Strategic planning application stage 1 referral

The proposal
Part demolition of existing buildings and redevelopment (including restoration and conversion of various historic buildings/facades, and new buildings of up to 11-storeys) to provide 1,381 new homes; 22,663 sq.m. of commercial space (warehouse, datacentre and SME office); 2,986 sq.m. of flexible community, retail and leisure; and, new public open space including allotments.

The applicant
The applicant is Barratt London and SEGRO, and the architects are Makower Architects, de Metz Forbes Knight, Hawkins Brown and MSA.

Strategic issues summary
Principle of development: In view of the plan-led consolidation of the Nestles Avenue SIL, the proposed residential-led mixed use redevelopment of this Opportunity Area site to deliver increased housing and employment densities is strongly supported (paragraphs 16 to 22).

Employment: The proposed reprovision of 4 hectares of employment land is strongly supported. The applicant is, nevertheless, strongly encouraged to incorporate a proportion of affordable workspace as part of the proposed small-scale office provision (paragraphs 23 to 26).

Housing: The proposed 35% provision of affordable housing is supported as a starting point, however, further interrogation is required in the context of SIL release, and the applicant must fully investigate the provision of grant funding (and any other available public subsidy) (paragraphs 27 to 36).

Urban design: The heritage-led masterplan is an exemplar of suburban intensification and would achieve a successful consolidation of employment land in order to support the integration of large-scale commercial operations and high quality, high density housing (paragraphs 40 to 46).

Transport: Whilst the proposed development is generally acceptable in strategic transport terms, the applicant needs to address issues associated with: car parking; trip generation; highway impact assessment; public transport; walking and cycling; travel planning; delivery and servicing; and, construction (paragraphs 63 to 83).

Recommendation
That Hillingdon Council be advised that whilst the scheme is strongly supported in strategic planning terms, the application does not yet fully comply with the London Plan for the reasons set out in paragraph 87 of this report.
Context

1. On 30 May 2017 the Mayor of London received documents from Hillingdon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has a six week period to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. However, in this case it has been agreed with Hillingdon Council that the Mayor will provide this statement on 19 July 2017. This report sets out information for the Mayor’s use in deciding what decision to make.

2. The application is referable under the following categories of the Schedule to the Order 2008:

   • 1A 1. “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”;
   • 1B 1.(c) “Development… which comprises or includes the erection of a building or buildings… outside Central London and with a total floorspace of more than 15,000 square metres”;
   • 1C 1.(c) “Development which comprises or includes the erection of a building… more than 30 metres high and is outside the City of London”; and,
   • 3B 1.(a,b) “Development which occupies more than 4 hectares of land which is used for a use within Class B1 (business), B2 (general industrial) or B8 (storage or distribution) of the Use Classes Order; and which is likely to prejudice the use of that land for any such use”.

3. Once Hillingdon Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.

4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) has been taken into account in the consideration of this case.

5. The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6. The former Nestle factory site is located in Hayes, within the Heathrow Opportunity Area and Hayes town centre Housing Zone. The site comprises 12 hectares of land bound by: Nestles Avenue and interwar suburban housing to the south; North Hyde Gardens and an electricity substation to the east; the Grand Union Canal and Great West Railway line to the north; and, a series of light industrial buildings to the west.

7. First established in 1911, the Hayes Nestle factory employed up to 2,000 people at its peak during the 1950s. More recently, following the steady contraction of its operations at the site, Nestle announced in 2012 that it was to close the factory. The site was finally vacated in 2015, and remains unoccupied to date.

8. The site is designated as the Botwell Nestle Conservation Area, and is occupied by a number of Locally Listed Buildings, comprising: the main factory building (Truscon building and Sandow building); a canteen building for staff amenity; a lodge; and, gates and railings along
Nestles Avenue (refer to Figure 1 below). There are also a number of mature Conservation Area trees at the site, mainly distributed along the southern frontage.

Figure 1: Nestle factory site and building accretions 1914 to present.

9 The site is generally well served by public transport, and is approximately 600 metres from Hayes and Harlington rail station (which will benefit from Crossrail 1/Elizabeth Line services from May 2018). Overall the site registers a public transport access level (PTAL) of one(b) to four, on a scale of zero to six(b), where six(b) denotes the most accessible locations in the capital.

Details of the proposal

10 Part demolition of existing buildings and redevelopment (including restoration and conversion of various historic buildings/facades and new buildings of up to 11-storeys) to provide up to 1,381 new homes; 22,663 sq.m. of commercial space (warehousing, datacentre and SME office space); 2,986 sq.m. of flexible retail, community and leisure; and, new public open space including allotments.

11 With respect to the Locally Listed Buildings at the site, the following is proposed:

**Main factory building (Truscon building and Sandow building)**
- Retention and refurbishment of high quality east, south and western facades (including surviving elements of the 1914 Sandow building). Roof extension and new-build elements north of the Sandow building, and a Truscon facsimile northern facade. The former industrial buildings would be converted to residential accommodation and wrapped around a new-build commercial warehouse.

