



HILLINGDON

LONDON

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c/o Judith Dickson/Manisha Pabari
Programme Officers
London Borough of Hillingdon
Civic Centre
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31st August 2018

Dear Mr Bridgewater

LONDON BOROUGH OF HILLINGDON'S LOCAL PLAN PART 2

I write further to the correspondence from the Greater London Authority (GLA) dated 17th August 2018, regarding Hillingdon's Local Plan Part 2. This notes that the proposed release of industrial land exceeds the figures set out in the Council's Employment Land Study and the Mayor of London's Industrial Land and Transport Supplementary Planning Guidance document.

The Council is somewhat exasperated with the approach taken on this matter, both in terms of the timing and nature of the issues raised. As discussed at the hearings, the Crown Trading, Matalan and other sites referred to in the letter are included in the infrastructure study for the Hayes Housing Zone, known as the DIFS. This study was approved and funded by the GLA. The sites also appear in the Mayor of London's own SHLAA 2017. The quantum of employment land release has been discussed with the GLA as part of the production of these documents and the Hayes Housing Zone on numerous occasions.

The letter from the GLA dated 27th July, which was submitted as an additional representation states that *'In his conformity letter issued in 2015, the Mayor accepted the release of a significant amount (75.31 hectares) of industrial land, including 27.59 hectares at Hayes'*. It goes on to state that *'...the Mayor considers that the release of an additional 2.6 hectares of SIL through the new Major Modifications not to be in conformity with the London Plan'*.

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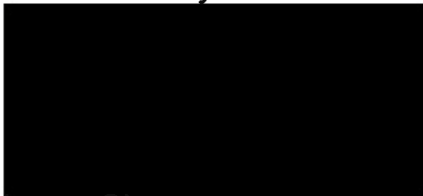
**London Borough of Hillingdon,
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The attached corrections to the Mayor's figures demonstrate that the Council is actually proposing to release 46.13 ha (gross) and 30.63 ha (net figure allowing for proposed new industrial floorspace). Given that the GLA's figures are incorrect and the amount of industrial land release is significantly below the amount that has already been accepted by the Mayor, the statement of non conformity should be withdrawn without condition.

The proposed changes to the policy relating to the Crown Trading site are simply not necessary to address issues of conformity or soundness. The site is located in the Hayes Housing Zone and the Council considers it entirely appropriate that the policy should refer to residential-led mixed use development. The Mayor is aware of the discussions that have taken place with the owners of these sites to bring them forward and to develop a mutually acceptable policy position. Again, the Council is at a loss to understand why a significant objection has been received at such a late stage in the process.

I hope this letter is useful in clarifying the Council's position on this matter. Should you have any further queries, please do not hesitate to contact my colleague Tom Campbell via the Programme Officers.

Yours sincerely



James Gleave
Planning Policy Manager

London Borough of Hillingdon
Calculations & Corrections
In Relation to the Further Written Statement
Submitted by
58-03-FWS Mayor of London

1. Summary

1.1 The following statement has been prepared in response to the Mayor of London's further written statement on Hillingdon's Local Plan Part 2, which was submitted to the Council on 27th July 2018. This statement concluded that the Local Plan was no longer in general conformity with the London Plan due to the proposed release of further sites which are designated as Industrial Business Areas.

1.2 The Council is disappointed that a statement of non-conformity has been submitted at such a late stage in the process and disagrees with the Mayor's conclusions regarding the amount of land to be released for the following reasons:

Inaccuracies within Annex 1 - the further written submission contains inaccuracies which misrepresent the proposed industrial land release.

Start Date for Calculating Release - Land permitted for release before June 2013 should not be included in industrial land release calculations when being considered against the Employment Land Study (2014).

The Loss of Undesignated Industrial Land - Officers do not consider that the release of undesignated sites should be included in the Mayor's calculations.

The Creation of New Industrial Floorspace - The further written statement does not consider new industrial floorspace that has been permitted within the timeframe of the Local Plan.

Crown Trading Estate and Chailey Industrial Estate (Site B) - the two main sites being objected to are proposing to retain their existing employment use on site.

1.3 Taking account of the above points, the Local Plan Part 2 proposes to release 37.69ha of industrial land for other uses. If undesignated sites are removed from the calculation, the release figure reduces further to 30.63ha. An explanation of these figures is set out below.

