geography, capacity, infrastructure requirements and reasonable alternatives through Local Plans. If the capacities are instead intended to operate as requirements for general conformity, the London Plan itself must provide evidence demonstrating why those locations and capacities represent the most appropriate spatial strategy, to allow open debate on their soundness.
- 3.2.9 Otherwise, the respective roles of the two tiers of plan-making. Rather than the London Plan establishing a broad strategic geography within which Hillingdon undertakes an evidence-led place-shaping exercise, the London Plan would effectively determine both where growth must occur and the capacity that must be achieved, leaving the Local Plan principally to identify sufficient sites to deliver a predetermined numerical outcome which is likely to be undeliverable.
- 3.2.10 The greater the prescriptive effect attributed to BLG geography and capacity, the greater the evidential burden on the London Plan to demonstrate why this location, why this geography, why this scale of growth, what infrastructure will support it, and why this option is preferable to reasonable alternatives.
- 3.2.11 That full evidential chain has not been published as part of the consultation material. The GLA has stated that site-specific outputs from its internal modelling cannot be shared and has described the mapped Green Belt BLGs as general areas of search forming a starting point for future local assessment. Hillingdon officers have therefore not been provided with the site-

level information needed to understand or test how the attributed capacities were derived.

- 3.2.12 Consequently, the BLG approach raises a fundamental issue of soundness. If Hillingdon is required, as a matter of general conformity, to deliver the capacity attributed to each BLG, the London Plan must provide a proportionate and transparent evidential basis demonstrating why each location and level of growth represents an appropriate and justified spatial strategy, having regard to place-shaping, strategic infrastructure, reasonable alternatives, deliverability and the wider growth and regeneration priorities of London and Hillingdon. In the absence of that evidence, the BLGs are not adequately justified or effective.

3.3 Strategic Gaps

- 3.3.1 The BLG approach is not an isolated defect. It illustrates a wider pattern. Matters that are inherently strategic and cross-boundary are acknowledged but not resolved. Responsibility is transferred to boroughs, infrastructure providers, future strategies or collaboration, even where those bodies cannot individually make or enforce the necessary London-wide choices.

MBUL1: Spatial strategy

- 3.3.2 MBUL1 should be the clearest expression of the Plan's strategic purpose. Instead, significant housing and employment growth is identified without a corresponding demonstration that the necessary infrastructure exists, will be provided or can be secured within the plan period.
- 3.3.3 A strategic plan should determine what growth can be accommodated, where it should be directed, how it should be sequenced and what infrastructure is required. MBUL1 instead distributes growth expectations and leaves boroughs, infrastructure providers and later investment decisions to reconcile those ambitions with constraints.
- 3.3.4 There is therefore no clear line of sight between the London Plan's growth ambitions and delivery. The Plan does not adequately establish the interventions required, the mechanisms for securing them, the priorities where capacity is constrained, or the consequences if critical infrastructure does not proceed. This undermines both justification and effectiveness.

MBUL4: Utilities

- 3.3.5 MBLU4 acknowledges that energy, water, sewerage and digital infrastructure are critical to future growth but does not establish a strategic framework for resolving capacity constraints. It relies heavily on engagement, information sharing and future planning rather than identifying deficits, necessary interventions and priorities.
- 3.3.6 This is particularly significant in west London, where housing growth, Heathrow, data centres, industrial activity and wider economic development

compete for finite energy, water, transport and land resources. These are inherently strategic and cross-boundary pressures.

- 3.3.7 The Plan does not establish where the critical constraints exist; what investment is required; how competing demands should be prioritized, how infrastructure provision should govern the sequencing of growth, or what happens where provision cannot be secured. It manages the process of discussing constraints rather than providing a strategy for overcoming them.

MBUL5: Sustainable transport

- 3.3.8 MBUL5 requires boroughs to identify transport interventions without demonstrating that the scale and distribution of growth are matched by committed and deliverable transport capacity. Major interventions, including Heathrow surface-access improvements, remain uncertain or unfunded.
- 3.3.9 The Plan provides no clear contingency if those schemes do not proceed. It does not explain whether housing targets, densities or BLG capacities would be reconsidered, or whether growth should be contingent on specified transport upgrades. In Hillingdon, these questions are inseparable from Heathrow expansion and require strategic resolution at London level.

HN1: Housing targets and infrastructure

- 3.3.10 HN1 establishes firm housing requirements without an equivalent level of certainty over the infrastructure needed to support them. This creates a fundamental imbalance between the certainty of the growth requirement and the uncertainty of its means of delivery.
- 3.3.11 In Hillingdon, substantial growth is directed towards Green Belt BLGs around Northwood, West of Ruislip and East of Ickenham without equivalent identification of the strategic transport interventions required, their costs, funding and delivery mechanisms, additional network capacity, competing demands on that capacity, or contingencies if infrastructure is not delivered.
- 3.3.12 The Plan consequently risks fixing the development quantum first and leaving infrastructure and place-shaping consequences to be resolved afterwards. That is the reverse of a genuinely strategic, infrastructure-enabled approach.

GLE2: Industrial land

- 3.3.13 GLE2 identifies broad industrial demand benchmarks by Property Market Area, but the strategic distribution remains weak. Boroughs are expected to collaborate, pool capacity and compensate for release, yet there is no effective mechanism for deciding which authority must accommodate unmet need.
- 3.3.14 The Plan relies on an Industrial Collaboration Working Group, but does not establish how disagreements will be resolved, how delivery will be enforced, or how one borough can rely on capacity in another borough's area.

GLE3: Data centres

- 3.3.15 Data centres are another London-wide issue transferred to boroughs. The Plan supports their growth but does not establish how much capacity London requires, how much land is needed, which locations are strategically appropriate, how data centres should be balanced against housing and industrial uses, or how finite electricity and water capacity should be prioritised.
- 3.3.16 This is particularly significant because data centres can consume substantial land, electricity and water. The Plan acknowledges those impacts but does not make the strategic choices necessary to manage them. The likely result is a market- and infrastructure-led distribution rather than a London-wide spatial strategy.

GLE8: Employment and skills

- 3.3.17 The objective of GLE8 is supported. However, if employment and skills obligations are strategically important, the Plan should establish a proportionate and consistent London-wide framework. Key matters including targets, contributions, eligible groups, monitoring and reciprocal arrangements are instead left largely to local negotiation, resulting in uncertain and potentially inconsistent outcomes.

GLE9: Aviation

- 3.3.18 Heathrow expansion is the clearest example of the Plan failing to engage with an issue that is inherently strategic. Expansion has potentially profound implications for housing delivery, Green Belt, utilities, rail and highway capacity, land availability, economic growth, environmental capacity, communities and place-making across west London.
- 3.3.19 The Mayor's opposition to expansion does not remove the need to plan for its potential consequences. The relevant decisions and preparatory work may occur during the life of the Plan. The Plan should therefore assess Heathrow expansion as a realistic strategic scenario and demonstrate how its growth strategy would operate alongside it.
- 3.3.20 The draft Plan recognises Heathrow principally through aviation and transport provisions but does not provide a coherent spatial framework for its wider land-use implications. There is no clear evidence demonstrating how the substantial housing, employment and infrastructure growth proposed for Hillingdon can be accommodated alongside expansion, or how cumulative demands on transport, utilities, land, environmental capacity and community infrastructure would be reconciled.
- 3.3.21 These issues cannot be resolved through individual planning applications or by Hillingdon alone. Only the London Plan can provide a coherent strategic framework across affected boroughs, infrastructure providers and Mayoral strategies. Deferring the matter leaves a significant gap in the spatial strategy for west London.

- 3.3.22 At Examination, the Mayor should therefore demonstrate either how Hillingdon's proposed growth trajectory can be delivered alongside Heathrow expansion or why it is justified to plan on a different basis. The current draft provides neither the necessary assessment nor a clear strategic position.

PV7: Green Belt growth

- 3.3.23 PV7 illustrates the same strategic imbalance. It is highly detailed about the characteristics of development but considerably less clear about how the proposed new places will be delivered.
- 3.3.24 The Plan does not adequately establish how strategic infrastructure will be funded, how land will be assembled, how development will be phased, who will lead comprehensive masterplanning; how premature or piecemeal development will be prevented, how cross-boundary infrastructure will be secured, or how delivery will be coordinated with competing strategic projects.
- 3.3.25 The policy is detailed about matters such as walking distances, bus performance and design expectations, but less clear about the strategic delivery architecture necessary to create successful new communities.
- 3.3.26 Given the significance of the proposed Green Belt growth, the London Plan should establish the strategic rationale, infrastructure framework and delivery mechanisms. Instead, it prescribes substantial capacity while delegating much of the place-shaping and delivery challenge to boroughs.

3.4 Areas of excessive prescription

- 3.4.1 The other side of the strategic deficit is excessive prescription. Although the NPPF envisages an SDS as genuinely strategic, many draft policies extend into detailed development management, technical design, operational practice and matters already capable of being addressed through Local Plans, design codes, Building Regulations or national standards.
- 3.4.2 The issue is not simply the length or detail of individual policies. It is whether intervention at London-wide level is necessary, proportionate and justified. In many cases, the Plan does not demonstrate why uniform London-wide prescription is preferable to allowing boroughs to respond to local circumstances.
- 3.4.3 This reinforces the central soundness concern: where the Plan has the opportunity and responsibility to be strategic, it frequently fails to make the necessary choices; where strategic intervention is less necessary, it becomes increasingly detailed and prescriptive.

Policy	Area of excessive prescription
MBUL2: Optimisation Framework	Prescribes height ranges, predetermined character settings, Sustainable Access Measure levels, site coverage and design processes, creating what is effectively a London-wide development management matrix. Appropriate site capacity cannot reliably be

	reduced to a transport score and one of six broad character settings. This should be left to locally based urban designers to determine through optimisation on site allocations and decision-making on applications.
MBUL3: Tall Buildings	Detailed requirements for lighting, cluster form, roof equipment, public viewing areas, suicide risk, telecommunications and solar generation, alongside separate height classifications.
MBUL4: Utilities	Extensive requirements for providers, coordinators, strategies, engagement processes and technical measures, despite failing to resolve the strategic questions of infrastructure capacity, investment and prioritisation.
MBUL6: Design	Detailed requirements for all development including materials, external shading, sunlight penetration, temperature conditions around the building(s), digital infrastructure, ducting, excavation and coordination. Proportionality must be introduced to this section to avoid creating a heavy burden on scheme viability and development management capacity.
MBUL8: Inclusive Design	Detailed requirements for design and access statements, evacuation lift-capacity assessments, evacuation lift strategies and lift management plans. The above is a clear example of duplication with UK building regulations and fire safety standards.
MBUL9: Public Realm	Detailed provisions for seating, shade, shelter, scooters, advertisements, glare, fountains, toilets and temporary public realm. A clear policy expectation must be installed around the necessity for all major development to be capable of delivering every element of MBUL9.
HN8: Housing Design	Detailed requirements for durability of circulation spaces, storage space and clothes drying. Such policies only confuse what can be considered within the planning system.
HN9: Accessible Housing	Detailed requirements for internal noise performance levels, charging points, how homes not allocated by the local authority are marketed and prescribing the professional criteria on who can author a design and access statement. Whilst amicable, these are not matters that should be installed within the planning system and it gives the illusion they can be controlled.
GLE3: Data Centre Generators	Detailed generator testing, engine, fuel, emissions and maintenance requirements despite the absence of a strategic spatial framework for data-centre growth.
GHR3: Whole Life Carbon	Prescribes carbon values by land use and building height, together with detailed assessment, reporting and monitoring tools.
GHR4: Heat Risk	Technical requirements for glazing, shading, fans, ventilation, albedo, cooling equipment and modelling.
GHR5: Drainage	Detailed runoff calculations, drainage hierarchies, contribution rates and information requirements, including a specified reference rate.
GHR6 and GHR7: Trees and Urban Greening	Prescribed valuation methods, replacement assumptions, soil volumes, canopy calculations, substrate depths and numerical Urban Greening Factor requirements.

GHR9: Waterways	Ten Riverside Strategy principles and detailed requirements for access, moorings, power, maintenance, flood defences and water-quality assessment.
GHR11: Cycle and Car Parking	Extensive numerical standards across uses, locations, parking types, route design, cycle hire, car clubs and operational parking.
PV7: Green Belt Design	Detailed walking distances, bus journey times, rail frequencies, bus speeds, rights of way, stop arrangements, heights and an additional set of parking standards.

- 3.4.4 The contrast is striking. The Plan can prescribe matters such as roof substrates, generator testing and oven heights, yet does not provide equivalent certainty about where strategic infrastructure will be delivered, how competing demands for electricity and water will be resolved, how Heathrow expansion will affect west London, or why particular BLGs represent the most appropriate locations for major growth.
- 3.4.5 Many of these matters would be more appropriately addressed through borough plans, design codes, national technical standards or Building Regulations. This would allow the London Plan to concentrate on the strategic choices that only a London-wide plan can make. This would bring the London Plan in line with Policy PM1 (Part 1) of the NPPF (2026) which outlines that the contents of spatial development strategies should be genuinely strategic in nature and allow for more detailed issues to be considered and addressed through other parts of the development plan.

3.5 Policies generating additional assessments and evidence

- 3.5.1 The Plan also introduces or reinforces a substantial number of assessments, statements, audits, appraisals, plans and monitoring requirements. Rather than streamlining the planning system, this adds complexity, cost and delay, increasing the burden on both applicants and local planning authorities.
- 3.5.2 The concern is cumulative. Each requirement may have an individual rationale, but the Plan does not demonstrate that the combined burden is proportionate or that it will materially improve outcomes. Resources risk being directed towards demonstrating procedural compliance rather than delivering development and creating successful places.

No.	Policy	Required assessment, plan or evidence
1	MBUL2 and MBUL3	Character studies and sensitivity assessments
2	MBUL2 and MBUL3	Tall building assessments and three-dimensional modelling
3	MBUL4	Utilities strategies and engagement records
4	MBUL5	Transport assessments and mapped intervention programmes
5	MBUL6	Independent design reviews
6	MBUL7	Heritage impact assessments
7	MBUL8	Inclusive design information and evacuation strategies
8	MBUL9	Public realm assessments

9	MBUL10	Fire safety evidence and competent engineer confirmation
10	HN3	Viability assessments and early, mid-term and late-stage reviews
11	HN5	Management plans for shared living and specialist accommodation
12	Housing	Affordable housing calculations and payment in lieu assessments
13	HN9	Accessibility marketing plans and completion reports
14	GLE3	Data centre waste heat utilisation plans
15	GLE3	Generator testing and emissions assessments
16	GLE7	Affordable workspace strategies and management plans
17	GLE8	Employment and skills targets and monitoring arrangements
18	GLE9	Advanced Air Mobility assessments
19	GLE11	Circular Economy Statements
20	GLE11	Pre redevelopment and pre demolition audits
21	GHR1 and GHR2	Energy statements and Low Carbon Heat Appraisals
22	GHR3	Whole Life Carbon Assessments
23	GHR4	Dynamic overheating modelling and Good Homes Alliance checklists
24	GHR5	Drainage assessments and Sustainable Drainage Systems proformas
25	GHR6	Arboricultural Impact Assessments, Method Statements and Tree Protection Plans
26	GHR6	Biodiversity Net Gain calculations
27	GHR7	Urban Greening Factor calculations, drawings and tables
28	GHR8	Accessible green space assessments and contribution calculations
29	GHR9	Water quality assessments using the Simple Index Approach
30	GHR10	Air Quality Assessments, Air Quality Neutral assessments and additionality requirements
31	PV8	Townscape and Visual Impact Assessments
32	Multiple policies	Post construction and post occupation monitoring across energy, carbon, accessibility, greening and other policy areas

- 3.5.3 The cumulative effect is a framework that risks prioritising process over delivery. Applicants must prepare an increasing volume of technical material while boroughs must review, negotiate, monitor and enforce an expanding range of requirements.
- 3.5.4 This is particularly difficult to justify where the Plan simultaneously leaves unresolved the strategic evidence and decisions necessary to establish whether the growth being required is deliverable in the first place.

- 3.5.5 The issue is therefore not simply regulatory burden. It goes directly to strategic purpose and soundness: the Plan devotes substantial policy attention to controlling how individual developments should operate while providing materially less certainty about the strategic conditions necessary for them to happen. It should be noted that no parts of Policy PM1 (Part 2) of the NPPF (2026) require the level of detail that has been included within this Draft London Plan.

3.6 Overall Strategic Soundness

- 3.6.1 Taken together, these concerns reveal a consistent structural weakness. The draft London Plan fails to be sufficiently strategic where only the London Plan can be strategic, while becoming unnecessarily prescriptive where decisions can properly be made through Local Plans, design codes or other regulatory regimes.
- 3.6.2 The Council therefore considers that the Plan has not demonstrated that its spatial strategy is justified or effective. The central problem is straightforward: where the NPPF gives the London Plan the opportunity and responsibility to be genuinely strategic, it too often defers the strategic decision; where national policy envisages detail being resolved locally, the Plan too often prescribes the outcome. This inversion of the proper role of a Spatial Development Strategy undermines both the justification for the Plan and confidence in its effective delivery over the plan period.

4 Strategic Failure: Heathrow Expansion

4.1 Planning for Expansion

- 4.1.1 The draft London Plan is fundamentally flawed in that it makes no meaningful attempt to plan for Heathrow expansion, despite expansion remaining Government policy and a nationally significant infrastructure project. While the Mayor has made clear his opposition to Heathrow expansion, whether expansion proceeds is not a matter for the London Plan to determine. The Government has already identified Heathrow as the location for nationally significant airport growth and that reality must form part of the strategic planning context for London.
- 4.1.2 The Government has also set London's housing need. However, unlike Heathrow expansion, national policy has not prescribed where that housing growth should be accommodated. That is the purpose of the London Plan. The Mayor therefore has limited influence over whether Heathrow expansion occurs, but significant influence over where housing and other growth is directed.
- 4.1.3 It is therefore incumbent on the London Plan to demonstrate how these two Government priorities can be accommodated together. At present, it does not do so.

4.2 Cumulative Growth

- 4.2.1 The Plan proposes substantial housing and other growth across west London, including an exceptional target of 24,030 homes in Hillingdon, while making almost no attempt to assess the implications of Heathrow expansion for its spatial strategy. Equally, Heathrow expansion is being considered against a baseline that does not account for the scale of housing, industrial, visitor and infrastructure growth now proposed through the draft London Plan. The result is that neither process properly considers the other.
- 4.2.2 This is particularly concerning because the Plan repeatedly argues that growth must be aligned with infrastructure provision, that transport constraints limit development and that careful sequencing is required to avoid unacceptable congestion and environmental impacts. Yet there is no assessment of the cumulative effects of Heathrow expansion, airport related growth and proposed housing and other growth in west London.
- 4.2.3 The draft London Plan fundamentally fails to recognise that Heathrow expansion would not simply add another source of growth to west London; it would actively reduce Hillingdon's capacity to accommodate other growth. Expansion would result in the direct loss of homes and substantial land take, displace existing employment and other uses onto an already constrained land market, and generate significant additional demand for housing from a major construction workforce.

- 4.2.4 In the longer term, an expanded airport would impose further safeguarding and operational constraints, including restrictions on building heights, limiting the ability to optimise sites and deliver the densities that the London Plan itself expects. These are not separate impacts.
- 4.2.5 Cumulatively, they reduce the amount of land available for development, increase competition for what remains and constrain the development potential of land that might otherwise contribute towards London's housing and economic needs.
- 4.2.6 It is therefore unreasonable for the London Plan to impose substantial additional housing and growth requirements on Hillingdon while treating Heathrow expansion as if it has no bearing on the borough's capacity to deliver them.
- 4.2.7 The same finite supply of land, housing, construction labour, transport capacity, utilities and infrastructure cannot simply be assumed to accommodate both programmes independently. Heathrow expansion would consume some of that capacity and permanently constrain some of what remains.
- 4.2.8 The issue for the London Plan is not whether Heathrow expansion should occur. The issue is whether the transport, utility and environmental capacity assumed by the London Plan to support housing growth has already been relied upon to facilitate Heathrow expansion. The Plan contains no assessment of the cumulative impact of accommodating both Government housing targets and Government aviation policy in west London. Consequently, it cannot demonstrate that either objective can be delivered without prejudicing the other. In particular;
- 4.2.9 **Transport infrastructure:** Heathrow expansion and London Plan growth both rely on additional rail, bus and highway capacity, yet there is no assessment of whether planned interventions can accommodate both airport growth and substantial housing growth across west London. Whilst Annex D states previously known surface access improvements deemed essential to mitigate Heathrow expansion, it adds no new consideration of how the failure or delay in delivering any or all of these improvements would drastically limit growth capacity in Hillingdon and West London.
- 4.2.10 **Construction capacity:** Heathrow expansion infrastructure, rail projects, utilities upgrades and major housing programmes would all be delivered over similar timescales and compete for the same construction workforce, materials, specialist contractors and supply chains.
- 4.2.11 **Utilities infrastructure:** Both Heathrow expansion and housing growth would increase demand for electricity, water supply, wastewater treatment and other utility services, raising questions over whether future infrastructure capacity has effectively been relied upon twice.
- 4.2.12 **Environmental capacity:** Both programmes would place additional pressure on flood risk infrastructure, air quality, transport networks and wider

environmental mitigation measures, yet no cumulative assessment has been undertaken.

- 4.2.13 **Operational impacts:** Once delivered, Heathrow expansion would generate additional passenger, employee, freight and servicing trips, while London Plan growth would generate substantial additional residential travel and freight demand of its own. The Plan does not demonstrate that west London's transport and infrastructure networks can accommodate both sets of growth simultaneously.
- 4.2.14 The principle matter is whether the same infrastructure has been counted twice: once to support airport expansion and once to support London Plan housing growth.
- 4.2.15 Ultimately, the Mayor has discretion over where growth is distributed across London. The Mayor does not have discretion over the location of Heathrow Airport, nor over whether Heathrow expansion remains part of Government policy. The draft London Plan therefore cannot simply ignore Heathrow expansion when determining how and where London's housing growth should be accommodated.
- 4.2.16 The decision to direct substantial growth towards Hillingdon, whilst failing to assess the implications of Heathrow expansion, renders the strategy unsound. Both Heathrow expansion and the housing growth proposed for west London are reliant upon the same transport and infrastructure networks. The Plan contains no meaningful assessment of how these competing demands can be accommodated together, nor whether sufficient capacity exists to support both.
- 4.2.17 This risks forcing the Council to locate growth into the limited parts of the borough perceived to be less constrained by Heathrow expansion, resulting in an artificial concentration of development that may not represent the most sustainable pattern of growth. Such an approach would be contrary to the principles of good strategic planning, which require growth to be distributed based on a full understanding of infrastructure constraints, capacity and the pursuit of sustainable development.
- 4.2.18 There must be a robust assessment of the extent to which Heathrow expansion constrains the capacity for additional growth in Hillingdon and the wider west London corridor. If Hillingdon's housing or other targets have been set without considering the infrastructure demands of Heathrow expansion, there can be no confidence that it is either deliverable or the right level of growth for the borough.
- 4.2.19 In the absence of such an assessment, the Plan has failed to demonstrate that its proposed distribution of growth is sound.

5 MBUL1 - Spatial Strategy

5.1 The Proposed Spatial Strategy for Hillingdon

5.1.1 Figures 2.1 and 2.2 of the draft London Plan (2026) outline a series of growth areas within the London borough of Hillingdon. These are outlined below:

Name	Type	Status
East of Ickenham	BLG: Green Belt residential-led mixed use	New
West Ruislip	BLG: Green Belt residential-led mixed use	New
Northwood	BLG: Green Belt residential-led mixed use	New
Stockley Park	BLG: Green Belt Future Candidate (Both residential-led and industrial)	New
Hayes	BFOA: Brownfield First Opportunity Area	Existing
M40 (Northolt Area)	BLG: Green Belt Industrial	New
M4 (Heathrow Area)	BLG: Green Belt Industrial	New

5.1.2 The above constitutes the single largest increase in growth expectations assigned to one authority from the adopted London Plan (2021).

5.1.3 As outlined elsewhere in this response (See Section 2 for full commentary) the Council has not been effectively engaged on these growth expectations.

5.1.4 Furthermore (See Section 4 for full commentary), the draft London Plan (2026) does not consider how these growth expectations align with the national policy expectation for Heathrow Airport Expansion.

5.1.5 Commentary is provided below on the unsoundness of growth areas, in line with national policy.

5.2 New Broad Locations for Growth - Residential

National Policy Support for Identifying Growth Locations

5.2.1 The NPPF (2026) outlines in Policy PM1 (Part 2(b)) that spatial development strategies should identify broad locations for growth and regeneration, including new settlements and major urban extensions.

5.2.2 Policy HO4 also outlines that the development plan should, where appropriate, identify suitable locations for strategic sites for housing-led development (such as new settlements, new urban quarters or significant extensions to existing settlements).

- 5.2.3 Noting the above, there is clear national policy support for the concept of identifying locations for residential growth within a spatial development strategy.

Lack of Effective Engagement and Evidence

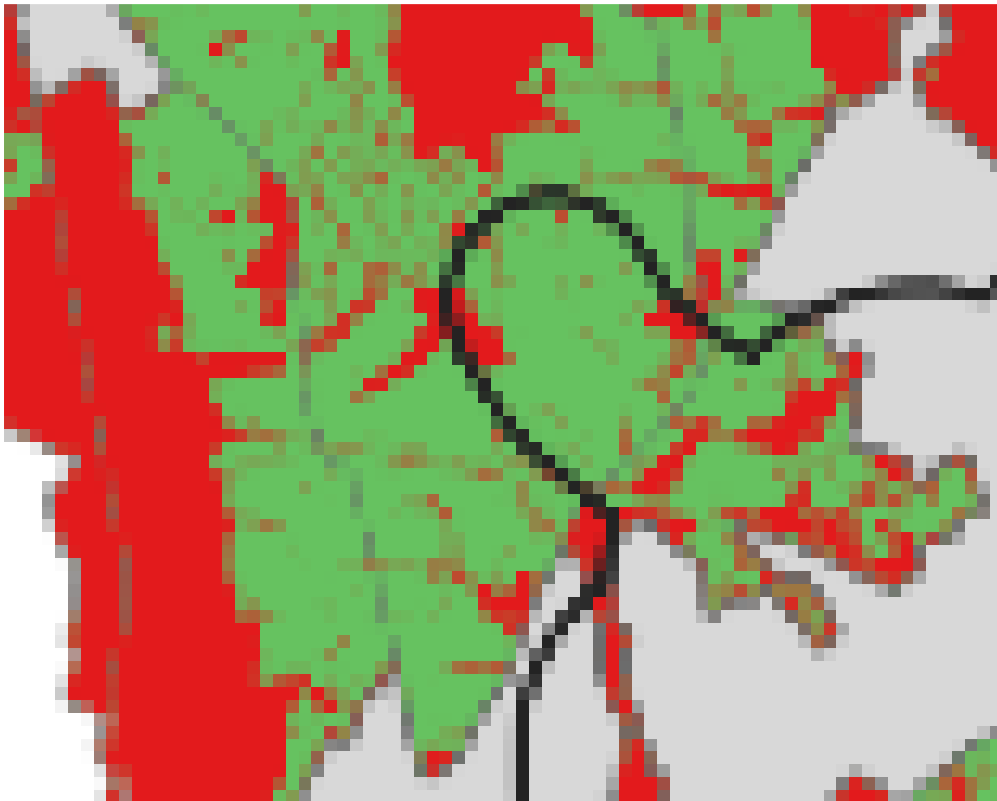
- 5.2.4 However, as outlined in Section 2, there has not been any effective engagement with the Council on either the principle of these broad locations for growth or the associated Greenfield housing target that is included within Table 3.1 (14,750 homes by 2036/37). This includes the Mayor refusing to publish the evidence which is supposed to support the soundness of these capacities.
- 5.2.5 As this commentary has already been provided elsewhere in this response, it will not be duplicated here.
- 5.2.6 However, when designating broad locations, the NPPF (2026) has further specific requirements around what must be provided. Policy PM1 (Part 2(d)) is clear that the 'general extent of areas' to be retained as Green Belt and changes to accommodate broad locations should be identified within spatial development strategies.
- 5.2.7 Figures 2.1 and 2.2 fail in establishing a general extent for the residential growth locations, as they are just covered by a small number on map with no discernible features. From this, it is not clear what the general extent of these growth locations should be. Furthermore, the Mayor has not published the site evidence behind these growth locations, which presumably would show where the suitable land constituting these locations is and the general extent of associated Green Belt release.
- 5.2.8 If capacities and associated housing targets had not been assigned to these areas, then the absence of areas and evidence would be more understandable. However, in deciding to apportion high growth targets to these growth areas, it becomes necessary to have this information and to test their soundness.
- 5.2.9 Policy HO2 (Part 1) outlines that where spatial development strategies establish a housing requirement for local planning authorities, these figures should not be retested as part of local plan preparation unless there has been a significant change in circumstances.
- 5.2.10 National policy is therefore clear that spatial development strategies must develop growth locations to a reasonable point of detail to allow discussion on their soundness prior to local plan preparation. This would evidently require publication of all the evidence which underpins the capacity figures that have been assigned to these areas, so their soundness can be tested as part of the spatial development strategy process.

Appropriate Strategy

- 5.2.11 The NPPF (2026) is clear that any new broad locations for growth must form an appropriate strategy for delivering sustainable development, considering

reasonable alternatives and other relevant strategies. They also must be consistent with national planning policy generally.

- 5.2.12 At a fundamental level, this includes reviewing whether housing needs should not be met in full due to the application of the policies in the NPPF that protect areas or assets of particular importance.
- 5.2.13 The Mayor of London has not provided the site sieving exercise for Green Belt land that is referred to within the SHLAA (2026). In its absence, the Council must guess what sites have been deemed suitable and unsuitable within the assessment. Chapters 3 and 4 of the London Plan Green Belt Strategic Approach (2026) provides the best insight to the sieving exercise that took place.
- 5.2.14 In the absence of details on which sites were deemed to be sustainable or not, it is not possible to determine whether Chapter 3 provides a sensible basis for **searching for sites** that promote active travel. However, using the broad map that includes all land in connectivity zones 1-3 (Figure 7) some land is clearly not within a 1200m walking distance of a railway station as stated.
- 5.2.15 See for example the area of land below off Breakspear Road South. Even disregarding ongoing road and path closures in the area due to HS2 works, the north-western portion of this site appears to be much further from West Ruislip Station than a **1200m walking distance**. These stretches of Breakspear Road South or New Years Green Lane are agricultural roads with no walkways or any bus route at present. The above would indicate that the sustainable locations that have been selected need to be published and discussed with London boroughs in full to determine whether the assumptions that have been used are sound.



Zoomed in extract of Figure 7 - Green Belt land covered by primary constraints and well-connected land (Green Belt Strategic Approach (2026) document)

- 5.2.16 In terms of the site sieving criteria beyond this point, the methodology cannot be truly understood without seeing its application to land parcels. Figure 7 is the only indication of how the **primary constraints** may have been applied in practice, but does not make clear which primary constraints were relevant to a site and mainly raises more questions around source data and application.
- 5.2.17 The methodology makes it clear that a site's **Green Belt performance** is not a determinative factor in deciding whether a site is suitable or not, contrary to national policy. This appears to have led to a scenario whereby highly performing Green Belt sites are envisaged for development. If taken forward, this would leave a wholly incoherent approach to Green Belt in London, with highly valued sites being built on through plan-making, in addition to Grey Belt sites where unmet need cases can potentially be made on a case-by-case basis (e.g. industrial uses, infrastructure or data centres). This approach is inconsistent with national policy which prioritises Green Belt as a policy of great importance.
- 5.2.18 The Council would agree with many of the primary constraints that have been included. However, there are several other material constraints recognised in national policy that are entirely absent from the study. These include impacts on **listed buildings** or **irreplaceable habitats**. Whilst it is understood that these types of constraints may not be known by officers at the Greater London Authority, local evidence and knowledge of these is readily available if this input had been shared with London boroughs ahead of publication. The failure

to include key national constraints like these in the study will have resulted in an additional overestimate of capacity.

