



Programme Officer  
London Borough of Hillingdon

By Email

27<sup>th</sup> June 2018

Dear Sir,

**Hillingdon Local Plan - Part 2 - Crown Trading Estate**

Thank you for your email regarding the comments that we submitted on behalf of the owners of the Crown Trading Estate to the Council's Local Plan Part 2.

We have read the Council's Proposed Modifications and whilst they go some way to meeting our objections, this is our first opportunity to comment on the proposed wording of the new policy for the Crown Trading Estate.

We support the inclusion of the site specific policy for the Crown Trading Estate but we **object** to the wrong stated PTAL for the site and the resulting proposed housing number provided within the allocation. Where housing numbers are to be used we support the flexible use of London Plan density guidelines but the Local Plan should be clearer that the housing numbers are precautionary and that higher densities may be achieved subject to site specific design and local context.

The Draft Site Allocations and Designations Local Plan States at Paragraph 3.5 that:

***"3.5 Where sites do not have planning permission, a range of factors have been taken into account to calculate the number of residential units that are expected to come forward from sites in this document. A key consideration is the density of development, which is measured as the number of units or the number of habitable rooms per hectare. In accordance with guidance in policy 3.4 and Table 3.2 of the London Plan, higher densities have been applied to sites with greater access to public transport."***

The proposed wording suggests that an assessment of appropriate density has already occurred. In reality this will be down to a design led approach to maximising quality housing developments and optimising housing delivery. It should be remembered that whilst certainty is sought to housing delivery numbers, the housing delivery numbers are minimum numbers and should be exceeded in all cases where it is appropriate to do so.

The proposed policy for CTC states that the site is expected to deliver 197 Units. The policy wrongly states that the site has a PTAL of 3. The site has a PTAL of 4 and as such the site has greater access to public transport that considered within the draft policy. The site is within easy walk of the Hayes Station, a future Cross Rail station which will further improve the accessibility of the site. The site also lies within the Housing Zone and we consider that the proposed housing number significantly underestimates the potential of the site.

CTC is an Urban site within 800m of Hayes District Centre. The adopted London Plan provides guidance on an appropriate density range. The site is 1.3ha resulting in a London Plan policy compliant density range of 91 - 338 units for the site. The draft London Plan removes reference to density ranges seeking to prefer a design led approach to site optimisation.

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Changes to the Proposed Modifications

1. Update the site PTAL level to 4;
2. The proposed housing number for the site should be revised to reflect the site's higher PTAL and the London Plan policy compliant density range of 91 – 338 units for the site;
3. The Plan should provide more flexibility and be clearer at paragraph 3.5 that where planning permission has not been granted housing numbers are only an estimate and are subject to detailed design work. This will encourage site optimisation in housing delivery.

We hope that these points can be resolved before the EIP, but if not we would still like to appear to discuss the Council's approach to density and housing numbers on the emerging sites. Optimisation of housing delivery should be a key Local Plan Policy objective in accordance with the London Plan and the fact that housing numbers are minimum levels.

We look forward to discussing this with your officers or in front of the Inspector.

Yours faithfully,



**Holly Mitchell**

Director