2. Inaccuracies within Annex 1

2.1 The Council disagrees with the conclusion that 75.31ha of industrial land is proposed to be released and notes that this figure has not been referred to in previous letters of general conformity. The Council's corrections to the Mayor's calculations (Annex 1) of the further written statement are set out below.

ID	Site	Location	Size	Designation
Hayes				
SA1	Enterprise House	Botwell - Hayes	03.ha	Industrial Business Area
SA2	The Old Vinyl factory & Gatefold Building	Botwell - Hayes	5.02ha (4.32ha Vinyl + 0.7ha Gatefold)	Industrial Business Area
SA3	Eastern End Blyth Road Major Mods - Site broken down into 3, but no additional loss in IBA	Botwell - Hayes	1.1 0.7ha (Site A 0.3ha + Site B 0.8ha 0.4ha ¹)	Industrial Business Area, TC (part)
SANEW	Crown Trading Estate	Botwell - Hayes	1.3ha	Industrial Business Area
SA4	Fairview Business Centre Major Mods - Site letters corrected	Botwell - Hayes	1.71ha (Site A 1.03ha + Site B 0.68ha)	Industrial Business Area/ part adjacent
SA5	Land to Sth of railway, including Nestle site	Botwell - Hayes	15.96 10.96ha (Site A 12.7ha ² + Site B 1.76ha + Site C 2.2ha)	Industrial Business Area
SA22	Chailey Industrial Estate Major Mods - Additional Site B	Townfield - Hayes	2.6ha (Site A 1.8ha + new Site B 0.8ha)	Industrial Business Area
SA23	Silverdale/Western View Major Mods - Sites A and B rearranged	Townfield - Hayes	1.4ha (Site A - 0.7ha + Site B 0.7ha + Site C - not IBA)	Industrial Business Area
SA24	Benlow Works	Townfield - Hayes	0.3ha	Industrial Business Area
Other				
SA13	Royal Quay - in residential use	Harefield	1.6ha	Industrial Business Area
SA14	Hillingdon Circus (Site A) / Master Brewer (Site B) Part open yard & storage / open green vacant land	Uxbridge North /Hillingdon East	2.1ha 0.3ha ³ + 0	
SA15	Sorting Office - industrial use	Manor	0.27ha	
SA18	West End Yard - industrial use /build yard	South Ruislip	1ha	
SA19	Braintree Road	South Ruislip	7.1ha	Industrial Business Area
SA25	Long Lane - industrial use	Uxbridge North	0.39ha	

SA29	Cape Boards Site	Uxbridge South	8.6ha	Industrial Business Area
SANEW	Waterloo Wharf	Uxbridge South	0.4ha ⁴	
SA32	Former NATS Site	West Drayton	12.59ha 1ha ⁵	Industrial Business Area
SA33	Kitchener House - part industrial use	West Drayton	0.1ha	
SA35	Former Vehicle Testing Station	Yeading (Hayes)	1.68ha	
SA36	Hayes Bridge	Yeading (Hayes)	0.8ha	Industrial Business Area
SA37	Former Coal Depot	Yiewsley	6.35ha	Industrial Business Area
SA38	Padcroft Works - industrial use Additional sites B & C	Yiewsley	1.96ha (Site A 1.6ha + Site B - 0.3ha + Site C - 0.06ha)	Industrial Business Area ⁶
SA39	Trout Road	Yiewsley	2.71ha (Site A - 2.7ha 2.4 ⁷ + Site B - 0.18ha + Site C - 0.13ha)	Industrial Business Area
SANEW	Land to the rear of 2-24 Horton Road	Yiewsley	0.5ha	
SA40	26-36 Horton Road - industrial use	Yiewsley	0.46ha	
SA41	High Street - Vacant	Yiewsley	0.2ha 0ha ⁸	

2.5 The following commentary relates to the corrections in Annex 1 above:

1. SA 3 - Eastern End of Blyth Road: Site B was a block of offices that has since been converted to residential use through prior approval. It has never had an industrial designation and is a town centre site. **Overestimated release of 0.4ha** in the calculations.
2. SA 5 - Land South of the Railway: The eastern portion of the site (5ha) has recently approved planning permission and is being retained for B1c/B2/B8 and a Data Centre (Sui Generis). **Overestimated release of 5ha** in the calculations.
3. SA 14 - Master Brewer/Hillingdon Circus: Site A comprises 0.3 ha of open yard & storage, not 2.1 ha. Site B does not contain any industrial uses. **Overestimated release of 1.8ha** in the calculations.
4. Waterloo Wharf is a new site that has been included as part of the SOPM which has been overlooked by the Mayor of London. **Underestimate of 0.4ha** of undesignated industrial land.

