

Ealing LPA Local Plan (Regulation 24) 2025

Matter 9, Qs1 – 9 & 11 – 115: Development Sites

Issue:

Whether the development sites proposed for allocation in the Plan are justified, effective, in general conformity with the London Plan, consistent with national policy and positively prepared.

Written Statement on Behalf of Ealing Council

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Questions

Town Plan Development Site Allocations – General

1. **For effectiveness, is it sufficiently clear that the Plan seeks to formally allocate the Development Sites as land for development?**

LPA Response: Yes, in the preface to Chapter 4 at Para. 4.0.12 explains that the “the Town Plans include the Development Sites (or site allocations) that will be critical to the delivery of the spatial strategy...” and a definition of Development Sites is also provided in the glossary. However, if it would provide better clarity, in the preamble to each of the individual town sections on ‘Development Sites’ either the heading could be amended to say: “(Name of Town) Development Sites (or Site Allocations) and/or an amendment to the second paragraph, second sentence of each section to read: “To deliver the town-level spatial strategies and their associated policies, a number of Development Sites (or site allocations) have been identified.”

2. **Are the overarching principles for the Development Sites (set out at the start of each section, e.g. Action is at para 4.1.61) justified and deliverable, including the expectation that key infrastructure is expected to be delivered in early phases of development?**

LPA Response: Infrastructure is expected to be delivered in earlier phases of development, where appropriate. Where the infrastructure is required to make the development acceptable in planning terms this will be secured and its delivery monitored through the S106 process.

3. **For effectiveness, is it clear how a decision maker should respond to the contextual considerations and design principles for each Development Site and the overarching principles? Is modification needed to clarify policy from guidance?**

LPA Response: Each individual site allocation is a policy in and of itself, and together they support the delivery of the vision, objectives and spatial strategy of the local plan and each of the seven individual town plans.

Each development site sets out policy and information to help a decision maker understand the uniqueness of the site and guide planning decisions. Clear and comprehensive ‘contextual considerations’ and ‘design principles’ have been provided for each Development Site, focusing on the unique issues and requirements to be considered for each site.

As is explained in each of the seven towns’ Development Sites section, a development site forms the adopted policy for each specific site and does not restate all relevant development plan policies. It continues to say that all proposals are expected to accord with the development plan as a whole as well as any local place making objectives set out in the relevant Town Plan, and to take account of relevant masterplans or supplementary planning documents.

The ‘overarching principles’ apply to all Development Sites and are repeated in each Town Plan’s Development Sites section. In hindsight, as these principles are essential guidance applicable to each site allocation, a modification to make the overarching principles a free-standing sites policy would add clarity.

4. For soundness, is it necessary for individual site allocations within the Plan to set out the anticipated yields for numbers of housing units and/or commercial floorspace to be delivered?

LPA Response: Whilst the council contends that it is not necessary because the plan is not measured upon the delivery of individual sites but rather the aggregate whole of housing delivery, further consideration will be given to providing indicative housing capacity figures, where appropriate, for each individual site allocation. However, it will be important to provide additional commentary in the preamble to each of Town Development Site chapters on how such figures should be interpreted.

5. Is the methodology for determining building heights robust and are the building height limits for each site allocation consistent with it?

LPA Response: Yes, the methodology is robust, based upon a well-used approach of layering suitability and sensitivity indicators, and is complemented by design-led analysis for each site. This produces two outputs; firstly, thresholds at which a building may be considered tall relative to its context, and secondly, allocated sites for tall buildings together with appropriate heights. Heights are then further iterated by reference to site-specific models.

6. Is the methodology for assessing heritage impacts of site allocations robust and is each site allocation consistent with it?

LPA Response: Assessment of heritage impacts by site allocations is inherently iterative but is based in the first instance upon known heritage assets, principally listed buildings and conservation areas. Further information has been drawn from the character studies, and from local knowledge to inform the development of each site allocation.

7. Given the identified deficiencies in access to open space in the evidence base, how do the policies in the Plan assist with addressing this issue and will they be effective?

LPA Response: The plan aligns with the National Planning Policy Framework (NPPF) and the London Plan (particularly Policies G1 to G8) ensuring consistency and legal robustness. It is also informed by spatial data and local needs assessments and takes an integrated approach emphasising how open and green space provision is linked with health, climate resilience and biodiversity goals.

More specifically, the plan includes strategic policy that includes objectives that include:

- protecting existing open spaces, including Metropolitan Open Land (MOL) and Green Belt;
- the creation of a new regional park;
- designating new Local Green Spaces, especially in areas with identified deficiencies; and,
- enhancing connectivity between green spaces to form a coherent network, improving both ecological value and accessibility.

Each of the Town Plans adopts a tailored strategy. For example, in Ealing Town, the plan proposes:

- enhancing existing parks and public spaces and
- creating new green links and improving access to the River Brent corridor

New developments, especially in high-density areas, are required, for example, to:

- provide on-site open space or contribute to off-site provision;
- integrate green infrastructure into design (e.g., green roofs, pocket parks); and,
- meet London Plan standards for open space provision.

In terms of effectiveness, the plan includes a monitoring framework to track delivery of open space improvements and ensure that developer contributions (via Section 106 or Community Infrastructure Levy) are used effectively. The Plan takes a comprehensive and place-based approach to addressing open space deficiencies. If policies are fully implemented, and there is adequate funding, the plan has the potential to significantly improve access to quality open space across the borough.

8. Given the number of allocations affected, how has flood risk been taken into account, both in terms of assessing the capacity of site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

LPA Response: As per the NPPF all of the allocation sites in the plan have been subject to the sequential test. The application of this process has been informed by the Strategic Flood Risk Assessment (EB100 & EB97). Section 2.5.2 of the IIA (S16) summarises the application and cumulative findings of the sequential test (and exception test where relevant). This confirmed that whilst a number of the allocation sites (30) can be wholly located within flood zone 1, the remaining 52 sites are affected by one or more Flood Zones 2, 3a (fluvial), 3a (surface) or 3b (fluvial). This contrasts with earlier Local Plan processes where most allocations were sited in flood zone 1, and this change in circumstance largely arises as a result of our decision in West London to also zone surface water risk and therefore to bring this source into the sequential and exception test process. The IIA considered the implications of solely accommodating development in flood zone 1 on our ability to accommodate development needs, and satisfy key local plan targets, concluding that such a strategy would leave Ealing significantly short of our needs. Of the 52 sites affected by medium or high-risk flooding, seven sites propose uses which are considered to be appropriate for the respective flood zone. The remaining 45 sites trigger the requirement to undertake an exception test.