5.2.19 The application of the primary constraints raises very significant concerns. Table 4 suggests that sites have been excluded based on being **Public Open Space** (designated and undesignated). However, Figure 7 shows several very significant public open spaces in Hillingdon as not covered by one of the primary constraints. It is therefore assumed they have not been sieved out and have been taken forward as suitable sites. These include examples of public open space that are currently appreciated by the local community as sporting facilities, burial spaces or ecological sites of importance. Examples of such sites seem to include:

- Herlwyn Park (Home to Ruislip RFC)
- Northwood Recreation Ground (Home to Northwood FC)
- Northwood Cemetery
- Hillingdon House Farm Sports Ground and Newt waterways project
- Ickenham Green (Home to Ickenham Cricket Club)
- Dowding Park (New Park on St Andrews Park Development)

5.2.20 The above raises significant doubt that the primary constraints have been applied in a consistent and effective manner. This can only be resolved through sharing the sieving exercise with London boroughs so they can review results in their area and appropriate exclusions made.

5.2.21 Paragraph 4.58 states a **potential capacity of 3,000 homes** was used as a minimum threshold for a residential-led BLG to be taken forward. When the comments above and below are considered, the Council is concerned that there may well be strong evidence that the residential-led BLGs in Hillingdon should have been discounted for not meeting this threshold, as they presumably have been in many other London boroughs.

Effective Strategy and Consistent with National Policy

5.2.22 The NPPF (2026) is clear that any new broad locations for growth must be part of an **effective strategy** and have a **reasonable prospect** that local plans will be capable of identifying site allocations to implement them.

5.2.23 The Mayor of London has not provided the deliverability and capacity exercise for Green Belt land that is referred to within the SHLAA (2026). In its absence, the Council must guess what capacity has been assigned to the sites deemed suitable by the Mayor. Chapter 4 of the London Plan Green Belt Strategic Approach (2026) provides the best insight to the capacity testing that took place.

5.2.24 At a fundamental level, the approach appears to assume that all land identified will come forward for residential use. No account is taken for land

being in an existing use which may have **social value** that would prevent the landowner displacing the existing use to pursue residential development. Obvious examples of these are uses such as sports facilities, burial space or irreplaceable habitats, which are also protected through national policy.

- 5.2.25 Some Green Belt compatible uses may also be operating as successful commercial businesses and there may be little **financial incentive** for a landowner to displace tenants or in some cases, themselves. Without access to the sites, it is not possible to provide full commentary on deliverability, but this is likely to be a key barrier to delivery in practice.
- 5.2.26 Paragraph 4.37 outlines the approach to **density** that has been used to calculate capacity. Whilst it is understood that the densities used have arisen from good precedent typologies generally, they are significantly higher than those under the prevailing typologies. It is not clear from the document how these have been tested on the types of land that the study identifies as suitable or if they have simply been applied numerically to the amount of land that has been identified. A high proportion of the examples used to create the highest precedent typology densities do not relate to greenfield land release, nor do they account for a significant amount of the relevant land being constrained by surrounding existing suburban housing.
- 5.2.27 Paragraph 4.62 outlines that only a **three-year** lead-in time has been set for when first completions are expected on site. Paragraph 13.11 of the SHLAA (2026) outlines that delivery is assumed from Year 4 of the Plan, which means completions on site as early as April 2030. There is no suggestion of the rate being reduced for Years 4-7 and introduction of a stepped trajectory, despite there clearly being a basis for residential rates not hitting their peak in the early years of any significant policy change.
- 5.2.28 There is clearly no basis to expect completions to even occur within a **five-year lead-in time**. At present, London boroughs do not even have access to the data which underpins this work as it has not been shared by the Mayor of London.
- 5.2.29 The London Plan will still be in draft when the 2027/28 financial year begins. The timeframe afforded to Local Plan creation by Government is set at 30 months, meaning site allocations are unlikely to be adopted within three years. At present, the Council is not in receipt of a valid planning application for any strategic housing development that would meet the criteria of the residential Green Belt BLG.
- 5.2.30 Once allocated, a site would still need to secure detailed planning permission before it could be built. The land would also need to be purchased by a housing developer, noting that most sites will not currently be owned by organisations who build houses. Once this is achieved, various other works must be completed prior to residential units even being commenced (for example condition discharges, environment assessments, site clearance and infrastructure works). Noting the above, it is highly unlikely that any significant residential capacity is achievable from these sites within the first five years.

- 5.2.31 This is supported by national policy, which defines deliverable sites as sites for housing that are available now, offer a suitable location for development now, and be achievable with a realistic prospect that homes will be delivered on the site within five years. For major development, sites are typically only considered as deliverable within 5 years if they have detailed permission and even then, can be discounted if there is clear evidence they will not be built within this timeframe.
- 5.2.32 For many of the sites, local planning authorities may struggle to argue that they are developable within 10 years, due to the uncertainty around prospects of delivery that are highlighted above. It is therefore clear that there is **no prospect** of local planning authorities with greenfield housing targets being able to identify sites to meet the associated housing targets in Table 3.1.
- 5.2.33 Once sites have commenced, the Mayor assumes delivery rates of **up to 1,000 units per year** on each residential BLG. Paragraph 4.63 outlines that the cap applies from year 4 onwards and was based on rates at Milton Keynes and work done by the New Towns Taskforce, without expanding on these points further.
- 5.2.34 The use of **Milton Keynes** as a comparison of what build-out rates could be achieved on a residential BLG seems very misguided. A source for the linked table on housing completions is not provided. For a start, it is a mature new town that was designated in 1967, meaning build out rates experienced since 1989 (23 years after it was designated) are not relevant to determining the potential annual build out rate of a new residential BLG that currently has no status, allocations or planning permissions. This is before one considers the level of public involvement needed to achieve the build out rates that were eventually realised in Milton Keynes.
- 5.2.35 Milton Keynes was also a designated new town of nearly 9,000 hectares, with a significantly higher forecast capacity for growth than the residential BLGs drafted in the new London Plan. Any assumption around build out rates must be viewed in the context of how many permissions existed at the time, so it is expressed as how many homes were built compared to what could have been achieved. Milton Keynes grew in multiple different parts of the town simultaneously, something which could not be achieved in small residential BLGs that themselves may only consist of a handful of sites that are near to each other and will be constrained by market absorption rates.
- 5.2.36 The document also references the **Start to Finish (2024) research** produced by Lichfields. This is the third iteration of this research looking at build out of large-scale residential development sites. It should be noted that this research excludes London because of the distinctive characteristics of housing development in the capital. Caution should therefore be exercised about assuming that rates achieved elsewhere in England could necessarily be translated into London.

5.2.37 The Start to Finish (2024) makes clear that site promotion, securing an allocation and pre-application work are all expected parts of promoting large sites, but are **not included** within the research. Specifically, it states that:

‘Securing a development plan allocation is an important stage in the delivery of most largescale housing sites. However, it is not possible to obtain information on a consistent basis for this process – which can often take decades across multiple plan cycles – and so we have not incorporated it in our analysis. For the purposes of this research the lead-in time reflects only the time from the start of the planning approval period up to the first housing completion.’

5.2.38 In terms of the period between the validation of a planning application and actual delivery on site, it states that:

‘the average time from validation of an outline application to the delivery of the first dwelling for large sites of 500 dwellings or more ranges from 4.9 to 6.7 years depending on site size.’

5.2.39 The research above therefore provides no basis for the draft London Plan using a three-year lead-in time and significant doubt on the appropriateness of even a five-year lead in time.

5.2.40 In terms of **build-out rates** once completions have started, it notes that for sites of 2,000 or more dwellings, the lower to upper quartile range for build-out rates is 100 to 188 dpa. Greenfield sites only can be built slightly faster than brownfield sites, but the average annual build out rates are still only **63 to 145** dpa. The research also highlights that the average annual build-out rates on large scale sites has reduced since previous iterations of the study, providing no evidence that they are set to improve.

5.2.41 Noting all the above, there is clearly **no reasonable prospect** of delivery rates of up to 1,000 units per year on each residential BLG. The Mayor must publish the full phasing assumptions for each residential BLG to allow these to be scrutinised by London boroughs. At present, the 10-year greenfield housing targets in Table 3.1 appear to be wholly undeliverable.

5.2.42 Finally, Paragraph 4.64 of the Strategic Approach document outlines that a viability discount of a maximum of 20 percent has been added to account for the likely impact of value-building in part through masterplan-led place making. The need to have all these sites master planned to the point at which value is added through the process itself clearly involves significant time, which currently is not part of the delivery expectations.

5.3 New Broad Location for Growth - Stockley Park

5.3.1 Stockley Park is also designated as a BLG: Green Belt Future Candidate in Policy MBUL1. It is designated for both residential-led and industrial uses.

5.3.2 Stockley Park is not referenced directly within either the SHLAA (2026) or the Strategic Approach (2026) document. However, Paragraph 14.18 of the

SHLAA alludes to there being an initial assessment of the capacity which could potentially be delivered in the future. This assessment has not been published as part of the Draft London Plan and must be published for London boroughs to review.

- 5.3.3 In the absence of the above, the Council or other readers cannot know what the extent of the area compromising 'Stockley Park' consists of. Policy MBUL1 (Part B(7)) states that Local Plans should make provisions for future strategic growth beyond the existing built-up area through safeguarding land identified as future candidate BLGs, and additional land in Green Belt BLGs indicated to have potential future capacity. In practice, this is impossible for local planning authorities without knowing the extent of the area it is supposed to be safeguarding.
- 5.3.4 In relation to the Stockley Park Future Candidate designation, the land around this area is currently experiencing demand pressures from data centres. As drafted, Part B(7) would see local authorities safeguard land for residential or industrial uses only. It is noted that the draft London Plan explicitly states that data centres should not be considered as part of industrial uses. The draft London Plan therefore needs to make clear the broad extent of the area it is referring to and make it clear that it is proposing to prohibit data centres in this area to provide clarity to both the market and decision-makers.
- 5.3.5 The Council would also note that previous iterations of masterplans for Heathrow Airport Expansion include land near to Stockley Park. In the absence of the initial assessments referred to in Paragraph 14.18, it is not clear to the Council how (if at all) the Stockley Park designation has been considered against potential land requirements associated with Heathrow Airport Expansion.
- 5.3.6 For the potential growth sites where it is to be determined whether proposals should accommodate residential or industrial floorspace, the draft London Plan should clarify that it will be for Local Plans to determine the most appropriate option.

5.4 New Broad Locations for Growth - Industrial

National Policy Support for Identifying Growth Locations

- 5.4.1 The NPPF (2026) outlines in Policy PM1 (Part 2(b)) that spatial development strategies should identify broad locations for growth and regeneration, including key locations for significant new jobs and other development.
- 5.4.2 Noting the above, there is clear national policy support for the concept of identifying locations for industrial growth within a spatial development strategy.

Lack of Effective Engagement and Evidence

- 5.4.3 However, as outlined in Section 2, there has not been any effective engagement with the Council on either the principle of these broad locations

for growth. This includes the Mayor refusing to publish the evidence which supports these capacities.

- 5.4.4 As this commentary has already been provided elsewhere in this response, it will not be duplicated here.
- 5.4.5 However, it must be noted that, when designating broad locations, the NPPF (2026) has further specific requirements around what must be provided. Policy PM1 (Part 2(d)) is clear that the 'general extent of areas' to be retained as Green Belt and changes to accommodate broad locations should be identified within spatial development strategies.
- 5.4.6 Figures 2.1 and 2.2 fail in establishing a general extent for the industrial growth locations, as they are just covered by a small number on map with no discernible features. From this, it is not clear what the general extent of these growth locations should be. Whilst it is not stated definitively, one can assume that Figure 9 of the Strategic Approach document (2026) is intended to show the extent of the clusters. However, this map is not of a sufficient quality for the reader to determine which sites are included.
- 5.4.7 National policy is clear that spatial development strategies must develop growth locations to a reasonable point of detail to allow discussion on their soundness prior to local plan preparation. This would evidently require publication of all the evidence which underpins the industrial broad locations for growth.
- 5.4.8 In addition to the sites which make up the industrial broad locations for growth, the Council also have been shared the following evidence which is stated to support these broad locations for growth:
- The junction modelling referred to in the Industrial land search methodology; (Para 3.33)
 - The industrial land search assessment and results; (Para 4.69 – 4.76)
 - The industrial land prioritisation assessment and results; (Para 4.77 - 4.83)

Appropriate Strategy

- 5.4.9 In the absence of the information above, it is not possible for London boroughs to engage fully with the suggested growth locations. The following comments are therefore naturally limited in scope.
- 5.4.10 The NPPF (2026) is clear that any new broad locations for growth must form an appropriate strategy to deliver sustainable development, considering reasonable alternatives and other relevant strategies. They also must be consistent with national planning policy generally.
- 5.4.11 Paragraph 2.19 of the Strategic Approach document (2026) summaries the shortfall of industrial land at 350 hectares of industrial land over the first 10 years of the plan. It should be noted that this total is derived from 278

hectares of industrial land release, which assumes a high build out rate of residential sites to begin with. The shortfall is assumed to increase to around 560 hectares by 2050. As noted in Section 12 of this response, there are queries raised around the accuracy of this demand figure.

- 5.4.12 However, Table 9 demonstrates that the approximate maximum net supply (hectares) of 9 of the Industrial BLGs amounts to 774 ha. It should be noted that this does not include supply from the 2 other Future Industrial BLGs that are designated in the draft London Plan. It also does not consider any industrial land capacity that would arise from Stockley Park, which is absent from the document altogether.
- 5.4.13 National Policy is clear that great importance should be assigned to Green Belt and any release should be supported by fully evidenced and justified exceptional circumstances. The evidence provided suggests a significant overprovision of industrial floorspace is being proposed, contrary to national policy, even assuming the generated need figures are accurate. This is before the capacity for higher density industrial BLGs has been explored. Therefore, there is not considered to be a need for three Industrial BLGs within Green Belt in Hillingdon.

Effective Strategy and Consistent with National Policy

- 5.4.14 Noting that there is no justification for the scale of Green Belt release being proposed, consideration must be had to removing the Industrial BLGs that are not supported by national policy.
- 5.4.15 As with the residential Green Belt BLGs, whether a site is **Grey Belt** has not formed part of the search methodology. It is only added in the prioritisation section as one of the lowest weighted criteria. Adding this to the prioritisation section itself is relatively meaningless, as this section did not exclude any of the proposed BLGs anyway and took them all forward.
- 5.4.16 If this key national policy constraint had been applied to the search methodology, the Hillingdon portion of the M40 site would have been excluded, noting that it is deemed to be strongly performing Green Belt in the London-wide Green Belt Assessment Report (2026). The Hillingdon portion of the M4 site also has a case to be considered as not Grey Belt and is being reviewed further in the Council's own Green Belt assessment.
- 5.4.17 It is not entirely clear from Figure 9 of the Strategic Approach document (2026) what land is proposed. However, it appears that the Hillingdon portion of the M40 site relates to the newly created Inspiration Club Golf Course. This Golf Course was created as part of land restoration on the site under Planning Permission Ref: 2292/APP/2006/2475. After more than a decade of land restoration, the site has only recently opened as a sports facility to the local community. In line with Policy GB5 of the NPPF (2026), this is Green Belt land being used for **outdoor sport and recreation**, which is a beneficial use for communities. Its loss would also be contrary to Policy HC7 of the NPPF (2026).

- 5.4.18 Noting the above, the Hillingdon portion of the M40 site is not flat and would require significant regrading of recently restored land. It is therefore not clear how this has not been captured by the **Topography** part of the search methodology.
- 5.4.19 The Hillingdon portion of the M4 site is flanked to the east, south and west by existing homes, including properties that would back directly onto the site. Furthermore, there is no direct access from the site onto the Motorway or the Transport for London Road Network (TLRN). To reach the M4 junction, vehicles would need to pass a significant number of residential receptors, including potentially through both the villages of Sipson and Harlington. The methodology does not seem to factor in proximity to **sensitive receptors** as a principle criteria for selecting sites, despite there being alternative options which may not have sensitive receptors to mitigate for.
- 5.4.20 Noting the inconsistency with national policy and the alternative of only releasing the required number of sites to meet need, the two Green Belt Industrial BLGs in Hillingdon should be removed based on the information available to date.