5. SA 32 - Former NATS Site: consists of 12.59ha of former Air Traffic Control facility and therefore did not operate as industrial land. IBA designation only related to approximately 1ha of the northernmost portion of the site closest to the railway. **Overestimated release of 11.59ha** in the calculations.
6. SA38 - Padcroft Works: was former industrial land but was not designated as an IBA. **Site needs to be recategorised in calculations.**
7. SA39: Trout Road: Site A is subject to planning permission which retains the northern part of the site (0.3ha) for B1(c) business units. **Overestimated release of 0.3ha in the calculations.**
8. SA41: High Street Yiewsley: consists of 0.2ha of formerly vacant offices within Yiewsley High Street and does not constitute industrial land release. **Overestimated release of 0.2ha in the calculations.**

2.6 Taking account of these corrections, there is a total overestimate of 18.89ha of total industrial land loss. The amount of IBA & other non designated industrial sites being proposed for release is therefore 59.51ha, before the additional considerations of this statement are taken into account.

Industrial and Business Areas (IBA) losses

	GLA Estimate Excluding Main Mods Area (ha)	GLA Estimate Including Main Mods Area (ha)	Revised LBH Calculation Area (ha)
Hayes	27.59	29.69	24.29
Other	41.52	42.01	28.16
Total IBP loss	69.11	71.70	52.45

Total Industrial Land Losses (IBA & other non designated sites)

	GLA Estimate Excluding Main Mods Area (ha)	GLA Estimate Including Main Mods Area (ha)	Revised LBH Calculation Area (ha)
Hayes	27.59	29.69	24.29
Other	47.72	48.71	35.22
Total Industrial loss	75.31	78.40	59.51

3. Start Date for Calculating Release

3.1 The Council's Employment Land Study Update (2014) was produced in June 2013 as part of the evidence base for the Local Plan Part 2 and sets a medium scenario benchmark release of 18.5 ha.

3.2 Sites considered already released from industrial land are not included within this 18.5ha benchmark figure and thus should not be taken into account when trying to measure proposed release against this benchmark.

3.3 The following three sites found in Annex 1, should not be considered as release against the 18.5ha medium benchmark figure or included in the Mayor's calculation, as the relevant planning applications were determined prior to June 2013. Site B of SA3 however should be retained in the calculations as it has yet to be determined.

ID	Site	Location	Size	Designation	Determined
Hayes					
SA2	The Old Vinyl factory & Gatefold Building	Botwell - Hayes	5.02ha (4.32ha Vinyl + 0.7ha Gatefold)	Industrial Business Area	19/04/13 and 27/03/12
SA3	Eastern End Blyth Road	Botwell - Hayes	1.1 0.7ha (Site A 0.3ha + Site B 0.8 0.4ha)	Industrial Business Area, TC (part)	Site A: 08/04/13 Site B: Retained in Calcs
Other					
SA32	Former NATS Site	West Drayton	12.59 1ha	Industrial Business Area	01/04/2011

3.6 The impact of these changes on the total amount of land released is shown below.

Industrial and Business Areas (IBA) losses

	GLA Estimate Excluding Main Mods Area (ha)	GLA Estimate Including Main Mods Area (ha)	Revised LBH Calculation Area (ha)
Hayes	27.59	29.69	18.97
Other	41.52	42.01	27.16
Total IBP loss	69.11	71.70	46.13

Total Industrial Land Losses (IBA & other non designated sites)

	GLA Estimate Excluding Main Mods Area (ha)	GLA Estimate Including Main Mods Area (ha)	Revised LBH Calculation Area (ha)
Hayes	27.59	29.69	18.97
Other	47.72	48.71	34.22
Total IBP loss	75.31	78.40	53.19

4. The loss of undesignated industrial land

4.1 Officers do not consider that the loss of undesignated sites should be included in the Mayor's calculations. These sites are subject to significantly less policy protection than designated land and are outside the strategic remit of the London Plan. The following sites should therefore be removed from Annex 1.