As part of the level 2 SFRA exercise a screening assessment was undertaken initially of all 82 allocation sites (85 were screened, but 3 sites were not pursued). This screening assessment at appendix A of the Level 2 SFRA (EB97) reconfirmed for each allocation the extent of overlap with each flood zone as a percentage of the site area and the vulnerability classification. This screening assessment also determined whether a more detailed site assessment was required for each allocation. To this end thresholds were employed. A site assessment was triggered where the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was equal to or greater than 0.49% of the site area for fluvial sources and or equal or greater than 7.5% for surface water sources. The findings of this site assessment are summarised in individual site proformas at appendix B of the Level 2 SFRA. Each proforma addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if the site will be safe over its lifetime (as per the exception test).

As is the case for the sequential test, the IIA also concludes that for all cases where triggered the exception test (both parts) are passed.

The findings of the SFRA and specifically the site assessments are also relevant to the Development Management process. Reflecting the assessment findings additional text has therefore been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which are relevant to the consideration of an application and may impinge on the design and layout of any future proposal on the specific site. This has been applied consistently and comprehensively reflecting the evidence, and the measures/design solutions are deemed to be achievable within the context of the wider allocation parameters.

As addressed previously the allocations omit capacities. The capacities employed for the trajectory either reflect permitted or pending schemes or are based on design-based work or capacity calculations which has typically employed conservative assumptions. At a high level this has considered environmental constraints including flood risk, which has moderated the developable area, and will have had a bearing on capacity estimates.

9. How have air quality issues been considered, evidenced and reflected in the choice of site allocations and any necessary mitigation?

LPA Response: The whole borough falls within an air quality management area as set out in the council's Air Quality Strategy {EB71}, and different measures applied depending upon local concentrations, primarily associated with vehicular traffic. Major vehicle arteries tend to be located in town centres and therefore also to coincide with many development sites.

Overall, improvements to air quality need to come from improvements to vehicle standards, and reductions in vehicle use, which fall at a national or regional level. New development provides the opportunity for buildings which better control and manages air quality, including mechanical ventilation where necessary, and allocations have further provided design guidance that avoids space and outdoor activities in parts of sites which are exposed to poor quality air.

10. For each proposed development site, please set out....

LPA Response: Please see a separate council written statement entitled "Matter 9, Q10: Development Sites"

Acton Development Sites

02AC - Acton Gardens

11. Is modification to the site boundary (highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3]) necessary for soundness?

LPA Response: Yes, the site boundary has been modified partly in response to Acton Gardens LLP's Regulation 19 representations requesting that the boundary be changed to reflect the status of phasing in the current development. It is therefore suggested that an amendment to

the boundary is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM46}.

06AC - Acton Vale Industrial Park & Westgate House

12. What provision, if any is made in respect to existing occupiers of the site?

LPA Response: Existing occupants of the site are not provided for specifically by the allocation. However, the requirement to prioritise new industrial provision must be based upon an assessment of local needs which would in turn highlight the demand of any businesses that would be displaced by redevelopment. This reflects the pressing need for new and improved industrial space, as well as the secondary opportunity on this site to deliver other uses.

13. Are the design principles appropriate in terms of scale and retention of the building?

LPA Response: No. It is therefore suggested that an amendment to building height is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM50}.

14. Is the allocation justified in respect of potential effects on the capacity of the local highway network and local car parking provision?

LPA Response: Yes. It is not anticipated that the allocation would have a detrimental effect on the local highway network capacity, as during the planning process the site will be required to set out measures to ensure as many journeys as possible relating to the site are made by walking, cycling and public transport. Any potential effects on local car parking provision will also be established in detail during the planning process.

07AC - Dean Court

15. Are any trees on or near the site subject to a tree preservation order?

LPA Response: Yes, all the trees adjacent to the trackside of the railway line next to Dean Court and at the eastern end of the site have tree preservation orders.

16. How will issues relating to air quality be addressed and will mitigation be effective?

LPA Response: Air quality issues are primarily associated with the east end of the site where it meets the A40. It is particularly important to limit the amount of outdoor space at this point of the development, and the allocations and visits that this will be concentrated along the south and western parts of the site, further from traffic emissions. Normal ventilation thresholds will also apply, and the opportunity for new development should allow filtered and mechanical ventilation where necessary to ensure air quality.

17. How have the effects on local biodiversity been assessed and, where necessary, addressed?

LPA Response: Yes. The allocation boundary has largely been set back to minimise encroachment into the designated SINC area. To ensure better clarity and ensure the policy is effective, a further suggested amendment is proposed under contextual considerations as follows:

“Development proposals should consider nearby features of ecological value (SINC and Green Corridor) and ensure the need for sensitive treatment along the northern edge of the site.”

Ealing Development Sites

01EA - Broadway Connection & Arcadia Shopping Centre

18. Is the proposed scope of uses justified, effective and consistent with national policy?

LPA Response: Yes, this is a prime town centre site, and the allocation makes provision for any suitable town centre uses.

19. Is the increased extent of the site allocation since the Regulation 18 stage justified?

LPA Response: Yes, allocations are not based upon land ownership and the identified principles are relevant to the full extended boundary.

20. How will the site allocation affect the town centre and is this evidenced and justified?

LPA Response: The allocation is relatively broad in permitting any use suitable to the town centre, with a particular attempt to promote office provision. Development in this location has been extensively tested and examined, particularly in relation to the recent Broadway Connection application, and it is clear that mixed town centre uses here will have a strong positive effect on the health of the centre as a whole, and office provision if it can be secured a potentially transformative and catalytic effect on the health of the local office market.

21. Does the supplementary planning document (2012) for the site remain relevant, and if so, are the allocation's Design Principles consistent with it?

LPA Response: No, this is effectively superseded by the allocation.

22. Is the maximum storey height specified in the Plan, correct?

LPA Response: No. It is suggested that an amendment is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM55}.

23. Do the Design Principles appropriately address movement around and through the site?

LPA Response: No. It is suggested that an amendment is made regarding the second design principle for clarity as proposed in the Schedule of Suggested Modifications {S24 - reference SMM55}.

02EA - Ealing Broadway Shopping Centre & Crystal House

24. Is the proposed scope of uses justified, effective and consistent with national policy?

LPA Response: Yes, this site forms the current retail anchor of Ealing Town Centre and is essential to its health and place within the local and London town centre hierarchy. It is appropriate and necessary for town centre uses to be the first consideration with other uses incorporated as appropriate and without prejudice to these primary uses.

