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**REPRESENTATIONS LONDON  
BOROUGH OF EALING  
DEVELOPMENT (OR CORE)  
STRATEGY SUBMISSION  
DEVELOPMENT PLAN  
DOCUMENT – INDEPENDENT  
EXAMINATION**

**HEARING SESSION**

**THURSDAY 3 NOVEMBER  
2011**

**MATTER 5 – SPECIAL  
OPPORTUNITY SITES**

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**ON BEHALF OF  
GOLDCREST LAND**

**REPRESENTOR NUMBER:  
4**

**REPRESENTATION  
NUMBER: 21**

**October 2011**

**Planning • Heritage**

Specialist & Independent Advisors to the Property Industry

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**Report Status:  
FINAL**

**Issue Date:  
10 October 2011**

**CgMs Ref:  
KG/12080**

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## 1.0 INTRODUCTION

- 1.1 We are instructed on behalf of Goldcrest Land to amplify their representations submitted previously on the Submission DPD document.

## 2.0 REPRESENTATIONS

- 2.1 Representations were submitted in respect of Policy 3.4 (a) that relates to the 'Southern Gateway, Park Royal area'. The representations made relate to the lack of justification for the 1500 residential units referred to in the document.

## 3.0 COUNCILS RESPONSE

- 3.1 The Councils response is set out in document in EAL12b – August 2011. This states:

"The Development Strategy refers to some key sites where housing provision can be achieved including the Southern gateway, Park Royal. At the same time the council have published some Initial Proposals for a Development Sites DPD. This provides further detail on this and many other sites which can contribute towards the delivery of additional homes. The vast majority of housing sites and their quantum in the Development Sites DPD are sourced from the Strategic Housing Land Availability Assessment (SHLAA). Figures for potential net residential units have been further tested and Page 11 (and Appendix 3) of the Development Strategy provides a breakdown of the approximate locations where new homes could be delivered across each of the 8 Neighbourhoods and within and outside of the 2 Corridors in the Borough. Further explanation is provided in Background Paper 2 – Housing".

- 3.2 As a result of this response the Council has made '**No Change**' to this part of the document. Accordingly we need to identify in evidence to the Inspector the shortcomings of the Councils approach to this matter.

## **4.0 AMPLIFICATION OF OBJECTIONS**

- 4.1 The Councils general approach to the identification of areas within the Borough as locations or neighbourhoods where housing provision may be achievable during the life of the plan is not questioned. It is however the number of units that the Council have suggested for the Park Royal area or Southern Gateway that is questioned and in light of the Councils response, their methodology.
- 4.2 The Councils response refers in part to other draft documents that are part of the suite of LDF documents and in particular the 'Initial Proposals for Development Sites DPD'. This is as the title states an initial document that we have also made representations of objection upon.
- 4.3 Contrary to what the Council state the Development Sites DPD does not provide the further detail for the delivery of additional homes. For the Park Royal area it specifies a total of 1500 homes, as in the Submission Core Strategy, and red lines a number of sites, but does not identify any capacity for these individual sites. It is therefore impossible to identify from this document how the total of 1500 homes figure is arrived at and as to how individual sites might contribute to that total and consequently how realistic this capacity is. In our view there has been no capacity assessment.
- 4.4 The Councils response then advises that "the vast majority of housing sites and their quantum in the Development Plans DPD are sourced from the Strategic Housing Land Availability Assessment (SHLAA)". Given this response is in respect of our objections to the document in relation to the Park Royal/Southern Gateway area it is reasonable to assume that the Council are suggesting this is the case here and we can find support for the 1500 in the SHLAA.
- 4.5 However that is not the case for the Southern Gateway. The 2009 SHLAA identifies a number of sites within Ealing Borough and on page 27 refers to 'Southern Gateway – Victoria Road' as an allocation and with a capacity of 977 units. In terms of phasing it is identified as Phase 4 completion (2021-2026), so towards the end of the plan period.

- 4.6 The capacity identified in the 2009 SHLAA is for 977 units, as opposed to the 1500 units in the Core Strategy, so there is a difference of 523 residential units. Therefore this is not the source of the 1500 units as suggested in the Councils response.
- 4.7 The response further states that the potential net residential units have been further tested and a breakdown of locations to deliver new homes is provided in Appendix 3. It is unclear as to in what context these figures have been further tested as there is documentary evidence of this. However this source takes us back to the 1500 units figure, with no identification of any detailed and rigorous testing.
- 4.8 The final reference in the response is to a 'further explanation' in the Background Paper 2 on Housing. This document provides a chronology on housing matters from the publication of the SHLAA to the Replacement London Plan and up to the Submission Development Strategy. Tables C and D that follow paragraph 4.5.7 of the document identify 1,500 units at Park Royal. The document indicates that these figures have been refined "in light of the residential quantum outlines in the Development Sites DPD".
- 4.9 As indicated previously the quantum for the Southern Gateway in the (Initial) Development Sites DPD is 1500 units, but this is stated to be derived from a number of individual sites that have no specific unit numbers. Indeed one of these individual sites was tested through the planning application and appeal process and found to be unsuitable for conventional housing.
- 4.10 The Background Paper at paragraph 4.5.8 states that the "Council is confident that development will be brought forward on these sites". We strongly question this statement when it is clear that no evidence has been put forward to support this assertion or to demonstrate how the Council has arrived at the figure of 1500 units for the Park Royal/Southern Gateway area.
- 4.11 None of the source documents identified in the Councils response to our objections provides any detailed analysis of the sites in the Southern Gateway. On the contrary they provide no basis for the figure in the Development Strategy

itself. One of the documents includes a figure for new units of over 500 units less than the Council have adopted.

4.12 The Council has provided no 'testing' of this higher number of units in any document it has published or referred to.

4.13 The Councils Annual Monitoring Report (AMR) published in January 2011 identifies land at the Southern Gateway with an area of 9.9ha as providing 400 units between 2010/11-2014/15. The figure of 400 is in italics in the AMR as it is forecast that the 'site' will contribute further beyond the next five years. Again there is no analysis as to how the figure here is arrived at.

4.14 We consider that the plan is unsound and that there is no justification for the unit numbers for this area.

## **5.0 CONCLUSIONS**

5.1 We have objected to the soundness of the Development Strategy in respect of its housing figures for Park Royal/Southern Gateway. We do not consider that the Council has justified how it has arrived at the figure of 1500 units.

5.2 We have considered the Councils response and this provides no confidence at all in the figure they put forward. We have examined all the documents referred to and can find nothing in them that supports the figure. On the contrary there is an indication for a lower figure than 1500 units.

5.3 We have been unable to find any testing or rigorous analysis as to how the net figure for this area was arrived at.

5.4 We must therefore conclude that the figure is flawed, unsound and unjustified and should be set aside.

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