Stockley Park

- 5.4.21 Stockley Park is also designated as a BLG: Green Belt Future Candidate in Policy MBUL1. It is designated for both residential-led and industrial uses. However, there is no reference to Stockley Park as one off the 11 clusters that were identified in Figure 9 of the Strategic Approach (2026) document. It is therefore not clear at what stage of the process it was discounted and when it was reintroduced.
- 5.4.22 The Council therefore request that, when sharing the information on the 11 clusters that have been identified, the assessment showing why Stockley Park was originally discounted is also provided. If it is deemed that an Industrial BLG in Hillingdon is still required, the Council should be involved in determining which broad location for industrial growth is the most suitable.

5.5 Brownfield First Opportunity Area - Hayes

- 5.5.1 The Council confirms it is content to have the Hayes Opportunity Area carried forward in the draft London Plan (2026) as a Brownfield First Opportunity Area (BFOA).

6 PV7 – Sustainable development and enhancement of the Green Belt

6.1 Strategic Need

- 6.1.1 Policy D(1) departs materially from national policy by replacing the NPPF requirement for an ‘evidenced unmet need’ with a requirement for ‘strategic need’.
- 6.1.2 The strategic need required by Policy D(1) has largely already been predetermined by the London Plan itself. The policy therefore does not provide an effective test of whether major development in the Green Belt is necessary but instead establishes the justification for such development through the Plan.
- 6.1.3 Once again, rather than providing clear strategic direction on what development is needed and where it should be located, the London Plan weakens the national policy test and provides limited constraint on major development in the Green Belt. This approach is not consistent with national policy and is therefore unsound.

6.2 New Green Space for Non-residential uses

- 6.2.1 The draft London Plan (2026) is proposing significant loss of greenfield land in Hillingdon through non-residential development, including potentially three industrial Green Belt BLGs and an undefined number of new data centres. As outlined in this response, Policy PV6 also significantly weakens the protection afforded to Metropolitan Open Lan (MOL).
- 6.2.2 The nationally set golden rules, referred to in Part D(3), do not require non-residential uses to provide new or enhanced green space that are accessible to the public. Policy PV7 follows the same response and would involve significant green spaces being lost without any mitigation for residents nearby.
- 6.2.3 Paragraph 4.71 of the Green Belt Strategic Approach (2026) used a gross-net-to-net ration of 50:50 to determine how much of a site would be designated for infrastructure provision, biodiversity mitigation, sustainable drainage, landscape enhancements, Green Belt improvements and other site-specific constraints. This is compared to only a 70:30 split for residential, which is required to provide new green space under the golden rules.
- 6.2.4 Therefore, the Mayor’s evidence allows for significantly more of the industrial Green Belt BLGs to be left for potential new publicly accessible green space. However, this opportunity is then not carried through to Policy PV6. This is a significant policy failure that should be rectified, to make clear that there is an expectation for these significant non-residential growth areas to create new publicly accessible green space. Where it may not be advantageous to create

new public green space within the redline boundary, significant improvements should then be utilised on other sites akin to the same value.

6.3 Additional Sustainable Location Criterion for Data Centres

- 6.3.1 Box PV7A (Part 3(c)) adds in an additional sustainable location criterion for data centres. Policy GLE3 already has a significant number of criteria for assessing whether a data centre is in a suitable place and there should not be a need to create additional criteria in different policies. Unlike with residential or industrial uses, data centres typically generate very low numbers of vehicle movements. Therefore, it is far more important for their locations to be dictated by matters such as land and infrastructure constraints.
- 6.3.2 At present, there are no examples in London of data centres on one site successfully transferring heat to residential units on another. Whilst an admirable objective that should still be explored in the future, it should not dictate their spatial distribution as it would never be guaranteed through the planning system.
- 6.3.3 Furthermore, Policy GLE3 references the fact data centres can compromise land supply needed to meet housing need as a reason for a location being unsuitable. At the same time, Box PV7A suggests giving up land within residential BLGs for data centres, rather than housing. This is an entirely contradictory approach and should be removed.

6.4 Walking Distance

- 6.4.1 Policy PV7 is heavily reliant on measuring exact walking distances. Paragraph 6.50 provides the only guidance on how this should be done. Further guidance on this would bring significant clarity and reduce the likelihood of different positions between parties during the determination of applications and during site allocations.
- 6.4.2 Examples of matters that require further clarity include:
- The **minimum quality** required to constitute a walking route. For example, there are parts of Outer London where roads do not have footpaths, street lighting or crossings. On paper, a site may be within 1200m, but it is highly unlikely that most people would walk such a route.
 - Assuming there is a minimum quality that must be met, clarify that the developer would be responsible for **funding the works** in full (assuming they are deliverable) prior to commencement of any dwellings.
 - Whether **elevation** should be included as a determining criterion.
 - Confirmation if the walking distance should be measured from the proposed residential units or if it applies to the **site access points**, which can be wholly different.

6.5 Box PV7C: Green Belt bus-corridor Clarifications

- 6.5.1 The term walking distance is included through this section, apart from in Table 6.3 where it refers to 'typical distance to local bus stop'. It is not clear if this is an error or intentional but clarity on this is required.
- 6.5.2 Part A also refers to direct access in less than 12 minutes but does make clear whether this should include an average waiting time or not. In practice, a user is unlikely to arrive at a bus stop exactly when a bus arrives and will factor in a wait time, usually based on how frequent the service is, with people planning to wait longer for a less frequent service.
- 6.5.3 Part C refers to it applying 'within greenfield portions of the site'. It is therefore not clear to the author whether this fully dedicated right of way only applies to land within the site itself or refers to the bus-corridor itself (which will presumably be mainly on public highway).
- 6.5.4 Part D refers to the average service speeds of the bus but this would not be something typically available to a decision-maker. A public source for obtaining this information should be provided.

6.6 Typical Building Heights

- 6.6.1 Table 6.3 includes both average densities and typical building heights. Paragraph 6.52 goes on to clarify that these should be used as net density thresholds.
- 6.6.2 However, if density calculations have been provided as a threshold, it is not clear what the value in adding typical building heights is. The local planning authority should have power to depart from these building heights where it would lead to an optimal design solution and still meet the density threshold.
- 6.6.3 Reference to typical building heights should therefore be deleted as it does not add value.

7 HN1 - Increasing London's housing stock

7.1 Greenfield Housing Target

- 7.1.1 The Council has raised its concerns regarding the lack of engagement on and soundness of the areas which compromise the Greenfield housing target of 14,750 within commentary on Policy MBUL1.
- 7.1.2 Therefore, comments in this section refer only to the application of the Greenfield housing target.
- 7.1.3 Paragraph 3.13 outlines that the Greenfield housing targets only compromise the capacity from 2030/31 onwards (year 4), to reflect the fact that there will be an evident delay until completions can be realised. Section 7.2 of the Council's response explains why this is an insufficient time period and there is no prospect of the Greenfield housing targets being achieved at this point.
- 7.1.4 However, Paragraph 3.13 essentially advocates for a stepped approach to housing targets, as permitted through National Planning Practice Guidance (NPPG - Paragraph: 012 Reference ID: 68-021-20190722). In practice though, the total housing targets are not expressed as such because the total housing target is not broken down into individual years. For Hillingdon, it takes the 24,030 target (2,403 per annum), which includes capacity from greenfield housing, and requires this to be delivered from year one. As national policy is currently drafted, this is how these housing targets would be interpreted for the purposes of demonstrating a five-year housing supply and the Housing Delivery Test.
- 7.1.5 Therefore, for the local planning authorities with greenfield housing targets, these need to be broken down into a stepped approach, with different annualised targets to reflect brownfield housing capacity only in the earlier years.

7.2 Small Sites

- 7.2.1 The Council have been assigned a ten-year housing target that consists of an estimated 5,571 homes from small sites. This is almost a doubling of the small site capacity for Hillingdon from the existing London Plan (2021), which targets 2,950 homes a year.
- 7.2.2 The Council were not engaged on the small site capacity evidence that underpins the draft London Plan (2026). As outlined on Section 2, the Mayor has refused part of the Council's request to have access to the data which underpins the small site capacity work that is summarised in the SHLAA (2026). Access to the completion data that was used and analysis from the dataset of sites referred to in Paragraph 8.17 was provided on the 8th October 2026, however this did not allow sufficient time for the Council to engage with this data.

- 7.2.3 It should also be noted that no evidence has been provided to indicate what the capacity would be using historic windfall delivery rates as a starting point, as has been the case with previous iterations of the London Plan.
- 7.2.4 In the absence of this information, it is not possible for London boroughs to provide conclusive commentary on the soundness of the estimated capacities, including whether there is a reasonable prospect of delivering these numbers. Commentary has therefore had to be limited to what has been published only.

Historic Windfall Delivery Rates

- 7.2.5 The NPPF (2026) outlines in Policy HO3 that historic windfall delivery rates should play a role in ensuring an allowance from windfall sites is realistic. Historically, the London Plan has used these as a starting point for estimating small site capacity, noting that they are the most likely forecast of future rates of growth in this area. This is because the factors which dictate delivery in practice (e.g. interest rates, residential values, delivery costs, policies) fluctuate over extended periods of times and cannot be forecasted. Looking at historic delivery rates over extended periods is the best way to capture changing delivery factors and avoid optimism bias that may occur when plan-makers seek to find more brownfield capacity.
- 7.2.6 The use of best performing three-year average is not equivalent to using historic windfall delivery, as it removes the very value of using long-term historic delivery rates described above by focusing on a short best performing period.

Small Site Design Code and 25-50% Uplift

- 7.2.7 The Draft London Plan (2026) refers to the London Small Site Design code. This document was not published as part of the London Plan consultation. It has since been published, with consultation open until December 2026.
- 7.2.8 The SHLAA (2026) uses the London Small Site Design code as its justification for departing from using historic delivery rates and for significantly increasing small site capacity. For the Modelled small sites, it has been used as rationale to add an additional 25-50% on the estimated capacity from this source which is then incorporated into the ten-year housing targets.
- 7.2.9 Firstly, the London Small Site Design Code will not be adopted now until 2027 at the earliest. It will then be utilised for decision-making from schemes submitted from this point onwards. However, homes completed from April 2027 will already need to have received planning permission. Once you factor in site promotion, pre-application, planning submission and decision-making, planning permissions influenced by the London Small Site Design Code will not materialise in the first few years of the plan. Furthermore, once planning is secured, the applicant would typically have up to three years to implement the permission. On this basis only, there can be no rationale for this additional 25-50% uplift being applied to small site capacity for the first five years.

- 7.2.10 Secondly, the existence of the London Small Site Design Code does not provide a rationale for a 25-50% uplift in capacity on small sites. This point was covered off extensively as part of the Examination in Public (EiP) for the current London Plan (2021). It was suggested as part of the draft London Plan (2017) that the existence of Policy H2 would lead to significant increases in completions on small sites. For Hillingdon, it was originally forecast that 765 homes per annum would be delivered on small sites. Despite Policy H2 being adopted, completions of this scale never materialised. Fortunately, the Planning Inspectors agreed with the evidence provided by boroughs, which showed the major constraints to small site delivery are not within the planning system. This saw the target scaled back down to 295 homes per annum based primarily on housing delivery rates, which is more aligned to the completions that have occurred.
- 7.2.11 The evidence provided was clear that there are a series of factors preventing faster delivery of small sites that are outside of the scope of planning, including market conditions, interest rates, access to finance, construction costs and labour constraints. Delivery is also hampered by landowners not wanting to redevelop their land for intensification, due to reasons such as wanting to live in the property themselves or exploring other income generation, such as letting it as a small-scale HMO. Constraints such as these are all baked into historic delivery rates, which is why they are the optimum source for forecasting delivery on small sites.
- 7.2.12 Therefore, there is no evidence to suggest the presence of a draft London Small Site Design Code will realise greater delivery of housing on small sites. Rather, it provides sound examples of how good quality small site design has occurred already under existing development plans, which suggests planning policy is not the key barrier to delivery.

Modelled small sites

- 7.2.13 Three types of small site delivery were modelled to provide capacity estimates. This involved using datasets generated by RCKa through a model that has not been published. Therefore, it is not possible for London boroughs to provide conclusive commentary on the soundness of the estimated capacities, including whether there is a reasonable prospect of delivering these numbers.
- 7.2.14 From the information published in the SHLAA (2026), it is noted that Hillingdon has been prescribed some of the highest capacities for infill development, including the 4th highest capacity for multi-unit infill. For the reasons outlined in the section above, the Council would object to the use of theoretical capacity studies to estimate windfall calculations, which do not account for the non-planning reasons these schemes do not come forward at the rate expected. The Council submitted significant evidence through the previous EiP outlining why a modelled approach would not result in higher delivery figures in West London, which remains available to review.

- 7.2.15 In the absence of the information being published, the Council cannot review the suitability of the density capacities used either. However, the density assumptions shown in Paragraph 8.24 would appear to be overly ambitious and may account for significant over-capacity for the multi-unit infill capacities.

Change of Use

- 7.2.16 An estimate for 10-year capacity from change of uses on small sites has also been provided. Paragraph 8.49 refers to the use of a dataset of change of use completions over the previous five years. The Council have requested this information, but it was only received on the 8th October and therefore analysis could not be incorporated into this response.
- 7.2.17 The assessment forecasts that Hillingdon will deliver the 2nd highest number of units from change of use on small sites, with a supply figure of 578. For reference this is considerably lower than the capacity forecast for neighbouring boroughs, including Hounslow (20), Ealing (24) and Harrow (122). Such drastic differences in figures between adjoining local authorities with similar characteristics would initially suggest that there may be a data quality issue that needs to be reviewed.
- 7.2.18 It is not stated in the SHLAA, but it is assumed the Planning London Datahub has been used as the source to create the dataset. In the absence of data quality controls, residential data in planning applications will often be submitted as 'New Build' or even left blank. Where data quality controls are in place, the London borough will manually correct this data to ensure it is accurate. Hillingdon Council does correct this data, when other boroughs may not, therefore this might explain the drastic difference in change of use completions and the corresponding forecasts. Without having access to the datasets, the Council cannot validate this assumption.
- 7.2.19 The other explanation maybe related to local policies. The Council adopted its modified Article 4 direction for Class MA developments in March 2024. This led to both a spike in prior approval applications before this date and created a significant pressure on developers to commence their developments before they expired, as they would not be able to resubmit for another prior approval in the future. This would coincide with the five-year period the SHLAA has used to forecast supply and would represent an anomaly only. Now that the Article 4 direction is in place and most prior approvals have since lapsed, there is little prospect of the level of delivery from change of use applications remaining at its current level during the plan period.
- 7.2.20 Noting the above, the remaining requested datasets must be published and discussion held about whether the small site portion of the target should be revisited for Hillingdon. At present, the most suitable strategy would appear to be to revert to a calculation based on historic delivery, as advocated by previous planning inspectors.

8 HN2 - Protecting and Reshaping Housing

8.1 Small and Large HMOs

- 8.1.1 Policy HN2 outlines that the loss of self-contained housing should be resisted, unless replaced with at least the existing overall floorspace and, wherever possible, uplifting existing densities, in line with Policy MBUL2.
- 8.1.2 It is not clear from the policy how an application for loss of C3 self-contained residential to a small (C4) or large (SG) House of Multiple Occupation (HMO) would be treated. However, one interpretation would be that this represents a loss of self-contained housing and therefore would not be supported. Policy HN2 would therefore be proposing a blanket ban on C3 self-contained residential to HMOs in London where Article 4 directions are in place.
- 8.1.3 However, this point is not expanded on in either the implementation or rationale section. If the intention was to create a blanket ban on C3 self-contained residential to HMOs, it is expected that it would have been highlighted here.
- 8.1.4 Therefore, this policy needs to be amended to make clear if this is its intention so its soundness can be reviewed and, if retained, the policy could be implemented consistently.

9 HN4 - Gypsy and Traveller accommodation

9.1 Evidence and target

9.1.1 Table 3.4 contains the 10-year targets for net additional permanent pitches for Gypsy and Traveller accommodation. Hillingdon's Target is net 49 additional pitches by 2036/37.

