

Local Plan Programme Officer
LB Hillingdon Local Plan Part 2 Examination

Via Email: programmeofficer@hillingdon.gov.uk

27 July 2018

Dear Sir/Madam,

**Re: LB Hillingdon Local plan Part 2 Examination
Policy SA22: Chailey Industrial Estate, Pump Lane**

Fairview New Homes (FNH) welcome the opportunity as the new land owner of Chailey Industrial Estate, Pump Lane, Hayes ('the Site') to build upon previous representations made by Royal London (CIS) Ltd regarding the emerging Local Plan Part 2.

FNH acquired 'the Site' on an unconditional purchase in March 2018 and we are committed to delivering the comprehensive redevelopment of 'the Site' to provide a significant number of new market and affordable homes as well as supporting ground floor commercial uses. The emerging proposals directly accord with the proposed site allocation and are being progressed through extensive consultation with Hillingdon Planning Officer's under the umbrella of a jointly agreed Planning Performance Agreement (PPA) with an anticipated planning submission date in November 2018. This was preceded by extensive pre-acquisition discussions in which the principle of residential-led development at 'the Site' was confirmed and strongly supported by both Hillingdon and the GLA in line with the emerging site allocation.

Building upon representations made by Royal London (CIS) Ltd 'the Site' is in urgent need of regeneration, as has been recognised by London Borough of Hillingdon (LBH). At present the site is largely vacant with the existing industrial and warehouse units being in poor conditions and not fit for purpose. This is compounded by the poor access arrangements and better quality alternative provisions that exist nearby – which all constrain demand. In support of releasing the site we specifically highlight the following:

- CoStar, a well-trusted online property database, provides a Building Rating for the building's quality relative to other buildings of the same type throughout the country. All properties in the estate have been given 1 or 2-star ratings (where 1 star is for the poorest quality property and 5 stars is for the best quality property). Other databases will also be referenced.
- The access and egress arrangements are poor, limiting the ability to operate the HGV movements that the uses demand.
- Historically units have not achieved acceptable market rates for the area with many of the occupied units achieving rents that are approximately 50% lower than that have been achieved on other units on Pump Lane.

- A review of existing employment land within the Borough, particularly The Hillingdon employment Land Study Update (2014) (Council's latest development evidence base document on topic of employment land) notes that there was approximately 383.9ha of active industrial land in LBH. The study's demand forecast projected a decrease in demand for industrial land of between 20.6ha and 16.3ha between 2013 and 2016 due to the forecasted decrease in industrial employment.
- According to CoStar, there are currently 150 units for let in 67 properties. This results in approximately 1,852,843sqft (172,134sqm) of industrial floorspace available to let in LBH. A large amount of these available properties are located in proximity to the subject site within the Hayes/West Drayton Corridor. Out of the 67 properties within which spaces are available for let in Hillingdon, 4 of them have a 5 star rating, 10 have a 4 star rating and 35 have a 3 star rating. Therefore, 49 of the 67 properties within which spaces are available for let would be considered to be higher quality buildings when compared the buildings at 'the Site'. This leaves the buildings on the 'the Site' at a strong disadvantage in terms of ability to let.
- Reviewing lease take up within the past 3 years, it is clear that a large number of properties remained on the market vacant for extended periods of time. The units within the 'the Site' have experienced similarly long periods of vacancy due to their poor quality.

The above then needs to be considered in the context of Hillingdon's 5 year housing land supply and the Boroughs current and future pressing need for housing delivery. The Hillingdon '5 year supply of deliverable housing sites' report (March 2015) sets out that the Borough has capacity to deliver 153% of the minimum 5 year supply target between 2015-2020. The Draft London Plan Consultation Document (2017) sets an annual target of 1,553 units for Hillingdon, this is a 261% increase when compared to the London Plan (2011) target of 595 units per annum. While LBH have historically been able to demonstrate an adequate housing land supply these proposed targets places increased pressure to bring forward residential development and we fully support the release of the site which will provide a significant opportunity to deliver strategic objectives including the Mayors identified need to deliver new market and affordable homes.