**Canteen building**
- Restoration and refurbishment of the canteen and colonnade, with a 6-storey new-build residential element to the north. The former staff amenity buildings would be converted for a mix of commercial and community uses including a nursery.

**Lodge**
- Proposed demolition in order to facilitate delivery of the large-footprint commercial units/employment space.
Case history

12 A series of four GLA pre-application meetings were held between August 2016 and March 2017 to discuss this scheme. The advice issued by GLA officers supports the plan-led mixed use redevelopment of this vacant industrial site to provide new homes and employment space as part of a heritage-led masterplan. The applicant was nevertheless advised to ensure that the planning submission addressed a number of detailed matters with respect to: employment; urban design; housing; sustainable development; and, transport.

Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

- Opportunity Area London Plan;
- Strategic Industrial Location London Plan; Land for Industry and Transport SPG;
- Employment London Plan;
- Housing London Plan; Housing SPG; draft Affordable Housing and Viability SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;
- Social infrastructure London Plan; Social Infrastructure SPG;
- Urban design London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;
- Historic environment London Plan;
- Inclusive access London Plan; Accessible London: achieving an inclusive environment SPG;
- Sustainable development London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy; Mayor’s Ambient Noise Strategy;
- Transport and parking London Plan; the Mayor’s Transport Strategy;
- Crossrail London Plan; and Mayoral Community Infrastructure Levy.

14 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; 2007 Hillingdon Saved UDP Policies; and, London Plan 2016 (Consolidated with Alterations since 2011).

15 The following are also relevant material considerations: National Planning Policy Framework and National Planning Practice Guidance; and, draft Hillingdon Local Plan part 2 (Proposed Submission Stage).

Principle of development

Opportunity Area

16 Hayes forms part of the wider Heathrow Opportunity Area which London Plan Policy 2.13 identifies as having capacity to accommodate a minimum of 9,000 new homes and 12,000 additional jobs. The London Plan also specifically recognises the Hayes-West Drayton corridor as offering a range of redevelopment opportunities - including small business parks, logistics and mixed uses.
Strategic Industrial Location

17  The 12 hectare former Nestle Factory site is located within a wider 34 hectare expanse of employment land south of the railway at Hayes and Harlington. Known as the ‘Nestles Avenue Industrial Cluster’, all 34 hectares is currently subject to designation as a Strategic Industrial Location (SIL). London Plan Policy 2.17 seeks to promote, manage and, where appropriate, protect SILs. Further to this, the latest evidence of strategic demand (London industrial land demand study 2017) suggests that boroughs now need intensify industrial land and retain overall levels of floorspace in order to safeguard future capacity to service the London economy and is growing population. This new evidence underscores the importance of carefully managed plan-led consolidation of SILs in line with London Plan Policy 2.17.

18  Having regard to the new evidence there remain opportunities to sustainably consolidate certain areas of SIL in accordance with Policy 2.17 in order to: deliver operational efficiencies for SIL occupiers; intensify employment densities; and, contribute towards wider London Plan objectives. However, approaches that would effectively reduce the reservoir of SIL land in order to introduce a mix of non-compliant SIL uses must be strategically coordinated as part of a robust evidence-based planning process, i.e. via an Opportunity Area Planning Framework or Development Plan Document.

19  In this particular case, Hillingdon Council has been engaged with the GLA since 2014 on a plan-led process of rebalancing a local surplus of employment land. The approach evidenced within the Council’s draft Hillingdon Local Plan part 2 (Proposed Submission Stage) advocates the release of 16 hectares of SIL from the Nestles Avenue Industrial Cluster (including this site). The key drivers for the proposed release of SIL land at the Nestles Avenue Industrial Cluster (rather than elsewhere in the borough) are: the proximity of this land to the Hayes and Harlington Crossrail 1 station (which is due to benefit from Elizabeth Line services from May 2018); and, the potential for comprehensive redevelopment of this land to support sustainable suburban intensification of homes and jobs (including the delivery of 22,663 sq.m. of new B Class floorspace) and the regeneration of Hayes town centre, in line with London Plan Policy 2.15.

20  Following thorough consideration of Hillingdon’s draft plan, the GLA issued a statement on 7 December 2015 confirming that this approach is in general conformity with the London Plan (refer to statement of general conformity, reference D&P/LDF14/LDD18/CG).

21  Accordingly, whereas London Plan Policy 2.17 resists development on SIL land for non-industrial type uses, noting the evidence for release and emerging mixed use allocation for this site within the draft Hillingdon Local Plan part 2; and, the well-developed employment offer within this scheme itself (refer below), GLA officers support the plan-led mixed use redevelopment of this site in strategic planning terms.

Principle of development – conclusion

22  Having regard to the evidenced approach to employment land management within the draft Hillingdon Local Plan part 2; and, the Heathrow Opportunity Area, Hayes town centre Housing Zone and Crossrail 1 context, GLA officers strongly support the proposed residential-led mixed use redevelopment of this vacant employment site in order to deliver increased housing and employment densities as part of a plan-led process of sustainable suburban intensification. The application complies with London Plan policies 2.13, 2.15 and 2.17.
Employment

23 As part of the coordinated approach to SIL consolidation discussed above, the draft Hillingdon Local Plan part 2 seeks the retention of 20% (2.4 hectares) of land at this site for employment generating uses.