25. Is the PTAL for the site correctly stated in the Plan and do the Design Principles reflect the rating?

LPA Response: No. It is suggested that an amendment is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM56}.

06EA - 49–69 Uxbridge Road

26. Is the proposed scope of uses justified, effective and consistent with national policy?

LPA Response: Yes, the site has potential to augment the scope and range of offers in the town centre and to provide additional residential accommodation where that facilitates or does not conflict with the main use. Improvement of this stretch of new Broadway is also dependent upon the provision of active frontage. Provision is also made for the reinstatement or expansion of existing cultural/leisure uses.

27. Does the site assessment adequately consider the relationship with the Questors Theatre?

LPA Response: Yes. Measures to improve permeability through the site are a key requirement for the site and reflected in the fourth design principle, including a link to the Questor's Theatre.

07EA - CP House

28. Is the proposed scope of uses justified, effective and consistent with national policy?

LPA Response: Clarity and effectiveness could be improved by reflecting in the proposed use the contextual consideration of potential for complementary active frontage uses:

'Office and complementary active frontage uses'

29. Is the maximum storey height specified in the Plan, correct?

LPA Response: No. It is suggested that an amendment is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM61}.

08EA - Craven House

30. Is the proposed scope of uses justified, effective and consistent with national policy?

LPA Response: Yes, the site forms an important part of the office corridor and should continue to contribute to this alongside any complimentary uses which improve active frontage.

It is suggested that an amendment to broaden the range of uses to include offices and supporting uses suitable to the town centre is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM62} in response to representations made.

31. Does the scale of development optimise previously developed land in line with the London Plan?

LPA Response: Yes, the scale of development is a product of the opportunities and constraints of the site, which is constrained, among other things, by its potential impact upon Walpole Park and Pitzhanger Manor.

13EA - 99–115 Broadway, West Ealing

32. Is the address for this allocation correctly cited in Table 2, page 170 of the Plan?

LPA Response: No, this is a typographical error, and it should read 99-113 The Broadway.

15EA - Waitrose, West Ealing

33. Is the allocation justified in respect of potential effects on the capacity of the local highway network and stipulated level of car parking provision?

LPA Response: Yes. It is suggested that an amendment to highway capacity and car parking provision is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM69}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

34. In terms of effectiveness, should Jacob's Ladder footbridge be included within the allocation site?

LPA Response: No. The Jacob's Ladder footbridge is owned by Network Rail. During the West Ealing Liveable Neighbourhood (WELN) scoping works, the council attempted to negotiate improving the footbridge, but this proved very challenging

due to funding and deliverability issues including its age and condition. The council has recently improved the lighting on the footbridge as part of the WELN programme, but further improvements will need to be done in conjunction with scheduled maintenance by Network Rail. As such, it is more effective for the footbridge to remain outside this already complex site, but for the council to seek significant contributions to fund the improvement works through the redevelopment of site 18EA, which has the landing point of the footbridge within its boundary.

35. Does the scale of development optimise the reuse of previously developed land in line with the London Plan?

LPA Response: Yes. This site is highly accessible, but is constrained by its local context, as well as the potential for significant impacts upon the broader setting of Kew Gardens World Heritage Site. The allocated heights are designed to come in just below the level at which impacts upon Kew would occur.

16EA - West Ealing Station Approach

36. Is the allocation effective in respect of parking, servicing and delivery arrangements?

LPA Response: Yes. Parking, servicing and delivery arrangements have been considered. A proposed amendment to ensure that the arrangements support sustainable travel has been formalised in the Statement of Common Ground with TfL {S22b}, amending the 5th Design Principle to read “Incorporate satisfactory off-street servicing and delivery arrangements” to make it clear that such arrangements should be put in place for both residential and commercial uses.

19EA - Gurnell Leisure Centre

37. Is the loss of Metropolitan Open land justified?

LPA Response: Yes. This is addressed in Section 2.2 of the Stage 2 Green Belt and MOL review {EB95}. The release of the leisure centre including car park and wider boundary corrections (Peal Gardens & Enterprise Lodge) are not considered to undermine the integrity and function of the wider MOL network. A continuous and substantial open corridor would be maintained east west through the Brent River Park. The decision to recommend the release of the car park is not based on its performance as MOL, but rather a preference to focus development on that side of the site. The proposed boundary adjustments are considered to result in a better defined and defensible edge to the MOL. It should also be noted that the site has extant planning permission, the old leisure centre has now been demolished and work on site has commenced.

38. Is the allocation effective in respect of servicing and coach drop off arrangements?

LPA Response: No. It is suggested that an amendment to servicing is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM73}. This has been formalised

in a Statement of Common Ground between TfL and the Council {S22b}.

20EA - Downhurst Residential Care Home

39. Is modification to the site boundary (highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3]) necessary for soundness?

LPA Response: Yes, the proposed modification to the site boundary takes into account the consented scheme that has been implemented.

21EA - Former Barclays Sports Ground

40. Is the loss of Metropolitan Open land justified?

LPA Response: Yes. The council are only proposing to remove the MOL designation from a small part of the MOL site and is making a small addition elsewhere {See Map 35 of the Atlas of Change, S17}. This is addressed in Section 2.2 of the Stage 2 Green Belt and MOL review {EB95}. The former clubhouse site in the NW corner is previously developed land and does not meet the criteria for MOL designation.

More importantly, the former Barclays Sports Ground is not currently used for sports, and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. The council is keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community.

41. Should the Plan treat this site allocation as 'enabling development in terms of Policy EA21 and the proposed use of the site?

LPA Response: Yes. The principle of development is based upon the need to enable the leisure use and access arrangements to the protected open space. This approach accords with the clear requirement in policy G4 for development in green and open spaces and its visual impact to be kept to a minimum.

42. Will the site allocation be effective in securing appropriate community sports provision?

LPA Response: Yes. The allocation is flexible depending upon the level and type of need identified at the application stage.

22EA - 96 Queens Drive & Telephone Service Centre

43. In terms of effectiveness, is the scope of proposed uses clear and deliverable and is it justified and consistent with Policy E4?

LPA Response: No. It is suggested that amendments to proposed uses and deletion of the fifth design principle are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM76}.

23EA - Old Actonians Sports Ground

44. Will the allocation result in the loss of playing fields and if so, is this justified and consistent with national policy?

LPA Response: No. The need to ensure that decisions taken around the replacement/loss of facilities are underpinned by robust evidence of supply and demand is accepted, as per Paragraph 103 of the NPPF and clause C of London Plan Policy S5.

