



**REF: MR/BH/R00021**

London Borough of Hillingdon  
Planning Department  
Civic Centre  
High Street  
Uxbridge  
UB8 1UW

8<sup>th</sup> May 2019

Dear Sir / Madam,

**HILLINGDON LOCAL PLAN PROPOSED MODIFICATION CONSULTATION  
REPRESENTATIONS ON BEHALF OF ELITE GROUP LTD**

I write on behalf of Elite Group Ltd, in respect of their interest in 3 Viveash Close, Hayes Hillingdon. This follows the representations made through the preparation of the Local Plan, including the last 'proposed changes' Regulation 19 consultation in December 2015 and the hearing statement which was submitted in respect to the Examination in Public (EIP) which took place in September 2018. This representation is made to the Local Plan Part 2 Development Management Policies Proposed Main Modifications Document March 2019. This includes the proposed modifications to the Local Plan which were presented to the Inspector prior to the Examination in Public (EIP) in September, and the proposed modifications in response to the Inspector's comments post the EIP.

These representations are submitted with respect to the site at 3 Viveash Close where planning permission was refused on 18th October 2018 for the "demolition of the existing building (Use Class B8) and the redevelopment of the site to include the erection of a part 8, part 10 storey building linked by podium level comprising 68 residential units (21 x 1 bedroom, 24 x 2 bedroom and 23 x 3 bedroom) (Use Class C3) and 1620 m2 commercial floorspace at ground, mezzanine and first floor levels (Use Class B1) with associated parking and landscaping". The refused application is now the subject of an appeal under ref. APP/R5510/W/18/3218824 and is due to be debated at a hearing on 25th June 2019.

The site at '3 Viveash Close forms part of a larger draft site allocation "SA5 Land to the south of the Railway, including Nestle" and is proposed to be de-designated as a strategic employment site. This draft site allocation is deemed to be an important strategic site for Hayes town and the wider borough. From the evidence reviewed to date we note that the Council has an understanding of the specific site, however, we have provided a site location plan at Appendix A which corresponds with this. Representations are made primarily to the draft site allocation SA 5 'land to the south of railway including Nestle' and set out in the following paragraphs.

**Relevant background to the site**

It is also important to note that "Site A" which forms part of the wider draft site allocation achieved planning consent on 4th July 2018 (LPA Ref: 1331/APP/2017/1883) for "Part demolition of existing factory buildings and associated structures, and redevelopment to provide 1,386 dwellings (Use Class



C3). office, retail, community and leisure uses (Use Class A1/A3/A4/B1/B8/D1/D2), 22,663sq.m (GEA) of commercial floorspace (Use Classes B1c/B2/B8 and Data Centre (sui generis)), amenity and playspace, landscaping, allotments, access, service yards, associated car parking and other engineering works". Site A has therefore come forward independently of both Site B and C.

In addition, On Site C a planning application has been with the Council for some time in relation to part of this land which is owned by Access (LPA Ref. 1699/APP/2017/2201) for "Demolition of existing building and redevelopment of the site to provide three basement levels for Class B8 (self-storage) and car parking, ground floor podium and five buildings above arranged over six, seven and ten floors for 7081sq.m of Class B8 (self-storage), 1,349 sq m of Class B1 (office), 115sq.m of Class A3 (cafe) and 164 Class C3 residential units; creation of a pedestrian walkway adjacent to the railway station; creation of a vehicular access and route from Nestles Avenue; provision of associated plant and landscaping". However, on 25th May 2018 the applicant withdrew the application. The remainder of the site is largely owned by Beccleugh who submitted an application for the "demolition of the existing buildings, site clearance and redevelopment to provide a mixed use scheme, including 457 residential units, 264 sqm (GEA) A1 retail use, 229 sqm (GEA) A3 cafe use and 2,273 sqm (GEA) B1 office, together with 237 car parking spaces and 1,070 cycle parking spaces, hard and soft landscaping, refuse and recycling facilities, and public and private amenity space". This was presented to planning committee on 4th April 2019 and received a resolution to grant consent subject to a S106.

## **Draft site allocation SA 5 'Land to the south of railway including Nestle**

### *Increase in housing delivery across the draft site allocation SA 5*

Prior to the EIP of the draft Local Plan modifications were made to the draft site allocation to increase the housing capacity from 707 dwellings to 1,800 across sites A, B and C. This subsequently increased the housing capacity of each of the parcels of land as follows:

1. Site A – from 500 – 1,000 dwellings;
2. Site B – from 97 – 300 dwellings; and
3. Site C -500 dwellings.

The increase in the dwellings numbers which was presented to the Inspector prior to the EIP is supported by Elite, specifically the increase in the number of dwellings which are required to be delivered across site B. This has policy amendment has had consideration to the New London Plan Draft Policy H1 which states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their development plans and planning decisions, especially the following sources of capacity, of importance is part "Sites with existing or planning public transport access level (PTALS) 3 – 6 or which are located within 800m of a Tube station, rail station or town centre boundary". The current appeal proposal will provide 68 units to support the delivery of the overall 300 dwellings at this site.