24 In this case the applicant is dedicating approximately 4 hectares of land (33%) at the east of the site for pure employment uses (providing 22,663 sq.m. of employment floorspace). In conjunction with various other employment generating uses proposed across the wider masterplan, the proposed development would be expected to support up to 536 full time operational jobs. This is strongly supported in line with London Plan Policy 2.7.

25 The employment space proposed breaks down as two main types: high specification large footprint commercial buildings (warehousing with ancillary office space); and, small-scale office and co-working space. The former (to be managed by SEGRO) comprises approximately 22,000 sq.m. and responds well to the strategic characteristics of this location in terms of logistics and related demand associated with Heathrow Airport. The latter (approximately 646 sq.m.) is distributed across three units within the Locally Listed Buildings, and presents a valuable opportunity to provide affordable workspace for local start-up companies.

26 Noting the emphasis that London Plan policies 2.7 and 2.17 place on sustaining SMEs in order to support the outer London economy, the applicant is strongly encouraged to incorporate affordable terms for the proposed small-scale office/co-working space. This could be managed by the applicant, or operated by an established workspace provider, but should offer a flexible and accessible package of workspace terms designed to incubate and support new businesses.

Housing

27 This site forms part of the wider Hayes town centre Housing Zone, which has been prioritised for accelerated housing delivery with GLA funding support. The proposed provision of 1,381 residential units would considerably exceed the minimum target output for this site within Hillingdon Council’s emerging site allocation (SA5), and would represent 25% of the Council’s borough-wide housing target up to 2025. The proposed provision of these units is, therefore, strongly supported in accordance with London Plan Policy 3.3. Table 2 below sets out the proposed residential schedule.

<table>
<thead>
<tr>
<th>Unit type</th>
<th>Affordable rent</th>
<th>Intermediate</th>
<th>Private market</th>
<th>Total</th>
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<tr>
<td>Studio</td>
<td>0</td>
<td>33</td>
<td>78</td>
<td>111</td>
</tr>
<tr>
<td>One-bedroom</td>
<td>62</td>
<td>135</td>
<td>378</td>
<td>575</td>
</tr>
<tr>
<td>Two-bedroom</td>
<td>36</td>
<td>140</td>
<td>381</td>
<td>557</td>
</tr>
<tr>
<td>Three-bedroom</td>
<td>41</td>
<td>22</td>
<td>75</td>
<td>138</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>139</strong></td>
<td><strong>330</strong></td>
<td><strong>912</strong></td>
<td><strong>1,381</strong></td>
</tr>
</tbody>
</table>

Table 2: Proposed residential schedule.

Affordable housing

28 London Plan Policy 3.12 seeks the maximum reasonable amount of affordable housing and at the local level the Hillingdon Local Plan sets a borough-wide strategic target of 40%. The Local Plan 40% target has also been adopted for the Hayes town centre Housing Zone.

29 The applicant is currently proposing a 35% provision of affordable housing (by habitable room), before subsidy, at a tenure split of 30% affordable rent and 70% intermediate (affordable
rent levels are set out within Table 3 below, intermediate products will have eligibility capped at incomes of £90,000 per year). The weighting towards intermediate tenure has been developed following joint GLA/Hillingdon Council pre-application discussions, and (whilst representing a departure from the strategic split within London Plan Policy 3.11) the tenure balance accords with the parameters of the Mayor’s draft Affordable Housing and Viability SPG.

<table>
<thead>
<tr>
<th>London Affordable Rent</th>
</tr>
</thead>
<tbody>
<tr>
<td>One-bedroom</td>
</tr>
<tr>
<td>Two-bedroom</td>
</tr>
<tr>
<td>Three-bedroom</td>
</tr>
</tbody>
</table>

Table 3: Affordable rent affordability levels.

The proposed provision of a 35% affordable housing offer (before public subsidy) is supported as a starting point. However, whilst the draft Affordable Housing and Viability SPG defines a 35% threshold as the cut off point for the requirement to submit viability information, paragraphs 3.58 and 3.59 of the draft SPG make clear the Mayor’s expectation that any release of SIL should support significant contributions to key planning objectives – in particular, the delivery of additional affordable housing. In practice this means that the Mayor expects the potential gain in land value (associated with the transfer of land from industrial to residential use) to support the delivery of additional affordable housing above the minimum 35% base position. GLA officers will therefore work with the applicant to robustly interrogate the provision of additional affordable housing in the context of SIL release.

Furthermore, in line with London Plan Policy 3.12 applicants are required to work with the Mayor, Local Planning Authorities and Registered Providers to ensure that the provision of affordable housing is maximised from all sources. The applicant must therefore fully investigate the provision of Mayoral grant funding (and any other available public subsidy) with a view to further increasing affordable housing delivery.

Given that this scheme meets the minimum 35% threshold of the draft Affordable Housing and Viability SPG, the requirement for a late stage affordable housing review mechanism is negated. However, in line with the SPG (and as an incentive for timely delivery), the Section 106 agreement will need to include provision for an early viability review mechanism – to be triggered if an agreed level of progress on implementation has not been made within two years of any planning permission.