Despite the reference to residential development, the driver for allocating the site is not to unlock land for housing. The overriding objective instead is to secure the long-term future of this site for outdoor sports. To this end the allocation is clear that any development must not reduce sport and recreation capacity and where possible increase the amount of usable pitch/court space.

Regarding the latter, the allocation promotes the consolidation and rationalisation of existing buildings, with the aim of increasing the area of the site which is usable as pitch/court space.

For clarity, it is suggested that amendments to proposed use, key infrastructure requirements and design principles are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM77}. This has been formalised in a Statement of Common Ground between Sport England and the Council {S22c}.

45. Will the allocation be effective in enhancing future outdoor leisure offer?

LPA Response: Yes, see answer to Q.44 above.

24EA - Wickes, South Ealing Road

46. Has the impact of the allocation on the Neighbourhood Centre been assessed? What evidence exists to determine whether the Design Requirements for this allocation should make adequate provision for the requirements of the existing business within the site?

LPA Response: Yes, the Town Centre Health Check {EB53, p.60} identifies the two anchors of the neighbourhood centre as being the Co-op and the Esso garage. Wickes stands out as a comparison retail use in contrast to the convenience nature of the centre.

The current customer base of the shop is primarily car-based and should not be seen as having an inherent effect upon the health of the centre. The availability of the site is largely dependent upon the agreement of the current occupant, and there seems to be no benefit on balance to requiring reprovision for the existing business.

Greenford Development Sites

01GR - Greenford Hall, Methodist Church former Police Station, former Clinic & Greenford Library

47. Is the allocation justified in respect of potential effects on the capacity of the local highway network and local car parking provision?

LPA Response: Yes. Bringing forward the site will contribute to an improved public realm and improved access to Ravenor Park and nearby shops, and any proposals will be expected to provide car parking in line with London Plan policy. The site is not expected to generate significant numbers of vehicle trips on the local highway network or to affect local car parking provision.

The site has a PTAL of 4 and is served by numerous bus routes, so although there is some severance from rail and Underground services at Greenford station, the site has relatively good accessibility by public transport.

48. Will the approach to parking be effective and in general conformity with the London Plan?

LPA Response: Yes. It is suggested that an amendment to car parking provision is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM83}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

02GR - Greenford Broadway Car Park

49. Will the approach to parking be effective and in general conformity with the London Plan?

LPA Response: Yes. It is suggested that an amendment to car parking provision is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM84}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

50. Is modification to the site boundary (highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3]) necessary for soundness?

LPA Response: Yes. It is therefore suggested that an amendment to the boundary is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM84}. This reflects post Regulation 19 discussions with Tesco to include the supermarket and car park as part of the site allocation to make more effective use of land, improve permeability across the wider site and add to placemaking for this prominent position within Greenford Town Centre.

This has been formalised in a Statement of Common Ground between Tesco and the Council agreed on January 16th 2025.

04GR - Westway Cross

51. How have the effects on local biodiversity been assessed and, where necessary, addressed?

LPA Response: It is likely to have limited indirect or no effect on the MOL, SINC and Green Corridor as they are separated from the site by the road network and features will likely be retained, or effects mitigated. More specifically, design principles propose the creation of a public greenspace in the centre of the site, linked by a network of green pedestrian and cycle routes that connect to the SINC. These should be tree lined with bio-diverse planting and SUDS to function as green corridors for wildlife.

However, to ensure better clarity and ensure the policy is effective, a further suggested amendment is proposed under contextual considerations as follows:

“Development proposals should consider nearby features of ecological value (MOL, SINC and Green Corridor) and ensure the need for sensitive treatment along the northern edge of the site.”

52. Is the allocation justified in respect of potential effects on the capacity of the local highway network and local car parking provision?

LPA Response: Yes. It is suggested that an amendment to car parking provision is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM85}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

05GR - Former Greenwich School of Management

53. Is the proposed employment led scheme and range of permitted uses justified?

LPA Response: Yes. There is a well-documented need for more industrial and employment space in London, as demand is increasing and diversifying, putting additional pressure on the affordability of industrial space, particularly for smaller businesses and business start-ups. Ealing Local Plan Policy SP1: A Vision for Ealing sets out a requirement for Ealing to grow and diversify its business space and further strengthen the role of its industrial areas. Ealing's Employment Land Review (ELR) {EB49} shows a historic shift from a net surplus of industrial land over the plan period to a potential deficit, with a net requirement for one additional hectare of growth.

06GR - Smiths Farm

54. Is modification to the site boundary (highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3]) necessary for soundness?

LPA Response: Yes. This is shown on Map4 of the Atlas of Change {S17}.

55. Is the site allocation justified and consistent with the national approach to Green Belt?

LPA Response: Yes. The use of the site has changed considerably since its initial designation as Green Belt. The existing use of the site makes no contribution to its Green Belt designation {EB95} and it now has planning permission for a residential led scheme.

Hanwell Development Sites

01HA - Land to the front of Ealing Hospital

56. Is the allocation justified, and will it be effective in respect of its understanding and management of potential effects on Ealing Hospital (including during development)?

LPA Response: Yes. This is a site where extensive discussions have taken place between the council and relevant stakeholders, and the landowner is fully supportive of the allocation and its intent. The optimisation of this parcel of land will ensure that the hospital benefits from a land receipt which will be used to help contribute to the refurbishment of the hospital campus as well as providing vital affordable housing for its workforce near the hospital.

Regarding the impact of potential effects during construction and development, it is suggested that amendments on access arrangements to the hospital campus are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM88}. This is in direct response to representations made by the NHS.

The scheme is not yet under formal pre-application consideration, but it is anticipated that the size of the campus means there is considerable flexibility to avoid any adverse impacts on the operational capabilities of the hospital.

03HA - George Street Car Park

57. Is the allocation justified in respect of potential effects on local car parking provision?

LPA Response: Yes. The proposed use is for a residential mixed-use scheme for the whole site. There is no suggestion of re-providing the existing car park. This has been accepted in a Statement of Common Ground between TfL and the Council {S22b}.

58. Is the allocation justified, and will it be effective in respect of potential effects on heritage assets, including the Clock Tower Conservation Area?

LPA Response: Yes. The allocation seeks to optimise the use of this town centre site and anticipates that the scale of development will be modest in size largely consisting of mews style housing.

04HA - Site of Lidl and discount store

59. Will a requirement to re-provide the supermarket on site be effective?

LPA Response: Yes. The 6th design principle seeks to reprovide a supermarket on site which is a key anchor for the District Town Centre. Discussions with the landowner confirm their intention to remain in situ and to explore any opportunity to expand their retail capacity.