9.1.2 The Council has identified shortcomings regarding the accuracy of the baseline supply data used within the London Gypsy and Traveller Accommodation Needs Assessment (GTANA). These issues undermine confidence in both the identified need and the deliverability of the proposed target. Key concerns are:

- The GTANA does not provide sufficient information to allow LPAs to check whether the need figure is accurate. This includes the absence of a full list of sites that were assessed. When this information was requested, it was stated that locations could not be provided to boroughs. Road names were provided but, due to their length and agricultural nature, it was not possible to identify the sites that had been passed from this category.
- In the absence of knowing which sites are in the study and form part of the figures, it would be impossible for a decision-maker to know if proposed supply was gross or net to these figures.
- The GTANA also does not provide details on how many pitches were discounted through application of the PPTS definition.
- Some sites included within the GTANA appear to have been treated as authorised, but do not have planning permission.
- There is discrepancy between the number of pitches identified in the GTANA and the number of pitches known to exist on some sites.
- The assessment identifies a need arising from households on an unauthorised encampment, but it is unclear how this has been reflected in the overall supply and need calculations.

9.1.3 The council has raised the concerns with the consultant and GLA at time of drafting, but the issues were not resolved prior to publication.

9.2 Deliverability

9.2.1 The Council considers that the target of 49 additional Gypsy and Traveller pitches over the 10-year period is an overestimate of need over the next 10 years and there is no prospect of it being delivered before 2037.

9.2.2 The London GTANA identifies a current supply of 32 authorised pitches within the borough, comprising 21 council-owned pitches and 11 privately-owned pitches, with no vacant or planned pitches identified. Historic delivery data

within the GTANA shows that authorised pitch provision in Hillingdon increased from 20 pitches in 2008 to 32 pitches in 2022, an increase of 12 pitches. Policy HN4 proposes a further 49 pitches over the next 10 years, representing a 153% increase over the entire existing authorised supply, a wholly disproportionate increase in one type of housing supply for the borough, further indicating potential shortcomings in the evidence.

- 9.2.3 In setting these apportionments, there is no evidence that the Mayor has considered capacity or deliverability constraints, as has been undertaken for other apportioned targets.
- 9.2.4 The Council asks that the London GTANA and the target are reviewed with input from the boroughs to resolve these issues. At present, Policy HN4 is not appropriate, effective or consistent with national policy.

10 PV5 – Industrial Land Supporting Housing Growth

10.1 LSIS Release

- 10.1.1 The Council were not consulted as to whether any LSIS locations in the borough should have been included within Table 6.2. The Mayor should engage with the Council on the appropriateness of including any LSIS locations within this table to accelerate housing delivery.

10.2 Non-designated Industrial Land

- 10.2.1 Part C of the policy only facilitates the loss of non-designated industrial land on locations of SAM 4 or higher.
- 10.2.2 In practice, this would prevent a small vacant car garage (B2) on a residential street within SAM 3 from being repurposed as new residential accommodation. If a site was in a truly unsustainable location, this would be picked up by the relevant other policies in the Development Plan.
- 10.2.3 If the land does not warrant either regional or local protection through SIL or LSIS designation respectively, then it is not clear what strategic basis there is for the Mayor blocking release of non-designated industrial sites. In the context of proposing 14,750 homes on greenfield land in Hillingdon, preventing the release of non-designated industrial land in most of the borough is not sound.

11 GLE1 - Sufficient and appropriate employment space

11.1 When Does Policy Apply

- 11.1.1 The Policy Aim of GLE1 is to provide the land use and floorspace needs of all sectors of the economy. This language is imprecise and does not make it clear to which use classes it should be applied. Part B of the policy is the only part of the policy which references a use class, referring to design requirements for Use Class E.
- 11.1.2 However, Paragraph 4.11 adds further confusion by referencing demand for retail, leisure and cultural infrastructure, which are not typically considered employment floorspace. It also references uses, such as industrial, which already have their own separate strategic policies.
- 11.1.3 The Policy therefore needs to be amended to make it clear which use classes it is trying to influence. Where there is already a strategic policy on a use, there is no rationale for it being covered here as it is at best duplication or at worst going to cause inconsistency.

11.2 No Spatial Strategy for Use Class E

- 11.2.1 Paragraph 4.11 outlines that the GLA holds strategic evidence which identifies demand for offices, research and development floorspace and life sciences laboratories. However, Policy GLE1 fails to provide a spatial strategy for meeting these needs, as there is no direction as to which locations would be suitable for supporting these uses and how much land each borough should seek to accommodate (if any).
- 11.2.2 For example, the London Economic Uses - Supply and Demand Study (2026) publishes new floorspace demand for offices in each London borough but then does not state if and where they should be met.

11.3 Re-providing space

- 11.3.1 The blanket requirement for all developments that displace any existing employment space to re-provide this within the scheme or as affordable workspace is overly prescriptive. By the GLA's own evidence, some employment space that will be repurposed is surplus to requirements and therefore would not need to be re-provided. In smaller developments, the re-provision is also likely to hamper viability and should be set by local policy only.
- 11.3.2 Whether a borough assists with finding space for small and independent businesses will depend on a range of factors, including resourcing and the existing users desire to stay. This is not a material planning consideration and

should be removed from the policy, with boroughs setting tailored local policies if they have resourcing to support it.

12 GLE2 – Supply of Industrial Land

12.1 Ineffective Engagement

- 12.1.1 As outlined in Section 2, the Council have not been effectively engaged on the contents of the Draft London Plan prior to publication. This includes any technical input that could have been utilised to improve the evidence base for industrial land, as well as any input on what a successful spatial strategy for meeting this need would be.
- 12.1.2 Issues that need resolving have therefore been outlined below to ensure Policy GLE2 is both sound and delivers the most appropriate strategy for Londoners.

12.2 Absence of Apportionments for Industrial Land

- 12.2.1 Policy GLE2 outlines that local plans should provide for and maintain sufficient industrial capacity to meet strategic needs. It then refers to Table 4.1 to demonstrate what this need is, which is the Storage and Distribution demand benchmarks by PMA. These appear to be a slightly rounded up version of the figures from the Storage and distribution land requirement column of Table 15-1 of the London Economic Uses - Supply and Demand Study (2026).
- 12.2.2 The table used only refers to storage and distribution, which is only one part of industrial land supply. Both the Supply and Demand Study (2026) and Industrial Evidence Paper covers the full range of industrial uses in its analysis, including B2, B8 and other industrial uses. It is not clear from the supporting policy text or the London Plan Industrial Evidence Paper (2026) whether this is deliberate or a mistake.
- 12.2.3 Section 15.1 of the Supply and Demand Study (2026) provides the conclusion on the industrial land supply balance. Under two different approaches (full repurposing vs. no repurposing) the land supply shortfall is assessed to be 270ha or 428ha. Both documents appear to advocate for repurposing to be the more appropriate scenario generally. The Supply and Demand Study (2026) outlines in Section 15.1 that in practice, the appropriate planning requirement is likely to sit between these two positions.
- 12.2.4 Regardless, it is not clear why the study does not rely on either of the final two columns of Table 15-1 for setting apportionments, as appears to be advocated in the Mayor's own evidence. It seems most logical to amend these to either the full repurposing scenario or a mid-point between the two scenarios.
- 12.2.5 An alternative may have been to use the figures within Tables 8 and 9 of the London Plan Industrial Evidence Paper (2026). This would appear to be an unsupportable approach as it seeks to factor in industrial release for housing as an additional demand, when in practice this would only arise from a proportional loss in demand for industrial space (i.e. 278ha of industrial

release for housing by 2036 would not occur if the forecast demand for S&D and R&D is as high as stated).

12.3 Repurposing B2 and Eg(iii) Floorspace

- 12.3.1 The Supply and Demand Study (2026) advocates for using a repurposing scenario, which assumes that declining need for B2 and Eg(iii) floorspace will be repurposed for Storage and Distribution if high demand is forecast. This is a logical assumption that is supported by the Council.
- 12.3.2 Paragraph 4.6 of the London Plan Industrial Evidence Paper (2026) seems to raise concern about this assumption, noting a low level of observed repurposing. However, the Council has implemented the existing London Plan's approach to intensification and can provide multiple examples of where this has been delivered. These include:
- Former Trimite Site, Arundel Road, Uxbridge (Ref: 9117/APP/2016/278)
 - Barton Buildings, Uxbridge Industrial Estate (Ref: 74891/APP/2020/1614)
 - Island Site, Eskdale Road, Uxbridge industrial Estate (Ref: 957/APP/2024/2765)
 - Berrite Estate, Iron Bridge Road, West Drayton (Ref: 45237/APP/2022/3398)
 - 555 Stonefield Way, South Ruislip (Ref: 70454/APP/2015/383)
 - Gethceln House, Dawley Road, Hayes (Ref: 71737/APP/2021/4535)
 - Land at Bulls Bridge Industrial Estate, Hayes (Ref: 75111/APP/2022/1007)
 - Unit 84, Hayes Industrial Park, Hayes (Ref: 63099/APP/2023/1608)
 - MSD Site, Breakspear Rd South, Harefield (Ref: 72870/APP/2022/3126)
- 12.3.3 Repurposing will always be challenging to track via the Planning London Datahub as the industry standard is to submit planning applications for whole new buildings to be used as either Eg(iii), B2 and B8 to guarantee flexibility, even though they typically occupied for B8 use post-completion.
- 12.3.4 The largest determinant of whether a redundant light or general industrial building will be repurposed is the rent that can be achieved from storage and distribution. The Supply and Demand Study (2026) forecasts high demand for S&D floorspace, which would itself support that repurposing should occur.

12.4 Storage & Distribution Demand

- 12.4.1 All the industrial demand and supply figures are driven by high storage and distribution demand estimates, particularly in Hillingdon. The figure of 182,000 sqm by 2050 (equivalent to 33ha) is the second highest in London.

- 12.4.2 These figures are unusually high when compared to comparative west London boroughs who are also near Heathrow Airport, as it is approximately three times greater than Hounslow and two and half times greater than Ealing (See Table 8.3 of the Supply and Demand Study (2026)).
- 12.4.3 As part of the Hillingdon Employment Land and Capacity Study (2023), take-up of industrial land over the previous 10-year period was compared to Ealing and Hounslow (See Table 16 for full details). It highlights a significantly higher number of industrial deals and total industrial sqft leased in both of these boroughs than in Hillingdon.
- 12.4.4 This makes the large discrepancy in storage and distribution take-up within the Supply and Demand Study (2026) seem more likely to be erroneous.
- 12.4.5 Furthermore, as part of the Hillingdon Employment Land and Capacity Study (2023), the Consultants investigated using take-up data from CoStar for the purpose of creating an industrial demand forecast (See Scenario 4). However, when undertaking this work, it became apparent that the CoStar data was not showing truly new take-up but was rather reflecting churn from existing local businesses and failing to capture net change. It led to highly anomalous projections which could not be used.
- 12.4.6 Noting the above, there is significant potential for similar data to be artificially inflating the Storage & Distribution demand forecast in Hillingdon. Therefore, this data needs to be published and discussion held with the Council to understand its accuracy, as it would have significant repercussions for apportionments.

12.5 Industrial Collaboration Working Group

- 12.5.1 Paragraph 4.23 states that Industrial Collaboration Working Groups for plan-making authorities will facilitate and coordinate the meeting of needs on a PMA basis.
- 12.5.2 Whilst the Council supports working with other authorities to monitor data and improve decision-making, this cannot be a substitute for the London Plan being sound at the point of adoption.
- 12.5.3 The Spatial Development Strategy should be setting evidenced and deliverable apportionments for individual boroughs which they can take forward in their own plan-making and decision-making, with any reservations about the apportionments discussed prior to examination and resolved before the London Plan is adopted.

12.6 Industrial Land in Green Belt

- 12.6.1 In terms of spatial approach, it is recognised that Policy MBUL 1 sets out industrial Green Belt BLGs to create new capacity. Commentary is provided on this under the relevant section.

- 12.6.2 However, Policy GLE2 does not provide a clear decision-making framework for new industrial proposals in the Green Belt that are outside of BLGs. Policy GLE2 should make it clear that these would not be supported, on the basis that supply can be sourced from the intensification of existing industrial land, repurposing brownfield land for industrial uses and limited Green Belt release through Policy GLE2 only.

12.7 SIL and LSIS

- 12.7.1 Policy GLE2 has removed existing London Plan policies outlining the importance of SIL and LSIS, as well as how to treat planning applications that would negatively impact these uses. This includes applications for both inappropriate uses within these designations, but also the treatment of proposals that are adjacent or near to existing designations. The key components of this existing policy should be restored within Policy GLE2 to ensure consistent decision-making. This is a critical part of ensuring brownfield land is effectively used to ensure Policy E1 of the NPPF (2026) is met and ensuring there are effective policies in place.

13 GLE3 - Data centres

13.1 NPPF Requirement

- 13.1.1 The NPPF (2026) outlines in Part 1 of Policy PM1 that spatial development strategies should set a positive vision for future growth and change at a sub-regional scale and provide a clear spatial framework for investment and growth. Part 2A outlines that this should be done through the apportionment to local planning authorities of objectively assessed needs for housing and other uses that are best considered at a strategic scale for the duration of the plan period.
- 13.1.2 Policy E1 of the NPPF (2026) outlines in Part 1C that development plans should, at the most appropriate level, allocate sites to implement the economic vision and strategy and meet identified needs over the plan period, paying particular regard to facilitating development to meet the needs of a modern economy (including sites and premises which are flexible and adaptable) and the specific locational requirements of different sectors. It goes on to cite data centres specifically as new infrastructure required to support growth.
- 13.1.3 The NPPF (2026) also defines data centres as essential infrastructure, whilst the government formally designated data centres as Critical National Infrastructure (CNI) in September 2024.

13.2 Absence of Allocation

- 13.2.1 The national policy position outlined above provides a clear position that the London Plan should be setting the apportionment to local planning authorities of objectively assessed needs for uses, unless they are not considered to be appropriately dealt with at the strategic scale.
- 13.2.2 Policy GLE3 of the London Plan (2026) does not set an apportionment target to London boroughs to meet a need for data centres. In line with the NPPF, this position would only be sound if the Mayor either deemed data centres not to be a strategic matter or there was a reason it would be more appropriately dealt with at local planning authority level.
- 13.2.3 At the national level, the Government is drafting a National Policy Statement on data centres and a Data Centre Strategy. As noted above, government has formally designated data centres as CNI in 2024. This alone would logically mean that they would warrant apportionment targets in spatial development strategies.
- 13.2.4 The study on London's Data Centre Future Growth Forecasts and Strategic Insights (2026) also highlights how London's data centre sector is undergoing a significant transformation, driven by rising digital demand, with grid connection data indicating potential growth of up to ten-fold by 2050. It also highlights significant issues arising from data centre, including those related grid capacity, water scarcity and restricted land supply. These are regional

issues that are not constrained to borough boundaries and should be directly linked to regionally set data centre targets.

- 13.2.5 By their very nature, the spatial distribution of data centres is not a matter that should be confined to Local Plans. Data centres constructed in one location will serve users in entirely different locations, including across countries. As noted in the Mayor's London's Data Centre Future Growth Forecasts and Strategic Insights (2026), whilst the initial surge in new data centres was focused in specific areas, their distribution is becoming far more widespread in the face of localised constraints, which is seeing new data centres in different parts of London, on the edge of London and in different parts of the Country (e.g. Newport & Cardiff now accounts for 9% of capacity). Therefore, there is clear scope for spatial development strategies to direct future growth locations and potentially restrict development based on constraints.
- 13.2.6 Noting the above, there is no basis for the draft London Plan (2026) disregarding its obligation under Policy PM1 of the NPPF (2026) to apportion to local planning authorities the need for data centres.
- 13.2.7 Policy GLE3 states that boroughs should pro-actively identify suitable locations in local plans for data centres to meet need, without attempting to define what the need is, either expressed as an apportionment or even combined for Greater London. This is clearly an ineffective policy and there is no reasonable prospect that local plans will be able to rationally identify sufficient site allocations without an apportioned need to aim for.