Mix of units

The proposed residential schedule (presented in Table 2 above) includes a mix of units between one and three-bedrooms. As discussed at pre-application stage, noting the prevailing context of interwar suburban family housing, and the proximity to Hayes and Harlington Station and the town centre, the weighting towards smaller units within the private market housing provision of this scheme is acceptable in strategic planning terms. However, in accordance with London Plan Policy 3.11 the applicant is expected to prioritise the provision of family sized affordable housing units as far as possible. Accordingly, as part of related discussions with Hillingdon Council (on local housing need) and the GLA (in respect to affordable housing grant funding), the applicant is strongly encouraged to exploit all further opportunities to maximise the provision of family sized affordable housing as far as possible.

Residential standards, children’s play space and housing density

All dwellings will meet or exceed the minimum space standards established by London Plan Policy 3.5 (Table 3.3) and 10% of dwellings would be wheelchair accessible/adaptable. This
is supported, and the Council will use planning conditions to secure Building Regulations standards M4(2) and M4(3) as per London Plan Policy 3.8.

35 With respect to children’s play space, scheme provides eight different areas for children’s play (totalling 1,990 sq.m.) across the landscaping strategy and semiprivate amenity spaces. This would offer a variety of different environments for play and recreation for the wide range of age groups expected within the scheme. The proposed provision of playspace meets the spatial requirements of the Play and Informal Recreation SPG and is supported in line with London Plan Policy 3.6.

36 In terms of housing density, the suburban nature of the surrounding context (and the varying PTAL) generally suggest a residential density of 150 to 350 habitable rooms per hectare / 35 to 90 units per hectare (based on Table 3.2 in support of London Plan Policy 3.4). However, in line with guidance within the Housing SPG, the characteristics of this particular Opportunity Area site (including its size and existing large-scale buildings) offer the potential to introduce a transition from the suburban setting to a neighbourhood of a more urban character. On this basis GLA officers advocate a high quality, high density approach that would support sustainable intensification of this suburban brownfield site, and help to capitalise on the connectivity enhancements of Crossrail 1. The proposed density of this scheme is 430 habitable rooms per hectare / 170 units per hectare. Whilst this would exceed the general range identified by Table 3.2, noting the particular characteristics of this site, the proposed density is strongly supported in strategic planning terms.

Social infrastructure

37 London Plan Policy 3.7 states that large residential developments should, where necessary, coordinate the provision of social, environmental and other infrastructure. Given the quantum of residential development proposed in this case, it will be important that the scheme appropriately contributes towards the infrastructure necessary to support sustainable communities.

38 In terms of social infrastructure, it is noted that the applicant is providing space for a nursery and children’s centre as part of a community centre to be provided within the refurbished canteen building. This is supported, and could provide enhanced facilities (as part of a relocation strategy) for the existing Children’s Centre at the western end of Nestles Avenue.

39 More general contributions to local infrastructure will be addressed via the Hillingdon Community Infrastructure Levy, and, to assist with prioritising and accelerating delivery, the GLA has been working with Hillingdon Council to undertake a development infrastructure funding study (DIFS) to identify the full range of infrastructure necessary to support anticipated growth within the Hayes Housing Zone. Soon to be published, this piece of work is feeding into the borough-wide Hillingdon Strategic Infrastructure Plan, and will be used to inform a review of Hillingdon Community Infrastructure Levy charging rates.

Urban design

40 As part of pre-application engagement across a range of sites south of the railway at Hayes and Harlington, the GLA has been working jointly with Hillingdon Council and other local stakeholders (including the applicant) to develop a broadbrush masterplan for the area. Whilst non-statutory in status, it sets out strategic design principles for the Council’s emerging SA5 site allocation which are intended to positively influence development proposals in this area and ensure that their design aspirations are aligned (refer to figure 4 below). Subject to resources, this work
may later be progressed further as part of a dedicated planning framework for the Hayes Housing Zone.

41 The masterplan in figure 4 essentially seeks to establish a new east-west route into the heart of the site, connecting the historic Nestle factory core with the station and high street. The canal edge at the north of the site would also be opened up, supporting improved connections with the wider Blue Ribbon Network and Green Chain corridors associated with the Crane Valley to the east. The masterplan seeks to retain the high quality Truscon and Sandow factory building facades, as well as the canteen building and adjacent green space known as Wallis Gardens. In terms of scale, the masterplan envisages taller buildings along the railway, transitioning to low-rise blocks at Nestles Avenue.

42 As demonstrated by figure 5, the proposed scheme responds very well to the design principles of the non-statutory masterplan, and would successfully manage the critical interface between residential; mixed use historic core; and, commercial employment uses. This would be achieved through the adoption of a legible residential street pattern – supported by the careful retention and conversion of the historic factory buildings (as described in paragraph 11); and, the use of these historic buildings (and various new-build elements) to wrap/buffer the proposed large-scale commercial uses. This arrangement also ensures that the commercial uses would benefit from direct access to North Hyde Gardens, and the strategic road network beyond.

43 The arrangement of the proposed masterplan would also deliver considerable improvements to the southern edge of the Grand Union Canal (which is currently inaccessible in this location). These improvements include the provision of a high quality landscaped towpath, fronted by a mix of residential and commercial uses. In conjunction with activation from residential blocks and a potential canoe club, the proposed location of the commercial office units at this edge would work very well in terms of providing activation and passive overlooking onto the canal – supporting the aims of London Plan policies 7.3 and 7.27.

Height, scale and massing

44 The scale of the proposal ranges from four-storeys (along Nestles Avenue at the interface with suburban hinterland) to 11-storeys (at the railway edge). The approach to scale generally accords with that within the non-statutory masterplan, and would be successful in terms of optimising the development potential of the site, and providing an appropriate response to the varying site edge conditions. Moreover, following an iterative process of design review at pre-application stage, the distribution of massing and building heights around the historic core of the

![Figure 4: Strategic design principles for emerging Hillingdon site allocation SA5.](image)
site has been carefully optimised to minimise impact on the setting of Listed Buildings and character of the Conservation Area (refer also to the historic environment section below).

Figure 5: Proposed masterplan for former Nestle factory site.

Residential design quality

45 The applicant proposes a variety of apartment blocks with balconies/internalised private amenity space and communal garden areas. These typologies have been carefully designed to: respond to the various sensitivities of their context; deal with the challenges of retaining historic fabric; and, create clearly defined and well-animated streets. Moreover, the prevailing north-south alignment of apartment blocks allows dwellings to benefit from favourable sun-lighting conditions. With respect to the element of residential conversion at the Truscon building, it is noted that the arrangement has been particularly well-considered to provide a favourable aspect and outlook for dwellings (as well as deck access for south-facing units in the main factory building).

46 The submitted block plans and layouts also demonstrate that the scheme would generally respond well to the residential design principles within the Housing SPG (in terms of maximising dual aspect units; providing ground floor residential entrances; and optimising unit to core ratios). Furthermore, subject verification that potential issues of noise and vibration (from the railway and/or commercial uses) would be suitable mitigated (refer to the sustainable development section below), GLA officers are of the view that the scheme exhibits a very high standard of residential design.

Historic environment

47 London Plan policies 7.8 and 7.9 recognise the potential of heritage assets as catalysts for regeneration and seek to ensure that development proposals conserve, restore and re-use heritage assets wherever possible and respect their character and setting. Following an iterative process of design review undertaken at pre-application stage, GLA officers are of the view that a favourable balance has been struck between the loss and retention of Locally Listed Buildings within the
Botwell Nestle Conservation Area. More generally, and mindful of the duty under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990, officers are of the view that the proposed scheme (which includes the retention of various heritage assets as part of a new residential neighbourhood; mixed use historic core; and, new employment quarter) would significantly enhance the character of the Botwell Nestle Conservation Area. More detailed heritage consideration with respect to Locally Listed Buildings/specific parts of the Conservation Area are set out below.

**Truscon building**

48 The proposal to fully restore the ‘art deco’ tower and its interiors (including the staircase and ground floor room) is strongly supported. The proposed extension on the main factory building roof is acceptable on the basis that it would be sufficiently set back so as not to compromise the integrity of the retained and restored 1930s facade, or the silhouette and presence of the ‘art deco’ tower. The decision to retain the eastern Truscon building elevation (as a front door to a new-build commercial unit behind) is particularly welcomed, as is the high quality northern facsimile elevation at the canal edge.

**Sandow building (and adjoining new-build blocks)**

49 The reconstruction of this largely hidden/lost historic element is strongly supported. Moreover, officers are satisfied that the scale, height, siting and massing of the proposed new-build blocks adjacent would not harm the integrity, setting, character and appearance of the retained elevations.

**Canteen block**

50 The proposed restoration of this block (including the former dining hall with suspended ceiling and colonnade, and the attached two-storey L-shaped block) is strongly supported. No objection is raised to the demolition of the single-storey lavatory block to the rear, and officers are satisfied that the proposed new build block that would replace this would not detract from adjacent heritage assets, or harm their character/setting.

**New-build block G (fronting eastern edge of Wallis Gardens)**

51 It is noted that the positioning of block G would result in a slight loss of area from Wallis Gardens, and would slightly affect the symmetry of formal garden layout either side of the central avenue. GLA officers are of the view that this would result in some loss that substantial hard to the character of the Conservation Area. However, having regard to the positive sense of garden enclosure and active residential frontage that his block would provide; the proposed retention and refurbishment strategy for the Locally Listed factory buildings on-site; and, the high quality of the wider new build masterplan elements and their positive contribution to the character of the Conservation Area generally – GLA officers are of the view that this proposed harm would be outweighed.

**Lodge**

52 The proposed loss of this interwar villa is regrettable. However, it is noted that this Locally Listed Building is of a very different architectural style to the art deco/modern movement 1930s factory and staff amenity buildings which define the primary character of the Conservation Area. Having regard to this; the proposed retention and refurbishment strategy for the Locally Listed factory buildings; and, the high quality of the new build elements and their
positive contribution to the character of the Conservation Area generally – GLA officers are of the view that this proposed loss would be outweighed.

Inclusive access

53 GLA officers support the commitment to ensure equal and convenient access throughout the development, and, note that the applicant has given careful consideration to the opportunities and constraints associated with the proposed conversion of Locally Listed Buildings across the site.

54 It is evident that building entrances across the masterplan would be legible, accessible and uncluttered. Internal layouts also demonstrate that the proposed blocks are well resolved - with circulation routes generously proportioned and well laid out. The typical unit layouts provided also demonstrate that relevant wheelchair standards could be achieved as required by London Plan Policy 3.8.

55 With respect to the public realm, the landscaping plans confirm that routes through the masterplan would legible and generous, and that gradients would be well-handled. Whilst shared surface areas are proposed in certain instances, officers note and welcome the fact that these would be delineated by kerbs in order to provide pedestrian safe zones. The application accords with London Plan Policy 7.2.

Sustainable development

Energy strategy

56 In accordance with the principles of London Plan Policy 5.2 the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. In summary the proposed strategy comprises: energy efficiency measures (including a range of passive design features and demand reduction measures); a single energy centre and site-wide network driven by combined heat and power plant; and, renewable technologies (comprising air source heat pumps and 2,240 sq.m. of photovoltaic panels). The approach proposed would achieve a 37% carbon dioxide reduction for the residential component of the scheme and a 34% reduction for the non-residential component. Whilst GLA officers are seeking a number of detailed clarifications, the proposed carbon dioxide savings are supported in principle. Notwithstanding this, pursuant to part E of Policy 5.2, a contribution should be secured towards the Council’s carbon offset fund in view of a 4 tonne per year shortfall against the strategic target within London Plan Policy 5.2.

Climate change adaptation

57 London Plan policies 5.10 and 5.11 seek the incorporation of new green infrastructure as part of development proposals, and policies 5.12 and 5.13 seek to reduce flood risk and secure sustainable urban drainage systems to reduce surface water runoff. The scheme includes various areas of soft landscaping; green/brown roofs; permeable paving; and, below ground rainwater storage to support urban greening and reduce surface water runoff rates in line with the Sustainable Design and Construction SPG. This is supported, as is the proposed use of native plant species and other ecological enhancements to support local biodiversity and access to nature in accordance with London Plan Policy 7.19.

Trees

58 It would be necessary to remove 106 individual trees and 6 groups of trees from the site/Conservation Area in order to facilitate the development. However, the proposal has been designed to allow for the retention of high quality trees wherever possible, and only seven of the
trees identified for removal are assessed to be of moderate quality (the remainder are all low quality). To mitigate the loss of existing trees the applicant proposes a comprehensive site-wide landscaping and replanting strategy which, overall, would deliver a significant uplift in trees at the site in line with London Plan Policy 7.21.

Noise and vibration

59 The proximity of the railway to the north of the site presents issues for residential quality in terms of noise and vibration. B Class uses operating within the proposed large scale commercial units and associated service yards are also likely to generate similar issues for adjacent sensitive uses. As discussed at pre-application stage it is important to ensure that these issues would be addressed in order to support a high quality residential environment, and protect the operational flexibility of the proposed new employment space. Accordingly the applicant has submitted a noise and vibration report as part of the environmental statement which considers the impacts in this regard and proposes means of mitigation. In summary, the assessment concludes that (both in terms of the impact of external sources on the development, and impacts between industrial and residential uses within the development itself) it would be possible to provide appropriate mitigation through measures such as carefully controlled glazing specification and mechanical ventilation. Having regard to the findings of the noise and vibration assessment the Council will ensure that necessary mitigation is secured by way of planning condition in line with London Plan Policy 7.15.

Air quality

60 The site falls within the Hillingdon Air Quality Management Area (AQMA) and the applicant has submitted an air quality assessment as part of the environmental statement which considers the impacts in the proposed development (during both its construction and operational phases). The assessment finds that the most significant air quality impacts (associated with dust particles) would occur during the construction phase of the development. However, a variety of proposed mitigation measures would reduce this impact in order to ensure that the residual effects would not be significant.

61 In terms of the operation of the development once completed, the assessment identifies associated road traffic as the single major source of impact (the effect of the proposed on-site energy centre is deemed to be negligible). Whilst in most cases the traffic impact would not result in any exceedance of levels for the AQMA, there is one location (close to Hayes and Harlington Station) where, based on the current baseline conditions, an exceedance is predicted to occur. However, the assessment notes that this exceedance occurs primarily due to diesel emissions from trains running on the adjacent railway line. Noting that the services on this line are currently in the process of being electrified, the baseline conditions in this location are expected to improve to a level where no additional mitigation would be required.

62 Overall, the anticipated traffic emissions generated by the development (whilst calculated to be of negligible impact in themselves) prevent the development from achieving air quality neutral status. Therefore, to ensure accordance with London Plan Policy 7.14 the Council must appropriately secure implementation of the suite of mitigation measures proposed within the air quality assessment, particularly measures for promoting sustainable travel and reducing private vehicle use (refer also to the transport section below).
Transport

Site access (residential)

63 The residential component of the scheme would be served by two main access roads - Milk Street to the west, and Canal Street to the east. Pedestrian access into the site will be available from Milk Street and Canal Street, plus a re-opened access to the east of Harold Avenue. Pedestrian access would also be available along the canal frontage to the north of the site, which will provide an alternative connection to North Hyde Gardens, and the towpath. Cycle access into the site will be from Nestles Avenue at Milk Street, Canal Street and the existing access to the east of Harold Avenue.

Site access (employment)

64 The residential and employment proposals are operationally distinct, and there is no shared vehicular access. Vehicular access for the employment site will be retained from North Hyde Gardens and each unit will have its own gated service yard. A number of pedestrian routes will be available including from North Hyde Gardens, a new route via the residential scheme and a new route via the canal. Cycle access will be from Nestles Avenue and North Hyde Gardens.

65 TfL has no objection to the proposed accesses, but notes that rationalisation / formalisation of parking on Nestles Avenue will be important to ensure safe movements and necessary visibility for all users coming in and out of the site.

Car parking (residential)

66 Residential car parking is proposed at a level of 0.5 spaces per unit, which equates to 648 standard residential spaces. This is level was agreed as acceptable in principle by TfL during pre-application discussions - subject to the outcome of the highways assessment. In addition to this, it is noted that 20 short stay spaces are proposed for the retail, commercial and community space. This is similarly acceptable.

67 An initial provision of 18 blue badge spaces to serve the number of wheelchair units within the affordable component of the development is proposed, with the number of oversized spaces to be increased as necessary when demand for them is identified. TfL seeks further discussion with the applicant and Council on how this is proposed to be operated in practice. More generally, the applicant’s proposal to monitor and manage car parking through a car park management plan is supported, and should be secured through the Section 106 agreement.

68 The applicant intends to fund future implementation of parking controls in the vicinity of the site and agrees that new residents of the development will not be eligible for any future on-street parking permits. Additionally, the applicant will fund five car club vehicles complemented by three years free membership and £25 driver credit for each residential unit. All of these measured are welcomed.

Car parking (employment)

69 The total level of car parking proposed for the employment uses is 213 spaces for 22,600 sq.m. - which equates to 1 space per 106 sq.m. This is well in excess of London Plan standards, which stipulate that parking for commercial uses should be provided at a maximum standard of one space per 500 sq.m. of gross B2 or B8 floorspace. Therefore, TfL strongly encourages this level of parking to be reduced, particularly given the existing congestion in the area and forthcoming increase in PTAL.
Cycle parking

70 For the residential and associated mixed use development a total of 2,186 cycle parking spaces are proposed. This includes 78 spaces for visitors and 117 accessible spaces. A total of 72 cycle parking spaces will be provided across the four employment units. This is London Plan compliant and supported. The detailed design of cycle parking following London cycling design Standards (LCDS) should be secured.

Trip generation

71 TfL has reviewed the proposed trip generation for both elements of the development and sent detailed comments regarding this to the Council in a letter dated 28 June 2017. In summary, the trip rates for the existing industrial use and the proposed employment uses are acceptable. However, there are number of questions around the proposed residential trip rates which need to be resolved – particularly to ensure that the impact on bus services is properly reflected.

Highway impact assessment

72 A significant amount of highway modelling and assessment has been done in support of the application, with the applicant taking two approaches to highway assessment and growth, one prescribed by TfL and the other by Hillingdon Council. TfL is undertaking a thorough review of this and has requested the modelling files from the transport consultant.

73 The road network around the site is very congested and will be sensitive to any increase in car use resulting from development. The A312 Bulls Bridge Roundabout is of particular concern, alongside the local road network where bus speeds are very slow due to congestion. The emerging Hayes DIFS (refer to paragraph 39), has identified a number of transport measures as being necessary to support growth in Hayes (including: M4 Junction 3 and Bulls Bridge roundabout capacity upgrade (£10,000,000); Bulls Bridge Roundabout design and rebuild (£3,000,000); Cranford Park Access (£3,000,000); and, Harlington Corner accessibility improvements (£300,000)) and it is expected that this development will make an appropriate contribution towards these schemes.

Public transport

74 TfL’s principal concern on public transport relates to proposed impact on the bus network, and the need to ensure that the necessary sustainable travel patterns would be achieved. The peak hour bus trips from this development alone will require an additional return journey in the peak hours, at a cost of £95,000 per year for 5 years, a total of £475,000. The total cost of the additional bus capacity needed to serve the Hayes Housing Zone is £5,000,000.

75 Additionally, as identified in the emerging Hayes DIFS there is a need for improved/new bus connections and priority in Hayes, which will play an important part in encouraging new residents to travel by sustainable modes. In order to achieve this, TfL has identified a scheme to divert a bus service along Nestles Avenue and as such is seeking developer funding, and potentially land, to deliver this scheme. The cost of this intervention is £1,250,000 and land may also be required. Further bus priority schemes have also been identified at a cost of £1,175,000.

76 Another key intervention is to deliver capacity improvements to the bus interchange at Hayes and Harlington station which is currently very basic and suffers from overcrowding at peak times. This could include bridge widening and the estimated cost of this scheme is £15,000,000.
Walking and cycling

77 A pedestrian environment review system (PERS) audit has been undertaken in support of the application. A number of deficiencies were identified and these should be resolved through the application. Furthermore, TfL expects the site to contribute towards promoting walking trips and embedding sustainable travel in the area, critical to enabling the aspired level of growth in Hayes Town Centre.

78 A cycling environment review system (CERS) has been undertaken in support of the application. This identified a need for improvements to cycle parking around trip attractors in the vicinity of the site. In addition to this, TfL modelling of Hayes Town Centre forecasts significant increases in cycle flows in the area by 2026. Therefore, it is expected that the applicant contribute towards delivery of interventions to support and embed cycling trips as identified in the emerging Hayes DIFS.

79 In summary, the total cost of the walking and cycling interventions allocated to the Hayes Housing Zone is £10,970,000 and this development will need to contribute accordingly.

Travel planning

80 It is welcomed that a travel plan for each major land use, (residential and commercial), has been prepared in support of the application. Final travel plans should be secured, monitored, enforced, funded and reviewed through the Section 106 agreement.

Delivery and servicing

81 Details of delivery and servicing trips need to be provided, alongside evidence that associated movements are adequately provided for in the layout of the site. Expected trips and measures to minimise and manage delivery and servicing movements should be formalised in a delivery and servicing plan (DSP), prepared in accordance with TfL guidance, prior to occupation of the development.

Construction

82 A construction management plan (CMP) has been submitted in support of the application. This contains high level measures to minimise and manage the impact of construction related movements on the transport network. These include minimising peak hour vehicle movements, vehicle booking systems and marshalling. The final CMP should be prepared in accordance with TfL guidance and submitted for approval prior to commencement of the development.

Financial contributions to mitigate transport impact

83 As cited above, there are a number of significant transport/infrastructure interventions identified to support growth within the Hayes Housing Zone. The impact of this proposed development will need to appropriately mitigated, and funding for necessary interventions will need to be secured via an appropriate legal mechanism. TfL would welcome further discussion with the applicant and the Council in this regard, in the context of the emerging Hayes DIFS.

Local planning authority’s position

84 Hillingdon Council is still reviewing the application, and is expected to consider the case at a planning committee meeting in September 2017.
Legal considerations

85 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

Financial considerations

86 There are no financial considerations at this stage.

Conclusion

87 London Plan policies on Opportunity Area; Strategic Industrial Location; employment; housing; urban design; historic environment; inclusive access; sustainable development; and, transport are relevant to this application. Whilst the scheme is strongly supported in strategic planning terms, the application does not yet fully comply with the London Plan as set out below:

- **Principle of development:** In view of the plan-led consolidation of the Nestles Avenue SIL, the proposed residential-led mixed use redevelopment of this vacant site to deliver increased housing and employment densities contributing to a sustainable suburban intensification within a Housing Zone and Opportunity Area is strongly supported in line with London Plan policies 2.13, 2.15 and 2.17.

- **Employment:** The proposed reprovision of 4 hectares of employment land / 22,663 sq.m. of employment space is strongly supported in line with London Plan Policy 2.7. The applicant is, nevertheless, strongly encouraged to incorporate a proportion of affordable workspace as part of the proposed small-scale office/co-working space.

- **Housing:** The proposed 35% provision of affordable housing is supported as a starting point. However, further interrogation of the affordable housing provision is required in the context of SIL release, and the applicant must fully investigate the provision of grant funding (and any other available public subsidy) in accordance with London Plan Policy 3.12 and the draft Affordable Housing and Viability SPG.

- **Urban design:** The heritage-led masterplan is an exemplar of suburban intensification and would achieve a successful consolidation of employment land in order to support the sustainable integration of large-scale commercial operations with high quality, high density housing. The application is supported in line with London Plan Policy 7.1.

- **Historic environment:** Whilst the proposal would result in some less than substantial harm to heritage assets, this harm would be outweighed by the refurbishment strategy for the Locally Listed factory buildings; and, the high quality of the new build elements of the scheme and their positive contribution to the character of the Conservation Area. The application accords with London Plan policies 7.8 and 7.9.
• **Inclusive access**: The approach to access and inclusion is supported in line with London Plan Policy 7.2.

• **Sustainable development**: Following minor clarifications on the energy strategy, the proposed climate change mitigation and adaptation measures; tree planting and landscaping strategy; and, noise, vibration and air quality mitigation measures should be secured by way of planning condition/obligation in line with London Plan polices 5.2, 5.10, 5.11, 5.12, 5.13, 7.14, 7.15, 7.19 and 7.21.

• **Transport**: Whilst the proposed development is generally acceptable in strategic transport terms, the applicant needs to address issues associated with: car parking; trip generation; highway impact assessment; public transport; walking and cycling; travel planning; delivery and servicing; and, construction to ensure accordance with London Plan policies 6.3, 6.7, 6.9, 9.10, 6.13 and 6.14.

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