

Written Statement

Ealing Council Statement 5: Special Opportunity Sites LPA5

Thursday 3rd November 2011

EALING COUNCIL



1. Introduction

1.1 The issues to be addressed in this hearing statement are:

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 at these sites. 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'*.

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.

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.

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?

2. Infrastructure

2.1 **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 at these sites. 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'*.**

2.2 On reflection, it is considered that specific development sites carried over from the UDP are best dealt with through the Development Sites DPD and it is therefore proposed that the 'Special Opportunity Sites' designation be deleted. The sites are not considered to be strategic under the PPS 12 definition, and should be deferred to a more appropriate Development Plan Document within the LDF. Finer grain details regarding site layout and uses will be found in the Final Proposals draft of the Development Sites DPD, due for publication in Spring 2012.

3. Deliverability

- 3.1 **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.**
- 3.2 The Development Sites DPD will provide further details of specific sites. Many sites have already come forward, and things may have progressed since publication of the UDP; for instance Southall Gas Works and parts of the Southern Gateway now have permission.
- 3.3 Viability and deliverability across the plan period vary for each site, and are dependent on market conditions. Of course each planning application is assessed on a case-by-case basis, and a site is only granted permission where it is judged to be acceptable development.
- 3.4 In some cases the planning context of the site may have changed since publication of the UDP, and another designation may have emerged. For instance Glade Lane is now classified as a Grade 1 Site of Importance for Nature Conservation (SINC), therefore precluding the appropriateness of built development.

4 Opportunity Area Planning Frameworks

- 4.1 **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.**
- 4.2 The LDF will develop more detailed policies and proposals for Opportunity Area Planning Frameworks (OAPF), however it was not considered a detailed issue for inclusion in the Core Strategy itself. Reference is made to the Southall OAPF in Policy 2.8, and to the Park Royal OAPF in Policy 3.3.
- 4.3 Please note that the Park Royal OAPF was published in January 2011, however the Southall OAPF is at an earlier stage in its development. We are currently working with the GLA and other stakeholders in bringing this document forward.

5 The Havelock Area

- 5.1 **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?**

- 5.2 Policy 2.9 'The Havelock Area' refers to the wider vicinity (including the Havelock Estate, Glade Lane Canalside Park, and Middlesex Business Centre). It is proposed that the special opportunity sites designation be deleted.