

GREATERLONDONAUTHORITY

Jameson Bridgewater

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

Department: Planning

Your reference:
Our reference: LDF14/LDD18CG
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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**

Thank you for affording the Mayor of London the opportunity to update his response to Hillingdon's Local Plan Part 2 submission, which was date 7 December 2015. A statement from Transport for London, which the Mayor supports has been sent separately. Due to the proposed further release of Industrial Business Area, the Mayor no longer considers Hillingdon's Local Plan Part 2 to be in general conformity with the current London Plan.

The draft new London Plan

You will be aware that the Mayor published his draft London Plan for consultation on 1st December 2017. He will publish his early suggested changes, following public consultation, shortly. It is anticipated the Examination in Public of the London Plan will take place in Winter 2018/19 with publication in Spring 2020. Once published, the new London Plan will form part of Hillingdon's Development Plan and contain, where relevant, the most up-to-date policies. Hillingdon's Development Plan Documents must be in general conformity with the current London Plan, however its policies will need to be considered alongside the draft London Plan. The draft London Plan and its evidence base are a material consideration in planning decisions, and the Plan gains more weight as it moves towards publication.

Housing

The 2017 London Strategic Housing Market Assessment (SHMA)¹ shows that London's housing requirement has increased significantly to approximately 66,000 new homes a year, due to population and household growth and increased backlog demand. In response, the Mayor has sought to ensure that the new London Plan provides an appropriate framework for meeting

¹ https://www.london.gov.uk/sites/default/files/london_shma_2017.pdf

London's housing needs in line with his overall vision for good growth, as set out in Chapter 1 of his draft Plan².

The London Strategic Housing Land Availability Assessment³ (SHLAA) provides an understanding of potential housing capacity across London. It uses a mix of sources and assumptions and was developed in response to London's dynamic land market. While it used site specific information, it is not a site allocations exercise. The sites' information is used to provide an understanding of aggregate potential housing capacity at a borough level at a point in time. A site's inclusion or exclusion from the SHLAA does not dictate if it will (or should) come forward for housing development, or not. The approach provides a robust understanding of overall housing capacity across London.

The current London Plan⁴ sets Hillingdon a housing monitoring target of 559 homes a year. However, the draft new London Plan⁵ increases Hillingdon's target to 1,553 homes a year. When published, Hillingdon will be monitored against this new target. Hillingdon's new housing monitoring target comprises 7,880 units from large sites derived through the London SHLAA process (in conjunction with Hillingdon) as well as 7,650 units (6,700 modelled and 950 windfall) from small sites⁶. In this regard, Hillingdon should not proceed with policies that would overly constrain the delivery of housing on acceptable housing sites, in particular, on small sites.

Industrial Land

London depends on a wide range of industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners. This includes a diverse range of activities such as food and drink preparation, creative industry production and maker spaces, vehicle maintenance and repair, building trades, construction, waste management including recycling, transport functions, utilities infrastructure, emerging activities (such as data centres, renewable energy generation and clean technology) and an efficient storage and distribution system⁷.

Industrial land and floorspace provide the capacity for the activities described above to operate effectively. In 2015, London had an estimated 6,976 hectares⁸ of land in industrial and related uses of which about 50 per cent was within Strategic Industrial Locations (SILs), a further 14 per cent was in Locally Significant Industrial Sites (LSIS) designated by boroughs and the remaining 36 per cent was in Non-Designated Industrial Sites.

Over the period 2001 to 2015, more than 1,300 hectares of industrial land was released to other uses. This was well in excess of the London Plan monitoring benchmarks⁹ set out in the Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG). Research indicates that

² <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/>

³

https://www.london.gov.uk/sites/default/files/2017_london_strategic_housing_land_availability_assessment.pdf

⁴ Table 3.1

⁵ Table 4.1

⁶ See Chapter 6 of the SHLAA

⁷ SEGRO, Keep London Working, 2017; Turley. Industrial Revolution, 2017

⁸ AECOM. London Industrial Land Supply and Economy Study, GLA, 2016

⁹ *ibid*

there will be positive net demand for industrial land in London over the period 2016 to 2041¹⁰, mostly driven by strong demand for logistics to service growth in London's economy and population. The evidence indicates that after factoring in both the positive net land demands and the management of vacancy rates, there would be scope to release a further 233 hectares of industrial land over the period 2016 to 2041, or nine hectares per annum. This compares to the current London Plan benchmark of 37 hectares per annum and recent (2010-2015) trends of the release of circa 100 hectares per annum. In addition, the demand assessment shows that in 2015, 185 hectares of industrial land already had planning permission to change to non-industrial use and a further 653 hectares were earmarked for potential release in Opportunity Area Planning Frameworks, Local Plans and Housing Zones¹¹.

Based upon this evidence, the draft new London Plan addresses the need to retain sufficient industrial, logistics and related capacity by seeking, as a general principle, no overall net loss of industrial floorspace capacity across London in designated SIL and LSIS.

In his conformity letter, the Mayor accepted the release of a significant amount (75.31 hectares) of industrial land, including 27.59 hectares at Hayes (see Annex 1), through the Local Plan Part 2 Site Allocations and Designations. Since his letter the Mayor has published his new draft London Plan and its supporting evidence, outlined above. The strategic evidence recommends that Hillingdon should adopt a policy approach to 'retain' industrial and warehousing floorspace capacity.

