

GREATER **LONDON** AUTHORITY
Development, Enterprise and Environment

Sarah Hiscutt
Planning Associate Director
GL Hearn Limited
65 Gresham Street
London EC2V 7NQ

Our ref: GLA/0995G/01
Date: 19 July 2019

Dear Sarah Hiscutt

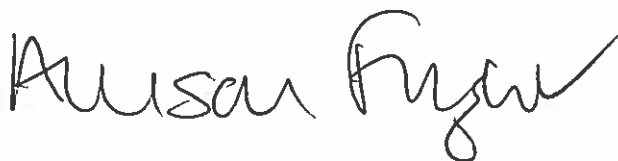
Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

Former Master Brewer Site, Freezeland Way
London borough of Hillingdon
Our reference: GLA/0995G/01

Further to the pre-planning application meetings held on 7 May 2019 and 25 June 2019, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely



Allison Flight
Deputy Head of Development Management

cc Lucinda Turner, TfL

Former Master Brewer Site, Freezeland Way in the London Borough of Hillingdon

The proposal

Construction of a residential-led, mixed use development to provide 588 homes, employment floorspace, flexible commercial floorspace, and associated car and cycle parking, highway improvements, hard and soft landscaping, plant and other associated ancillary development.

The applicant

The applicant is **Inland Homes** and the architect is **BDP**.

Context

1 On 7 May 2019 a pre-planning application meeting was held at City Hall, a follow up this meeting was held on 25 June 2019. The meetings have been attended by the following:

GLA group

- Connaire O’Sullivan – Senior Strategic Planner, GLA (case officer)
- James Keogh – Senior Strategic Planner - Urban Design, GLA
- Kate Randell – Team Leader – Development Management, GLA
- Abby Crisostomo - Senior Policy and Programmes Officer (Environment) – GLA
- Ioanna Mytilinaiou – Energy Planning consultant - GLA
- Joseph Oakden - TfL

Applicant

- Des Wicks (Inland Limited)
- Ben Johnson (Inland Limited)
- Roy Collado (Collado Collins Architects)
- Ian Fenn (JTP)
- Joanna Allen (JTP)
- Tim Gabbittas (WSP)
- Sarah Hiscutt (GL Hearn)

2 The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor’s formal consideration of an application.

Site description

3 The application site is 2.39 hectares and was previously occupied by the Master Brewer Motel that has subsequently been demolished. The site currently comprises hard standing and semi-mature vegetation with large advertising boards located on the boundary adjacent to Long

Lane. Vehicular access to the site is provided via an entrance/exit point onto Freezeland Way. There is a small strip of designated Green Belt land located within the eastern portion of the site which extends into a wider area of Green Belt beyond the site boundary along the majority of the North Hillingdon settlement boundary.

4 The site is located to 2.3 kilometres to the south-west of Uxbridge Town Centre and south of the A40/Western Avenue. To the south of the site is Freezeland Way and beyond this is Hillingdon Circus Junction and North Hillingdon Local Centre. Immediately to the west of the site is Long Lane/A437.

5 Hillingdon Tube Station is 200 metres to the east of the site (Metropolitan and Piccadilly Lines). There are several bus stops within 200 metres of the site servicing bus routes to and from Ickenham, Uxbridge and Oxford. As such, the site has a moderate public transport accessibility rating of 3 on a scale of 1 to 6 (where 6 is the highest). Heathrow Airport is 5 miles from the site to the south.

Details of this proposal

6 Construction of a residential-led, mixed use development to provide 588 homes, employment floorspace, flexible commercial floorspace, and associated car and cycle parking, highway improvements, hard and soft landscaping, plant and other associated ancillary development.

Strategic planning issues and relevant policies and guidance

7 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2012 Hillingdon Local Plan: Part 1 – Strategic Policies, and the Part 2 – saved policies of the Unitary Development Plan 2012 and the 2016 London Plan (Consolidated with Alterations since 2011).

8 The following are relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance.
- Draft London Plan Consolidated Version of Changes (July 2019), which should be taken into account on the basis explained in the NPPF.
- Hillingdon Council's draft Local Plan: Part 2 – Development Management Policies, Site Allocations and Designations and Policies.

9 The following are relevant material considerations:

- | | |
|---------------------------|---|
| • Land use principles | <i>London Plan; Town Centres SPG;</i> |
| • Housing | <i>London Plan; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG; Affordable Housing and Viability SPG;</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;</i> |
| • Inclusive access | <i>London Plan; Shaping Neighbourhoods: Accessible London: Achieving an Inclusive Environment SPG;</i> |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy.</i> |

Summary of meeting discussion

10 Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to land use principles, affordable housing, housing, sustainable development and transport. GLA officer advice in respect of these issues is set out within the sections that follow.

Principle of development

11 The principle of a residential-led mixed-use development on the site has been established through the sites planning history. Furthermore, Hillingdon Council's emerging draft Local Plan: Part 2 – Development Management Policies, Site Allocations and Designations and Policies identifies the site for residential-led, mixed-use developments (SA Master Brewer and Hillingdon Circus, Hillingdon (Site B)). The emerging allocation comprises both the site and the vacant land located adjacent to the site on the western side of Long Lane, known as 'Hillingdon Circus'.

12 The London Plan sets a 10-year housing target of 5,590 and an annual monitoring target of 559 new homes per year in Hillingdon per year between 2015 and 2025. The redevelopment of the site to provide a mixed use residential led scheme providing 588 new residential units equates to 10.5% of 10 year target and is therefore strongly supported. Draft London Plan Policy H1 increases this annual target to 1,553 the proposals would deliver 36% of the annualised target set out in the draft London Plan. This is supported. The applicant must demonstrate that the full residential capacity of the site has been optimised by any future proposals.

13 London Plan Policy 4.7, draft London Plan Policy SD6 all set out a town centre first approach to the provision of new town centre uses. The London Plan establishes that edge or out of centre retail development must be subject to an assessment of impact. Flexible floorspace is proposed which may include workspace, affordable workspace, community uses and retail uses. The flexible uses are proposed within the ground floors of the blocks at the edges of the blocks fronting onto the public realm. The proposed flexible uses are intended to satisfy the localised need arising from the proposed new homes and the wider development in the wider area. Given the limited scale of the proposed flexible uses at the site it would not prejudice the vitality or viability of the boroughs Town Centre locations.

14 London Plan Policy 7.16 and draft London Plan Policy G2 afford Green Belt Land the strongest protection in accordance with national guidance. The NPPF through paragraphs 133-147 affords the strongest possible protection to Green Belt. The NPPF provides that construction of new buildings should be regarded as inappropriate save for certain limited exceptions set out in paragraph 145. There is a small strip of Green belt included within the envelope of development to the eastern edge of the plot. This land is not proposed to be developed on but incorporated into the wider landscape strategy. This is strongly supported in accordance with the policies outlined above. At application stage the enhancement works to this area of land must be fully detailed.

Affordable housing

15 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 seeks to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy H6 of the draft London Plan (Consolidated Version of Changes (July 2019)) identifies a minimum threshold of 35% (by habitable room) affordable housing, with an upper threshold of 50% for publicly owned land. Applications providing the relevant threshold level of affordable housing before public subsidy; with an appropriate tenure split; having explored potential additionality through grant funding; and, meeting all other relevant policy requirements and obligations to the satisfaction of the Mayor and Local Planning Authority can follow the 'Fast Track Route' route as set out within

draft London Plan Policy H6 and the Mayor's Affordable Housing and Viability SPG. Such applications would not need to submit a viability assessment, and would not require a late stage viability review mechanism to be secured as part of any Section 106 agreement.

16 Policy H7 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG set out a tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined in partnership with the Local Planning Authority. If at application stage the proposal does not meet the requirements of the draft London Plan threshold approach, and/or if the LPA is not satisfied that the proposed tenure split appropriately responds to local need, an application must be determined under the 'Viability Tested Route' - requiring submission of a full viability assessment for rigorous independent review.

17 The applicant has proposed 35% affordable housing by habitable room before subsidy. The affordable housing tenure mix is yet to be finalised. This is supported in principle. The applicant team must agree the tenure split with the Council in accordance with the principles of the draft London Plan. The applicant must explore the availability of grant funding to further increase the affordable housing offer.

18 It is understood there may be a long lease arrangement between the applicant and the council for an area of land to the south of the site. In some instances, this would mean that the land could be considered primarily in private ownership although consent may be required from the freeholder. For these reasons where the public sector land interest is in the form of a freehold or similar interest and a long leasehold is in place which is not held by the public land owner, the 35 per cent threshold would apply in relation to the Fast Track Route. If not the 50% public land threshold would apply to this portion of the site. At application stage the GLA will need to fully understand the land ownership arrangements for all areas of the plot.

Affordability

19 The Mayor is committed to the delivery of genuinely affordable housing and draft London Plan Policy H7; the Mayor's Affordable Housing and Viability SPG; and, the Mayor's Affordable Homes Programme 2016-21 Funding Guidance set out the Mayor's preferred affordable housing products. The applicant is advised that the Mayor's preference is for affordable rent products to be secured at London Affordable Rent benchmark levels, and for intermediate shared ownership products to be secured as affordable to a range of incomes below the upper limit of £90,000 per annum, and benchmarked against the monitoring figure of £56,200 per annum in the London Plan Annual Monitoring Report. All affordable housing must be robustly secured in perpetuity, within a Section 106 agreement.

Housing

Density

20 Noting the characteristics of the location as well as the proximity to Hillingdon Station, this site lends itself well to the creation of a new high quality, high density mixed use neighbourhood. London Plan Policy 3.4 and Policy D6 of the draft London Plan seek to optimise housing density, with the draft London Plan placing greater emphasis on a design-led approach to density assessments. Essentially, the higher the density of a development, the greater the level of design scrutiny that is required - particularly in terms of qualitative aspects of the development design, as described in draft London Plan Policies D4 'Housing quality and standards' and D2 'Delivering good design'.

21 The residential density of the scheme would be 246 units per hectare which exceeds the upper limit of the indicative range within the London Plan and the thresholds set out within Policy D6 of the draft London Plan. The proposal therefore triggers the requirement for an increased level of design scrutiny. The supporting text of London Plan Policy 3.4 confirms that the density matrix should not be applied mechanistically enabling account to be taken of other factors relevant to optimising potential. However, the scheme must be of exemplar design in order to be justified, and must provide the fullest contribution of affordable housing. At application stage it must be demonstrated that the full residential potential at the site has been optimised in order to make the best use of London's available land.

Residential mix

22 London Plan Policy 3.8 encourages new developments to offer a range of housing choices in terms of mix and size. Draft London Plan Policy H12 recognises that a higher proportion of one and two-bedroom units is generally more appropriate in more central or urban locations and states that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes. In strategic planning terms any future housing mix must be fully justified against local need with an appropriate proportion of family sized accommodation. GLA officers would expect the provision of family housing to be appropriately prioritised within the social/affordable rent component of the mix, in response to local need.

Residential quality

23 The residential floorplates are yet to be finalised, indicatively the applicant has confirmed that the blocks will benefit from efficient unit to core ratios (of no more than 8 units per core), single aspect north facing units will be minimised as far as possible and internal spaces will, as far as practical be well-defined, sun-lit. the applicant must also ensure that all units have access to adequate private shared amenity spaces. All ground floor units should include direct front door access to help animate the streets and spaces and promote passive surveillance.

Children's playspace

24 London Plan Policy 3.6 and draft London Plan Policy S4 require development proposals to make provisions for play and informal recreation based on the expected child population generated by the scheme. The Mayor's Play and Recreation SPG and draft London Plan Policy S4 expect a minimum of 10 sq.m. per child to be provided in new developments. The GLA playspace calculator has recently been refined to better predict the likely child yield of schemes. The applicant should refer to the revised calculator to ensure that sufficient playspace is provided within the scheme. The proposals must demonstrate at application stage that there is an appropriate provision of playspace, particularly for the youngest children. Furthermore, policy S4 of the draft London Plan makes it clear that play space in new residential developments should not be segregated by tenure. The applicant should aim to deliver all the playspace requirements on site in the first instance. Where this is not possible the applicant would be required to demonstrate that the recreational needs/any shortfall in playspace provision can be accommodated within surrounding public amenity space. This approach, if fully justified is acceptable; however, the Council would be encouraged to seek an open space contribution where appropriate to mitigate any intensified use of local spaces.

Urban design

Layout

25 The proposed masterplan would introduce three main routes east to west through this vacant brownfield site - helping to connect Hillingdon Station and the wider town centre in the east, with adjacent Green Belt land to the west. The street pattern created by the above-mentioned primary routes helps to set up a conventional arrangement of blocks either side of the three main routes. Creating a strong sense of arrival at the prominent south western entry corner is supported and there is strong potential to re-establish the historic character of the junction in townscape terms. The perimeter blocks would serve to reduce noise and air quality issues to the central spaces of the plot, which have been characterised for community/commercial and amenity spaces. This approach is supported in order to buffer the wider masterplan from road noise. The layout and ground floor of the masterplan is generally supported, as the detailed design evolves the applicant team should maximise active frontages and optimise ground floor interfaces between blocks whilst ensuring the number of single aspect facing units is minimised as far as possible. Based on the visualisations and plans provided to date, the quality of the proposed public realm strategy is supported. The housing towards the southern portion of the site should be designed to avoid the need for fencing onto the public realm. This might be achieved through exploring options for a hybrid arrangement of housing and flatted blocks. The indicative block layout is broadly supported and strikes a good balance between offering a range of housing typologies, character areas within the site and a legible sequence of streets and spaces.

26 The intention to contain car parking within podiums along the northern portion of the site is supported and options for edging the car parking with active duplex frontages should be explored. A conventional approach to on-street parallel street-based parking (where necessary) for the remainder of the site is supported subject to being suitably integrated into the public realm/landscaping design. The applicant is encouraged to reduce car parking as much as possible.

Height and massing

27 London Plan Policies 7.1 and 7.4 and draft London Plan Policies D1 and D2 require development to have regard to the form, function and structure of an area and the scale, mass and orientation of surrounding buildings. The application proposes the construction of a series of blocks ranging between 2 and 9 storeys. The intention to contain the taller elements of the scheme towards the northern portion of the site parallel to Western Avenue (A40) is supported and would assist in buffering noise to the rest of the blocks. As part of this rationalised approach the mitigation of noise and air quality effects associated with Western Avenue to the north should be fully addressed both in terms of the massing response to this edge and in the internal layouts and fabric of the blocks. The proposed height and massing strategy responds well to the sites contexts with the tallest elements along the northern edge and the lowest components lining the southern boundary of the site in closest proximity to the low-rise residential properties which front Freezeland Way. In order to realise the full regenerative potential at this site and maximise the level of affordable housing delivered by the scheme the applicant must ensure that the height and massing strategy fully realises the potential of the plot.

Architecture

28 The architecture of the scheme is yet to be fully developed but early schematic designs promote visual links to the surrounding suburban context and respond well to the surrounds. The intention to respond to the established residential character of the surrounding area through the use of architectural features such as pitched roofs, proportions of key facades and materials is

welcomed. These design principles should continue to be incorporated into the architecture of the scheme.

Inclusive access

29 London Plan Policy 7.2 and draft London Plan Policy D3 require that all new development achieves the highest standard of accessible and inclusive design. These policies seek to ensure that all new development can be used easily and with dignity by all.

30 London Plan Policy 3.8 and draft London Plan D5 require that 10% of new housing is delivered as designed to be wheelchair accessible and that the remaining 90% are easily adaptable for residents who are wheelchair users. At application stage the scheme must demonstrate that 10% of units across the development, comprising a mix of unit sizes will be delivered as wheelchair user dwellings, the remaining units must be delivered to Building Regulation M4(2) specifications. This will need to be secured by condition, along with Building Regulations standards M4(2) and M4(3) in line with London Plan Policy 3.8 and Policy D5 of the draft London Plan.

31 Draft London Plan Policy D11 requires, in the interests of fire safety and to ensure the safety of all building users, all development proposals to achieve the highest standards of fire safety. At application stage the applicant must submit a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor.

Sustainable development

Energy

32 The updated GLA Energy Assessment Guidance provides details on the information that should be provided within the energy assessment to be submitted at stage 1. See link for the latest guidance published in October 2018: <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>

33 The residential component of the scheme should achieve net zero carbon with at least an on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations. The non-residential components of the scheme will be expected to achieve 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations. The zero carbon target will apply to non-domestic developments when the draft London Plan is adopted. A full technical note has been issued to the planning agent which should be responded to in full at application stage.

Drainage and flood risk

34 Given the site is greater than 1 hectare in area. Under the NPPF, a Flood Risk Assessment (FRA) will need to accompany the application. The site is greater than 1 hectare in area. Under the NPPF, a Flood Risk Assessment (FRA) will need to accompany the application. The drainage strategy should aim to reduce surface water discharge from the site to greenfield rates in accordance with London Plan Policy 5.13 and draft London Plan Policy SI.13. The drainage strategy should aim to reduce surface water discharge from the site to greenfield rates in accordance with London Plan Policy 5.13 and draft London Plan Policy SI.13.

Urban greening

35 London Plan Policies 5.10 and 7.21 seek to retain existing trees of value, or mitigate their loss, and require developments to incorporate urban greening measures. Draft London Plan policies G5 and G7 go beyond the London Plan policies by embedding urban greening measures

and retention of existing trees of quality into the planning process. As set out in draft London plan Policy G5 the Mayor has developed a generic Urban Greening Factor model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments. This is based on a review of green space factors in other cities. The factors outlined in Table 8.2 of the policy are a simplified measure of various benefits provided by soils, vegetation and water based on their potential for rainwater infiltration as a proxy to provide a range of benefits such as improved health, climate change adaption and biodiversity conservation. At application stage compliance with draft London Plan Policy G5 must be demonstrated. The applicant has outlined their intention to incorporate these principles at an early stage of the design. To do this effectively the applicant should, ensure site levels are designed to allow SuDS strategy to function properly, ensuring SuDS is incorporated as part of both the landscape and drainage strategies. Where there is a proposed loss of trees this must be fully evidenced and justified at application stage.

Transport

36 A Transport Assessment (TA) must be produced by the applicant as part of any future submission. The TA must be in accordance with TfL's best practice guidance, available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>.

37 The applicant must produce; a Travel Plan, a Construction Logistics Plan and a Servicing and Delivery Plan. These documents must be submitted as part of any future submission and completed in accordance with TfL guidance. Guidance on these documents can be found at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>, <http://content.tfl.gov.uk/construction-logistics-plan-guidance-for-developers.pdf> and <http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf>

38 The existing vehicular access junction on Freezeland Way will be retained and interventions proposed as part of the previous scheme at the site are re-proposed. This is acceptable subject to a Stage 1 Road Safety Audit and swept path analysis being undertaken.

39 London Plan Policy 6.13 and draft London Plan Policy T6 require developments to provide the appropriate level of car parking provision. Car parking is proposed at a ratio of 0.3-0.35 spaces per residential unit, in line with draft London Plan policy T6.1. Whilst this quantum accords with draft London Plan requirements GLA officers note the potential to reduce car parking provision to encourage more sustainable modes of transport and fully utilise the good public transport connections. The applicant proposes 3% of spaces to be designated disabled persons parking, in accordance with draft London Plan policy T6.1. It should be demonstrated on plan as part of the Parking Design and Management Plan how an additional 7% of dwellings could be provided with a designated disabled persons parking space in future upon request.

40 Cycle parking should be provided to be in line with the draft London Plan standards, contained within Table 10.2. Cycle parking design should be in accordance with London Cycle Design Standards (LCDS). Short Stay cycle parking should also be provided in line with draft London Plan standards and should be located close to the access points into the development, within the public realm. Cycle parking is to be provided in conformity with the minimum standards for quantum outlined in draft London Plan policy T5, which is welcomed. Cycle parking is to be provided in conformity with the minimum standards for quantum outlined in draft London Plan policy T5, which is welcomed.

41 New pedestrian routes through to the green-belt land to the east of the site are proposed, which are welcomed, helping to promote walking and cycling in the vicinity of the site, in line with

draft London Plan policy T2 Healthy Streets. TfL recently published 'Small Change, Big Impact', which highlights ways London's public spaces can be enhanced by small improvements. These principles should be incorporated into any future scheme.

Conclusion

42 The residential-led mixed use redevelopment of the site, providing approximately 588 residential units is supported in principle. The applicant should have due regard to the advice as set out in this report in respect to; housing, affordable housing, urban design, inclusive access, sustainable development and transport.

for further information, contact GLA Planning Unit (Development & Projects Team):

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