

## Hillingdon Local Plan Part 2 - Examination

### Written Statement on behalf of Bourne End Investments Ltd

#### Main Matters MM3 and MM4 – Policy SA39A Trout Road Yiewsley

A number of written representations were submitted on behalf of our client Bourne End Investments Ltd. For a number of these we will depend on our written representations but still have objections most specifically in relation to Policy SA39 Trout Road Yiewsley (Site A). It is this, in the context of national and local employment and housing policies which we wish to have the opportunity to discuss further at the hearing. As such, this relates primarily to Main Matter MM3 and to some extent Main Matter MM4 as set out in the Inspectors Hearing Programme note.

The site boundary (as most recently detailed on the Plan on page 56 of the Main Modifications Document May 2018) has not been amended in accordance with the plans submitted in previous representations and as such does not show the full 2.31 ha site. The areas excluded are buildings and land at 133 to 141 High Street and land fronting St Stephens Road and these should be included in the context of the planning application and permission for the site.

Site SA39A at Trout Road is identified for 149 units based on 99 residential units and 50 extra care home units within the 2014 permission.

The amendment to the wording of the policy from residential and design led to specifically referencing the planning consent 38058/APP/2013/1756 is not considered to be a sound approach to a Site Allocation Policy which is in place to 2026. Whilst it is relevant to refer to the consent there are too many market and viability issues and it ignores the potential of the site to accommodate amendments and alternatives that would be acceptable in design terms and in terms of the need to increase housing units on sites. This site was first discussed in a mixed use context around 2010 and an updated position is required. We note the Council have already had to make a number of updates in the 2018 modifications documents following changing and evolving planning permissions across a number of sites.

It is taking a significant period of time to achieve approval of reserved matters for the existing consent. Even in this time the market has changed as has the policy climate such that to be required to develop in accordance with a planning permission on the site of its time makes no sense in a policy climate of having to optimise the use of land and deliver higher housing numbers.

As an example, the extra care home use approved within the original application is now questionable in terms of viability given the scale of the provision on site and the lack of demand for it by providers. There is no need for the allocation to be so specific and constrained given this is a prime housing site.

Further, having to retain industrial units in an area that is now predominately residential makes no sense and is inconsistent with the approach taken recently by the Council in determining an application on the COMAG site. Here officers confirmed:

*“The existing warehouse (Use Class B8) which is surrounded by a residential development does not represent a compatible use nor does the existing unit represent an efficient use of the site”.*

This is inconsistent with the approach for the SA39A Trout Road site.

It is noted that a number of sites locally in former industrial use have been released for full residential use such as:

- COMAG, Tavistock Road – Former warehouse buildings with permission for 104 residential units
- The Padcroft Works (Site SA38). Former industrial site with permission for 308 residential units and only 175 square metres B1 floorspace on a smaller 1.6 ha site (and within District Centre where arguably more appropriate location for mixed use inc retail and commercial).
- Caxton House (Site SA39B) industrial site adjacent to Rainbow Park site for full residential development of 44 units.
- Onslow Mill (Site SA39C) industrial site adjacent to Rainbow Park site for full residential development of 24 units.
- Land to rear of 2-24 Horton Road (new allocation) – 86 residential units and 1 small no. retail unit

The Employment Land Update 2014 confirms there has been an increase in the surplus of employment land. Further, it recommends the release of the Trout Road site.

Even at the time the first representations were submitted in 2013 to seek an allocation for the site, the NPPF confirmed that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities (para 22).

Paragraph 51 stated that local planning authorities should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.

The national housing policy context has been updated in the revised NPPF which comes into immediate effect with regard to development management and hence is relevant to the Trout Road site. It confirms that strategic policies should, as a minimum, provide for objectively assessed needs for housing and set minimum housing densities. Para 59 on housing supply confirms that it is the governments objective to significantly boost the supply of homes and that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. Section 11 of the new guidance focuses on the efficient use of land and paragraph 117 confirms that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses.

The newly published NPPF indicates local planning authorities will be required to drive up the numbers of homes delivered in their areas rather than simply how many are planned for. Whilst not directly to this local plan at this late stage it does indicate government position and intention.

The London Plan (2016) confirms the pressing need for new homes and confirms that the new homes targets are minimum targets and seeks the realisation of the optimum potential of sites.

The Trout Road site SA39A is a prime housing site opportunity within Hillingdon and opportunities to optimise its use for housing should be taken. The site allocation should not constrain its potential:

- Single ownership with deliverability in the short term
- Regeneration of the local area and environmental improvements especially to the High Street and canal side
- Sustainable development close to existing local shops, services, employment and facilities
- High quality design
- Enhanced landscape setting and enhanced links through the site from the High Street to the Canal
- Enhanced residential amenity from the above and in an area now primarily residential in context (including SA39B and C allocations).
- Residential development previously confirmed in local consultation as preferred by local residents
- Existing planning permission including detailed assessment of all constraints and site features

The site can achieve a significant increase in residential units from the current approval including a potential increase in storey heights (to reflect other recent permissions and developments in proximity of the site) and to reflect the direction of emerging policy within the London Plan. The wording of the policy should be amended to reflect this.

As such, the proposed policy wording similar to that suggested within our representations to the Proposed Submission Plan in 2014 is the most appropriate approach for the site ie:

*The Council will support the residential redevelopment of the site in accordance with the approved permission or with any subsequent new permission which will contribute to the regeneration of Yiewsley and the District Centre. The Council may allow some commercial, leisure or retail uses on the site as part of a mixed use scheme if found to be viable given its sustainable location close to the district centre.*

I look forward to the opportunity of discussing the site specific and more general housing and employment policy matters further at the Hearing on 7 August 2018.