

Our Ref: R00021

26th July 2018

By email and post: programmeofficer@hillingdon.gov.uk

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

Dear Mr Bridgewater,

**HILLINGDON LOCAL PLAN PART 2 EXAMINATION
WRITTEN HEARING STATEMENT 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 and the last 'proposed changes' Regulation 19 consultation in December 2015.

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 Inspector has an understanding of the site, however, we have provided a site location plan at **Appendix A** which corresponds with this. This statement provides an update to the representations made by CgMs on behalf of the Elite Group dated 8th December 2015 and relates to the following main matters:

- Main Matter 3 – Site Allocations and Designations – New Homes
- Main Matter 9 – Development Management Policies Chapter 4: New Homes

Relevant Background Information on Site

Following the previous consultation in December 2015, General Food Trading Co c/o the Elite Group submitted a planning application for part of Site B of the wider draft site allocation. The planning application was submitted on 18th May 2017 for "demolition of the existing buildings and redevelopment of site with comprising; a part 7 and part 9 storey building with podium level providing 68 residential units on upper floors and 1670 m2 commercial floorspace at ground, mezzanine and first floor levels along with associated car parking, cycle parking and landscaping" (LPA Ref 36678/APP/2017/1774). At present, the application has not been determined by Hillingdon Council, but they have confirmed that they intend to refuse it despite support from the GLA.

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.

On Site C a planning application has been with the Council for sometime 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), 1349sq.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. We have been in regular contact. Our understanding is that the Council are supportive of the development of Site C being brought forward in two separate planning applications.

Main Matter 3 – Site Allocations and Designations – New Homes

We submitted our initial representations to the Council on 4th November 2014 and further representations were made on 15th December 2015. We supported the inclusion of the site within the draft Local Plan throughout the consultation process, however, have the following key points to reinforce with regards to the draft policy and the implications that it has for the delivery of housing at this particular site.

Provision of 97 Units on Site B

We strongly object to the inclusion of ‘the provision of 97 unit’ within the draft site allocation as this restricts the number of residential dwellings on the site.

The New London Plan Draft Policy H1 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.

At paragraph 4.11 it states that the Mayor has undertaken a London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified a need for 66,000 additional homes per year across London. In Hillingdon the 10 year target for target net completions equates to 15,530 dwellings with an annualised average of 1,553 dwellings. These targets are minimums and Local Authorities should seek to exceed these.

This draft Development Management Policy refers to the PTAL rating which is currently set at 4; however, this is due to increase to 5 before 2021 due to Crossrail Station opening.

We therefore consider this number to be restrictive as a higher density scheme is appropriate in this location given the proximity to Crossrail, which will support 10 trains an hour at peak times. The density matrix as set out in the emerging Development Management Document is therefore not relevant to this site. Further, as the site is located adjacent to one of the entrances to a Cross Rail Train Station it is in an optimum location for a tall building of higher density. Further, the site benefits from overlooking a railway line instead of buildings thus reducing the issue of overlooking or potential daylight/sunlight concerns.

We do not believe there is evidence to support this restriction as included within the draft site allocation and this will hinder the Council’s ability in achieving to meet their housing requirement of 6,375 dwellings for the plan period as included within the draft Local Plan Part 2. As set out above, the London Plan has set target housing completions which exceed Hillingdon’s base housing requirement for the plan period and the Council should seek to meet and exceed these.

The Council have failed to recognise that Site B could in fact deliver more housing at a higher density. Taking this justification into account we suggest the current policy wording is amended from:

“The provision of up to 97 residential units on Site B and 110 residential units on Site C. Proposals should be consistent with the PTAL rating and take account of lower suburban densities to the south.”

To the following:

“The provision of residential units on sites B and C should be flexible to respond to the site’s individual characteristics and emerging public transport improvements.”

This would ensure a flexible approach having regard to national guidance, local context and include meeting the requirements of the Local Plan Part 1.

