
Main Matter 3 Site Allocations and Designations – New Homes

Participant Statement on behalf of London
Diocesan Fund

Revised Pre-submission Policy SA22: Chailey
Industrial Estate, Pump Lane

1. Hearing Statement

Are the housing land site allocations set out in the HLLP2 justified by appropriate available evidence, having regard to national guidance, and local context including the meeting the requirements of the HLPP1?

- 1.1. This hearing statement relates to land owned by the London Diocesan Fund, known as “Site B”, which now forms part of the mixed use allocation at Chailey Industrial Estate under revised pre-submission policy SA 22.
- 1.2. The Fund strongly support the Council’s current position to re-insert Site B as part of the mixed-use allocation.
- 1.3. Since the submission of the Fund’s planning representations in response to the Council’s Revised Proposed Pre-submission Plan (December 2015) (as attached at **Appendix A**), the Government have published a revised National Planning Policy Framework (NPPF) (July 2018) and the Mayor has issued his revised London Plan with a series of housing evidence to underpin it.
- 1.4. The adopted and revised NPPF continue to state the need for significantly boosting housing land supply.
- 1.5. The new London Plan is more focussed and ambitious than the plans that have gone before it and it will certainly have to be as the scale of the challenges facing London are unprecedented. The ten year housing targets set out in the new Plan require annual housing completions to reach 65,000 additional homes a year, a 53% increase over the target of 42,000 in the current Plan. Yet even this substantially increased figure falls well short of the 94,000 new homes that analysis carried out by Savills suggests would be required to address the affordability crisis facing London.
- 1.6. The new London Plan removes the density matrix that sought to optimise the use of land in the current Plan. Instead it seeks to optimise the use of land through a design led approach to determine capacity of sites with regard to context, connectivity and infrastructure capacity. The higher the density of the development the greater the level of scrutiny that is required of its design and particularly the qualitative aspects of design.
- 1.7. At a local level, the revised London Plan identifies Hillingdon with a total 10 year capacity of 15,530 new homes (annual target of 1,503 units per annum) which ranks them the third highest borough in terms of uplift in housing targets when set against the adopted targets in the adopted London Plan (2015–2025).

- 1.8. The GLA's recent London Housing Strategy (May 2018) indicating a critical need to identify more housing land to meet current and forecasted housing need and demand through "*intensive use of London's available land.*" Under policy 3.1 of this document it is stated that the Mayor will strongly promote appropriate development of new homes on brownfield land, in and around town centres at a high density in order to support Councils achieving their new housing delivery targets. At paragraph 3.15 it is stated that "*large brownfield sites represent a significant reservoir of land capacity with major opportunities for comprehensive masterplanning and redevelopment, and the potential for mixed use development that can contribute to housing delivery.*"
- 1.9. Importantly, policy 3.2 of the document (investment to support housing delivery) indicates that the Mayor will support maximising opportunities for new homes where major public transport infrastructure improvements are present.
- 1.10. The London Plan identifies Hayes as part of the wider Heathrow Opportunity Area. This area is identified by the London Plan as having capacity to provide a minimum of 9,000 new homes (and 12,000 additional jobs). The area will benefit from two planned Crossrail stations (Hayes and Harlington and West Drayton) which offers significant development opportunity in terms of regeneration now and for the future.
- 1.11. Hayes Town Centre is identified as a GLA Housing Zone with a requirement to achieve 2,788 new homes.
- 1.12. The site sits within the both the wider Heathrow Opportunity Area and the Hayes Town Centre Housing Zone identified for significant development growth.
- 1.13. Mixed-use regeneration at "Site B" would only consolidate current, consented and proposed regeneration schemes within the locality with the aim to positively transform the local area to meet existing and future housing and employment needs. The site adjoining Site B, Site A within the wider SA22 allocation, is proceeding with positive pre-application consultation establishing development principles in the local area and Site B will only go further to continue creating a high-quality mixed use place in fundamentally transforming this area through beneficial regeneration.
- 1.14. The site was included previously within the draft policy SA18 of the Site Allocations and Designations Proposed Pre-submission Version 2014. It was subsequently removed without substantive evidence to justify a removal within the Pre-submission Version (October 2015). The Fund subsequently acquired the site and strongly object to the exclusion of the site from the mixed-use allocation on the basis that "Site B" offers an ideal residential/retail mixed-use allocation opportunity.
- 1.15. Given the significant housing pressures across London and within the borough, it is considered the site offers a unique opportunity to identify further housing capacity which will greatly assist in meeting local housing needs and demands within the locality and the borough as a whole.

- 1.16. The Fund submitted as part of their 2015 representations initial design feasibility work to demonstrate that a residential scheme is workable with a retail component (whether that be a re-formatted Matalan store or wider retail use, subject to further discussions and exploration with Matalan). As landowner, the Fund are keen to bring the site forward for a high quality, mixed-use regeneration and will be working closely with the Council in moving positively forward with refreshed design options with a view to engage in pre application consultation on a preferred option.
- 1.17. The identification of “Site B” for housing and retail development will assist in the HLPP2 meeting housing growth objectives set out in the adopted and revised NPPF, adopted and revised London Plan and HLPP1.
- 1.18. On the assumption that the Inspector might need to identify a unit capacity figure for Site A it is proposed that the wording “at least 100 units” is inserted subject to a refreshed feasibility and benchmarking against the adjoining housing scheme at site A (in terms of proposed density, heights, layouts amongst other principal considerations).
- 1.19. On the above basis continuing to identify “Site B” within SA22 will ensure the policy is:
- Positively prepared
 - Justified
 - Consistent with the NPPF

Main Matter 5

Nature Conservation Sites

Proposed SINC Extension 11

Participant Statement on behalf of London
Diocesan Fund

1. Hearing Statement

- 1.1. This statement relates to land at West Ruislip Golf Course and Old Priory Meadows which has been proposed for an extended borough grade II Site of Importance for Nature Conservation (SINC) – SINC 11.
- 1.2. The objector, the landowner, London Diocesan Fund (LDF), owns land within this proposed extended designation. A red line plan is attached (at **Appendix A**) to this statement as part of the appended representations submitted on behalf of the LDF in June 2016. The critique of the Council's LUC study 2015 (cited at paragraph 1.8 below) which was undertaken by the LDF's ecologist CSA Environmental is also attached at **Appendix A** which formed part of the formal representations at the time.
- 1.3. Further investigations have since been undertaken by CSA which are incorporated within the statement below.
- 1.4. The revised National Planning Policy Framework (NPPF) identifies at paragraph 174 (b) that plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
- 1.5. The revised London Plan provides protection for Sites of Importance for Nature Conservation (SINC).
- 1.6. Sites of Metropolitan Importance include the best sites in London of nationally important wildlife sites and locally important places where Londoners can discover wildlife places within an urban setting. Sites of borough importance include woodlands, rivers, grasslands and some of the more mature parks which have ancient trees and meadows. There are almost 800 of these sites identified to date, with a total area of about 12,000 hectares (almost 8% of London's land area). Comparatively therefore they are in plentiful supply and varied in ecological value. There are also sites of local importance with local intrinsic nature conservation value.
- 1.7. In the recent review of the Mayor's new London Plan the LUC undertook a study to consider sites for upgrade to Metropolitan Importance and borough I Importance and this site was not included.
- 1.8. As indicated within the earlier representations, the Council undertook a review of new and

extended SINC which is contained in a study prepared by LUC in October 2015 entitled “*London Borough of Hillingdon: Review of Proposed New and Extended SINC*” (Examination Document EB005). The findings of this study largely reflect the recommendations set out in the earlier GLA’s 2005 study undertaken by the London Ecology Unit at the time.

- 1.9. As cited at paragraph 2.8 of CSA’s June 2016 report, the 2005 GLA study indicated that: “*the section of the river to the north has been dredged in the past and is relatively species-poor... the southern section of the river, beside the golf course, is a rich wetland habitat [not part of the LDF site] enhanced by adjacent wet grassland and a drainage ditch.” The report goes on to describe this wetland habitat of principle ecological value.*
- 1.10. The Council’s own 2015 assessment essentially carried through the 2005 GLA’s recommendations stating that “*the site provides a diverse habitat mosaic comprising the river and associated wetland habitats... the site is also important in terms of providing habitat connectivity along the River Pinn.”*
- 1.11. The LUC report indicates that because of the public footpath that exists to the north of the site, this “*provides access to nature and a countryside feel*.” There is no reference to the fact that public access is necessary for safeguarding or maintaining the ecological value of this part of the site. The footpath does not contribute towards the key, wider objective which is to connect existing and proposed SINC along the River Pinn Corridor given the significant ecological value of the River Pinn’s wetland habitats and species.
- 1.12. It is therefore clear from both studies that the key functional role of the SINC is the protection and enhancement of the wetland habitats along the River Pinn with its principle purpose providing a habitat connectivity along this river corridor. This is also evident from the Council’s proposed SINC4 and SINC16 sites connecting to the existing SINC designations along the river corridor. This is the principle purpose of the SINC; extending the site northwards to include the LDF’s land which does not serve or contribute to this purpose.
- 1.13. CSA have undertaken further investigations since the 2016 representations to include a walkover survey on 19th July 2018. The survey results were comparable to the previous survey results undertaken at the time of their original report (June 2016), and are summarised below (full survey results attached to **Appendix B**).
1. Grassland within the “Meadow” and “Narrow Fields” (as identified at on the plan at Appendix A of the CSA 2016 report) typically comprise “dry” species-poor semi-improved grassland. These habitats do not comprise “associated wetland habitats” and

therefore arguably do not contribute to the key stated aims of providing habitat connectivity along the River Pinn.

2. The extreme southern extent of the LDF site does show some influence from the adjacent River Pinn, with dry meadow transitioning into wet woodland, scrub and tall herb communities. These habitats measuring approximately 20 metres width along the riparian corridor contribute somewhat to the “*diverse habitat mosaic comprising the river and associated wetland habitats.*” This 20 metre buffer zone is identified within the LDF site boundary and identified on the proposed plan illustrating the changes to the SINC boundary (at **Appendix C**).
3. The off-site wetland habitat south of the River Pinn adjacent to the golf course (outside the LDF red line boundary) includes trees, tall herb, wet grassland and scrub communities showing clear affinity with the riparian corridor which contributes to its overall ecological importance. Again this area is included within the proposed SINC boundary area as attached to **Appendix C**.

- 1.14. It is CSA’s view therefore that by amending the proposed SINC boundary to remove the majority of the land from the LDF site, save a 20 metres buffer zone from the river, and to include the southern area of land adjacent to the golf course - the areas of highest ecological importance will be protected, namely the River Pinn and its associated wetland habitat.

Recommendations

- 1.15. On the above basis the proposed SINC 11 Extension is found unsound due to being:
- Not positively prepared
 - Unjustified
 - Not consistent with the NPPF
- 1.16. We therefore recommend that the map (at page 200) of the Revised Proposed Submission Version (October 2015) should be amended to include the ecologically important wetland area along the River Pinn Corridor to include the 20 metre buffer within the LDF site.
- 1.17. The proposed boundaries of SINC 11 is found at **Appendix C**. The text at page 200 of the draft plan should also cite a revised site area for the SINC Extension 11 at 2.3 hectares.