

Matter 5 – Special Opportunity Sites

1. Key policy 1.2(h) identifies Special Opportunity Sites. It is unclear what, if any, infrastructure will be required to facilitate the redevelopment of these sites and there is no indication of what type of development will be encouraged.

This appears not to accord with the advice in PPS12 that states ‘Infrastructure planning for core strategy should also include the specific infrastructure requirements of any strategic sites which are allocated in it.’

Greenford Green SOS

It is very important that adequate infrastructure needs for sustainable development are accommodated on the Greenford Green SOS if it is to be developed for housing. These needs, together with the environmental constraints, should be included in the Core Strategy so that developers realise what the capacity for alternative uses are. It is at present in industrial/ warehousing/office use with good public transport available at Greenford station. It is particularly suitable for employment use although lorry access is along residential streets. The SOS boundaries are shown enlarged the site in the Atlas of Changes to the Proposals Map. The site was allocated for mixed development in the 2002 draft UDP and no progress has occurred. The increase in area could make available enough land for the new Greenford Secondary school site to replace the proposed site on Green Belt along Western Avenue. This could launch the land use changes if there is no demand for industrial property.

Accordingly, we consider that relocation of this school proposal should be considered if the SOS is to proceed.

There are important constraints from this location adjacent to Horsenden Hill (MOL), a popular public open space with nature conservation value of metropolitan importance, a natural landmark from this and adjoining boroughs and a long distant viewpoint. Its future should not be just guided by the limited wording of CS Policy 3.6 [*a high density mixed- use development including offices, housing, leisure, community and improved transport interchange facilities...*] The impact on the amenity of Horsenden Hill should also be taken into account. The UDP does this in Policy 3.1 (4) [*Development adjacent to MOLs should not prejudice their purpose, sense of openness or environmental character*]. The impact of high buildings if built on this SOS would be to impose an urban outline where at present there is a natural geological feature as important to West Londoners as Parliament Hill is to those who live and work in central London (see London Plan designated view Table 7.1 (2)).

A supplementary planning document is promised but we object to this proposal on the following grounds:

- 1) Core strategy should justify why Greenford Green is proposed for mixed use which could undermine the future of a strategic industrial location which provides warehousing with access to the A40 and this use still continues despite its alternative designation for about 10 years.**
- 2) The wording should include: "The built form of any new development should not impact on the unique environment of Horsenden Hill and its characteristic natural landmark. Only low rise buildings will be permitted."**

The Southern Gateway to Park Royal SOS

The Southern Gateway has been developed for high rise flats and student accommodation on a major traffic gyratory without the amenity space required by the UDP. It is already a group of unattractive, congested, polluted developments some of which are not yet completed. There is little social infrastructure. The Gateway should now be provided with adequate public open space before any more high buildings are allowed as proposed in the Park Royal Opportunity Planning Framework (GLA). We are particularly concerned that this

Framework is proposing more high buildings when at present it contains the highest buildings at 19 storeys in the whole of the Opportunity Area. We request the Inspector to make a site inspection.

Current proposals to ameliorate the lack of open space are inadequate. The two proposed areas should be identified in addition to the small area used for a petrol station which the Council hopes to compulsorily purchase for a town square outside the station (on October 11 2011 the Council will consider a proposal to develop a new public space outside North Acton Underground Station on the site of the Esso Garage, Victoria Road). This square would be so small that it could only provide a forecourt to the station entrance. Another site mentioned is the cemetery which might be adequate for sitting out in the summer lunch hours but would not provide anywhere for children to play. Social Infrastructure such as surgeries, leisure facilities and school places will also be needed.

The expansion of housing in this primarily industrial and business area would generate more children than could be accommodated at the nearest school (John Chiltern PS) which is an award winning design and provides children who lack access to play space with an attractive playground. Further building on this school site would damage this facility.

ECS are particularly concerned that the redesign of access to Park Royal has created unacceptable levels of congestion and that the high rise development of the Southern Gateway contributes to this. Any redevelopment of the North Acton Station site should take this into account.

We object to the extension of the gateway with its high density development onto the Elizabeth Arden Site with its locally listed building and to the south of the A40 because this site is separated by the wide A40. Its development would also involve the loss of land from the A40 Green Corridor.

The Core Strategy should make it clear that no further development will be allowed on the SOS until there is an adequate local park, improved access to Wormwood Scrubs and adequate infrastructure provided.

2. Footnote 39 indicates that the sites were previously identified under the UDP. It is not clear why these sites did not come forward previously or what has been done to ensure that there is a realistic chance of them coming forward for development in the future.

Glade Lane SOS

We object to the inclusion of Glade Lane as a Special Opportunity Site. The London Plan and UDP equate MOL and Green Belt in policy terms. It was designated as MOL but became an SOS when proposed as an alternative sports stadium site when the Southall's Stadium site was redeveloped for housing. This area was made an SOS to accommodate a new one. Because it is no longer needed as a Stadium site or no finance is available it should be either be returned to MOL or retained as a site for a stadium if interest or finance became available.

Building houses on it would take a wedge out of an area between existing MOL and a Green Corridor with considerable nature conservation value. The wedge should be used for public open space or playing fields. The Council has provided a superb open space for Northolt residents at Northala fields on unused green belt. The Council should provide an attractive open space for Southall residents with access for people suffering from a lack of open space (this deficiency is illustrated on Sheets 3 and 4 in Vol 2 of the UDP). The site is contaminated by past dumping of building materials and presumably no developer has expressed an interest in this rather remote SOS. A site visit would confirm these problems.

The SOS should be deleted and the land returned to MOL.

3. The London Plan policy 2.13 provides for opportunity areas and intensification areas. It would appear from London Plan map 2.4 that both Southall and Park Royal/Willesden Junction lie, at least in part, within the Borough. Policy 2.13 (C) provides that LDFs should develop more detailed policies and proposals for opportunity areas. This is not evident in the Core Strategy, neither are any detailed policies.

The greatest detail about Park Royal is provided in Appendix 2 -6) which is not policy. This refers to the Park Royal Opportunity Area Planning Framework 2008 which is somewhat out of date. Policy 3.3 which promote business and industry in Park Royal is inadequate in dealing with the need to provide orbital transport, the problems of the amenity of existing residents, details of how access can be improved and management of pollution levels.

These issues should be included in the policy.

4. Footnote 39 refers to further details in policies (proposals in text) but policy 2.9 refers to the Havelock Area not Glade Lane as in the identification of the special opportunity sites in the supporting text to policy 1.2(h). Is there a lack of consistency or are they different areas?

No views.