

STATEMENT TO EALING DEVELOPMENT (CORE) STRATEGY EXAMINATION IN PUBLIC

Matters 5 and 7

Iceni Projects Limited on
Behalf of SGL

Date: 3 November 2011

Representation Number: 186

1. STATEMENT TO THE EXAMINATION IN PUBLIC

- 1.1 This statement to the Ealing Core Strategy Examination in Public has been prepared on behalf of SGL in relation to Matters 5 and 7, which address the Special Opportunity Sites and the A40 Corridor.
- 1.2 The statement has been prepared as David Churchill, who was scheduled to attend, is now unable to having unforeseen emergency family matters to attend to.
- 1.3 The Inspector and Council are aware of the circumstances within which SGL is attending the Examination, having taken forward the representations submitted by the previous owner of the former GSK site in Greenford Green.
- 1.4 The site is identified as a Special Opportunity Site. It is one of only three identified in the Borough. The exclusivity of the allocation confirms the importance of the sites allocated and the contribution they will make to the growth and future success of the Borough.
- 1.5 The text of the Core Strategy indicates that Greenford Green falls within the A40 Growth Corridor. However, there is an apparent disparity between the text of the Core Strategy and the Key Diagram (and subsequent plans), which suggests it falls outside of the same. As such, we are seeking assurances that the Key Diagram (and subsequent plans) will be amended to confirm the inclusion of Greenford Green within the A40 Growth Corridor.
- 1.6 Turning therefore to the specific matters to be discussed during the hearing sessions, we address Questions 2 and 3 of the Special Opportunity Sites session below:

Question 2:

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'*.

- 1.7 The potential removal of the Special Opportunity Sites designation from the Core Strategy could be very damaging to the prospect of their regeneration in the short term. SGL are in negotiations with the Council regarding the regeneration of the Greenford Green site, which seeks to include a range of uses that extend beyond the current allocation. As such, the future regeneration proposals for the site specifically rely on the differentiation between the wider SIL designation and the specific proposals for the future of the site owned by SGL.

- 1.8 The site owned by SGL is a fully developed site. It does not require specific infrastructure to serve it, but it will be brought forward with the necessary contributions to the enhancement of the surrounding area. As such, the identification of the Greenford Green Special Opportunity Site in the Core Strategy does not require the identification of specific infrastructure requirements to accord with paragraph 4.11 of PPS12.
- 1.9 The development proposals for the Special Opportunity Sites, in particular Greenford Green, are considered to be central to the achievement of the Core Strategy and involve considerable investment by the owners to realise their regeneration. They fit the definition of strategic sites in paragraphs 4.6 - 4.7 of PPS12
- 1.10 The identification of the Special Opportunity Sites in outline, rather than detail accords with the requirements of paragraph 4.7 of PPS12.
- 1.11 Were the allocation of the Special Opportunity Sites proposed to be deleted, it will have a potentially series deleterious effect on the regeneration of the sites. It would significantly delaying the delivery of the regeneration proposals, which are currently being advanced in discussions with the Council, whilst the Development Sites DPD is being prepared.
- 1.12 There has been no objection to the identification of the proposed Special Opportunity Sites in the Core Strategy. The deletion of the Special Opportunity Sites designation would have an unnecessary negative effect on the delivery of the regeneration proposals.

Question 3:

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.

- 1.13 The identification of the sites in the previous UDP confirms the strategic nature of the sites and the continued importance that must be placed on their delivery. They are large complex sites, which require certainty in the planning process to secure their delivery.
- 1.14 In the case of Greenford Green, the site owned by SGL was previously owned by a pharmaceutical giant with significant worldwide landholdings. Whilst the site was a former site of the UK headquarters, the vacation of the site commenced during the life of the previous UDP and was not completed until late 2009, when the preparation of the Core Strategy had commenced.
- 1.15 The previous owner of the site was under no imperative to regenerate the site.

- 1.16 SGL, the new owners of the site, are focussed on the positive regeneration of the site for a mix of uses, in accordance with the form of development envisaged by the Council. It is imperative that the site is identified within the Core Strategy to help achieve this aim. The Special Opportunity Sites allocation provides the basis for the regeneration proposals.
- 1.17 In conclusion, therefore, we are seeking the retention of the Special Opportunity Sites designation and the amendment of the Key Diagram (and subsequent plans) to confirm the inclusion of Greenford Green within the A40 Growth Corridor.
- 1.18 The amendment required to the Key Diagram (and subsequent plans) is minor and will not require further consultation or assessment through the SEA process. However, it will provide clarity for SGL in pursuit of the future plans for the regeneration of the former GSK site in Greenford Green.