

Our ref: J040953

Planning Policy Team  
London Borough of Hillingdon  
3N/02 Civic Centre  
High Street  
Uxbridge  
UB8 1UW

8 May 2019

Dear Sir/Madam,

### **Former Master Brewer Motel site, Freezeland Way, Hillingdon**

#### **Representations to the LB Hillingdon Local Plan Part 2: Main Modifications Consultation (May 2019)**

On behalf of our Client, Inland Limited, we write in response to the 'Proposed Main Modifications to the Local Plan Part 2 – Site Allocations and Designations' (hereafter known as 'LPP2'), which is currently undergoing a Main Modifications Consultation as part of the Examination in Public process.

Our Client welcomes the opportunity to comment on LPP2. We set out key points for consideration below in relation to development proposals at the above-mentioned site in Hillingdon (Site Allocation Reference 'SA 14'), and consider that the amended wording to the Site Allocation presents a positive step forward for the realisation of the full development potential of the site but that additional accommodations could be made to fully achieve the development opportunities available.

#### **Planning History**

The former Master Brewer Motel site has been subject to a number of planning applications and the redevelopment of the site has been an objective of LB Hillingdon for a considerable amount of time. In summary, the most recent applications are as follows:

- 4266/APP/2014/518 and 4266/APP/2014/519 – Mixed use redevelopment of the former Master Brewer Hotel comprising the erection of a foodstore measuring 3,543sqm (GIA) (Use Class A1), with 179 car parking spaces and 32 cycle spaces; an additional 3 retail units measuring 1,307sqm (GIA) (Use Class A1 to A5); a 70 bed hotel (Use Class C1) and 19 car parking spaces and 4 cycle spaces; 125 residential units (Use Class C3) with 100 car parking spaces and 138 cycle parking spaces and associated highways alterations together with landscape improvements. Resolution to grant August 2014.
- 4266/APP/2017/3183 – Construction of a residential-led, mixed use development comprising buildings between 4 and 9 storeys to provide 437 residential units (Use Class C3); employment floorspace (Use Classes B1(a-c)); flexible commercial floorspace (Use Classes A1/A3); associated car and cycle parking; and hard and soft landscaping, plant and other associated ancillary development. Refused February 2019.

## Site Allocations and Designations

### Principle of the Site Allocation

The proposed site allocation at the former Master Brewer Motel site has long been established in the Planning Authority's (saved) Unitary Development Plan and throughout the LPP2 process, with the redevelopment of the Site presented as a long-term objective of LB Hillingdon. Accordingly representations were previously submitted to prior stages of consultation in the plan-making process for LPP2. These have commented on similar issues to those set out below, including site capacity and the principle of residential development alongside a movement away from a retail-led scheme as previously submitted for planning permission.

### Site Quantum

The Site was allocated in the Submission version of LPP2 at Site Allocation Policy SA 14 – Master Brewer and Hillingdon Circus, alongside the adjacent plot of land known as Hillingdon Circus. In the Submission version of LPP2, the Site had an identified capacity for up to 125 homes. In the Main Modifications version, this capacity has been increased to 250 homes.

Our client seeks to understand the justification as to why the capacity of the Site has been capped at this seemingly arbitrary amount, with no supporting evidence to indicate why the capacity should not be increased owing to the on-going rigorous design testing of the Site (through various planning application submissions) and the direction of travel for emerging policy objectives for the delivery of development, including significant new homes in sustainable locations, adjacent to public transport. When turning to the evidence base for justification of this decision, it is apparent that LB Hillingdon's housing trajectories test the delivery of between 125-140 homes on-site depending on the year of publication. This quantum similarly has not been justified. In addition, the Site Deliverability Assessment document submitted as part of the evidence base for the LPP2 Examination in Public considers an indicative capacity of 390 homes for the two parts of the Site Allocation. We would welcome an indication as to where any evidence is being used to determine the Site's capacity.

The draft London Plan, currently at Examination in Public, sets out aspirations to make the most efficient use of land in order to accommodate London's housing needs, directing growth towards locations accessible by public transport. This includes the redevelopment of brownfield sites, including our Client's Site, which is capable of delivering development that is strategic in nature and has the ability to accommodate a significant number of new homes. LB Hillingdon face a significant increase in their annualised housing requirement under the draft London Plan, seeing an increase of nearly 178% from an annualised target of 559 dwellings per annum to 1,553 dwellings per annum in the emerging targets. As such, LB Hillingdon should be looking to maximise the potential of sites that can accommodate this significant growth increase, especially those close to public transport such as our client's Site, which lies in close proximity to Hillingdon London Underground Station as well as the strategic road network.

LB Hillingdon's current housing supply (as set out in the December 2017 "5 Year Supply of Deliverable Housing Sites 2017/18-2021/22") identifies a 5-year target of 2,516 dwellings and a supply of 4,417 dwellings against adopted plan targets. However at the time of publishing, only 2,933 dwellings of the quantum identified were under construction. Additionally, when considered against the draft London Plan targets, LB Hillingdon's increased housing requirement creates a 5-year target of 7,795 dwellings. Our client is concerned that LB Hillingdon are underestimating the deliverable capacity of the Site, which is not aligned with the spatial strategy and aspirations of the draft London Plan, which seeks to make the most efficient use of land in sustainable locations.

### Links to Green Belt

The updated policy for the Site Allocation in the Main Modifications version of LPP2 has adjusted the red line boundary to remove the adjacent Green Belt land from the proposed designation. Accordingly, the policy

wording has also been updated to remove any reference to the adjacent Green Belt land, which previously sought to:

*“Improve access to Freezeland Covert to promote open space of recreational value; enhance ecological and wildlife interest on land west of Freezeland Covert and to enhance pedestrian access between the Green Belt areas east and west of Long Lane.”*

Our client wishes to emphasise that whilst this wording has been removed, they are committed to delivering wider public benefits relating to the provision of green space and access through the redevelopment of the Site. Additionally, the Sustainability Appraisal for LPP2 and its Addendum both consider the Site’s promotion of the positive use of the Green Belt as a significant benefit of the Site Allocation itself. The removal of this wording seems short-sighted given our client’s imminent acquirement of the adjacent parcel of land on the Site’s eastern boundary, which lies within the Green Belt, with intentions to improve connections to Freezeland Covert to provide public access to previously under-utilised green space. The provision of access and landscaped open green space within the Site Allocation to connect to the adjacent land at Freezeland Covert is currently being tested through the masterplanning process for an emerging set of proposals for the Site.

**Summary**

In conclusion and in line with our previous representations to LPP2, it is requested that LB Hillingdon review their level of completions anticipated for the Site. The redevelopment of the Site offers an opportunity to deliver new homes within the Borough, and the uplift in site capacity needs careful consideration in order to fully promote both the principles of sustainable development and to make the most efficient use of land. The Site has the capability to support a higher number of homes, and our client believes that the most appropriate way to determine this would be through a high quality design-led approach. We would welcome an opportunity to discuss this and our other suggestions further with officers to identify an appropriate capacity that reflects this large, sustainable brownfield site; and to create a policy that truly supports the potential of the Site.

If you have any questions regarding the above, please do not hesitate to contact Sarah Hiscutt [redacted] or Alexandra Higgin [redacted]

Yours faithfully,

[redacted signature]

**GL Hearn**  
*For and on behalf of Inland Limited*