ID	Site	Location	Size	Designation
Other				
SA14	Hillingdon Circus (Site A) / Master Brewer (Site B) Part open yard & storage / open green vacant land	Uxbridge North /Hillingdon East	2.1ha 0.3ha + 0	
SA15	Sorting Office - industrial use	Manor	0.27ha	
SA18	West End Yard - industrial use /build yard	South Ruislip	1ha	
SA25	Long Lane - industrial use	Uxbridge North	0.39ha	
SANEW	Waterloo Wharf	Uxbridge South	0.4ha	
SA33	Kitchener House - part industrial use	West Drayton	0.1ha	
SA35	Former Vehicle Testing Station	Yeading (Hayes)	1.68ha	
SA38	Padcroft Works - industrial use Additional sites B & C	Yiewsley	1.96ha (Site A 1.6ha + Site B - 0.3ha + Site C - 0.06ha)	Industrial Business Area
SANEW	Land to the rear of 2-24 Horton Road	Yiewsley	0.5ha	
SA40	26-36 Horton Road - industrial use	Yiewsley	0.46ha	

4.5 The impact of these changes on the total amount of land released is shown below.

Industrial and Business Areas (IBA) losses

	GLA Estimate Excluding Main Mods Area (ha)	GLA Estimate Including Main Mods Area (ha)	Revised LBH Calculation Area (ha)
Hayes	27.59	29.69	18.97
Other	41.52	42.01	27.16
Total IBP loss	69.11	71.70	46.13

5. The creation of new industrial floorspace

5.1 The further written statement does not consider the net release of industrial land, referring solely to the proposed release and not referencing the creation of any new industrial floorspace that has been permitted during the timeframe of the Local Plan.

5.2 Whilst the draft London Plan (2017) is not considered to have significant weight to the public examination and is not the iteration of the London Plan that the Local Plan Part 2 is aiming to be in conformity with, the following has been set out in terms of substitution, intensification and co-location for ease of comparison.

Substitution

5.3 The following site has been permitted during the Local Plan timeframe and consists solely of new SIL Compliant B1(c), B2 and B8 uses, half of which has since been completed.

Site	Permission	Date Granted	Use	Size (ha)
Stockley Park, Phase 3	37977/APP/2015/1004	14/12/15	45,000sqm of light industrial uses (Use Class B1c and/or Use Class B2) and/or storage and distribution uses (Use Class B8)	12

Intensified Sites

5.4 The following sites have been permitted during the Local Plan timeframe and consist of former industrial sites that have been redeveloped to provide a net gain of SIL compliant B1(c), B2 or B8 uses. Whilst officers appreciate intensification should be measured in regards to net increase in floorspace (sqm²), for comparison with the original Annex 1 it is necessary to include the net gain as an estimated hectare increase on the previous use of the site.

Site	Permission	Date Granted	Use	Size (ha)	Net Gain (ha)
Former EMI Site, Dawley Road	8294/APP/2015/1406	09/10/15	Redevelopment of the site to provide 10,728sq metres of Class B1(c) and B2 (General Industrial) and B8 (Storage and Distribution) floorspace	2.6	1.6
Building 63 Phase 500 Riverside Way, Uxbridge North Industrial Estate	56862/APP/2014/170	30/05/14	Permission includes the redevelopment of the site to provide 1 industrial unit (2361sqm) for B1(c), B2 and B8 uses.	1.4	0.6

Former Trimate Site Arundel Road, Uxbridge Industrial Estate	9117/APP/2016/278	09/03/17	Proposed redevelopment of the site for three industrial/warehouse units with ancillary offices (Use Classes B1c/B2/B8) and a total floorspace of 16,178sq.m (GEA)	2.17	0
Prologis Park	18399/APP/2013/1019	23/07/13	Application to provide 14, 383 sq m (GEA) of commercial floorspace (B8 Use Classes)	4	1.3

Co-Location on Schemes

5.5 The following sites have been permitted during the Local Plan timeframe and contain SIL compliant B1(c), B2 and B8 uses, which have been retained as part of mixed use schemes that co-locate with alternate uses.

5.6 Due to the difficulty of comparing lost hectares and new industrial floorspace, the retained floorspace identified in this section has not been subtracted from the 75.31ha, but has been included to identify examples of where SIL complaints uses have been retained on site.