Comprehensive Development

Comprehensive Development across Site B

This section of the draft site allocation policy reads, ‘as a preference sites A, B and C should form a comprehensive development scheme’. We pointed out in our original representations submitted in November 2014 that although this may be an ideal scenario for the Council, the land which forms part of the designation is in fragmented ownership and now site A has come forward independently and achieved consent for 1,386 homes.

We do not believe that this wording should be included as it has the ability to preclude development coming forward on individual parcels of land of Site B and C. This will ultimately prevents the Council delivering housing on sites B and C if it takes this policy approach as landownership, particularly on Site B is fragmented. As set out above, the Council have granted consent at Site A for the development and therefore it is evident that the Council are supporting piecemeal development across the sites. Indeed a similar approach is being adopted on Site C as this is being brought forward in two planning applications.

It should be noted by the Inspector that throughout the evolution of the proposals and determination of the application, we have attempted to engage with both the adjacent landowners specifically within this Site B to bring forward comprehensive development across the site alongside landowners of Sites A and C. We have written to a number of the landowners and occupiers of Site B on; 16th May 1st June, 8th September 2016 and 8th December 2017 to explain our aspirations to develop 3 Viveash Close and requested to meet with them to discuss their development aspirations, offering the opportunity to work collaboratively to bring forward comprehensive development.

On behalf of the applicant, we 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 CPO’ing 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.

Design Measures

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 was demonstrated in the application at the site (LPA Ref: 36678/APP/2017/1774). This was through the inclusion

of flank wall 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. We have enclosed the 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.

Deliverability

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, the site can be developed independently as part of Parcel B due to measures included within the design and will therefore not prejudice any future development coming forward within this parcel B of the site allocation.

Suggested Amendments to Policy "SA5 Land to the south of the Railway, including Nestle"

As such, we recommend that the following wording 'as a preference sites A, B and C should form a comprehensive development scheme' is removed from the draft site allocation as it has the ability to preclude housing delivery on Sites B and C. This would ensure that housing can be delivered and seek to achieve to meet the housing requirement of 6,375 dwellings per annum as set out in the draft Local Plan Part 2.

We trust that the above is helpful in the context of the EiP. It would be appreciated if you could confirm receipt of this Hearing Statement in respect of Elite's site at 3 Viveash Close, Hillingdon. If you have any queries on the comments enclosed please contact myself or Beth Hawkins.

