

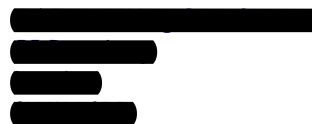


2 May 2019

Our Ref: TfL Com Dev/LB Hillingdon Reps/BH/PCP
Your Ref:

Planning Policy Team, 3N/02,
Residents Services,
Civic Centre,
High Street,
Uxbridge, UB8 1UW

Transport for London
Commercial Development
(Property Development)



By email: localplan@hillingdon.gov.uk

Dear Sir or Madam

Local Plan Part 2 Schedule of Proposed Main Modifications

Thank you for the opportunity to make representations in respect of the proposed Main Modifications to the Draft Local Plan Part 2.

TfL is a significant land owner in the borough. Please note that our responses below represent the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a significant landowner in the borough only, and do not form part of the TfL corporate response. Our colleagues in TfL Spatial Planning will provide a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

Officers will be aware that TfL has entered into a joint venture with Triangle London Developments LLP (a consortium between Notting Hill Genesis and U+I Group plc) (TLD) to develop land at Northwood Station for a housing-led, mixed-use scheme and to deliver 'step free access' for passengers. TLD has reviewed and endorses these representations.

Representations

The London Plan provides the strategic, London-wide policy context for borough local development plan documents; all local development plan documents and Neighbourhood Plans have to be in general conformity with the London Plan. As such, the proposed Main Modifications to Hillingdon's Local Plan should be in general conformity with the draft London Plan which is currently undergoing Examination in Public and is therefore at a late stage in the adoption process.

Representations can only be made on policies that are proposed to be amended; as such, we make representations in respect of policies:

- DMHB 17 (Residential Density)
- DM 10 (Housing Mix)
- Site Allocation SA16: Northwood Station, Green Lane

Policy DMHB 17 Residential Density (p. 14, Main Modifications)

Policy DMHB 17 relates to residential density for new developments and includes a Density Matrix based on dwelling size and location type. While it is welcomed that the proposed changes seek to increase the permissible units / habitable rooms per hectare within the density matrix, it is considered that in practice, the density targets will still be applied mechanistically rather than through a more flexible, design led approach, as advocated in the draft London Plan, which has removed its density matrix.

Draft London Plan Policy D6 (Optimising housing density) requires development to make the most efficient use of scarce land resources in London and to be designed at the optimum density, utilising a design-led approach. The design-led approach will inform the evaluation of a site's context and help to identify its capacity for growth and particular consideration should be given to a number of matters including:

- “1) the site context, including surrounding built form, uses and character;*
- “2) the site’s connectivity and accessibility by walking, cycling, and existing and planned public transport to jobs and services (including both PTAL and access to local services);*
- “3) the capacity of surrounding infrastructure ...”*

Hillingdon’s proposed approach is not in conformity with the Draft London Plan, design-led approach. If the draft Policy DMHB 17 matrix is applied mechanistically and decisions do not account for site-specific circumstances then it is too crude a tool to optimise site capacity. The research findings for the draft London Plan found that there is no case for continuing to set a maximum level, since the appropriate criteria for limiting density are judgemental ones, and decisions about what is qualitatively unacceptable are most appropriately decided by the local authority or the Mayor. As such, although the upper limits for Hillingdon’s density matrix are proposed to increase, they still do not allow for the flexibility that the draft London Plan seeks to achieve and may restrict development on sites that would be appropriate for higher densities, due to site-specific circumstances. The development capacity of development sites should be assessed on a site by site basis, rather than a blanket approach across the whole Borough. It is therefore recommended that Hillingdon bring their draft policies in line with the approach of the draft London Plan and remove the residential density matrix.

