

29 March 2021

Former Master Brewer site, Freezeland Way

in the London Borough of Hillingdon
planning application no.4266/APP/2019/3088

This addendum sets out a further update which needs to be considered in conjunction with the Update Report ref: GLA/0995g/05.

Further update

Additional representation

A further submission has been received from the London Borough of Hillingdon, consisting of a letter with the following enclosures:

- Master Brewer – GLA Representation 260321;
- Air Quality Peer Review for 4266/APP/2019/3088 21082020; and
- Air Quality Peer Review for 4266/APP/2019/3088 SUMMARY.

The Representation can be summarised as follows:

1. Reiteration of previous procedural concerns and request for the case to be re-considered at a further public representation hearing;
2. Reiteration of previous concerns about the principle of a tall building in this location and the application's conflict with London Plan and Local Plan policy in this regard;
3. Raising concerns about the housing delivery figures presented to the Mayor at Stage 2 and drawing attention to the recent London Plan AMR in relation to this matter;
4. Raising concerns that the Council's Air Quality Peer Review was not considered by GLA officers or the Mayor, which concludes that further mitigation is required; and
5. Considers that the planning balance needs to be reconsidered and that the application should now be refused.

GLA officer response

Points 2 and 5 have already been considered in the Update Report.

With regard to Point 3, GLA officers can see no reference to affordable housing delivery being reported at 12% in either the Stage 2 report or the Representation Hearing Report. Furthermore, the Council appears to be conflating housing delivery with housing approvals in its Representation. For completeness, the tables outlining housing delivery and housing approvals in LB Hillingdon at Stage 2 are pasted below, followed by the table outlining housing delivery in the Representation Hearing Report, which matches the corresponding one from the Stage 2 report:

Stage 2 report (16 March 2020):

Total supply	2016-2017	2017-2018	2018-2019	Total	net delivery %
Homes target	559	559	559	1,677	171% of target
Homes delivered	836	948	1,076*	2,860	
Affordable homes target	196	196	196	588	34% of target
Affordable homes delivered	59	66	76	201	

Table 2: LB Hillingdon's delivery against London Plan housing target and Local Plan affordable housing target (source: London Development Database). * long-term vacants returning to use not included in delivery % as no data exists for 2018/19.

Net approvals	FY2015-2016	FY2016-2017	FY2017-2018	Total	Performance against target
Homes target	559	559	559	1,677	410% of target
Homes consented	1,331	2,604	2,943	6,878	
Affordable homes target	196	196	196	588	160% of target
Affordable homes consented	78	134	729	941	

Table 3: LB Hillingdon's performance against London Plan housing target and Local Plan affordable housing target in terms of planning approvals (source: London Development Database).

Representation Hearing Report (3 September 2020):

Table 5: LB Hillingdon's delivery against London Plan housing target and Local Plan affordable housing target (source: London Development Database). * long-term vacants returning to use not included in delivery % as no data exists for 2018/19.

Total supply	2016-2017	2017-2018	2018-2019	Total	net delivery %
Homes target	559	559	559	1,677	171% of target
Homes delivered	836	948	1,076*	2,860	
Affordable homes target	196	196	196	588	34% of target
Affordable homes delivered	59	66	76	201	

GLA officers note the Council's reference to the recently published AMR, which at Table 3.5 increases the 'homes delivered' figure for 2018/19 from 1,076 to 1,121 and at Table 3.7 increases the affordable 'homes delivered' figure for 2018/19 from 76 to 78 (corresponding with the total increase from 201 to 203 in Table 3.10 for the years 2016/17-2018/19). This results in the total net delivery for Hillingdon over these three reporting years increasing from 171% to 173% and the affordable housing delivery increasing from 34.2% to 34.5%. Neither of these increases is considered to be significant.

With regard to Point 4, the Council raises concerns that its Air Quality Peer Review was not considered by GLA officers because it is not mentioned in the Representation Hearing Report. This is because this information was submitted to the GLA by the Council on 28 August 2020 along with its pre-hearing representation, more than one working day after the Representation

Hearing Report was published. The Council's pre-hearing representation and Air Quality Peer Review was addressed in the addendum report published on the day of the hearing.

GLA officers consider the application to be in accordance with planning policy regarding air quality and as such the 'damage cost' payment requested by the Council is not justified. It should also be noted that GLA officers no longer recommend that any windows within the scheme be fixed shut. Upon further review of the technical assessments this is not considered to be necessary and, through discussions on draft conditions, which included the Council, it is recommended that this requirement be deleted.

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