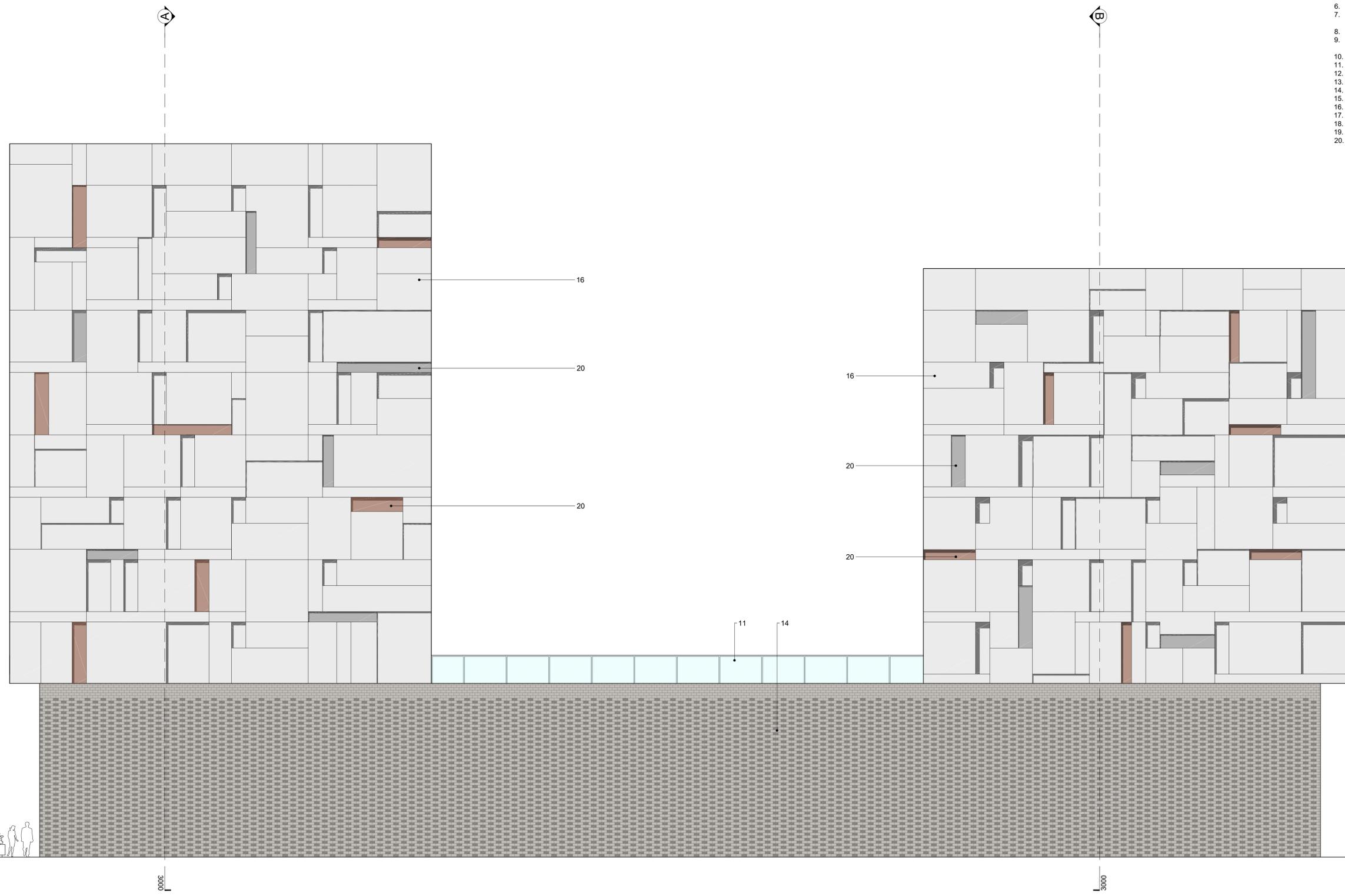
Yours sincerely,

[REDACTED]

MATTHEW ROE
Director

DRAWING KEY:

1. Brick 1 Glazed brick
2. Brick 2 Medium dark facing brick
3. Aluminium window frames with dark grey PPC finish
4. Fair-faced concrete
5. Steel square-bar balustrade with dark grey PPC finish
6. Aluminium curtain wall with dark grey PPC finish
7. Winter gardens with full height openable panels in front of balustrade
8. Bi-fold gates to car park
9. Raised planter and railing serving units facing onto residents garden
10. Concrete canopy
11. Glass balustrade
12. Concrete columns
13. Louvre door
14. Feature pattern brickwork
15. Glazed entrance door to communal cores
16. Light concrete panels, recessed at various depths
17. Concrete band
18. Signage
19. Rendered division panel with white finish
20. Feature metal wall panel, metallic finish



notes
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drawing notes
 Colours are indicative only & subject to variation depending on printing processes and screen settings



REV | BY | CHKD | DATE | AMENDMENT DETAILS

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project
3 Viveash Close, Hayes

client
General Food Trading Inc.

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drawing title
**Elevations
 Proposed South Elevation**

PLANNING

scale 1:100@A1 drawn by KCR checked by JM date 17/01/2018

DRAWING NUMBER project status revision
897 | P | 2103 A



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KEY
 — Site boundary



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project
3 Viveash Close, Hayes

client
General Food Trading Inc.



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drawing title
Location Plan

PLANNING

scale 1:1250@A1	drawn by DG	checked by JM	date 12/04/2017
DRAWING NUMBER 897	project P	status 0001	revision