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Your Ref

Representor 109

Local Plan Programme Officer,
C/O Planning Policy Team,
Hillingdon Council,
Civic Centre,
High Street,
Uxbridge UB8 1UW

26th July 2018

Dear Inspector

HILLINGDON LOCAL PLAN PART II – LOCAL PLAN EXAMINATION

CBRE Ltd acts as planning agent to A2Dominion in respect of their interest at Fairview Business Centre (Site Allocation SA4) (the site). The Inspector and Council will be aware of previous representations (Reference 109) made in respect of the site in October 2015 on behalf of CBRE Global Investors, the previous owners of the site.

Our previous representations have been addressed in part but further work is required to ensure that the plan is sound. We support the overall approach of Hillingdon in identifying the release of the site from the current employment designation and the proposal to allocate the site for residential led-mixed use development. Our response is focused upon the four tests of soundness as set out in the NPPF and principally relates to draft Policy SA4. Within this response we include proposed Main Modifications in **Green** which, if incorporated, will resolve the issues of soundness identified.

We have included below our suggested revision to the policy wording along with the justification for each recommended change.

Policy SA4 (MM3)

The Council will support proposals for residential development that contribute to the regeneration of Hayes Town Centre and meet the following criteria:

1. *The provision of residential development ~~up to~~ of at least 320 ~~260~~ units.*
2. *Small scale commercial uses at ground floor level that support residential uses will be considered suitable.*
3. *Proposals should complement and be consistent with any proposed development on the adjacent Crown Trading site. **In the event that development on the adjacent site is not forthcoming, the development proposal should demonstrate how it does not preclude development coming forward on the Crown Trading Estate.***
4. *The Council will expect all development proposals to provide canal side access, improvements, and canalside activity to contribute to the enhancement of the Strategic Canal and River Corridors, in accordance with relevant policies on the Blue-Ribbon network.*
5. *The proposals should include active frontages along Clayton Road.*

6. The provision of appropriate new public open space in accordance with Council standards.

Justification for Amendments to Policy SA4

At Least 320 Units

- **Justified** – the Council evidence the provision of up-to 260 units with reference to the London Plan Density Matrix, no site-specific analysis has informed the up-to 260 figure. As the GLA note, the London Plan Density Matrix is a crude assessment tool and cannot account for the characteristics of individual sites. In this regard it would be unjustified for the policy to establish a ceiling figure to the allocation which is untested.

Indicative massing studies undertaken for A2Dominion have indicated the potential for over 350 units at 7 – 8 storeys as part of a mixed use residential led-development.

Hillingdon note that 260 units on-site is at the lower end of the urban band for the density PTAL matrix. 260 units on site (152 units/ha) represents the lower end of the GLA's Density Matrix which for urban sites with a PTAL of between 4 – 6 extends up to 260 units per hectare. A scheme of 380 units would site within this at 222 units/ha.

At the very least the policy should incorporate a range or an 'at least' approach to the housing figure of 320 units (188 units/ha). Such an approach would be justified in the context of the site's Housing Zone context and would acknowledge the anticipated PTAL improvements in the area following the opening of the CrossRail Station at Hayes.

With the suggested modifications the policy is justified.

- **Effective** – the focus of the plan is correct in looking at options to deliver the Local Plan Part I housing figure of 559 dwellings per annum. However, as set out in the Draft London Plan, the housing figure proposed is triple the current provision to 1,553. Whilst it would be inappropriate for the Hillingdon Local Plan to adopt this Draft London Plan target, in delivering an effective plan, the wording of the site allocations should ensure the necessary flexibility is included to account for a potential requirement to deliver an increase in the current housing target in the near future rather than be forced into an early review of the plan.

With a particular focus on Hayes, this is markedly the case with respect to the planned opening of the Crossrail Station which will change the dynamic of the area and is likely to be a key spatial focus for housing delivery in the years to come.

- **Consistency with the NPPF** – Paragraph 15 of the NPPF states that all plans should include clear policies that will guide how the presumption in favour of sustainable development is applied locally. As drafted, the 'up-to 260 units' is at odds with the Minor Modification at Paragraph 3.6 which states that the final number of units appropriate on-site allocations will be determined through the development management process. The two policies create uncertainty for the Plan's intentions for the site and it is suggested that it is revised accordingly to reflect the principle that the development management process will be used to inform the final figure.

In addition, with the NPPF requiring LPAs to '*significantly boost the supply of housing*' the cap created by an 'up to' figure is also inconsistent with this aim.

With the suggested modifications the policy is consistent with the NPPF.

Collaboration with Crown Trading Estate

- **Consistency with the NPPF** – whilst A2Dominion support the principle of a joined-up solution for the two sites, it is important that this does not create an unnecessary burden to delivery. In the context of the

requirement to ‘significantly boost the supply of housing’ (Paragraph 47) and a need to ensure that ‘plans have sufficient flexibility to respond to rapid change’ (Paragraph 14) the suggested amendments to the policy will ensure consistency with the NPPF.

As drafted, the policy is unclear as to how Site Allocation SA4 would progress in the event that development on the Crown Trading Estate was not forthcoming. Whilst we have no reason to suggest that this would be the case, it is important that the policy allows for appropriate flexibility and pragmatism for this scenario to ensure that proposals on SA4 could proceed.

Policy DMHB17 - Residential Density (MM9)

All new residential development should take account of the Residential Density Matrix contained in Table 5.3. Where appropriate in design terms, opportunities for higher density development near major transport nodes and in Housing Zones should be considered. Developments will be expected to meet habitable room standards.

Justification for Amendments to Policy DMHB17

Transport Nodes and Housing Zones

- **Consistency with the NPPF** – Paragraph 30 of the NPPF states that local plans should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable transport modes. Policy DMHB17 plays a key role in dictating the pattern of development for the Borough. The omission of reference to sites outside of designated centres but with high PTAL ratings is not consistent with the NPPF.

In respect of SA4, the site is located outside of the Hayes Town Centre Boundary and would fall under the category of Residential Area within 800m of a Town Centre. This category is considered to be misleading and underestimates the role of the site in delivering sustainable transport objectives (given the distance (circa. 320m / 5 minute walk) to Hayes and Harlington Railway Station).

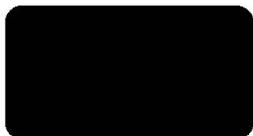
With the amendment proposed above the policy can be considered as consistent with the NPPF.

- **Effective** - The proposed amendment to the plan at Page 9 notes that ‘the Hayes Housing Zone is expected to deliver a significant proportion of Hillingdon’s Housing Requirement.’ In delivering an effective policy it is appropriate to include an indicative density figure for the Hayes Housing Zone that will result in an effective policy for the target to be met. At present, the density guidance is confined to the town centre area, a smaller area than the Housing Zone.

With the amendment proposed above the policy can be considered as effective in delivering Hillingdon’s Housing Target.

We endorse the proactive approach of Hillingdon to-date in identifying and realising the potential for the site. With the amendments to proposed Policy SA4 and DMHB17 we believe that the Hillingdon Local Plan Part II can be found sound.

Yours faithfully



MATT GORE
DIRECTOR (PLANNING)