As part of the Major Modifications Hillingdon is proposing the release of a further sites currently designated as Industrial Business Area:

- New Site - Crown Trading Estate
- Site SA22 (Site B) - Chailey Industrial Estate
- Site SA38 (Sites B and C) - Padcroft Works, Tavistock Road
- Site SA39 (Site C) - Trout Road

Current London Plan policy 2.17 Strategic Industrial Locations states that boroughs should promote, manage and where appropriate protect strategic industrial land. Hillingdon is identified as a limited release borough. Following discussions with GLA officers, 69.1 hectares of Industrial Business Area has been agreed for release. This is already in excess of the Land for Industry and Transport SPG¹² industrial land release benchmark for Hillingdon of 26 hectares for the period 2011-2031, and it does not include a figure for land already released through planning applications. Given the above evidence produced since the current London Plan and the extent of proposed industrial release in Hillingdon overall, and at Hayes in particular, 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, as detailed in the table below.

Proposed policy / major modification	Mayor's objection
Site Allocations and Designations	
Page 9 – Housing Zones	It should be noted that Housing Zones are not planning designations.
New site – Crown Trading Estate	The Mayor objects to the further release of SIL, especially without a comprehensive master plan for the SIL, as a whole, which

¹⁰ CAG Consulting, London Industrial Land Demand Study, GLA 2017

¹¹ Housing Zones are not a planning designation

¹² Annex 1. Indicative industrial land release benchmarks 2011-2031

	demonstrates no net loss of industrial floorspace capacity, in line with London Plan policies 2.17 and 4.4 and draft new London Plan policies E4, E5 and E7.
Page 32 Policy SA4 Fairview Business Centre	The reference to the owners of Fairview working with the adjacent Crown Trading Estate should only be in the context of the land owners working to ensure no additional net loss of industrial land. The further release of industrial land at the Crown Trading Estate is not supported. The number of homes should be informed by a design process.
Site SA22 Chailey Industrial Estate Site B	The Mayor objects to the further release of SIL, especially without a comprehensive master plan for the SIL, as a whole, which demonstrates no net loss of industrial floorspace capacity, in line with London Plan policies 2.17 and 4.4 and draft new London Plan policies E4, E5 and E7.
Site SA38 – Padcroft Works, Tavistock Road Sites B and C	The Mayor objects to the further release of SIL, without a comprehensive master plan for the SIL, as a whole, which demonstrates no net loss of industrial floorspace capacity, in line with London Plan policies 2.17 and 4.4 and draft new London Plan policies E4, E5 and E7.
Site SA39 – Trout Road Site C	The Mayor objects to the further release of SIL, without a comprehensive master plan for the SIL, as a whole, which demonstrates no net loss of industrial floorspace capacity, in line with London Plan policies 2.17 and 4.4 and draft new London Plan policies E4, E5 and E7.
Paragraph 4.14 of Local Plan Part 2 Site Allocations (Blyth Road, Clayton Road, Printinghouse Lane)	This would allow the introduction of residential development in SIL contrary to London Plan policies 2.17 and 4.4 and draft new London Plan policies E4, E5 and E7.

Furthermore, in accordance with existing and emerging policy, the Mayor will expect released industrial sites to include significantly higher levels of affordable housing and contribute to social infrastructure, given their generally low existing use values. It would be helpful if this can be made clear in the Local Plan Part 2.

The reference to Industrial Business Parks in draft policy DME:1 should be deleted. These will no longer be designations under the draft new London Plan, and should be designated as SIL. Due to the demand for industrial land outlined above, SIL uses should be restricted to those set out policy E4 of the draft new London Plan.

In line with the above up to date evidence and the draft London Plan policy, Hillingdon's proposed Main Modifications should not release any further industrial land without a comprehensive masterplan to ensure no overall net loss of industrial floorspace capacity.

Green Belt

The draft new London Plan will introduce stronger protection of the Green Belt, and does not support the de-designation of the Green Belt. The proposed release of Green Belt should be tight around existing buildings.

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

Annex 1

Industrial land release identified from Site allocations and designation document and [Major Modifications document](#)

ID	Site	Location	Size	Designation
Hayes				
SA1	Enterprise House	Botwell - Hayes	0.3ha	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	1.1ha (Site A 0.3ha + Site B 0.8ha)	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	15.96ha (Site A 12ha + 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	
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
SA32	Former NATS Site	West Drayton	12.59ha	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
SA39	Trout Road	Yiewsley	2.88ha (Site A - 2.7ha + 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	

Industrial Business Park (IBP) losses

	Excluding Main Mods Area (ha)	Including Main Mods Area (ha)
Hayes	27.59	29.69
Other	41.52	42.01
TOTAL IBP loss	69.11	71.70

Total Industrial Land losses (IBP and other)

	Excluding Main Mods Area (ha)	Including Main Mods Area (ha)
Hayes	27.59	29.69
Other	47.72	48.71
TOTAL INDUSTRIAL LAND LOSS	75.31	78.40