13.3 Electricity

- 13.3.1 When determining if a site is suitable for use as a data centre, Policy GLE3 (Part A(1)) adds the availability of current and projected electricity connectivity, whilst recognising the requirement to meet local housing, employment and other infrastructure needs, as a reason a site may be unsuitable.
- 13.3.2 However, the Mayor's London's Data Centre Future Growth Forecasts and Strategic Insights (2026) already identifies that electricity demand from data centre has risen sharply, with more than 8GW of future capacity requests, nearly ten times above current operational levels, now in the grid connection queue. It notes that this capacity remains unavailable for other future uses, which continues to create a barrier to delivering new housing, infrastructure and other employment.
- 13.3.3 It is well documented that West London has already had development stalled due to electricity network constraints: [West London electricity capacity constraints | London City Hall](#)
- 13.3.4 Whilst temporary solutions have been found (e.g. ramping solutions), the London Plan's growth aspirations for residential and employment uses far exceed current levels of delivery. Clearly, restricted electricity capacity is already a significant constraint to delivering the residential apportionment

targets in West London. Accelerating data centre growth simultaneously is clearly incompatible with that ambition.

- 13.3.5 In the absence of infrastructure improvements to allow for new electricity grid capacity until 2037 at the earliest, the Council has already had requests to considered data centres that are powered by on-site gas-fired generation. This is not an issue that is limited to West London, with an application for Development Consent Order (DCO) recently submitted a 300MW data centre in Buckinghamshire: <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110030>
- 13.3.6 Policy GLE3 currently takes no position as to whether the mayor would be supportive of data centres being powered by gas as an alternative to connecting to the electrical grid, but it is assumed that it would not be compatible with the Mayor's other stated environmental aspirations.
- 13.3.7 The above provides compelling evidence that significant electricity capacity constraints already exist within parts of West London, with infrastructure improvements not occurring until 2037 at the earliest. If Policy GLE3 (Part A(1)) was implemented as drafted, the conclusion would be that West London is an unsuitable location for further data centre development. If this is the Mayor's position, then this should first be discussed with the relevant boroughs and, if agreed, made unambiguous within Policy GLE3 of the London Plan.

13.4 Water

- 13.4.1 When determining if a site is suitable for use as a data centre, Policy GLE3 (Part A(1)) also adds the availability of water supply capacity as a determining factor.
- 13.4.2 The Mayor's London's Data Centre Future Growth Forecasts and Strategic Insights (2026) outlines how data centres have emerged as a significant source of water demand.
- 13.4.3 The GLA region, along with much of the Thames Water supply zone, has been classified by the Environment Agency as an area of serious water stress. While major new water infrastructure projects should boost water security, they are largely designed to close the currently projected supply-demand gap, and do not fully account for the water needs of emerging infrastructure such as data centres. If data centre growth accelerates, particularly with ongoing use of water-intensive cooling, demand could again outpace available capacity.
- 13.4.4 The Mayor's own study above provides compelling evidence of forecast water scarcity. Even without data centres, preventing water scarcity will require reduced consumption, reduced leakages and large-scale infrastructure investment, none of which is guaranteed.

- 13.4.5 This point is especially important given that London is already recognised as a water stressed region. The starting point should therefore be a robust strategic justification as to why additional data centre capacity should be accommodated within London at all, what economic benefits this would deliver, and whether alternative locations outside London may represent a more sustainable solution. Only once that assessment has been undertaken should expectations be placed on boroughs to identify sites or work with neighbouring authorities.
- 13.4.6 Therefore, it is not clear how Policy GLE3 (Part A(1)) could be used to differentiate between suitable areas for data centres within different parts of Greater London. If all new data centres stand to compromise the availability of projected water supply to some degree, then this would be a rationale for significantly reducing their delivery across the whole of London based on water scarcity.

13.5 Land Supply

- 13.5.1 When determining if a site is suitable for use as a data centre, Policy GLE3 (Part A(4)) adds that consideration should be had to whether using the land for a data centre would compromise the supply of housing, employment and infrastructure.
- 13.5.2 It is considered that this criterion is wholly ineffective as any new data centre will be required to be built on land that is or could in the future be used for housing, employment or infrastructure. It would therefore be grounds for all new data centres being considered unsuitable in London.
- 13.5.3 Part B of the Policy is also wholly ineffective. After Part A lists the 'suitable' locations for new data centres, it suggests that London boroughs should build data centres in what could only logically be defined as 'unsuitable' areas. Planning to deliver any use in unsuitable locations would, by definition, be contrary to national policy.
- 13.5.4 Part B suggests that data centres should be located in the BLGs. The Draft London Plan (2026) heavily relies on the BLGs for residential and industrial growth as part of its spatial strategy. As noted above, to be considered suitable, the policy also says that they should not compromise land for residential, employment or infrastructure uses. This part of Policy GLE3 is therefore wholly inconsistent with the rest of the plan.

13.6 Collaboration with neighbouring authorities

- 13.6.1 The draft London Plan (2026) is subject to Policy PM10 of the NPPF (2026). This outlines that plan-making authorities should engage proactively with neighbouring and other relevant plan-making authorities (where there are strategic interdependencies across boundaries) to identify and address cross-boundary matters.

- 13.6.2 Policy GLE3 requires local authorities to collaborate with neighbouring authorities within and beyond London to identify suitable locations for data centres. However, the Plan provides no justification as to why this cross-boundary exercise is necessary, what level of provision is being sought, or how authorities are expected to determine whether they have done enough. The policy identifies no target, no capacity requirement and no measurable outcome. As drafted, local authorities are effectively being asked to undertake an open-ended search for data centre opportunities without any clear understanding of the strategic objective they are expected to deliver.
- 13.6.3 As noted elsewhere in this response, the Mayor should be undertaking proactive engagement on strategic matters of cross boundary importance such as data centres. This duty cannot just be effectively delegated to London boroughs to undertake post-publication of the draft London Plan (2026) as this is the very document which should be informed by those discussions.

13.7 Soundness

- 13.7.1 Policy GLE3 is not considered to be positive. It does not provide an objectively assessed need for data centres and has not been prepared based on effective joint working on cross-boundary strategic matters.
- 13.7.2 Policy GLE3 is an inappropriate strategy. A reasonable alternative has been prepared under the sub-headings above.
- 13.7.3 Policy GLE3 is an ineffective policy. There is not a reasonable prospect that local plans will be capable of identifying site allocations because no need figure or apportionments are included in the policy.
- 13.7.4 Policy GLE 3 is inconsistent with national policy. It is not consistent with policies PM1 and E1 of the NPPF (2026).

13.8 Required Change

- 13.8.1 To achieve soundness, Policy GLE3 must be reviewed. In the absence of a nationally derived need figure for new data centres, the draft London Plan should work towards a need based on the delivery rate of data centres to date.
- 13.8.2 This need should then be apportioned to boroughs based on land supply and known infrastructure constraints, with lower apportionments for highly constrained areas. In situations where the delivery of other strategic needs is being prevented or slowed, the London Plan should be clear what will be prioritised.
- 13.8.3 Policy GLE3 should also take a position on the reliance of on-site gas-fired generation in data centres and whether this is compatible with the environmental aspirations of the rest of the plan.

14 GLE6 – Visitor Infrastructure

14.1 Spatial Strategy

- 14.1.1 The evidence base for the draft London Plan (2026) includes Visitor Accommodation in London: Post-pandemic recovery and supply-demand forecasts to 2050. This appears to be the evidence base that would support Policy GLE6, however no reference is made to the forecasts that have been produced.
- 14.1.2 The study uses multiple forecasts, including a blended view as the central case scenario. Policy GLE6 however does not make it clear which scenario has been taken forward for drafting the London Plan, nor does it outline which should be used for decision-making on relevant applications.
- 14.1.3 Policy GLE6 also fails to confirm that there is likely to be a sufficient supply of brownfield land to meet the forecast need. Whilst this seems to be a fair interpretation of the visitor study, it should be clarified within Policy GLE6 for future decision-making on relevant applications.

14.2 Restricting hotels near to Heathrow Airport

- 14.2.1 As is highlighted in the visitor study, a significant proportion of visitor accommodation in London is located within Hillingdon. This is generally very localised to Heathrow Airport. This is a successful strategy supported by the Council, as it provides accommodation for staff and passengers adjacent to or even on the airport itself, reducing the reliance on private vehicle travel.
- 14.2.2 However, Part C of Policy GLE6 would insist on the application of the national sequential test for town centres for any new visitor accommodation. The Council propose an amendment to allow visitor accommodation on or near to Heathrow Airport to be supported without the need for a sequential test.
- 14.2.3 The Council is forecast to accommodate 4,092 new bedrooms and there is no evidence to suggest these could be accommodated within town centres near to Heathrow Airport. Hayes is the closest town centre to Heathrow Airport but is a Brownfield First Opportunity Area. Any surplus brownfield land within Hayes Town Centre has therefore been allocated for residential-led development, making visitor accommodation in the town centre less viable.

15 PV6 – Metropolitan Open Land (MOL)

15.1 Protecting MOL

- 15.1.1 Policy PV6 aims to protect and enhance MOL, but in practice the policy significantly weakens its designation. The plan-making section has different criteria for releasing or creating MOL, which is an ineffective strategy. The decision to draft the policy so that only one of the criteria within Part C(2) needs to be met puts it at odds with criteria for designating MOL, when logically they should be the same.
- 15.1.2 The most significant issue is the introduction of a criterion that means MOL that has physical or charging restrictions on it should effectively be released. This is a wholly misguided approach that would lead to significant loss of important greenspace overtime and must be amended.
- 15.1.3 Firstly, whether a site has physical or charging restrictions on it will have little determination to its benefit as part of either a strategic corridor or green space (criterion iii) or being an extensive green space with natural or historic features and landscape that contribute to setting and biodiversity (criterion ii). A site's physical or charging restrictions will not reduce the historic or natural value of a site, nor does it impact its overall value on openness. If anything, charging can provide more resourcing for better stewardship towards improving historic or natural value. For example, Kew Gardens is an entirely ticketed or member-only space that clearly would meet the criteria of (ii) and (iii) but oddly be justified as release under C(2)(ii). Despite being ticketed, it still has significant value to the wider public through nature preservation, maintaining historic assets and its openness can be experienced and enjoyed from adjacent public footpaths.
- 15.1.4 Secondly, public bodies have introduced fees to access almost all sport and recreation facilities in green spaces, typically through hire costs and parking fees. Similarly, sports and recreation teams that use the sites will likely have their own charging or membership cost recovery mechanism. This is critical to ensure a degree of cost recovery is secured from those using the site more, even if this is still subsidised. This in turn allows good quality facilities to be available to the whole public for use when they want or need them. Typically, the quality of the sport and recreation facilities is directly correlated to the quality of provision, which in turn ensures a range of facilities from amateur level upwards. All the above takes place outside of the planning system and is not controlled by a development plan and is controlled by the site operator. The existence of charging or membership on a site is an intrinsic part of retaining facilities for leisure, recreation and sport in London and should not be used as a metric for supporting the release of MOL.
- 15.1.5 Thirdly, as drafted, the policy essentially encourages privately owned MOL to introduce high charging fees or simply block off access entirely, leaving facilities vacant and unusable to the public. In doing so, under Policy PV6,

they would have created a strong argument for their site to be released from MOL to secure a significantly higher return through redevelopment. This would be directly in contrast to the stated aims of the policy and the Draft London Plan (2026) as a whole.

- 15.1.6 Unlike with wholly publicly owned land that can maintain MOL at taxpayer expense, for a private or third sector organisation to maintain MOL to an expected standard with public access, it is clearly necessary that there is a degree of revenue generation from the site to secure good stewardship. It will also prevent land speculation on MOL, with investors having a clear steer that blocking off land from the public will not improve the chance of them being released.
- 15.1.7 In the absence of this policy being amended, Policy PV6 would reduce all privately owned and third sector MOL over time. The protection afforded to the remaining spaces would be entirely reliant on good public sector stewardship (i.e. public bodies not electing not to charge or restrict access) rather than any planning policy.

15.2 Green Belt to MOL

- 15.2.1 The Council supports Part E of the policy, which highlights that boroughs through local plans should consider whether areas of Green Belt land which are, or will become, wholly or largely contained within the urban area meet the criteria set out under C(1) and could be suitable for designation as MOL.
- 15.2.2 The rationale section should make it clear that for some London boroughs, due to the historic Green Belt policy being equivalent to MOL, there has been no need for this exercise and it may not have been undertaken. Therefore, it is likely that the change in policy designation for some boroughs is anticipated to be significant.

15.3 Residential Use and Exceptional Circumstances

- 15.3.1 Part C(2) should make clear that the need for new residential capacity alone is not considered to be an exceptional circumstance for releasing MOL.

16 MBUL5 - Sustainable transport

16.1 Car-Centric Use Definition

- 16.1.1 Part G of Policy MBUL5 states the car-centric uses that make poor use of land, such as drive throughs or low-density retail parks, except for car charging stations for electric vehicles should be refused.
- 16.1.2 Whilst there may be merit in including a policy on car-centric uses, there is no definition within the policy or Glossary.
- 16.1.3 Paragraph 2.80 outlines that there is a need to restrain car parking in new developments and to resist non-strategic car-centric uses that otherwise would induce more car trips and impact on vital freight and other journeys.
- 16.1.4 This paragraph refers to 'non-strategic' car-centric uses, whilst the policy itself refers to car-centric uses that make poor use of land. In terms of implementing this policy, in the absence of a clear definition, there will be inconsistency between decision-making across London or certainty for relevant industries.
- 16.1.5 The Policy should be refined to make clear exactly what uses would be prohibited under this policy. This could include outlining the strategic car-centric uses that are permissible. Another angle for review would be the Sui Generis uses listed in the Use Class Order, for example:
- for the sale of fuel for motor vehicles;
 - for the sale or display for sale of motor vehicles;
 - for a taxi business or business for the hire of motor vehicles;
- 16.1.6 In terms of a drive through specifically, this would require further clarity. For example, is this targeting commercial units with car lanes specifically or is it aimed at any hot food takeaway with significant car parking.

17 HN5 - Managing specialist accommodation

17.1 Purpose Built Student Accommodation

- 17.1.1 Hillingdon has a PBSA bedspace target of 1,562 over a 10-year period (to 2037) based on the London SHMA 2026 (set out in Table 3.6). This is the 4th highest requirement apportioned to London boroughs. It is noted that the targets will be kept under review as need may be impacted by changes to the higher education sector.
- 17.1.2 Hillingdon's SHMA notes that there has been a drop in student numbers in Hillingdon from a peak in 2021/22 of 18,655 to 15,475 in 2023/24 and states:
- 'Unless student numbers return to their previous level, and that is unlikely given that student numbers are falling at many other academic institutions, then this would imply that no further student accommodation would be required in Hillingdon for local students.'*
- 17.1.3 Any need for PBSA in Hillingdon has historically been driven because it hosts Brunel University of London (BUL). Like many universities, changing national policies have seen a significant reduction in overall student numbers. However, this reduction at BUL has been particularly acute, with overall student numbers reflected in tuition fees at 13,478 in the 2024/25 Annual Report, which was a year-on-year decrease of 2,318 (15%). This was driven by fall in postgraduate numbers of 36% (46% overseas) following significant growth in recent years; postgraduate student intake peaked in 22/23.
- 17.1.4 The above led to the launch of the first phase of a transformation plan to reduce costs. In terms of impact on capital projects, it is noted that the Annual Report outlines these being continually re-assessed in the light of the financial position.
- 17.1.5 It should also be noted that, in the previous ten-year period, the Council has only had one significant planning approval for new PBSA in the borough. This application (1058/APP/2021/3423) for 61 bedrooms was approved in 2023 and has not yet delivered any new accommodation.
- 17.1.6 Considering the evidence above, it is not deemed there is evidence of demand for new PBSA in the borough over the next ten years and the figure of 1,562 is both unnecessary and undeliverable, noting that supply of this accommodation is only dictated by the market. The target should be recalculated based on known supply in the first five years (i.e. 61 bedrooms) and then replicated again for the remaining 5 years.

18 PV3 - Town centre and high streets

18.1 Hayes town centre updated to Major centre

18.1.1 Hayes is defined as a District Town Centre in the existing and draft London Plan. Hillingdon Council requests that it is changed to a Major centre to reflect the significant growth and expanding role of this centre in recent years.

18.1.2 Major centres are defined in the Draft London Plan as:

‘Town centres with significant employment, culture, leisure and service functions (though tending to be smaller in scale compared to Metropolitan town centres). They typically have a relatively high proportion of comparison retail relative to convenience retail and excellent levels of public transport access.’