05HA - Marshall Site, Gold's Gym & Garages on Montague Avenue

60. Is the allocation justified, and will it be effective in respect of potential effects on heritage assets, including the Clock Tower Conservation Area?

LPA Response: Yes. The third design principle seeks to ensure that the design, scale, layout, and materials reflects the prevailing character and fine grain of the surrounding area. If the Inspectors concur and with the benefit of hindsight and in the interests of clarity and consistency, a new contextual consideration could be added as follows: "Overall scale and design of proposals should be responsive to heritage aspects of the adjoining St Hanwell Clock Tower Conservation Area to the east."

61. Is the allocation justified and consistent with national policy in respect of sports/leisure provision?

LPA Response: No. it is suggested that an amendment to the proposed use to include leisure/sports use is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM90}. This has been formalised in a Statement of Common Ground between Sport England and the Council {S22c}.

07HA - Copley Close Estate

62. Is a requirement for car parking for units of three bedrooms or more justified and will it be effective in the absence of specifying an applicable parking standard?

LPA Response: The PTAL of the site is 1b-2. London Plan Policy T6 (Table 10.3) states that for an Outer London residential site of PTAL 2-3, up to 1 car parking space per dwelling is permitted. For this development the council is specifying that car parking should be provided for units with 3+ bedrooms, in order that families and others living in the larger units can have access to a vehicle where required, while expecting adherence to London Plan parking standards for the site overall.

Northolt Development Sites

01NO - Car Sales Site and Northolt Leisure Centre

63. How have biodiversity/green corridor issues been taken into account? Will the design principle of reversion on site or on adjacent site be effective?

LPA Response: Yes. The fifth design principle requires reversion of biodiverse planting on site or on adjacent SINC land if there is any development on SINC land within the site boundary. More detailed consideration will be made at the planning application stage but is likely that HS2 sub surface safeguarding will limit the quantum of development in very close proximity to the railway line ensuring that the most significant development will be on frontage or wrapping around the existing leisure centre.

64. Are any trees on or near the site the site subject to a tree preservation order?

LPA Response: Yes, all trees adjacent to the trackside of the railway line are subject to a tree preservation order. This includes a section of the southern part of the site.

65. In light on Historic England's comments, have potential effects on heritage assets been considered and appropriately addressed?

LPA Response: Yes, a Heritage Impact Assessment has been produced to address comments made by Historic England. Under contextual considerations, it should be noted that the fifth bullet point says: "New development should respond to the site's proximity to Northolt Village Green Conservation Area, views towards St Mary's Church, a Grade I listed building and neighbouring Mandeville Parkway Open Space."

66. Are the anticipated arrangements in respect of leisure centre parking justified and will they be effective in assisting with the delivery of sustainable development?

LPA Response: No. It is therefore suggested that an amendment for disabled parking provision, EV provision and the promotion of active travel is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM94}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}. In hindsight, under design principles, the 11th bullet point regarding car parking for any residential development should be deleted given that the site has a PTAL of 4 if the Inspectors agree.

02NO - Mandeville Parkway

67. How has the issue of any loss of open space and effects on the wider area been considered? Will the design principle to limit development primarily to part of the site be effective?

LPA Response: Development proposals seek to ensure that there is no net loss of open space. A planning application is currently being considered and is expected to be determined in Autumn 2025 (224827FUL) and adheres to this design principle. The focus of

development is residential infill at Lewes Close and redevelopment of nearby garages in the southwest corner of the site and redevelopment of old mostly derelict garages which are situated between the Racecourse Estate and the open space along the northern boundary of the site allocation.

68. Is the site boundary appropriate in terms of showing the area proposed for development?

LPA Response: Yes. The boundary seeks to ensure that any development proposals result in improvements to the open space. The planning application is associated with the creation of a better network of footpaths that provide new linkages to the bus stop and highway crossings as well as extensive tree planting.

03NO - Northolt Sorting Office

69. For consistency with the stated proposed use, and therefore effectiveness, is modification needed to clarify the design principles relating to industrial uses?

LPA Response: Yes. It is suggested that an amendment to delete the first two design principles is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM95}.

04NO - Northolt Driving Range

70. Is development justified, consistent with national policy, and in general conformity with the London Plan in relation to Green Belt?

LPA Response: Yes. This is land south of the Ruislip Road shown on Map 5 in the Atlas of Change {S17} and is part of parcel GB4. The council's Green Belt and MOL Review Stage 1 {EB96} concluded that this parcel of land did not meet the criteria of its current Green Belt designation noting that: "The part south of Rowdell Road, in particular, does not feel or function like GB. It includes several buildings and hardstanding including a private gym with car park, and a school." The site did not score well against MOL criteria either.

The Green Belt and MOL Review Stage 2 {EB95} concluded that this parcel of land had changed significantly since it was originally designated Green Belt many decades ago and it currently makes no contribution towards Green Belt purposes. There is an opportunity to make better and more efficient use of the land to provide an employment-led, mixed-use scheme, which incorporates improvements to active travel and the canal towpath.

The Mayor of London initially opposed changes to the Green Belt designation of this site but then acknowledged that: "Changes to the NPPF and new government guidance in relation to green belt and grey belt need to be taken into consideration on these matters, recognising that this plan is being considered under the previous NPPF" in Statement of Common Ground between the GLA and the Council {S22 d}. It is currently the subject of a Green Belt review being undertaken on behalf of the Mayor of London and it is very likely that the findings will concur with the council's own assessment.

71. Is the contribution the site would make to industrial needs justified by evidence?

LPA Response: Yes. There is a well-documented need for more industrial space in London, as demand is increasing and diversifying, putting additional pressure on the affordability of industrial space, particularly for smaller businesses and business start-ups. Ealing Local Plan Policy SP1: A Vision for Ealing sets out a requirement for Ealing to grow and diversify its business space and further strengthen the role of its industrial areas. Ealing's Employment Land Review (ELR) {EB49} shows a historic shift from a net surplus of industrial land over the plan period to a potential deficit, with a net requirement for one additional hectare of growth. The bulk of projected need (70% of the gross total) is for logistics space. The location of the site adjacent to the A40, to an existing Strategic Industrial Land (SIL) and within the borough's dominant logistics corridor along the A40 Corridor presents a unique opportunity to designate new industrial land that will help meet these needs.