Overall, we strongly support the release of 'the Site' and are generally supportive of revised policy wording as outlined within Council's Statement of Proposed Modifications. We would, however, take this opportunity to highlight the following:

Proposed Housing Numbers and Density Guidance

The Local Plan should outline that prescribed housing numbers and density ranges are minimum targets and look to encourage site optimisation which may result in higher densities subject to detailed design and local context. This point is reinforced in the draft London Plan which seeks a design-led approach to determining site capacities as opposed to the prescriptive density matrix and associated thresholds. This represents a clear directive from the Mayor that achievable densities should be determined on the combined basis of good design quality reflecting the site's characteristics and context.

We refer to Draft London Plan Policy D6 which seeks development proposals to make the most efficient use of land and optimise density. Supporting text to Draft Policy D6 states at paragraph 3.6.1:

“For London to accommodate growth in an inclusive and responsible way every new development needs to make the most efficient use of land. This will mean developing at densities above those of the surrounding area on most sites.”

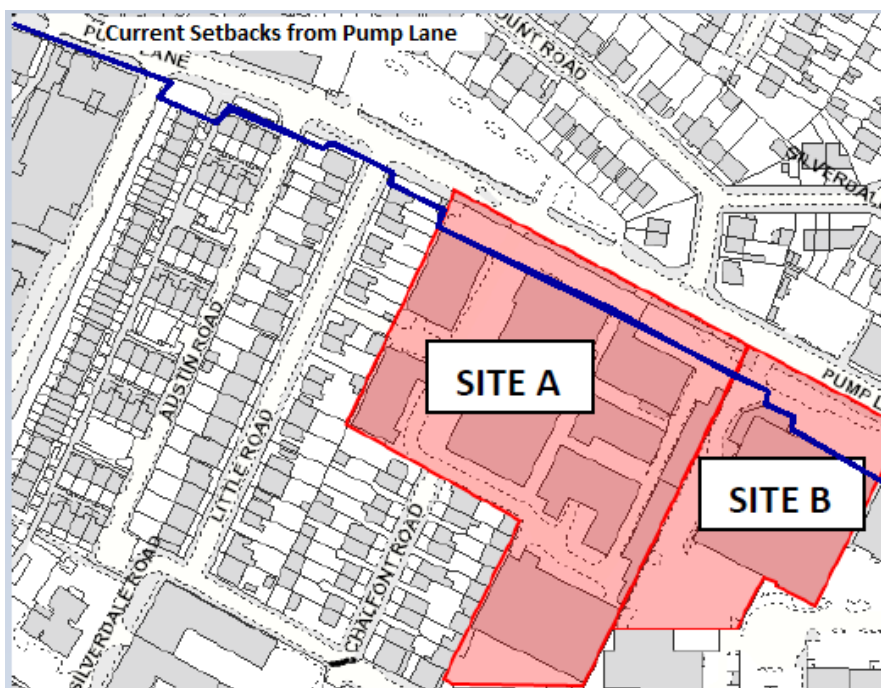
Optimisation of housing delivery should be a key Local Plan Policy objective in accordance with the draft London Plan and we suggest that reference to development densities and unit numbers should be seen as minimum / flexible targets in favour of a design-led process.

Development Principles

We have concerns with the inclusion of the following development principle:

‘Development proposals should maintain the current setback from Pump Lane, to allow for the introduction of potential public transport improvements’

Whilst we are sympathetic to Council’s aspirations for potential public transport improvements along Pump Lane maintaining current setbacks is onerous and would significantly impact on the developable area of ‘the Site’. The issue is further complicated given the varying setbacks which currently exist along Pump Lane. Particularly, residential properties to the west which are all in various ownership are set closer to Pump Lane, while the adjoining Matalan site (also included in the proposed site allocation) is set further back (refer to figure 1 below). Accordingly, the generic development principle would not result in a uniformed setback along Pump Lane enabling proposed improvements to be achieved. Ultimately, the requirement needs to be considered in the context of optimising the site for housing delivery versus any real benefit that could be achieved. Alternatively, we suggest setbacks should be spawned from a design led solution and developed in consultation with Officer’s at LBH.



We trust these representations will be given due consideration in the EIP and would welcome further discussions with Officers or in front of the Inspector.

Yours faithfully,



David Chalmers
Principal Planner
Fairview New Homes