5.7 Officers would note that whilst the following list contains permitted schemes, proposed site allocations for the release of employment land also include policy requirements to include elements of employment use on site.

Site	Permission	Date Granted	Use
Enterprise House, Botwell	11623/APP/2013/3606	16/10/14	Mixed use scheme which includes the retention of approximately 4,500 sqm (GIA) of employment use (Use classes B1 (a-c) and B2 with ancillary cafe) at ground and first floor levels and cafe.
The Old Vinyl Factory, Botwell	59872/APP/2012/1838	19/04/13	Mixed use scheme including 7,886 sqm of new B1 (a-c) floorspace, part of which has been implemented as the Central Research Laboratory.
Gatefold Building, Botwell	51588/APP/2011/2253	14/02/12	The scheme includes 5 x workshop units (Class B1, B8 or A2 uses), and associated car parking and landscaping.

Calculations

5.9 For the reasons stated in paragraph 5.6, the co-location schemes listed above have not been included in the revised calculations. As such, the following calculations are based on the new industrial land attained through new and redeveloped sites.

5.10 On the basis that this intensification has either taken place on designated IBA or in the case of Stockley Park land that will be appropriate for industrial land designation post-completion, this has been subtracted from the revised 46.13ha total IBA losses to return a net **final figure of 30.63ha of release**.

Site	Size (ha)	Net Gain (ha)
Stockley Park, Phase 3	12	12
Former EMI Site, Dawley Road	2.6	1.6
Building 63 Phase 500 Riverside Way, Uxbridge North Industrial Estate	1.4	0.6
Former Trimate Site Arundel Road, Uxbridge Industrial Estate	2.17	0
Prologis Park	4	1.3
TOTAL	22.17ha	15.5ha

5.11 The impact of these changes on the total amount of land released is shown below.

Industrial and Business Areas (IBA) losses

	GLA Estimate Excluding Main Mods	GLA Estimate Including Main Mods	Revised LBH Calculation	New IBA	Revised LBH Calculation
	Area (ha)	Area (ha)	Area (ha)	Area (ha)	Area (ha)
Hayes	27.59	29.69	18.97	-2.9	16.07
Other	47.72	48.71	27.16	-12.6	14.56
Total IBP loss	75.31	78.40	46.13	-15.5	30.63

6. Crown Trading Estate and Chailey Industrial Estate (Site B)

6.1 The further written statement is objecting to the following five sites for release:

1. New Site - Crown Trading Estate
2. SA22 (Site B) - Chailey Industrial Estate
3. SA38 (Sites B) - Padcroft Works, Tavistock Road
4. SA38 (Sites C) - Padcroft Works, Tavistock Road
5. SA39 (Site C) - Trout Road

6.2 Padcroft Works and Trout Road already have existing planning permissions which are being implemented. It is therefore considered that the main objection here relates to the inclusion of Crown Trading Estate and Chailey Industrial Estate (Site B).

6.3 The release of the Crown Trading Estate is seen to be consistent with the objectives of the Local Plan Part 1, in so far that it brings forward a site along the Grand Union Canal for mixed use development, in order to assist in the regeneration of the Hayes/West Drayton Corridor. The proposed site allocation imposes the requirement to include *'the provision of small-scale commercial uses at ground floor level'*, with initial discussions with the landowner indicating that this will be delivered.

6.4 Chailey Industrial Estate (Site B) has been in long-term use by the discount retailer Matalan and has not been in industrial use. The proposed site allocation refers to the proposed development on site as being *retail/residential*, which is based on the representations submitted by the landowner, who indicate a desire to reconfigure and retain the ground floor A1 retail use as part of a mixed use scheme.

6.5 Officers would also note that Site B was previously included within the first Regulation 19 draft Local Plan Part 2 (2014) and did not attract an objection from the GLA at the time.

6.6 Whilst the two schemes are being release from their designation as Strategic Industrial Land (SIL), their existing uses are to be retained as part of the mixed use schemes being proposed within the site allocations.

6.7 Furthermore both of these sites have been previously discussed with the GLA since 2017, as evidenced through the inclusion of the sites within the Development Infrastructure Funding Study (DIFS).

6.8 Both sites were also accepted for residential development within the Mayor's Strategic Housing Land Availability Assessment (2017), which indicates that GLA Officers have previously accepted the principle of the release of the sites for residential use, with the sites continuing to underpin the draft London Plan (2017) housing target.