

GREATER LONDON AUTHORITY

Jameson Bridgewater

Planning Inspector
c/o Manisha Pabari & Judith Dickson
Programme Officers

Department: Planning

Your reference:
Our reference: LDF14/LDD18CG
Date: 17 August 2018

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Dear Mr Bridgewater

Re: Hillingdon - The Local Plan Part 2: Revised Proposed Submission Version

- **Development Management Policies**
- **Site Allocations and Designations**
- **Policies Map**

Following the Examination Hearing session on 7 August 2018, the Mayor welcomes the additional information provided by the London Borough of Hillingdon which clarifies the industrial land release figures. The Mayor originally requested this information in his response to Hillingdon's Local Plan Part 2 consultation in December 2015 and again, by email, on 7 June 2018, prior to him issuing his statement of non-conformity. He is pleased that details have now been provided.

The Mayor considers that the loss of undesignated sites should be included in the calculations of industrial land loss, along with losses from designated industrial locations. The London Industrial Land Supply and Economy Study 2016 identifies that undesignated industrial sites comprise more than a third of London's industrial capacity and cumulatively they are of strategic significance in the capital.

After allowing for the revisions in Hillingdon's note (received 14 August 2018), the quantum of industrial land release from Industrial Business Area (IBA), that is, excluding non-designated industrial land from the calculations, is still in excess of both the Mayor's Supplementary Planning Guidance (SPG) benchmark and Hillingdon's own employment study benchmark, which suggested 18.5ha release (medium scenario). My officers have sent you a separate note on the status of the London Plan and Hillingdon's Local Plan Part 1. However, in this regard it should be noted that the Mayor's Land for Industry and Transport SPG is a material consideration in this matter.

The loss of this quantum of industrial land remains a strategic concern.

To help address these concerns, the Mayor would wish to see an amendment to the site allocation NEW SA Crown Estate in the Major Modifications (which proposes additional de-designation of SIL/IBA) to read:

~~“The provision of light industrial and commercial uses as part of the overall mix of uses
small-scale commercial uses at ground floor level”~~

“Proposed Development: Residential-led Mixed use development including light
industrial, commercial and residential uses”

This amended wording would be sufficient to withdraw the Mayor’s opinion that Hillingdon’s Local Plan Part 2 (with Major Modifications) is not in conformity with the London Plan.

Given the planning permission for Stockley Park Phase 3, Hillingdon is also asked to consider whether the supporting text to the wider Stockley Park Locally Significant Employment Locations (LSEL) could encourage intensification of uses, and support further Class B1c, B2 and B8 uses as per Phase 3 development, and not offices alone.

The Mayor would also like to state that in line with the evidence and draft new London Plan policy E4 he is unlikely to support the further release of industrial land and, in particular, protected industrial land.

The Mayor will welcome a full review and proactive approach to the intensification of industrial land and floorspace across the borough in Hillingdon’s immediate review of its Local Plan.

Yours sincerely



Juliemma McLoughlin
Chief Planner

Cc: Dr Onkar Sahota, London Assembly Constituency Members
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL