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**BY EMAIL & POST: LondonPlan@london.gov.uk**

2<sup>nd</sup> March, 2018

Dear Mayor,

**NEW DRAFT LONDON PLAN  
REPRESENTATIONS ON BEHALF OF CIRRUS LAND LIMITED AND THE GUINNESS**

On behalf of Cirrus Land and The Guinness Partnership we hereby submit representations on the New Draft London Plan (see attached).

Cirrus Land and The Guinness Partnership are promoting the potential development of land at Yiewsley Waterside, which is located in LB Hillingdon. Yiewsley Waterside would assist in the delivery of a major regeneration of Yiewsley by facilitating a strategic scale major residential scheme. This would include the delivery of a significant and policy compliant amount of genuinely affordable housing.

The location of Yiewsley Waterside would take advantage of being located within a ten-minute walk of West Drayton station, which from December 2019 will be served by Crossrail (the Elizabeth Line West).

We welcome the draft London Plan's objectives to pursue 'Good Growth', 'build a city that works for all Londoners' and to address London's 'housing crisis'. However, we believe that addressing the latter in particular, requires not only a tightly honed Plan, but also necessitates further consideration in making this Plan, to ensure that sufficient deliverable land is identified to fully meet the housing needs of Londoners.

The Yiewsley Waterside proposal being promoted by Cirrus Land and The Guinness Partnership would create a new community and involve development on land which comprises predominantly previously-developed land and made ground. Photos of parts of the site are included in our formal response to the Plan (attached).

The proposed development could deliver up to 3,500 homes and will meet or exceed the 35% affordable housing requirement as set out by the Mayor. This site therefore provides the opportunity for a significant portion of much needed affordable housing, which would help to meet both Hillingdon and London wide housing targets. The proposals will also support the utilisation of a major national piece of infrastructure, the Elizabeth Line, which combined with the existing transport routes provides both a deliverable and desirable strategic site with extensive transport links.



In our detailed response to the Plan (see attached), we welcome the housing targets but note that they should be higher. We also note that there are significant question marks over the ability of individual Boroughs to deliver a step-change in the delivery of housing at the new rates proposed on small sites.

Since we consider it to be essential that higher housing delivery rates are achieved, including the provision of higher rates of housing, but are also concerned that Boroughs will not be able to deliver all the housing that is needed - we also request that a review of the Green Belt is undertaken in order to identify additional sources of housing land supply.

In particular, there should be focussed reviews of the Green Belt in locations within currently defined Growth Corridors and Opportunity Areas and on land which is closely related to existing urban centres and existing or planned transport hubs. This would enable there to be a clear focus upon the consideration of sites such as Yiewsley Waterside which includes despoiled Green Belt land where anti-social behaviour, unlawful uses, fly tipping, contamination and invasive species are rife and would not only unlock land for much needed housing (including affordable housing) but also provide a wealth of social, economic and ecological benefits to London and its residents.

In conclusion, we consider that it is precisely sites such as Yiewsley Waterside, that comprises predominantly previously-developed land and made ground and could deliver significant numbers of new and affordable homes in sustainable locations, which can play a key role in addressing the growing London housing crisis and should be supported through the provision of policy guidance in the New London Plan. However, it is clear that in order to do so, a more flexible and pragmatic approach to development, in particular on poor quality areas of Green Belt land needs to be adopted at all levels of governance.

We trust that these representations will help the Mayor refine the next draft of the London Plan. Given its early stage in the plan-making process, we advise the Mayor should not refer to the draft Local Plan policies until its adoption.

If there is anything that Officers would like to discuss, please do not hesitate to contact us at these offices.

Yours sincerely,

  
  
**NEVILLE SURTEES**  
Associate

Encs.

cc. R. Vestentoft - Cirrus Land  
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M. Hanson - The Guinness Partnership

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2<sup>nd</sup> March 2018

**LONDON PLAN RESPONSE  
ON BEHALF OF CIRRUS LAND LIMITED AND THE GUINNESS PARTNERSHIP**

This response to the New London Plan consultation is made on behalf of the development partners responsible for the promotion of the redevelopment of land at Yiewsley Waterside (in LB Hillingdon). The co-promoters comprise Cirrus Land and The Guinness Partnership.

This response provides the reasoning behind why we consider that there should be changes made to the New London Plan, to enable a focussed review of the existing boundaries of the Green Belt in certain areas, in order to deliver the step-change in housing delivery required to meet London's housing needs. This response is structured around the following topic headings:

- Addressing the Housing Crisis
- Yiewsley Waterside - A Proposal to Meet London and Hillingdon's Housing Needs
- Request for a Review of the Green Belt (Policies SD1 and G2)
- Other Related Responses to the New London Plan (Policy GG2 And Key Diagram)



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## ADDRESSING THE HOUSING CRISIS

### Need and Supply

Taken at face value the draft London Plan does not identify sufficient supply to meet identified need. This is borne out when the housing target (Table 4.1) of 64,935 dwellings per annum (dpa) is compared with the GLA's Strategic Housing Market Assessment (SHMA). The SHMA shows that London has a need for approximately 66,000 additional homes a year.

The Mayor's housing target is also much lower than would result if the calculation of housing need for London was based on the Government's proposed standardised methodology for measuring housing need (i.e. 72,400 dpa). This is even lower than the calculation of housing need by the Home Builders Federation, which cites a rationale for why the Objectively Assessed Need for London should be the 'uncapped requirement' of 92,000 dpa.

Irrespective of the final number, and for the reasons given in our responses to the draft Plan policies relating to small sites and Green belt, we consider that there is a pressing need to identify our Yiewsley Waterside proposals to meet the housing targets (which are referred to in our overall response to the New London Plan).

### Small Sites

In order to try and meet the housing target the draft London Plan relies upon 24,573 homes (Table 4.2) coming forward from 'small sites' to help meet delivery of the overall housing target for London. This represents approximately 38% of the total number of new homes required. In Hillingdon, to deliver its specific ten-year housing target of 15,530 homes, approximately 7,650 homes (Table 4.2) would need to be built on small sites (i.e. 765 dpa).

Based on previous experience, we see no grounds for confidence in believing that the required 'step change' with respect to 'small sites' will take place particularly to the extent sought in the draft London Plan.

Achieving the proposed delivery rate represents a significant challenge. The London Strategic Housing Land Availability Assessment (SHLAA) (November 2017) demonstrates that the average number of completions across 'small sites' from 2004/05 to 2015/2016 has been 10,828 (Table 6.3), significantly lower than the rates being targeted. Moreover, the SHLAA indicates this figure has only exceeded 12,000 dpa (i.e. roughly half the target) in 4 of these 12 years (Table 6.1). Indeed, in Hillingdon the average rate of completions on small sites for the same period is 203 dpa, which is only 26.5% of the 765 dpa that the Plan needs to be built to meet its small sites target for the Borough.

Furthermore, for the following reasons we do not consider it possible for there to be a step change increase in small site delivery in London:

- (i) there is a general lack of organisational knowledge or capacity on the part of those in control of most small sites;
- (ii) there is a significant financial outlay in promoting development on such sites;
- (iii) there is a potential lack of confidence on the part of some promoters in securing a profit sufficient to justify the cost and risk involved;
- (iv) there is a general lack of confidence on the part of some promoters of small sites in being able to justify pursuing a scheme against its existing or alternative use value; and
- (v) the planning, legal and ownership issues associated with some small sites are often complex and difficult to address.

It seems far more realistic to assume, instead, that the delivery rate continues at 10,828 dpa. In that scenario the New London Plan's housing supply falls to 51,190 homes per annum, far short of need, whatever calculation is used.

This brings into sharp focus the need to identify other sources of supply of housing, in particular sites such as Yiewsley Waterside (which is referred to in our overall response to the New London Plan). Furthermore, by identifying sites such as Yiewsley Waterside for development, it would also reduce the need to develop land within sensitive parts of existing suburban areas, which could lead to its over-intensification and adversely affect its existing character, a concern in Hillingdon Borough.

### **Matching Delivery with Need**

Historically London has fallen short of its targets for delivery of housing which has in part contributed to the current housing crisis. Indeed, past rates of housing delivery identified in the most recent London Annual Monitoring Report 2015/16 (AMR no. 13) (July 2017) revealed that total net housing completions were 38,533 homes against a target of 42,338 (Table 2.6). That is only 91% of the total number of dwellings currently required and only 59% of the target set by the New London Plan. This figure falls further if student rooms are counted on a 3:1 basis, as stated in the Plan, something which we support.

It is not only market housing, but also affordable which has lagged behind targets. The current AMR states that between 2013/14 and 2015/16 the average percentage of affordable homes delivered ranged from 20% to 26%, a long way short of the targets set out in the New London Plan. It is clear therefore that a step change in the delivery of market and affordable housing is required and we would question the ability of small sites and greater densities alone to achieve this.

### **Conclusion**

In response to the Housing target for London (i.e. Table 4.1), we believe the Mayor should revisit these figures in line with the Government's standardised methodology for calculating Objectively Obsessed Housing Need. In addition, the figures used from the SHLAA should discount any sites with a 'low probability' of delivery. The Mayor of London should also revisit these figures to ensure they represent the minimum that each local planning authority can deliver.

All in all, delivering the minimum number of homes set out in the draft London Plan requires such a significant overall 'step change' that it is difficult to see how it can be achieved without substantive changes to the approach set out in the draft New London Plan.

We accordingly recommend that measures are taken to boost delivery. This should include a review of the Green Belt within the currently specified opportunity areas, as described in our responses to the Plan and include the consideration of sites such as Yiewsley Waterside.

Irrespective, and for the reasons given in our responses to the draft Plan policies relating to small sites and Green belt, we consider that there is a pressing need to identify our Yiewsley Waterside proposals (which are referred to in our overall response to the New London Plan) in order to meet London's housing targets.

## YIEWSLEY WATERSIDE - A PROPOSAL TO MEET LONDON AND HILLINGDON'S HOUSING NEEDS

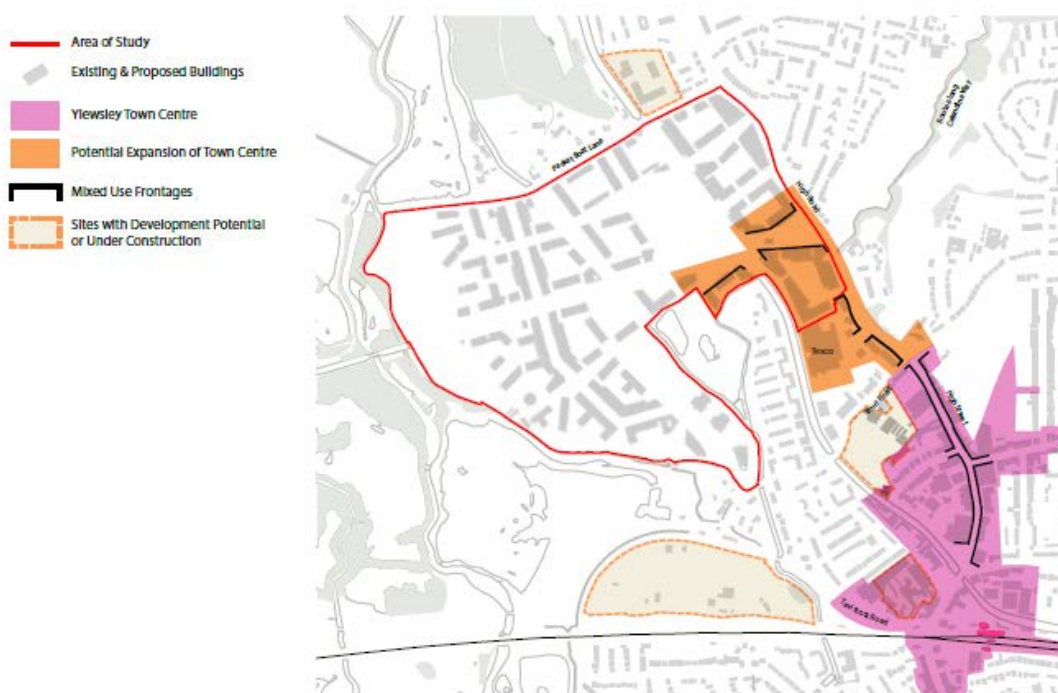
### Introduction

Yiewsley Waterside involves the creation of a new community on land which is predominantly previously-developed or made ground, which will promote regeneration and development within the Heathrow/Hayes Opportunity Area (within the Elizabeth Line West corridor) in the New London Plan (Figure 2.10). The scheme will include a significant, policy compliant level and mix of genuinely affordable housing, while taking advantage of the future Elizabeth Line station which will be located within a ten-minute walk of the site.

The development could deliver up to 3,500 new dwellings along with supporting community infrastructure and act as a catalyst for the regeneration of existing commercial land and buildings along Hillingdon High Street, while making a significant contribution to the housing requirements of Hillingdon and Greater London.

### The Site and Surroundings

Yiewsley Waterside comprises an area of approximately 48 hectares (119 acres) located 500m to the north west of Yiewsley town centre, 2 miles to the south of Uxbridge town centre and 0.6 miles to the north west of West Drayton railway station (which is due to be upgraded by December 2019 as part of Crossrail - and give further impetus to regeneration projects in the local area). The site is formed of two parts, separated from the existing urban area by the Grand Union Canal. The majority of the site is designated as Green Belt.



Site Location Plan



## The Core Area

This land lies to the west of the Grand Union Canal and is bisected by the Slough Branch of the canal; as such it is located at a junction of these two canals. Cirrus Land and The Guinness Partnership (the "development partners") are promoting the site in collaboration with the landowners. This part of the site has an area of 39 hectares, comprising predominantly previously-developed land or made ground. There is a long history of licensed and unlicensed tipping over the site. To the north west of the slough branch of the canal tipping dates back the 19<sup>th</sup> century.

South east of the Slough branch gravel extraction in the early part of the 20<sup>th</sup> century was followed by a long period of the site being used for licensed and un'-licensed tipping which continued into the 1970's so that ground levels are now many metres in excess of the original datum. This made ground covers approximately half of the land. There is a disused waste transfer station on the site. The history of tipping has resulted in there being significant contamination on the site. In addition, numerous industrial and commercial uses have become established north east of the slough branch of the Grand Union Canal.

The following 3D illustration shows one way in which Yiewsley Waterside could be developed.



Yiewsley Waterside – 3D Illustration

The Grand Union Canal and Packet Boat Marina, marks the eastern edge of the site. The Slough Arm of the Grand Union Canal crosses through the middle of the site. The Core Area is located within the Colne Valley Regional Park and is currently designated as Green Belt.

## The Regeneration Area

This part of the site could come forward at a later date and comprises land along Hillingdon High Street (9 hectares) which is either in employment or out-of-town centre commercial use. The timing of development is currently expected to follow the commencement of development within the Core Area due to its current use as commercial units. It is envisaged that future proposals for mixed-use development would retain the current levels of employment on site in conjunction with a high-density residential scheme.

The following photos show activities undertaken within the centre of the Core Area.



1. Unlicensed tipping and materials grading on the north-west side of the Slough branch of the Grand Union Canal





2. Abandoned waste transfer station at the north-western end of Trout Lane



3. Tipping/ plant storage/dumping on land south east of the canal.



4. Buildings facing the canal at the waste transfer station



5. Example of some of the anti-social behaviour on site.

### The Opportunity

The site at Yiewsley Waterside presents an unusual opportunity to deliver an exemplar residential development of up to 3,500 dwellings within the Elizabeth Line West Growth Corridor and Opportunity Area, while being within easy walking distance of West Drayton Crossrail station. This major regeneration scheme can be achieved by bringing into use land which, is predominantly previously-developed and made ground, much of which is contaminated and in need of remediation.

In total, it is envisaged that approximately 3,500 dwellings could be delivered with 2,500 dwellings built within the Core Area and a further 1,000 dwellings in the Regeneration Area. As part of the delivery of housing, emphasis will be placed by the promoters of Yiewsley Waterside, which includes The Guinness Partnership, to build sufficient affordable housing to meet the policy requirements of the New London Plan (including the delivery of a policy compliant mix and range of tenures).

Development within the Core Area would involve the building of a high density residential area. Delivery of development within this area is envisaged to come forward first. The scheme includes comprehensive remediation of the site and significant environmental and ecological improvements would form a key part of the scheme.

It is envisaged the Regeneration Area redevelopment could come forward at a later stage and involve the consolidation of existing retail and employment floor space, which is there at present. The timing of development is currently expected to follow the commencement of development within the Core Area due to its ownership and current use as commercial units.

LB Hillingdon notes in its current adopted Local Plan Part 1 that Crossrail and the Grand Union Canal have an important role to play in the regeneration of the Hayes/West Drayton Corridor. This corridor corresponds to the Heathrow/Hayes Opportunity Areas (within the Elizabeth Line West corridor) identified in the New London Plan (Figure 2.10). The Local Plan also encourages the regeneration of Yiewsley town centre.

The proximity of Yiewsley Waterside to Crossrail, the town centre and the Canal means that future development in this location would contribute towards Hillingdon's future growth aspirations.

By creating physical connections between the existing urban area, the Canal (including the Packet Boat marina) and the nearby lakes in the local area, the delivery of development at Yiewsley Waterside would also present opportunities for the Colne Valley Regional Park to realise a number of its aims for this part of the Park. For example:

- Connecting lakes with the Grand Union Canal/increasing access to open spaces, the Green Belt and urban fringe.
- Enhancing distinctive visitor destinations and boosting the visitor economy.

In addition, the delivery of the Regeneration Area would allow for the future extension of the Celandine Route into the site and onwards into the Colne Valley Park.

The delivery of Yiewsley Waterside offers the chance to implement the aims of the adopted Hillingdon Local Plan and also to address documents on good practice guidance created by the Canal & River Trust. These proposals include a requirement that "waterways should not be treated simply as a setting or backdrop for development but as a space; a leisure and commercial resource in its own right. The potential 'added value' of the waterspace needs to be fully explored (through waterspace strategies where appropriate)". (Ref.: <https://canalrivertrust.org.uk/planning-private/planning-and-design/unlocking-the-added-value-of-water-through-planning-and-design>).

Furthermore, by identifying sites such as Yiewsley Waterside for development, it would also reduce the need to develop land within sensitive parts of existing suburban areas, which could lead to its over-intensification and adversely affect its existing character, which is a concern in Hillingdon Borough.

### **Creating a Better Green Belt Boundary**

The development proposals associated with Yiewsley Waterside will create a new, strong and defensible boundary for the Green Belt, a safer and more accessible Colne Valley Park and a high quality waterside leisure destination in a sustainable location which utilises new transport infrastructure at West Drayton while meeting the future development needs of Greater London and Hillingdon.



In order to set a physical framework for its containment, it is proposed that the River Colne is used to define a new and long-standing Green Belt boundary in this location as it does further north at Uxbridge Moor and West London Industrial Park. In doing so, the proposed new Green Belt boundary would release sufficient land which would be capable of delivering a sustainable pattern of development (i.e. the land at Yiewsley Waterside is within close proximity of Yiewsley town centre and West Drayton railway station), which is well related to the existing urban area.

Although the Core Area of Yiewsley Waterside is currently designated as Green Belt, it includes a number of urbanised elements, including a marina, a disused waste transfer station and a mixture of small scale industrial and commercial uses. In addition, a significant part of the Core Area comprises made ground which results from historic landfills.

The Core Area is also physically contained as a result of its topography and the presence of dense vegetation and water bodies around its western/south-western boundaries; and by existing built development along the north-eastern and south-eastern boundaries. The choice of the River Colne as a proposed new Green Belt boundary would also serve as a permanent and defensible barrier.



Aerial View of Area with Potential New Green Belt Boundary

When assessed against the five purposes of the Green Belt it is considered that land within the Core Area of Yiewsley Waterside should be released from the Green Belt, in order to make a contribution towards meeting the housing needs of London and Hillingdon:

- Development in this particular location will not result in the unrestricted sprawl of Yiewsley. It is proposed that the River Colne would serve as the new Green Belt boundary, which is defensible and capable of serving as a permanent, long-term boundary.
- It performs no role in preventing neighbouring towns from merging.
- Land within the Core Area does not comprise open countryside. Instead, it contains various urbanising elements and is physically contained by its topography and by existing built development (as described above and shown on the photographs included in this response). Its development would not, therefore, result in the encroachment of the countryside.



- There are no historic towns within the wider area. As a result, the development of land at Yiewsley Waterside would not result in any visual harm to the setting and character of an historic town.
- The redevelopment of the Core Area of land at Yiewsley Waterside would assist in promoting urban regeneration in this particular area, including the remediation of contaminated land (resulting from historic landfill), the removal of nuisance uses from the site (i.e. unregulated industrial uses) and the removal of significant areas of land covered by non-native invasive species. It would also act as a catalyst for future redevelopment and regeneration in the wider Yiewsley area (including within the defined Regeneration Area as part of the Yiewsley Waterside proposals), which would take advantage of the greater accessibility and connectivity of the area which will result from the opening of Crossrail in December 2019.

The development of this site will not result in the loss of land which performs any of the key roles of the Green Belt. The designation is erroneous in this location. The damaged and previously-developed or made ground character of the land is even more evident on inspection (see above photos).

### **Connecting People and Places**

The site presents an opportunity to create a development where residents are able to walk, cycle and use public transport to meet their daily needs. The site lies close to Yiewsley town centre which has a good range of services and employment opportunities.

West Drayton Station, which will see Crossrail services begin in December 2019, is within easy walking and cycling distance, via safe and convenient routes. Residents will also be within walking distance of the existing bus services running along High Road/High Street. These include regular services to Yiewsley town centre and Uxbridge. It is therefore intended that there should be a focus upon maximising walking and cycling and the use of public transport.

In terms of connecting Yiewsley Waterside to the surrounding urban area by road, use will be made of the existing connections from Packet Boat Lane and Trout Lane, particularly during the earliest phases of the proposed development of the Core Area. As the development of Yiewsley Waterside progresses, including the redevelopment of the Regeneration Area, further improvements to road connectivity can be made - as part of the aim to balance the delivery of development with the delivery of associated supporting infrastructure.

### **Boosting the Local Economy**

The delivery of development at the scale proposed at Yiewsley Waterside would make a significant contribution towards maintaining and enhancing the vitality and viability of the local economy, including Yiewsley High Street and towards creating and sustaining jobs in the construction industry.

Based on initial research undertaken by Barton Willmore, the development of Yiewsley Waterside could deliver a number of economic benefits, as illustrated below:

Core Area (2,500 dwellings):

- Average household expenditure of £54.2m within Hillingdon Borough;
- 238 direct jobs sustained on site per month over the construction period (13 years) and 143 indirect jobs sustained over the construction period; and
- Opportunities for greater use of the existing marina for leisure and tourism use.

Regeneration Area (1,000 dwellings):

- Average household expenditure of £21.7m within Hillingdon Borough;

- 206 direct jobs sustained on site per month over the construction period (6 years) and 124 indirect jobs sustained over the construction period
- Opportunities for the landowners and occupiers to redevelop their existing buildings for new employment and commercial units (with residential on the floors above).

Direct and indirect jobs will also be created for the commercial element of the scheme (i.e. community, leisure etc.).

Furthermore, the proposal has the potential to not only regenerate the adjoining commercial area and support local shops and services, but it could also extend the town centre northwards. This could connect with the new mixed-use area (Penn Place/Grand Union Square) incorporating or expanding upon some of the existing retail uses, such as Tesco supermarket.

### **Opportunities for Ecological Enhancement**

Based on the findings of a walk-over survey and a desk-based assessment, it is noted that part of the Core Area is covered by non-statutory designations (which are fairly wide ranging in the detail of the importance of the ecology which is present). It is also noted that the site is seen to be dominated by areas of disturbed ground which is largely absent of vegetation, thick stands of scrub (principally Butterfly Bush), young/semi-mature woodland, fishing lakes, additional ponds/standing water, and the canal.

The proposed development of the Core Area would offer the opportunity to remove dense and significant stands of Butterfly Bush, which is a non-native invasive species and one that has been subject to raised levels of concern, particularly in London because it smothers other native wildflower and affects diversity, and dominates the habitat. Indeed, DEFRA has added this species to the invasive non-native species list for London, with aims to control and reduce its presence. Butterfly Bush has also been classified under Category 3 of the London Invasive Non-native Initiative (LINI) which details these as 'Species of high impact or concern which are widespread in London and require concerted, coordinated and extensive action to control/eradicate'. The proposed development would also offer the opportunity to remove large stands of Japanese Knotweed, which is also prevalent within the Core Area.

### **Flood Risk**

Although water is a dominant visual feature in this locality, much of the site is within an area at low risk from flooding (i.e. Flood Zone 1 and 'Areas Benefitting from Flood Defences'). Such areas have a less than 1 in 1,000-year annual probability of flooding from rivers. This is largely because the site levels following the completion of the landfill operations are well above the levels of the watercourses. The remediation strategy for the site would minimise the removal of materials and create finished development platforms which meet requirements for flood protection.

Around the periphery of the site there are localised areas with a higher risk of flooding (i.e. Flood Zone 3). The detailed masterplanning process will minimise the potential for significant impact within such areas, including proposals for the storage of water and flood protection. Detailed designs will also incorporate Sustainable Drainage Systems (SuDS) to promote natural drainage processes, reduce flood risk both on site and in the neighbouring areas, reduce pollution and provide landscape and wildlife benefits.

## Ground Conditions

Land at Yiewsley Waterside comprises predominantly previously-developed land and made ground. This is by virtue of an industrial history dating from the 19<sup>th</sup> century when its uses included a tallow factory, quarries and landfills. At present the site includes a disused waste transfer station and a mixture of small scale industrial and commercial uses. Historic landfill covers approximately half of the site containing domestic, commercial and industrial waste dating from as early as the turn of the last century.

The past uses of the site have had a negative impact on the quality of the environment (including contamination in the soil and groundwater). All of which can undermine water and land quality, and the environmental value for wildlife and communities.

The development at Yiewsley Waterside, therefore, provides an opportunity to deliver a sustainable remediation strategy to improve the quality of the local environment and bring the land back into beneficial use. The remediation strategy would seek to mitigate the risk to human health from contaminants in ground water; protect and enhance water resources (such as secondary and principal groundwater aquifers, local rivers and lakes, the Grand Union Canal) and maximise retention and re-use of material on site.

## Heritage

The Vision Plan for Yiewsley Waterside has been drawn on the basis that there are no listed buildings within the defined area. The proposed development also seeks to respect its location immediately to the south of a Conservation Area, which includes the bridge and public house on Packet Boat Lane.

A large part of the western edge of Hillingdon Borough (including Yiewsley Waterside) is located within an Archaeological Priority Area. Any development proposals implemented in this location would therefore be the subject of archaeological assessment. It is considered, however, that the likelihood of finding significant archaeological remains is limited given that a large part of the site is either made ground or former landfill.

## Key Benefits of Yiewsley Waterside

The development partners vision for Yiewsley Waterside covers land which can be developed in the short to medium term (i.e. the Core Area) and into the longer term (i.e. the Regeneration Area). It is envisaged the development will come forward in two parts, initially the core area with the regeneration area following at a later date. That is because Cirrus and The Guinness Partnership understand that the development of its land within the Core Area will act as a catalyst for the regeneration of land along Hillingdon High Street. In turn, this regeneration will further integrate the development of the Core Area into the existing communities at Yiewsley and West Drayton.

When viewed as a whole, the delivery of Yiewsley Waterside will create an exemplar new mixed-use community that responds to the housing and job growth demands of West London. Key elements and benefits are:

- Around 3,500 new dwellings
- London Plan compliant provision of genuinely affordable housing.
- Future regeneration of employment and commercial land for new job, retail and community use.
- Boosting the local economy.
- Clean-up of contaminated land.
- Removal of significant areas of invasive plant species.
- Excellent connections to public transport, notably Crossrail.
- Better access to the Grand Union Canal (including additional crossings).

- Public Open Space and connections to the Colne Valley Regional Park and Celandine Route.
- Redevelopment of a site with significant anti-social behaviour issues
- Ecological enhancement of the land.
- Creation of a long term sustainable boundary for the Green Belt.
- Assisting Greater London and Hillingdon to meet their housing targets.
- Reducing the pressure placed on LB Hillingdon to over-intensify existing suburban areas.
- The promoters have the resources and expertise to deliver an exemplar regeneration scheme in an opportunity area.



## REQUEST FOR A REVIEW OF THE GREEN BELT (POLICIES SD1 AND G2)

In order to ensure that the New London Plan can deliver its housing targets across Greater London and in particular in Hillingdon Borough, including the provision of affordable housing which accords with policy requirements, we request that a targeted review of the Green Belt is undertaken.

Our responses that include our request for a review of the Green Belt are included below, i.e. in relation to Policies SD1 and G2. In addition, please also see below our responses to Policy GG2 and in relation to the Key Diagram, which further expands our responses.

In specific terms, we request that there is a focussed review of the Green Belt in the Borough of Hillingdon within the Elizabeth Line West Growth Corridor and Opportunity Area. In particular, on and within the Green Belt which is closely related to West Drayton railway station (which will be served by Crossrail from December 2019) and Yiewsley town centre. Within this particular area of interest is land proposed by the promoters called Yiewsley Waterside

### POLICY SD1 OPPORTUNITY AREAS

#### - Paragraph 2.0.2

Whilst this paragraph outlines that the designation of the Green Belt will serve to focus investment and development on brownfield land, we note that this is not entirely the case and – as drafted – will rule out the potential for the sustainable development of sites with significant need of remediation which are located in the Green Belt the redevelopment of which will have far reaching local benefits.

Yiewsley Waterside will involve the redevelopment of predominantly previously-developed land and made ground in the Green Belt which can be designed to be well-contained and built at a high-density. Its development would also act as a catalyst to the regeneration of land in and around Yiewsley town centre and West Drayton railway station, which is currently known as an anti-social behaviour hotspot. As stated in our other responses to the New London Plan, we consider that Green Belt policy should be reconsidered, and a focussed review undertaken to identify sustainable growth opportunities within what are currently defined in the New London Plan as Growth Corridors and Opportunity Areas.

#### - Paragraph 2.0.4

We agree that the existing Opportunity Area which includes the Heathrow OA and the Hayes OA has *"the potential to deliver a significant amount of the new homes and jobs that London needs"*.

However, for reasons given in our responses to the Housing policies, we do not consider that *"the London Plan has a clear focus on delivery"*.

In particular, we have concerns over the likelihood of the Plan achieving its target of delivering a significant step-change in the building of housing on small sites. This, as we have explained, will create a large shortfall in potential housing land supply, which will need to be addressed in a positive and proactive manner by the Mayor.

#### - Policy SD1

We support the aim of the New London Plan that ensures *"that Opportunity Areas fully realise their growth and regeneration potential"*. However, in view of the points made in our response to the housing delivery policies in the draft Plan, we do not consider that this will be achieved without the identification of proposals such as Yiewsley Waterside and a focussed review of the Green Belt within what are currently defined in the New London Plan as Growth Corridors and Opportunity Areas. This point is also made in our response to Policy GG2.

If Yiewsley Waterside were identified as an Opportunity Area site in its own right, it could deliver approximately 3,500 dwellings at a high density and located within a 10-minute walk of West Drayton railway and Crossrail station. We can also confirm that the Yiewsley Waterside proposal would also deliver a policy compliant percentage of affordable housing.

As described in the introduction to this response, the 3,500 dwellings would be delivered through the development of approximately 2,500 dwellings within the Core Area and the future delivery of the remaining 1,000 dwellings on land which could come forward through the regeneration of land which is currently in use for employment and out-of-town retail (which would be rationalised into a new mixed-use area that would sustain long-term employment and incorporate housing at upper levels in the redeveloped area).

- **Request**

In order for sustainable development proposals such as Yiewsley Waterside to help in delivering a step-change in housing delivery, we request that a focussed review of the Green Belt is promoted in the New London Plan. This should include the following associated changes being made to Policy SD1:

- (A)(1)+(3) Clarification should be given to the reference 'adopted planning frameworks'. In this regard, this element of the Policy should include reference to LPAs having the ability to undertake focussed reviews of the Green Belt which are located within what are currently defined in the New London Plan as Growth Corridors and Opportunity Areas and which would deliver significant growth in locations that are served either by existing or proposed public transport. Further clarification should be given that such reviews are made as part of the process of Part 1 Local Plans, particularly where the development would deliver growth of a strategic scale (i.e. as an Opportunity Area site); or, if possible, through further work being undertaken as part of this Plan's preparation.
- A(X) At present, the Policy does not make any clear reference to the Mayor, LPAs or other delivery agencies engaging with landowners/developers in order to identify and bring forward development within Growth Corridors or Opportunity Areas. Whilst this might be implied by the Policy, clarification should be given that landowners and developers will be an integral part of the site selection and delivery process.
- B(1) As with our response to Parts A(1) and A(3), this element of the Policy should include guidance that focussed reviews of the Green Belt should be considered as being an acceptable option in the delivery of sufficient growth within Growth Corridors and Opportunity Areas to meet London's housing needs.

- **Paragraph 2.1.62 to 2.1.64 (Heathrow/Elizabeth Line West Growth Corridor)**

We support the identification of this growth corridor and note that it contains a number of existing and new OAs, to assist in meeting the long-term development requirements of London.

However, for the reasons we have given in our response to the housing delivery policies of the Plan, we do not consider that the New London Plan will be able to deliver the significant step-change in housing provision required to meet London's housing needs – particularly in relation to small sites.

In order to assist the Mayor and LPAs in meeting London's housing needs, and in accordance with the indication given at paragraph 2.1.63, we request that the Mayor already gives further consideration to identification of additional OAs within the currently defined Growth Corridors – in particular the Heathrow/Elizabeth Line West Growth Corridor.

To now, it is our understanding that the New London Plan has not taken account of the sustainable development opportunities which are located in the Green Belt. Especially where such sites are located within Growth Corridors, utilise previously-developed land (including made ground) and are located in close proximity to existing or proposed transport nodes (i.e. such as Yiewsley Waterside).

#### - Request

We, therefore, request that changes are made to this particular section of the Plan – in addition to the other changes requested to Policies GG2, SD1 and G2 – to enable the focussed review of the Green Belt in order to deliver additional growth within what are currently defined in the New London Plan as Growth Corridors and Opportunity Areas.

To this end, we also request the identification of an additional OA within the Heathrow/Elizabeth Line West Growth Corridor, i.e. Yiewsley Waterside.

A description of the Yiewsley Waterside proposals and an outline of the arguments in favour of the proposed development and its release from the Green Belt is given in the introduction to our response to the New London Plan.

### **POLICY G2 LONDON'S GREEN BELT**

We object to the wording of Policy G2(B) which states that the "*de-designation*" of the Green Belt will not be supported.

As we have argued in relation to other policies and proposals of the New London Plan, there should be a review of the Green Belt in order to ensure that the Plan can deliver the number of dwellings that are required to meet London's needs. At the very least, we consider that the Plan should allow for any Local Planning Authority that wishes to undertake a review of the Green Belt in order to ensure that it can meet the housing targets set by the New London Plan. Indeed, and in this regard, we consider that the decision not to promote a review of the Green Belt fails to take into consideration sites requiring remediation located within the designated areas which could be released and identified for large-scale sustainable development, relieving pressure on and protecting existing urban areas, particularly more suburban locations.

As currently drafted, the New London Plan and Policy G2, is unsound because it conflicts with the guidance provided at Paragraph 83 of the NPPF, which requires and allows for LPAs to review and alter their Green Belt boundaries in exceptional circumstances through the preparation or review of their Local Plans.

Furthermore, we consider that the New London Plan should go further and take the opportunity to identify opportunities now for Green Belt releases in sustainable locations. In doing so, we would recommend that the Mayor undertakes a focussed review of the Green Belt within what are currently defined in the New London Plan as Growth Corridors and Opportunity Areas. This should include land which is close to transportation nodes and hubs, particularly where this could encompass previously-developed land (including made ground) contaminated land and anti-social behaviour hot spots.

We consider that by undertaking a focussed review of the Green Belt, as described above, it could deliver significant growth in locations that are served either by existing or proposed public transport improvements (i.e. such as Yiewsley Waterside with its close proximity to Crossrail).

In this case, Yiewsley Waterside does not provide "*multiple beneficial functions*" of Green Belt, as suggested in paragraph 8.2.1 of the New London Plan. The land in question at Yiewsley Waterside does not involve land which is used or best used for growing food. The land, in fact, contains contaminated land, a disused waste transfer station, a mixture of non-complying industrial uses and historic landfills and is a hotspot for anti-social behaviour. Furthermore, by keeping this land in the

Green Belt, it is holding back the development of land comprising predominantly previously-developed land or made ground, which is not helping to drive forward the re-use of London's previously-developed land (as also envisaged by paragraph 8.2.1).

Indeed, we do not consider that the development of a site such as Yiewsley Waterside will deprive inner urban areas from regeneration and investment, as suggested in paragraph 8.2.1. In fact, given that it is likely that London will need to find significant additional sources of supply of land to meet its housing requirements, we consider that London will need the development of land in both inner and outer urban areas if it is to achieve a step-change in housing delivery – this includes previously-developed land (including made ground) in the Green Belt.

We are also concerned about the approach taken in paragraph 8.2.2 of the New London Plan where it is stated that a Green Belt site being derelict and unsightly is not an acceptable reason why it should be developed. We consider that such an approach will do nothing to help the improvement of sites which are in immediate need of remediation (for example to address issues of contamination or the increasing presence of invasive non-native ecological species). Indeed, in most cases, there are not the funds available to make such improvements without development. In any event, the improvement of such sites should be considered as being a contributory reason for the removal of the site from the Green Belt. Particularly where it can be demonstrated that the site includes previously-developed land or made ground, is contaminated and which is located in close proximity to existing centres of development and existing or planned transport hubs (such as railway stations).

Similarly, whilst paragraph 8.2.2 refers to derelict sites in the Green Belt making "*positive contributions to biodiversity, flood prevention, and reducing the urban heat island effect*", these things should not be viewed in isolation as being reasons why such sites cannot be released from the Green Belt. Again, and as stated above, such sites should be considered for release from the Green Belt, where it can be demonstrated that they: do not involve statutory ecological designations and can deliver biodiversity enhancements; avoid areas at highest risk from flooding; comprise previously-developed land (including made ground); and are situated in sustainable locations.

#### - Request

In order to ensure that the New London Plan can deliver sufficient land to meet the needs of Londoners, we request that further consideration is given to making changes to Policy G2 and to other related policies and proposals concerning the protection of the Green Belt. In particular, consideration should be given to enabling there to be focussed reviews of the Green Belt within what are currently defined in the New London Plan as Growth Corridors and Opportunity Areas in order to identify sustainable locations for development.

To this end, we also request a focussed review of the Green Belt in LB Hillingdon within the Heathrow/Elizabeth Line West Growth Corridor is either undertaken through the New London Plan or identified as part of the work which will need to be undertaken in the next review of the Hillingdon Local Plan Part 1.

A description of the Yiewsley Waterside proposals and an outline of the arguments in favour of the proposed development and its release from the Green Belt is given in the introduction to our response to the New London Plan.



## **OTHER RELATED RESPONSES TO THE NEW LONDON PLAN (POLICY GG2 AND KEY DIAGRAM)**

### **POLICY GG2 MAKING THE BEST USE OF LAND**

We support the overarching aim of Policy GG2 to create high-density, mixed-use places that make the best use of land. To this end, we also support the aim to prioritise the development of Opportunity Areas, sites containing previously developed and made ground, sites which are well-connected by existing or planned railway stations and sites on the edge of town centres (GG2 Part A); and planning for good local walking, cycling and public transport connections to support a strategic target of 80% of all journeys using sustainable transport and using new and enhanced public transport links to unlock growth (GG2 Part E).

In our opinion, the development of Yiewsley Waterside (as described above) matches the aspirations of Policy GG2 and could deliver approximately 3,500 dwellings. Furthermore, by identifying sites such as Yiewsley Waterside for development, it would also reduce the need to develop land within sensitive parts of existing suburban areas, which could lead to its over-intensification and adversely affect its existing character.

We are, however, concerned that the New London Plan fails to capitalise on the important opportunities which are presented by proposals for sustainable development on sites such as Yiewsley Waterside.

Although the Yiewsley Waterside site is located within the Elizabeth Line West Growth Corridor the Heathrow/Hayes OAs, is predominantly previously-developed land (including made ground), is within 10 minutes' walk of West Drayton station and in close proximity to Yiewsley town centre, the site is currently designated as being Green Belt. The result of which is that, what could otherwise be considered to be a highly sustainable, policy compliant development which could deliver a significant number of new dwellings (including a policy compliant percentage of affordable housing), the proposed development of Yiewsley Waterside will be judged to be inappropriate development if the New London Plan is adopted as currently drafted.

We consider the wording of Policy GG2 Part D, and other policies and paragraphs of the New London Plan which preclude a review of existing Green Belt boundaries to be a shortcoming of the Plan. This also represents a significant missed opportunity to promote the necessary sources of supply of housing which could deliver the step-change in housing delivery identified by the Mayor; to encourage regeneration; and to encourage greater use of sustainable modes of transport – both in relation to London as a whole and for LB Hillingdon.

#### **- Request**

Further consideration should be given to the drafting of the New London Plan before it is Examined and changes made to it which encourage relevant LPAs to undertake focussed reviews of their Green Belt boundaries. Such reviews of the Green Belt should particularly focus upon those areas which comprise previously-developed land (including made ground), are located within what are currently defined as Growth Corridors and Opportunity Areas in the New London Plan and would deliver significant growth in locations that are served either by existing or proposed public transport. In this regard, changes should be made to Policy GG2.

### **KEY DIAGRAM**

In making our response to Policy SD1 we wish to note that on the Key Diagram there are references to 'Ongoing Opportunity Areas' (such as 1. Heathrow and 2. Hayes) on the left-hand side of the legend; and also a list of OAs such as 'Elizabeth Line East and West' on the right-hand side of the legend. The list of OAs on the right-hand side of the legend are shown on the key diagram as different areas of coloured shading and identified in subsequent figures in chapter 2 of the Plan as 'Opportunity Areas'.

We believe that the description of these 'OAs' on the key diagram could lead to some confusion for the reader because, for example, on Figure 2.10 the 'Elizabeth Line West' relates to the definition of a 'Growth Corridor'.

We would suggest, therefore, that the notations on the legend of the key diagram (and potentially elsewhere in the Plan) are reviewed so that there is a clear differentiation between what are 'Ongoing Opportunity Areas', 'OAs' and 'Growth Corridors'. In doing so, we also believe that the key diagram would benefit from describing what are the dashed coloured lines on the plan (i.e. the ones that we believe relate to 'Growth Corridors').