The borough's need for additional industrial land, the lack of alternative sites suitable and available for industrial use, and the site's location adjacent to well established Strategic Industrial Land, with good strategic road connectivity constitute the exceptional circumstances for changing its Green Belt designation. It is therefore proposed that the site is designated Locally Significant Industrial Site (LSIS).

72. Are modifications to the site boundary and other policy details needed to reflect land in the ownership of the Canals and Rivers Trust?

LPA Response: Yes. It is suggested that amendments to the site boundary, the proposed use, the addition of a new contextual consideration and a revision to the 4th design principle are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM96}.

73. For consistency with national policy, is modification to the proposed use needed to refer to re-provision of a leisure/sport use on the site? Is such a use deliverable?

LPA Response: Yes. It is suggested that an amendment to the proposed use is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM96}. This has been formalised in a Statement of Common Ground between Sport England and the Council (S22c).

05NO - Medlar Farm Estate, 06NO - Yeading Lane I, 07NO - Yeading Lane II, 08NO - Grange Court

74. What are the implications of 05NO being included in the White Hart Roundabout Strategic Masterplan Area? What is the latest on the masterplan? How is it anticipated that the masterplan and the development of 05NO and 06NO Yeading Lane I should be taken into account?

LPA Response: A new spatial master plan was prepared as part of the 20-minute framework that was part of the Local Plan evidence base and has already been published {see EB116, from Page 50 onwards}. This sets out guiding principles that illustrate how Northolt could

transition to become a 20-minute Neighbourhood and a framework that includes economic hubs, movement and residential. It also includes place specific proposals including for the White Hart Roundabout and environs. More detailed master planning of the White Hart Roundabout has also been prepared but this is not currently in the public domain due to commercial sensitivity.

The estate regeneration sites are currently outside the scope of the framework but present opportunities to improve street interfaces and to contribute to the proposed new neighbourhood centre, including enhanced permeability.

75. For all sites, how have biodiversity/green corridor issues been taken into account?

LPA Response: For 05NO, 07NO and 08NO, although a SINC or Green Corridor or both may be situated nearby, they are separated from the site by built development and the road network ensuring adverse impacts are unlikely.

In the case of 06NO, the site overlaps or is adjacent to both a SINC and a Green Corridor which will require mitigation of any adverse impacts. Design principles seek to upgrade the Yeading Lane Estate Open Space and the area of SINC between the estate and The Parkway.

76. For all sites, do the design principles that ask for refurbishment and infilling to be considered as a first option, but also refer to complete demolition and redevelopment give a clear direction about the development that may be permissible on the site? Is a 'refurbishment first' requirement in accordance with national policy and in general conformity with the London Plan in respect of making the best use of land?

LPA Response: Policies in the plan must be read as a whole. Policy WLC in Chapter 5 requires applicants to undertake an optioneering exercise as part of the Whole Life Cycle Carbon Assessment. This seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option. The findings of this optioneering exercise should be considered alongside other planning considerations to determine the most appropriate option, including consideration of a retrofit first approach. The 'options' considered should include reuse/refurbish options, alongside any new build options if pursued. All options evaluated should then be capable of comparison reflecting the same best practice standards.

This is also consistent with London Plan Policy H8 which requires that for estate regeneration schemes before the demolition and replacement of affordable homes, consideration should be given to alternative options first. This requires balancing the potential benefits of demolition and rebuilding of homes against the wider social and environmental impacts and consider the availability of any funding available and conditions attached to that finding. In the supporting text, the London Plan says that different schemes will require different interventions or a combination of some or all of the above – there is 'no one size fits all' approach.

77. For 05NO, how and where is it expected that the children's centre on the site will be

provided and, if it's on site, is modification needed to clarify?

LPA Response: Reprovision of the children's centre is listed as a key infrastructure requirement and this need is also set out in the fifth design principle. In the interests of clarity, the proposed use could be amended to say: "Residential-led, mixed-use scheme including reprovision of the children's centre."

78. For 06NO, how have effects on the Green Belt been considered and is the Council's suggested modification adjusting the site boundary to exclude Green Belt land necessary for soundness?

LPA Response: No changes to Green Belt are proposed in relation to 06NO. This may be a typographical error in the question and probably is meant to refer to 07NO which is Yeading Lane II. If so, see answer to Q.79 below.

79. For 07NO, is modification to the site boundary (highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3]) necessary for soundness?

LPA Response: Yes. It is suggested that amendments to the site boundary and site area is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM97}. This is land south of the Ruislip Road shown on Map 5 in the Atlas of Change {S17}.

80. For 08NO, how has loss of open space been considered?

LPA Response: There are no formal planning designations covering any of the open spaces within this site allocation although it is adjacent to Green Belt which is situated on its northern boundary (West London Shooting Ground). The allocation itself emphasises the importance of landscaping, greening improvements, play space facilities and green links as key infrastructure requirements. Contextual considerations highlight that there are no formal play spaces for children, who are prohibited from playing ball games on the grassed areas and that there are a number of mature and semi mature trees on the estate, which should be retained.

09NO - Kingdom Workshop, Sharvel Road

81. How does the evidence demonstrate that the site will be appropriate and deliverable within a timeframe consistent with the identified needs?

LPA Response: The site was selected following a rigorous assessment of potential sites in a report commissioned by the council in June 2023, 'Gypsy and Traveller pitch provision site assessment' [EB74] and a focused Regulation 18 consultation that ran from 5 July to 16 August 2023. More detailed master planning of the Kingdom Workshop site has since been undertaken in anticipation of a future planning application being submitted. This is not currently in the public domain due to commercial sensitivity and the need to ensure that prior consultation takes place with the GRT community and their representatives. Nonetheless, the emerging work demonstrates the suitability of the proposed site and confirms that it can accommodate six pitches. The council is actively looking to secure an interest in the land.

82. Is development consistent with national policy in relation to Green Belt land?

LPA Response: Yes. The council intend to make an exceptional, limited alteration to the Green Belt to accommodate the site as an inset site to meet the specific identified need for a new traveller site, in line with PPTS 2015 and 2024 Policy E para. 17. The Mayor of London initially opposed changes to the Green Belt designation of this site but then acknowledged that: “Changes to the NPPF and new government guidance in relation to green belt and grey belt need to be taken into consideration on these matters, recognising that this plan is being considered under the previous NPPF” in Statement of Common Ground between the GLA and the Council {S22 d}. It is also currently the subject of a Green Belt review being undertaken on behalf of the Mayor of London and it is very likely that the findings will concur with the council’s own assessment that this parcel of land performs poorly against the NPPF tests.

83. How have potential effects on Down Barns Farm been considered?

LPA Response: Yes. See also the answer to Q81 above regarding more detailed master planning of the Kingdom Workshop site since publication of the Local Plan at Regulation 19.

The council’s preference is for the neighbouring farm to be retained. However, any decisions about the future of the farm must be seen in the wider context of the freeholder’s ambitions to bring forward proposals to build a sizeable development on the entire farm as well as Kingdom Hall. These proposals have been previously resisted by the council primarily because the land continues to be protected primarily as Green Belt apart from the proposed release of site 09NO.

However, the wider parcel of land (including the farm) is currently the subject of a Green Belt review being undertaken on behalf of the Mayor of London and there is potential for this study to concur with the findings of the council’s own Green Belt and MOL Review Stage 1 {EB96} that it performs poorly against the relevant Green Belt tests. Notwithstanding this, the impacts of this review and any implications for the wider area will be matters for a future review of Ealing’s Local Plan and not the current iteration.

10NO - Airways Estate

84. Is modification to the site boundary (highlighted in the Council’s response to Initial Questions dated 10 January 2025 [EX3]) necessary for soundness?

LPA Response: Yes. It is suggested that amendments to the site boundary and the first design principle are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM99}.

85. Is modification necessary for soundness to refer to the site’s proximity to the Grand Union Canal as a contextual consideration?

LPA Response: Yes. In response to representations made by the Canal and River Trust it was proposed that a further bullet point is added to the end of the 'Contextual Considerations' section of this allocation as follows: “The site is bounded to the south by the Grand Union Canal. The canal is within a cutting at this point and below the level of the site. Any

development should not adversely affect the stability of the cutting slope, as this could increase the risk of damage to the adjacent canal.” This was inadvertently omitted from the Schedule of Proposed Modifications.

Perivale Development Sites

For all Perivale development sites

86. How have issues relating to air quality been considered and will mitigation be effective?

LPA Response: Poor air quality in Perivale is concentrated along the A40 corridor, and this is also the location of the identified development opportunity sites. Most mitigation here will rely upon technical measures such as mechanical ventilation where necessary. Wherever possible, as at 01PE, provision has been made to locate shared and private amenity space away from the road, and to the rear of new built development.

02PE - Land on the South Side of Western Avenue

87. Is development justified, consistent with national policy, and in general conformity with the London Plan in relation to effects on Metropolitan Open Land and open space?

LPA Response: Yes. The site forms a small island surrounded by built developments and the busy A40. It makes no contribution towards MOL objectives as confirmed in the Green Belt and MOL Review Stage 1 {EB96}. However, it is suggested that amendments to car parking provision and any future access arrangements from the A40 are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM102}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

Southall Development Sites

01SO - Southall Crossrail Station & Gurdwara

88. To be justified, is modification needed to clarify the requirements in relation to parking?

LPA Response: Yes. It is suggested that an amendment to car parking provision is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM108}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

02SO - Southall Sidings

89. Is allocation of the site justified in respect of its potential effects on biodiversity?

LPA Response: Yes. The allocation benefits from an extrant planning permission – 201888FUL and the decision notice was issued in May 2020. The site is designated as part of a SINC as part of Southall Railsides SINC, but this designation is out-of-date and stems from when the railway sidings became overgrown, prior to it becoming a Crossrail works site. The features for which it was designated are no longer present.

The site had comprised previously developed land of mainly concrete hardstanding land and containers for storage, ancillary offices and parking, mostly within shipping containers. Surveys undertaken found no evidence of roosting bats and no nesting black redstarts. The buildings and other structures were found to have negligible potential for roosting bats. The survey also found a low to negligible potential for a range of other protected or notable species, including badgers, great crested newts, hazel dormouse and reptiles. A range of ecological enhancements are proposed, including:

- installation of bird and bat boxes;
- green roofs;
- the planting of a native hedgerow along the southern boundary,
- tree planting along the northern boundary and within the landscaped areas; and,
- native and non-native shrubs, herbaceous grasses and ferns included in the soft landscaping.

90. Is allocation of the site justified in respect of its potential effects on protected trees? Do the capacity expectations of the site to accommodate development reflect any relevant constraints?

LPA Response: Yes, see also answer to Q.89 above. The extant scheme contains a detailed landscaping strategy including for protection of retained trees. In general, the original trees provided little in the way of arboricultural or amenity value with the majority to be replaced of C Category – i.e. low quality. Their purpose in the main is to obscure views of the yard behind from the main road and houses opposite. There are no Category A trees on site. Proposed replacement tree planting will meet and exceed existing tree numbers. 136 new trees in the public and private amenity spaces will replace 92 individuals and 2 tree groups. A new belt of large standard trees is proposed to front of the site along Park Avenue.

91. Is modification needed to the requirements in relation to parking needed for general conformity with the London Plan?

LPA Response: Yes. It is suggested that an amendment to car parking provision is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM109}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

03SO - Former Sorting Office & Kings Hall Methodist Church

92. Is modification needed to the requirements in relation to parking needed for general

conformity with the London Plan?

LPA Response: Yes. It is suggested that an amendment to car parking provision is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM110}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

93. How have effects on the locally listed building been considered?

LPA Response: Yes, the allocation anticipates the retention of the King's Hall, which is currently in a poor condition and requires facilitating development to secure its future.

04SO - Southall West London College

94. Is modification needed to the requirements in relation to parking needed for general conformity with the London Plan?

LPA Response: Yes. It is suggested that an amendment to car parking provision is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM111}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

95. Is modification needed to include leisure/sport uses amongst the proposed uses in order to be consistent with national policy and, if so, would the modification be deliverable?

LPA Response: Yes. It is suggested that an amendment to the proposed use is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM111}. This has been formalised in a Statement of Common Ground between Sport England and the Council {S22c}.

05SO - 31–45 South Road & Telephone Exchange Quality Foods & Iceland

96. Is modification needed to the requirements in relation to parking needed for general conformity with the London Plan?

LPA Response: Yes. It is suggested that an amendment to car parking provision is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM112}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

06SO - Fairlawn Hall and Science of the Soul

97. Is modification needed to the requirements in relation to parking needed for general conformity with the London Plan?

LPA Response: Yes. It is suggested that an amendment to car parking provision is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM113}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

07SO - The Limes, Maypole Court, Banqueting Centre, 13–19 The Green

98. Will the approach to parking be effective and in general conformity with the London Plan?

LPA Response: Yes. It is suggested that an amendment to car parking provision is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM114}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

08SO - Middlesex Business Centre

99. Is the boundary of the site justified, including in terms of helping to achieve sustainable development and the availability of relevant land?

LPA Response: Yes, the boundary is the product of a long development history going back to the beginning of the Southall OAPF and is considered to be deliverable as a whole.

09SO - Havelock Estate

100. For effectiveness, is modification needed to set out more detail relating to highway layouts and bus infrastructure?

LPA Response: Yes. It is suggested that an amendment to highway and bus infrastructure is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM116}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

10SO - The Green

101. Will the allocation be effective and in general conformity with the London Plan in terms of the growth and regeneration potential of the Southall Opportunity Area?

LPA Response: Yes, the allocation deals effectively with a complex site and allows for significant new development while enhancing the positive aspects of the area.

102. Is the allocation justified and in general conformity with the London Plan in respect of car parking requirements?

LPA Response: Yes. It is suggested that an amendment to car parking provision is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM117}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

11SO - The Green Quarter (Southall Gasworks)

103. Will the allocation support sustainable development of the Green Quarter and its surroundings?

LPA Response: Yes, the allocation reflects current master planning work on the site.

104. Will the approach of supporting development of the site through an agreed masterplan be effective, including the specification within the policy of what a masterplan should contain and linkages with the wider development of the area?

LPA Response: Yes, master planning on this site is significantly advanced and makes provision for these principles.

105. Is the allocation justified and general conformity with the London Plan in respect of car parking requirements?

LPA Response: Yes. It is suggested that an amendment to car parking provision is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM118}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

13SO - Endsleigh Industrial Estate & 14SO Witley Works

106. Are the allocations justified in relation to their treatment of Adelaide Dock Yard?

LPA Response: No. It is suggested that amendments to the contextual considerations and design principles are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM119-120}. It is also proposed that some additional amendments are made to provide better clarity and make corrections:

Amend the proposed use to say: *“Residential led, mixed use scheme (including some Industrial) with the retention of the Adelaide Dock.”*

Delete the second and third design principles of 13SO and replace it as follows:

“Development should establish an open and legible street network as far as possible. Given constraints on access to the canal, and to the south of the site in general, routes and industrial access will generally exit to the north of the site. Parallel links will therefore be at a premium where they can be achieved. Development should avoid a piecemeal and fragmented approach, and further consolidation of individual sites and landholdings may be necessary in order to deliver an appropriate scheme.”

Delete the second design principle of 14SO and replace it as follows:

“Development should establish an open and legible street network as far as possible. Development should avoid a piecemeal and fragmented approach, and further

consolidation of individual sites and landholdings may be necessary in order to deliver an appropriate scheme.”

These suggested amendments are in direct response to the representations made by the Canal and River Trust and discussion between them and the council.

107. Will the design principle relating to co-ordination of layout and serving between 13SO and 14SO be effective?

LPA Response: No. See the proposed revision above.

15SO - Monorep Site

108. Is the allocation justified in terms of its consideration of heritage assets and potential effects on canal infrastructure?

LPA Response: No. It is suggested that amendments to key infrastructure requirements, contextual considerations and the second and eight design principles are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM121}. This is in direct response to the representations made by the Canal and River Trust.

16SO Warren Farm and Imperial College Land

109. Is the allocation consistent with national policy and in general conformity with the London Plan in relation to Metropolitan Open Land?

LPA Response: Yes. The entire site is designated as Metropolitan Open Land (MOL), and the proposed uses (outdoor sports facility and nature reserve) are not considered in principle to be inappropriate uses. Specifically, London Plan Policy G3 B says that one of the criteria for MOL designation is “it includes open air facilities, especially for leisure, recreation, sport....”

The London Plan currently affords MOL the same status and level of protection as Green Belt. The uses envisaged under the allocation are considered to be appropriate having regard to the provisions within the NPPF and says that:

“A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt”

but notes that there are number of exceptions including:

“the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation....as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it” {EB10, Para 154 b}.

110. How has the issue of biodiversity been considered and is the approach justified?

LPA Response: The council intends to designate an extensive part of the site as a Local Nature Reserve which will complement the existing SINC designation. But a relatively small part of the site has been identified as a strategic site capable of accommodating a multisport and multi-pitch facility, due to its location, size and capacity to meet an identified growing need {see EB85}. Any proposed built development will need to comply with the relevant national and regional policy tests, particularly in respect of its MOL designation. Future provision of outdoor facilities will therefore need to take into consideration the current site sensitivities as well as the need to protect the wider green space.

17SO - Great Western Triangle Centre

111. Is the allocation in general conformity with the London Plan when regard is paid to policy on Strategic Industrial Land?

LPA Response: The plan has made limited provision for allocation of SIL sites for potential mixed intensification where these do not constitute large scale consolidated industrial areas. Provision upon this site shows significant drift toward quasi retail uses and the site as a whole, which is sandwiched between residential, hospital, and green space uses is not suitable for large-scale unconstrained industrial use.

18SO - Golf Links Estate

112. For clarity, and therefore effectiveness, is modification needed to remove the reference to Birkdale Court outdoor sports facility and open space?

LPA Response: Yes. The open space referred to as Birkdale Court outdoor sports facility comprises a children's play area and communal amenity space serving the adjacent residential properties. The space is not managed formally for sports and was included erroneously labelled. It is therefore suggested that an amendment is made to the current use that deletes the reference to Birkdale Court as proposed in the Schedule of Suggested Modifications {S24 - reference SMM122}. This is also supported by a Statement of Common Ground between Sport England and the Council {S22c}.

19SO - Cranleigh Gardens Industrial Estate & Kingsbridge Crescent

113. For effectiveness, is modification needed to set out the design principles for the part of the site that addresses the canal?

LPA Response: Yes. It is suggested that amendments to the contextual considerations and the design principles are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM123}. This is in direct response to the representations made by the Canal and River Trust.

20SO - Hambrough Tavern

114. For effectiveness, is modification needed to clarify the expectations in terms of servicing the site?

LPA Response: Yes. It is suggested that an amendment to servicing arrangements is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM124}. This has been formalised in a Statement of Common Ground between TfL and the Council {S22b}.

21SO - Toplocks Estate

115. How has the issue of biodiversity been considered and is the approach justified?

LPA Response: A SINC is situated within the northern boundary, borders to the site to the west along the canal and is adjacent to the site to the east, albeit separated by a road.

To ensure better clarity, a further suggested amendment is proposed under contextual considerations as follows:

“Development proposals should consider nearby features of ecological value (SINC) and ensure the need for sensitive treatment along the edge of the site.”

{END}