## **Comprehensive development and co-ordinated approach**

Specifically, the proposed modifications currently being consulted upon further emphasises the

importance of the draft site allocation to deliver housing and includes additional policy text which states “The three sites identified in this allocation form the most significant growth point within the Hayes Housing Zone. The Council is keen to ensure that complementary design principles are adopted and the resulting infrastructure requirements associated with planned levels of growth are fully assessed and integrated. In addition, proposals from individual landowners should, as far as possible, come forward in a coordinated manner without prejudicing the development aspirations on other parts of the site”. This additional supporting policy text is supported by Elite as it further emphasises the strategic importance of the site allocations and parcels of land in delivering homes to the area. Importantly, it acknowledges that the sites within the wider site allocation are under separate ownerships and states that the Council is keen to ensure that complementary design principles are adopted. As stated earlier, it should be considered that site A (Barratts and Segro) has achieved consent for redevelopment and part of site C has achieved consent (Beccleugh). Therefore, the Council are adopting a flexible approach to the sites coming forward independently and their design approaches provided they are co-ordinated and complementary in design terms.

Most importantly, the supporting policy text now states that “proposals from individual landowners should, as far as possible, come forward in a coordinated manner without prejudicing the development aspirations on other parts of the site”. This additional supporting policy text added through the proposed modifications states that proposals should come forward in a co-ordinated manner as far as possible. This acknowledges that the individual sites across the site allocation are in separate ownership and indicates that provided that best endeavours have been met that an overall co-ordinated approach will be supported. Although the specific policy wording for all sites (A,B and C) still includes “as a preference Sites A, B and C should form a comprehensive development scheme across the whole site”, the additional supporting policy text allows further flexibility to the approach to the development of the sites with the inclusion of “as far as possible, come forward in a co-ordinated manner without prejudicing development aspirations on other parts of the site”.

In respect of 3 Viveash Close, Elite have made the best endeavours to contact the adjacent land owners of Site B and the various land owners of Site B. It should be noted that the GLA also sought to bring forward a planning application for Site B by assembling the site owners to work together, but this was not possible due to the fragmented land ownership. Most recently, it is understood that the Council have looked at compulsory purchase order the land and have made further attempts to contact the landowners of parcel B with no response. The proposed development at the application site can therefore not be prejudiced by the ‘aspiration’ to bring forward comprehensive development across each of the sites and across the 3 sites, particularly within Site B as it is logistically not possible given the fragmented ownership. Furthermore, the proposals at this site have come forward in a co-ordinated manner without prejudicing development aspirations on other parts of the site.

This is additional supporting policy text is strongly supported by Elite as a co-ordinated approach has been taken to the development proposals at the site and measures have been incorporated within the design to ensure that the development of the rest of site B will not be prejudiced. Furthermore, it should be considered that part of Site B could be developed in isolation and not inhibit development coming forward across the rest of the site through appropriate design measures. This is demonstrated in the current appeal proposal (LPA Ref: 36678/APP/2017/1774), and includes walls with covered window openings on the north elevation; which would avoid any future issues with separation distances and

overlooking. Furthermore, the orientation of the blocks in terms of their heights limited overshadowing over the neighbouring site. A proposed site plan and elevations at Appendix B which illustrates this and confirms that the proposed development here would not inhibit development coming forward across the rest of Site B or Sites A and C, therefore meeting the new requirement of the supporting policy text.

Additional policy text has also been added to the site allocation which states that "Subject to the outcome of area specific studies, the Council may consider an approach to car parking which departs from the standards set out in this plan, if supported by relevant public transport improvements and other mitigating measures". This is strongly supported by Elite and recognises the site allocation's highly sustainable location next to Hayes and Harlington Station of which will benefit from Crossrail in the near future which will benefit the sites PTAL rate increasing it from 4 – 5 in 2021.

It should be noted that the application site is deliverable as defined within the NPPF as it is available now, offers a suitable location for development and is achievable. Housing can be delivered at this within the immediate future which further responds to the purpose of the GLA Housing Zone to accelerate housing delivery and seek to contribute towards Hillingdon's housing requirements. As detailed above, Elite are supportive of the amendments to the policy wording through the proposed modifications and the current appeal application has demonstrated that the site can be developed independently as part of Parcel B and measures included within the design will therefore not prejudice any future development coming forward within parcel B of the site allocation.

We trust that the above is helpful in the context of the proposed modifications consultation which is due to close on 8th May. It would be appreciated if you could confirm receipt of these representations in respect of Elite Group Ltd interest in Hillingdon. If you have any queries on the representations enclosed, please contact myself or Beth Hawkins [REDACTED]

Yours faithfully,



**Matthew Roe**  
Director  
ROK Planning