18.2 Evidence supporting Major centre designation

Hayes’ significant functions

18.2.1 The Draft London Plan defines Major Town Centres according to their significant employment, culture, leisure and service functions. They typically have relatively high proportion of comparison retail and excellent levels of public transport access. Here, we outline how Hayes meets these criteria:

- **Transport** - Hayes Town Centre is a significant transport interchange, with Hayes & Harlington station and several high street bus stations (10+ bus routes) connecting visitors and residents to Central London, Heathrow, Reading and surrounding towns. The designation as a District Town Centre has not been reviewed since the station was upgraded to a Crossrail Station.
- **Employment and Land Use** - Hayes’ mixed land uses offer residents several retail options and service types, whilst providing a range of employment opportunities.
- **Opportunity Area** – The site is currently designated as an Opportunity Area and this is starting to mature, with continued residential-led growth taking place. In turn, this will strengthen footfall and purchasing power in the area, leading to a proportional spend in retail, leisure and services.

Threshold assessment

18.2.2 New data gathered by Impact Data Metrics on behalf of LB Hillingdon demonstrates how Hayes meets the requirements to be classified as a ‘Major town centre’ against several metrics set out by the GLA’s review of London Plan Town Centre Network Classification (Technical Annex 1).

18.2.3 It models both the existing Hayes Town Centre boundary and an expanded boundary incorporating land to the west and under the Old Vinyl Factory

(OVF). This reflects considerations for the emerging Hillingdon Local Plan, in which Hayes Town Centre boundary could be extended to include the OVF area, as it is already functionally and geographically integrated into the rest of the existing town centre. For comparison, Southall town centre has also been modelled, which is classified as a Major town centre in the London Plan and has a similar West London context. It should be noted that Southall does not meet all the criteria for Major status, indicating that not all thresholds must be considered mandatory gateways for classification.

- 18.2.4 Accounting for the addition of the OVF site to the Town Centre boundary, our data shows that Hayes meets several thresholds for 'Major Town Centre' Classification which the Draft London Plan does not consider. As a result, the number of thresholds met by Hayes Town Centre for 'Major' classification rises from **six to nine out of 15**. This is higher than other town centres that have been elevated from 'district' to 'major' town centre status, like Edmonton Green in Enfield which meets eight indicator thresholds.¹

Ref.	Assessment metrics	Major Town Centre benchmark ²	Hayes Town Centre: current boundary	Hayes TC: including OVF / expanded boundary	Southall	Updated classification assessment
A	Total occupied town centre floorspace (excl. offices - sqm) ³	40,000	23,742	55,864	~55,000-65,000	Above threshold under expanded boundary
F	Total office floorspace (sqm) ³	10,000	2,201	15,795	~3,300–3,900	Above threshold under expanded boundary
G	Total estimated employment ⁴	1,500	3,006	3,616	~2,100	Above threshold under both boundary scenarios

- The new data contrasts the current judgement that Hayes TC does not meet the threshold under **Metric G (total employment)**. Hayes supports roughly 3,006 jobs (3,616 jobs with the expanded boundary) comfortably above the 1,500-employment benchmark and Southall's estimated employment of 2,100 jobs.
- The data indicates that Hayes does not yet meet the thresholds **Metric A (total occupied town centre retail floorspace)** and **Metric F (total office floorspace)**. However, with the expansion of the boundary to include the OVF

as is consistent with our Local Plan review, Hayes TC surpasses both benchmarks:

- **A (occupied retail floorspace):** The current boundary contains 23,742sqm of occupied floorspace; below the 40,000sqm benchmark. However, with the expanded boundary, the total occupied floorspace rises to 55,864sqm. This exceeds the benchmark and is comparable to Southall Town Centre's 55,000-65,000sqm.
- **F (total office floorspace):** There is 2,201sqm of office space within the current boundary. However, this rises to 15,795sqm with the expanded boundary, exceeding the benchmark of 10,000sqm and surpassing Southall approximate office space of 3,300-3,900sqm.

Data Sources

¹ See rows CJ-CM in 'Outputs' under 'Technical Annex 1: Review of London Plan Town Centre Network Classification'

² Benchmark figures outlined in 'Threshold criteria' under 'Technical Annex 1'

³ Hayes Floorspace and office space figures based on data from the Valuation Office Agency (VOA) Rating Register and Billing Authority records (BA code 5510) matched against rateable property unit references located within Hayes Town Centre and Old Vinyl Factory (OVF) - obtained by Impact Data Metrics.

⁴ Employment figures based on official ONS BRES data (2024 Apportioned), obtained by Impact Data Metrics.

19 PV4 - Strategic Economic Clusters

19.1 Heathrow Economic Area

- 19.1.1 Heathrow should be a Strategic Economic Zone of higher importance, akin to the CAZ. The draft London Plan correctly identifies the Heathrow Economic Area as a Strategic Economic Cluster; however, the area's economic significance extends well beyond its aviation function.
- 19.1.2 The Heathrow sub-region has evolved into a diverse economic geography containing internationally significant logistics, business, technology, creative, industrial and innovation activities, alongside major regeneration and investment opportunities.
- 19.1.3 Work has started at borough level to collect and evidence base. The GLA, boroughs and strategic partners should work collaboratively to coordinate investment, infrastructure planning, economic development and skills initiatives across the wider Heathrow economic geography, recognising that economic relationships extend beyond administrative boundaries.

19.2 A Heathrow Economic Area policy as 'CAZ level' importance in the London Plan

- 19.2.1 As part of this, the London Plan should therefore introduce a dedicated Heathrow Economic Activity Zone policy, recognising the area's strategic role as a major economic cluster and supporting coordinated cross-boundary approaches to investment, innovation, skills, place-making and inclusive growth, like the role played by the Central Activity Zone.
- 19.2.2 Such a policy would provide a stronger strategic framework for securing economic benefits for local communities while supporting London's wider productivity and competitiveness objectives. It would also provide a clear steer on which uses would be supported, ensuring that development associated with Heathrow Airport can be in close proximity, improving efficiency and reducing environmental impacts.
- 19.2.3 The London Plan could set out that Local Plans and development proposals within the Heathrow Economic Activity Zone should support:
- advanced logistics and distribution,
 - technology and innovation,
 - creative and digital industries,
 - advanced manufacturing,
 - business and professional services,
 - green and low-carbon industries, and

- education, skills and research functions.

20 MBUL2 - Optimising the use of land and site capacity

20.1 Appropriate densities in the outer London context

- 20.1.1 MBUL2 requires plan-making authorities to make the best use of land in line with Box MBUL2. MBUL2 includes Table 2.1 which sets out density targets for different settings and SAM levels.
- 20.1.2 Table 2.1 does not take of account the outer London suburban setting in combination with poor public transport links and contains unrealistically high densities for the Hillingdon context.
- 20.1.3 Table 2.1 sets density ranges from 220hr/ha to 1,300hr/ha. Assuming an average of 3 habitable rooms per unit, this translates 70dw/ha to 433dw/ha. This is well above the densities in the National Model Design Code, which sets densities of 30-50dw/ha for the suburban context. Table 2.1 makes no assumption for a predominant 2 storey setting, which is the character of Metroland suburbs across Hillingdon.

20.2 Suggested change

- 20.2.1 The GLA should work with boroughs to revise the density targets regarding settlement types and realistic development scenarios. The policy should:
- Include more density metrics with lower densities for smaller sites.
 - Improve coordination between densities and building heights.
 - Include realistic (lower) residential density targets.
 - Remove 7-9 storey recommendations as these do not work in terms of viability due to 2 core requirements following new fire safety requirements.
 - Provide density figures for industrial buildings (Floor Area Ratio) based on the assumptions held within the industrial land evidence.

21 MBUL3 - Tall buildings

21.1 Non-residential tall buildings

- 21.1.1 Tall buildings have been defined by their height only and not in relation to their context. If the prevalent height comprises a number of 30m tall buildings than a proposal of similar height should not be considered tall. Similarly, in a context of a predominant height of 9m only a 30m midrise building would be considered tall and tall building design policy should apply. The policy should be amended accordingly.
- 21.1.2 The policy is focused on residential buildings only. Industrial or aviation structures sometimes require heights much above 30m, such as Heathrow Aviation tower of 86m or asphalt plant of 40m. The policy should recognise other tall structures.

21.2 Required Policy Change

- 21.2.1 The policy should not limit buildings over 30m to SAM4 and above. While the overall principal of developing tall buildings in highly sustainable locations is sound, the specific limit of 30m in SAM4 could be limiting in the Hillingdon context, where areas which are SAM3 may be suitable for taller buildings over 30m in some contexts.

22 GHR1 - Energy-efficiency

22.1 Ineffective Implementation

- 22.1.1 The Council strongly supports the objective of reducing energy demand and improving the environmental performance of new development. However, we have significant concerns regarding the proposed reliance on Energy Use Intensity (EUI) and Space Heating Demand (SHD) as planning policy requirements.
- 22.1.2 The draft policy fails to distinguish adequately between design-stage modelling metrics and real-world operational outcomes. While SHD and EUI may have value as design tools, they are not readily measurable or enforceable planning outcomes. SHD is fundamentally a modelled output derived from assumptions regarding building fabric, occupancy, weather conditions and operation. It is not a metric that can be directly measured or verified in normal residential occupation. EUI is capable of being measured, but the resulting figure reflects not only the design and construction of a building, but also the behaviour and circumstances of those occupying it.
- 22.1.3 In practice, operational energy consumption is influenced by factors that fall entirely outside the planning system. These include occupancy levels, home working patterns, thermostat settings, appliance ownership, age and health of occupants, and individual lifestyle choices. The policy therefore risks moving beyond the regulation of development and into the regulation of personal behaviour. This is neither an appropriate nor realistic role for the planning system.
- 22.1.4 The Council is also concerned that the policy provides no clear explanation of how compliance is to be monitored, interpreted or enforced. The draft London Plan appears to assume that operational energy data will be collected and reported for a number of years following occupation. However, it does not explain:
- Who is legally responsible for providing the data where properties are sold or ownership changes.
 - What action is expected where data is not submitted.
 - What action is expected where targets are missed.
 - How failures caused by occupant behaviour will be distinguished from failures arising from design or construction defects.
 - What planning consequences arise from non-compliance.
- 22.1.5 These omissions create significant uncertainty for local planning authorities, applicants and residents alike.

- 22.1.6 The practical challenges are particularly acute for residential development. Collection of meaningful EUI data for individual homes would require access to energy consumption information held by householders and energy suppliers. The Council is concerned that this raises questions regarding privacy, consent and data protection. It is unclear whether residents would be expected to provide personal energy consumption data and what mechanisms would exist if they declined to do so.
- 22.1.7 The policy therefore risks creating a regime in which local authorities are expected to monitor an outcome over which neither they nor the developer have effective control, using data that may not be accessible, and against targets that cannot be reliably attributed to the development itself.
- 22.1.8 The Council considers that EUI and SHD may have merit as design-stage benchmarking tools and as part of evidence gathering to improve industry understanding of operational performance. However, they are not suitable as policy tests against which development acceptability should be judged unless a robust, proportionate and legally enforceable monitoring and compliance framework is first established.
- 22.1.9 In its current form, the policy is unworkable in practice, unclear in operation and unenforceable through the planning system. The draft London Plan should either substantially revise the policy to focus on design-stage assessment only or provide a clear and comprehensive framework explaining how operational performance targets will be monitored, attributed, enforced and funded over the lifetime of the development.
- 22.1.10 Planning should regulate buildings, not the people who occupy them. The proposed policy risks judging the acceptability of development on the basis of future occupant behaviour rather than the quality of the development itself. Decisions about heating, home working, appliance use and energy consumption are matters of personal choice, not planning control. While encouraging lower carbon lifestyles is a legitimate public policy objective, it is not the role of the planning system to monitor, influence or enforce the day-to-day behaviour of individual residents. Such an approach would be intrusive, impractical and fundamentally at odds with the purpose of the planning system.

22.2 Alternative approach

- 22.2.1 The Council considers that the previous approach, which assessed the likely operational performance of buildings through energy assessments submitted at the planning stage, provided a more proportionate and workable mechanism for securing energy efficient development. It focused on matters that are capable of being influenced through the planning process, namely building design, fabric performance, energy systems and renewable energy provision. This approach allowed applicants and local planning authorities to assess and compare proposals on a consistent basis, while avoiding reliance

on factors that are outside the control of both the developer and the planning authority once a development is occupied.

23 GHR3 - Whole life-cycle carbon

23.1 Effectiveness and Deliverability

- 23.1.1 The Council does not support Policy GHR3 in its current form. The policy risks becoming a costly reporting exercise with little connection to real world outcomes. Applicants will be required to prepare increasingly complex carbon assessments, yet it remains unclear who will verify the assumptions, check what is ultimately built, or enforce compliance over the lifetime of development. Local planning authorities do not have the expertise, resources or powers to monitor construction supply chains, material specifications or procurement decisions. As a result, the policy is likely to generate more reports, more cost and more delay, without providing meaningful assurance that the claimed carbon savings are delivered.
- 23.1.2 This is a fundamental issue of effectiveness. A policy can only be effective if it can be implemented, monitored and enforced in practice. The draft London Plan does not demonstrate how boroughs will verify compliance, what resources will be available to do so, or what action can be taken where developments fail to achieve their predicted outcomes. Without a credible implementation and enforcement framework, the policy risks becoming a paper exercise rather than a mechanism for reducing emissions.

23.2 Impact on Regeneration and Brownfield Delivery

- 23.2.1 The policy also risks driving poor planning outcomes. A carbon assessment may indicate that an existing building should be retained, but that does not mean it is viable, occupiable or capable of meeting modern needs. Preventing redevelopment does not guarantee reuse. Instead, it may leave obsolete or underutilised sites stalled indefinitely.
- 23.2.2 More fundamentally, the policy risks constraining the redevelopment of brownfield land while doing little to reduce demand for new homes, jobs and infrastructure. Development pressure will not disappear because a carbon assessment recommends retaining a building. It will simply be displaced elsewhere, potentially onto less suitable or more environmentally sensitive sites.

23.3 The Limits of the Planning System

- 23.3.1 Policy GHR3 appears to ask local planning authorities to regulate the carbon impacts of the construction industry. This is neither a realistic nor appropriate role for the planning system. Planning authorities determine the acceptability of development, not the detailed sourcing, manufacture and specification of construction materials. Embodied carbon would be more effectively addressed through national building standards, product regulation and construction industry requirements than through planning assessments that local authorities cannot realistically verify or enforce.

23.4 Conclusion

- 23.4.1 As drafted, the policy is planning by spreadsheet. It requires excessive modelling but limited scope for enforceable deliverability, and unlikely to achieve the outcomes it seeks. The Plan has not demonstrated that the policy can be consistently implemented, monitored or enforced by London boroughs. This calls into question whether the policy is effective and therefore whether it satisfies the tests of soundness. A policy that cannot be reliably delivered in practice cannot be regarded as an effective component of the strategic development plan.

24 GHR8 – Accessible Green Space

24.1 Soundness Concerns

- 24.1.1 The Council does not support Policy GHR8 in its current form. The policy raises significant concerns in relation to the tests of justification and effectiveness. It introduces additional categories, assessment frameworks and contribution mechanisms without demonstrating that they are necessary, that existing policy tools are insufficient, or that the proposed approach will deliver materially better outcomes than the current framework.

24.2 Excessive Complexity and Additional Designations

- 24.2.1 GHR8 introduces yet another planning designation and measurement framework into an already crowded policy landscape. The Plan already contains Metropolitan Open Land, Green Belt, Sites of Importance for Nature Conservation, Areas of Deficiency, Urban Greening Factor requirements and Local Nature Recovery Strategy priorities. GHR8 adds a further layer of categorisation through Accessible Green Space classifications and deficiency area assessments without clearly demonstrating why existing policies are inadequate.
- 24.2.2 The result is a policy framework that is increasingly complex and difficult to navigate. Rather than providing a simpler and more effective approach to green infrastructure planning, GHR8 creates additional terminology, additional assessments and additional opportunities for dispute.