It is recognised that the changes to the supporting text of policy DMHB 17 state that these figures should be a starting point for discussions on the issue of residential density and ultimately, density should be determined by a design led approach. However, it is considered that by retaining the density matrix, this reduces the flexibility of developments and there are concerns that this will be applied rigidly, contrary to the ethos of the draft London Plan. The GLA found that there was confusion about the proper role of the matrix, with many stakeholders misunderstanding how it was intended to be applied. This would continue to occur if the residential density matrix were to be retained in the Local Plan and rather than being a starting point for discussions, the matrix will limit development potential and will not optimise site capacity.

In the supporting text, recognition should be given to the draft London Plan requirement to optimise the potential for housing delivery on all suitable and available sites, especially at sites with a PTAL of 3 – 6 or which are located within 800m of a tube or rail station or a town centre boundary (draft London Plan Policy H1, Increasing Housing Supply). This is additional to areas such as Uxbridge town centre and Hayes Housing Zone which are referred to in the text.

In order to optimise housing development, the policy and supporting text should recognise that the most appropriate development in accessible locations will be flats.

Policy DMH 2 Housing Mix (p. 8, Minor Modifications)

Policy DM 10 relates to the mix of housing units within residential development schemes and requires housing mix to reflect the Council's latest information on housing need. While the text for the policy is proposed to remain the same, the proposed modifications seek to amend the supporting text, including the removal of Table 4.1 which identified set housing requirement targets by tenure and unit size.

While the removal of Table 4.1 is welcomed as it was too prescriptive and did not allow for changes in housing demand or site-specific circumstances, the following text has been added to the latest draft (paragraph 4.6):

“the Council's current information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly 3-bedroom properties. Applicants proposing residential schemes will be required to demonstrate that this need has been taken into account.”

Draft London Plan Policy H12 (Housing Size Mix) states:

“Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme applicants and decision-makers should have regard to:

...

“6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity”.

The draft London Plan supporting text (paragraph 4.12.2) continues to state:

“Boroughs should not set policies or guidance that require set proportions of different-sized (in terms of number of bedrooms) market or intermediate units to be delivered. Such policies are inflexible, often not implemented effectively and generally do not reflect the optimum mix for a site taking account of all the factors set out in part A of Policy H12 Housing size mix. Moreover, they do not necessarily meet the identified need for which they are being required; for example, larger market units are often required by boroughs in order to meet the needs of families but many such units are instead occupied by sharers.”

And at paragraph 4.12.4:

“Well-designed one- and two- bedroom units in suitable locations can also attract those wanting to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new build development.”

The proposed modification additional text would not be in general conformity with the draft London Plan which specifically states that in some circumstances a higher proportion of smaller units would be more appropriate (e.g. in more accessible and central locations). As such, the emphasis the Council is seeking to place on the provision of larger homes is too restrictive and not applicable to all sites, nor would it comply with the draft London Plan. As such, it is recommended that the additional text requiring applicants to demonstrate consideration has been given to the provision of 3-bedroom homes should be removed in order to conform with the draft London Plan and allow the necessary flexibility in unit mix dependent on site-specific circumstances.

Site Allocation SA16: Northwood Station, Green Lane (p. 34, Main Modifications)

For 2016 – 2021, it is stated that “*TBC 0*” new homes are to be provided on this site, which TfL CD and its development partner are promoting for sustainable, housing-led, mixed-use development. Officers are aware that TfL intends to obtain planning permission in order to ‘start on site’ at this allocated site by early 2021. This should therefore be updated.

For 2021 – 2026, the proposed number of units is “*To be determined by design*”.

We suggest that “*To be determined by design and phasing*” is included for both 2016 – 2021 and 2021 – 2026.

Concluding Remarks

We hope that these representations are helpful and we look forward to working with the Council over the coming years to deliver high quality, transport / housing-led, mixed use schemes to meet needs in the borough. If you need any further information or would like to discuss any of the issues raised in our representations, please do not hesitate to contact me or my colleague Patricia Cazes-Potgieter.

Yours faithfully



Brendan Hodges | Principal Commercial Planner
TfL Commercial Development



cc.

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