24.3 Lack of Clarity and Practical Application

- 24.3.1 The policy relies heavily on acronyms, technical terminology and accessibility metrics that are not intuitive to applicants, communities or decision makers. AGS, AoDs, LGIF, LNRS priorities and multiple accessibility measures create a policy that is difficult to understand without continual reference to supporting documents and guidance.
- 24.3.2 More fundamentally, it is unclear how the policy is intended to operate in practice. If a development falls within an Area of Deficiency, the policy does not clearly explain:
- What level of green space provision is required.
 - What level of financial contribution would be acceptable.
 - Which deficiencies should take priority.
 - How competing green infrastructure objectives should be balanced.

- 24.3.3 Instead, these matters are largely deferred to future local standards, future payment rates and other strategies. This creates uncertainty for applicants and local planning authorities alike.

24.4 Unclear Delivery Mechanisms

- 24.4.1 The requirement for boroughs to establish local quantity standards and payment rates is particularly problematic. While the policy requires local authorities to set contribution rates for offsite provision, it provides little guidance on how those rates should be calculated, how they relate to existing Section 106 and Community Infrastructure Levy mechanisms, or how consistency across London will be achieved.
- 24.4.2 A strategic policy should provide a clear framework for implementation. Simply requiring boroughs to develop their own approaches transfers responsibility for resolving key policy questions to local authorities and creates the potential for significant variation across London.

24.5 Duplication with Existing Policy Frameworks

- 24.5.1 There is also a significant risk of duplication. Urban Greening Factor policies already require developments to deliver greening outcomes, while Biodiversity Net Gain introduces a separate framework for ecological enhancement. Existing open space policies also seek to address deficiencies in provision.
- 24.5.2 GHR8 appears to establish a further mechanism intended to secure many of the same outcomes without clearly identifying the additional benefit it provides. The Plan does not adequately explain why existing mechanisms cannot achieve its objectives or why an additional layer of policy intervention is required.

24.6 Conclusion

- 24.6.1 GHR8 is not justified as the most appropriate strategy and is unlikely to operate effectively in practice. Rather than simplifying decision making and improving green infrastructure provision, the policy introduces additional complexity, terminology and uncertainty while leaving key implementation questions unresolved. The policy has not demonstrated that it will deliver better outcomes than the existing framework and therefore risks adding process and administrative burden without corresponding public benefit. As drafted, there are serious concerns as to whether the policy satisfies the tests of soundness.

25 GHR9 - Clean and Healthy Waterways

25.1 Soundness Concerns

- 25.1.1 The Council does not support Policy GHR9 in its current form. The policy raises significant concerns in relation to the tests of justification and effectiveness. It attempts to address a wide range of issues, including water quality, biodiversity, heritage, public realm, flood resilience, navigation, recreation and moorings, within a single policy framework. In doing so, it lacks a clear strategic focus, duplicates several existing policies and introduces additional requirements without demonstrating that they are necessary or will lead to better planning outcomes.

25.2 Lack of a Clear Strategic Objective

- 25.2.1 The policy lacks a clearly defined planning purpose. It seeks to improve water quality, enhance biodiversity, increase public access, protect heritage assets, support navigation, improve climate resilience, facilitate recreation and accommodate moorings. While each of these objectives may be desirable, the policy does not identify which objectives take precedence or how decision makers should balance competing priorities.
- 25.2.2 A strategic policy should provide clarity on the outcomes it seeks to achieve and the basis upon which planning decisions should be made. GHR9 instead combines multiple objectives into a single policy without establishing a clear framework for resolving conflicts between them.

25.3 Duplication and Policy Overlap

- 25.3.1 Much of the policy duplicates matters addressed elsewhere in the Plan. Water quality is addressed through drainage and water management policies. Biodiversity is addressed through ecological and nature recovery policies. Public realm and access are addressed through design and public realm policies. Green infrastructure is addressed through separate greening policies.
- 25.3.2 Rather than introducing a distinct strategic approach to waterways, GHR9 largely repackages existing policy objectives around a waterway setting. This creates overlap, increases complexity and makes it more difficult to understand which policy requirements add value beyond those already contained elsewhere in the Plan.

25.4 Excessive Complexity and Additional Requirements

- 25.4.1 The policy introduces a further layer of designations, strategies and technical requirements, including Clean and Healthy Waterways strategic locations, Thames Policy Areas, Joint Thames Strategies and Environmental Opportunity Areas. Applicants, boroughs and decision makers are required to

navigate an increasingly complex policy framework with no clear evidence that the additional designations will improve outcomes.

- 25.4.2 Similarly, the requirement for referable developments to undertake water quality assessments using the Simple Index Approach introduces a highly technical assessment process. The policy does not explain how the results should inform decision making, what level of performance is expected, or how compliance should be assessed. As a result, there is a risk that the assessment becomes another procedural requirement rather than a meaningful planning tool.

25.5 Failure to Provide a Decision-Making Framework

- 25.5.1 The policy repeatedly requires development proposals to improve water quality, enhance biodiversity, increase public access, protect heritage assets, provide maintenance corridors and facilitate moorings. However, it provides no hierarchy between these objectives and no guidance on how conflicts should be resolved.
- 25.5.2 In practice, conflicts are inevitable. Public access can adversely affect sensitive habitats. Moorings may conflict with ecological enhancement. Flood management infrastructure may affect heritage assets or views. A strategic policy should provide a framework for balancing these competing interests. GHR9 does not do so, leaving key decisions to be resolved on a case-by-case basis without clear policy direction.

25.6 Conclusion

- 25.6.1 GHR9 attempts to address too many issues within a single policy and consequently lacks a clear strategic focus. It duplicates existing policy requirements, introduces additional technical assessments and designations, and fails to establish a coherent framework for resolving competing objectives. Rather than simplifying decision making, the policy risks creating further complexity, uncertainty and administrative burden. As drafted, there are serious concerns as to whether the policy represents the most appropriate strategy or can be applied consistently and effectively in practice, calling into question its soundness.

26 GHR10 - Air Quality

26.1 Soundness Concerns

- 26.1.1 The Council supports the objective of improving air quality across London. However, Policy GHR10 raises concerns in relation to the tests of justification, effectiveness and consistency of application. The policy introduces ambiguity in key areas, creating uncertainty for applicants and local planning authorities while failing to establish a clear and consistent framework for securing air quality improvements.

26.2 Lack of Clarity and Consistency

- 26.2.1 The concept of "areas of concern" is insufficiently defined. While Air Quality Management Areas and the Air Quality Focus Areas provide established and clearly identifiable spatial designations, the policy allows boroughs to identify additional areas without setting out clear criteria or thresholds for designation.
- 26.2.2 This creates the potential for significant variation in how the policy is applied across London, with similar developments potentially subject to different requirements depending on local interpretation. A strategic policy should provide a consistent framework rather than leaving fundamental aspects of implementation to be determined at borough level.

26.3 Reliance on EIA Thresholds

- 26.3.1 The requirement for only Environmental Impact Assessment development to secure additional air quality improvements should be reconsidered. EIA is a procedural assessment regime, not a planning impact threshold, and whether development requires EIA often depends on screening decisions and individual circumstances.
- 26.3.2 As drafted, developments with comparable air quality impacts could be subject to different policy requirements solely because one has been screened into EIA and another has not. This risks arbitrary outcomes, inconsistent decision making and uncertainty for applicants and decision makers alike.

26.4 A More Effective Approach

- 26.4.1 A more effective approach would be to require major development within clearly defined air quality focus areas to demonstrate measurable air quality improvements. Such an approach would focus on environmental outcomes rather than procedural distinctions and would provide a more transparent and consistent basis for decision making.

26.5 Conclusion

- 26.5.1 As drafted, the policy lacks the clarity necessary for consistent implementation across London and relies on procedural thresholds that are not directly related to air quality impacts. The result is uncertainty over how the policy will operate in practice and whether it will achieve its stated objectives. This raises concerns as to whether the policy is justified and capable of effective implementation.

27 GHR11 - Cycle and Car Parking

27.1 Soundness Concerns

- 27.1.1 The Council supports the objective of promoting sustainable travel and reducing car dependency. However, Policy GHR11 is excessively detailed and prescriptive for a strategic planning policy. The policy contains extensive numerical standards, technical requirements and assessment methodologies more characteristic of development management guidance than a strategic development plan. This raises concerns as to whether the policy is justified, proportionate and capable of consistent implementation across London.

27.2 Excessive Prescription

- 27.2.1 The policy extends well beyond strategic direction into detailed matters including cycle parking standards, bay dimensions, parking assessment methodologies, station parking requirements, car club provision and highly detailed parking ratios.
- 27.2.2 Much of this material would be more appropriately contained within supporting guidance, where it could be updated in response to changing travel patterns, technology and evidence without requiring amendment to the London Plan itself. Embedding this level of detail within strategic policy creates unnecessary complexity and risks the Plan quickly becoming outdated.

27.3 A One-Size-Fits-All Approach

- 27.3.1 The policy applies a highly standardised London-wide approach despite substantial differences between central, inner and outer London. While the objective of reducing car dependency is supported, the policy does not sufficiently recognise that accessibility, travel behaviour, public transport provision and household characteristics vary significantly across the capital.
- 27.3.2 A strategic plan should establish clear principles while allowing flexibility to respond to local circumstances. The current approach risks imposing uniform standards where local conditions may justify a more nuanced response.

27.4 Complexity and Implementation

- 27.4.1 The reliance on the Sustainable Access Measure (SAM) introduces additional complexity into an already detailed policy framework. SAM becomes a key determinant of parking standards, yet it adds another technical assessment tool that applicants, communities and decision makers must understand and apply. The Council would question why, when there is existing certainty from both decision-makers and the wider industry on the application of PTAL to car parking standards, why a new disruptive methodology has been introduced.

- 27.4.2 When considered alongside the extensive parking formulas, standards and requirements elsewhere in the policy, this risks making implementation unnecessarily complicated and reducing transparency in decision making.

27.5 Conclusion

- 27.5.1 Policy GHR11 contains a level of technical detail that is disproportionate to the role of a strategic development plan. Rather than focusing on the key principles necessary to support sustainable transport objectives, it creates an extensive framework of standards, formulas and assessment requirements that would be more appropriately contained within supporting guidance. The cumulative effect is greater complexity, reduced flexibility and increased uncertainty, raising concerns as to whether the policy represents the most appropriate strategy and can be applied effectively and consistently across London.

28 GLE12 - Waste

28.1 Areas of Support

- 28.1.1 The West London Waste Plan (WLWP) is part of Hillingdon Council's adopted development plan and is, therefore, referred to in the response to draft policy GLE12, particularly in relation to the evidence base underpinning the draft policy.
- 28.1.2 Hillingdon Council support, in principle, the continued commitment to achieving net waste self-sufficiency, the streamlined approach to apportioning waste across London to ensure this is managed effectively and support for the transition towards a more resource-efficient and circular economy.
- 28.1.3 We also support the continued protection and safeguarding of existing waste sites, together with the scope for the plan led release of waste sites where justified. This is particularly important given the need to balance significant competing pressures for land across London and to ensure sufficient waste capacity to meet current and future waste needs.
- 28.1.4 We welcome the continued emphasis on cross-boundary working and consider that its effective implementation will require access to robust, up-to-date London-wide information on waste capacity and waste flows. In this regard, the proposed GLA waste capacity monitoring and reporting tool (Resource Futures' Work Package 4) would provide an important mechanism for maintaining a consistent evidence base, monitoring progress towards net self-sufficiency and identifying opportunities for capacity sharing across boroughs and sub-regional waste planning areas. For the waste capacity monitoring and reporting tool to be implemented effectively, policy GLE12 should be updated to require operators and/or landowners to monitor and report their waste capacity and flows annually. This would allow a more comprehensive understanding of waste capacity and flows in real time to help inform plans.

28.2 Methodology and Data Sources

- 28.2.1 We support the simplified apportionment methodology in principle. It is noted that work package 2 of the evidence base assesses borough performance against the current 2021 London Plan targets. Having reviewed the methodology undertaken, several limitations and concerns have been identified and clarification is sought including on the data sources used, inconsistencies around the use of the best available data across London, the omission of more recent data and planning activity, and unevidenced assumptions regarding the treatment of waste transfer sites.
- 28.2.2 In addition, aspects of the methodology and calculations are not sufficiently transparent to allow for a proper consideration of the evidence. It is unclear why the emerging West London Waste Plan, of which Hillingdon is a

participating borough, evidence base was not considered within the calculations. Nor, why, in line with National Planning Policy for Waste, alternative sources of the best available data are not considered appropriate to reflect waste capacity at sub-regional level in real-time. Any conclusions regarding capacity need and shortfalls in the West London Waste Plan area should utilise the most recent and locally relevant evidence, including that supporting the emerging West London Waste Plan.

28.3 Required Changes

- 28.3.1 We would ask that GLE12(D)(1) be redrafted to clarify that, where a site is identified for release in a development plan, it is the equivalent capacity of the site in question, rather than the site itself, which should be offered to assist boroughs who have not yet met their apportionment targets. This will provide useful clarity for plan-makers and allow for greater flexibility in implementation, thereby ensuring that the policy is effective. Further clarification would also be welcomed regarding the practical implementation of Policy GLE12(D)(1), including how surplus capacity should be identified, evidenced and shared between boroughs.
- 28.3.2 We object to the definition of a waste site at paragraph 4.100. This definition includes ‘a site whose primary activity is a waste-management operation that is authorised by the Environment Agency’. As drafted, a site which has an EA permit for a waste-management operation but does not benefit from a lawful planning use would be safeguarded, despite the fact that this site might not have been found acceptable in planning terms. This presents issues for the management of development through the planning system, as EA permits relate solely to the control of pollution rather than land-use considerations, resulting in complications to enforcement proceedings relating to unauthorised development where a lawful planning use has not been established.
- 28.3.3 It is also our understanding that EA permits are not ‘tied to the land’ but instead relate solely to the operator in question (i.e. a specific waste management company or individual). As such, where an EA permit is the sole qualifying criteria for site safeguarding, this status would have to fall away in the event that a permit is surrendered by that operator – something which would take place entirely beyond the purview of the waste planning authority. This could lead to potential issues with waste sites being ‘lost’ on an ad hoc basis should an operator move on or cease trading, despite the fact that the land in question could still perform the waste operation in question if a new operator were to move onto the site. The approach in paragraph 4.100 to the existing waste site definition is therefore considered to undermine the Plan’s safeguarding objectives and doesn’t allow for effective implementation of the policy. To be effective, and therefore sound, the policy should be framed to ensure that its operation is concerned only with matters which the planning authority can influence. The definition of a waste site should therefore be tied to planning status only.

- 28.3.4 Turning to compensatory capacity, we do not agree with the approach set out in paragraph 4.106 that 'If a site is not operational at the time that a planning application has been submitted, the maximum throughput over the five years preceding the closure should be used'. We are concerned that such an approach could incentivise developers to run down throughput in the 5 years ahead of closure, thus minimising the compensatory capacity that would need to be secured as part of a planning application. Instead, we consider the policy should require that the best available evidence and site specific considerations are used to deduce the maximum achievable throughput level for which compensatory capacity should be provided. This should consider the peak throughput in the 5 years preceding submission amongst other relevant factors.
- 28.3.5 We would welcome the opportunity to contribute to further discussions on the evidence and the effective implementation of the policy approach.

29 GLE13 - Aggregates and mineral resources

29.1 Apportionment target evidence

- 29.1.1 The London Local Aggregates Assessment (2024), refers to the London Plan housing target of 522,870 homes over 10 years. This does not align with the actual draft London Plan housing target of 558,000 new homes up to 2037 and therefore. Please clarify if this impacts the apportionment targets set in the plan.
- 29.1.2 The Local Aggregate Assessment (LAA) 2024 states that, supply is only just sufficient against the 2021 London Plan target of 0.7 Mtpa and that whilst it is currently meeting NPPF targets (2024), it will need to rely on other regions for supply in the near future (para 5.13). Since then, a new NPPF has been introduced and new London-wide housing, infrastructure and transport targets introduced. As such, it is not clear that current London or national targets can be met.

30 Errata Sheet

30.1 PV1 Brownfield First Opportunity Areas (BFOAs)

- 30.1.1 Please note that the Hayes BFOA is shown on Figure 4.1 but then is not listed as a BFOA in the corresponding list/legend below.