

**Development Sites DPD**

**Initial Proposals Consultation Report**

**29 June 2012**

# 1 Introduction

- 1.1 This statement sets out which bodies and persons were invited to make representations on the preparation of the Development Sites Development Plan Document (DS DPD) under Regulation 25 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. It identifies how bodies and persons were invited to make representations, summarises the main issues raised, and briefly explains how those issues will be addressed in the Final Proposals DS DPD.

## Background

- 1.2 The Development Sites DPD supports the delivery of the Development Strategy through allocating land for a particular use or type of development. The proposed allocations comprise sites identified through the evidence base for the LDF including the London Housing Capacity Study/Strategic Housing Land Availability Assessment, Employment Land Review, and various Town Centre and Opportunity Area Development Frameworks; sites carried forward and/or updated from the UDP; and sites put forward by landowners and developers.
- 1.3 In accordance with Regulation 25, the Council undertook formal public consultation on the Development Sites Initial Proposals from September to November 2010. This consultation was originally scheduled to last for six weeks from 17 September to 30 October 2010; in response to requests from a number of organisations the Council extended the consultation closing date to 30 November 2010.
- 1.4 This consultation provided more than 10 weeks for businesses, community/voluntary groups, residents and statutory organisations to make representations on the content of the Initial Proposals for the Development Sites DPD. The consultation also included a call for sites, which invited individuals and organisations to put forward potential sites for redevelopment for the Council to consider for inclusion within the Development Sites DPD.
- 1.5 The Initial Proposals were also informed by comment received during three earlier rounds of formal public consultation relating to Ealing's LDF: Issues and Options for Spatial Planning (February to March 2006); New Issues and Options for Planning Your Borough: Strategy and Sites (September to October 2007); and the Development Strategy Initial Proposals (September to October 2009).

## Bodies Invited to Make Representations

- 1.6 The Council specifically consulted with the organisations, bodies and groups identified in Appendix 1 in order to gather their early comments on a wide range of sites considered to have the potential to contribute to the delivery of key policies and objectives in the Development Strategy over the plan period. These consultees included specific consultation bodies and other statutory bodies, local amenity and residents' groups, businesses and individual residents. In addition, the Council consulted more widely through a variety of

consultation techniques. A copy of the consultation response and new sites forms are included in Appendix 2, along with the Public Notice, consultation letter, leaflets and publicity articles from local publications.

1.7 The following consultation methods were used in accordance with processes set out in the Regulations and in the Council's adopted Statement of Community Involvement (SCI):

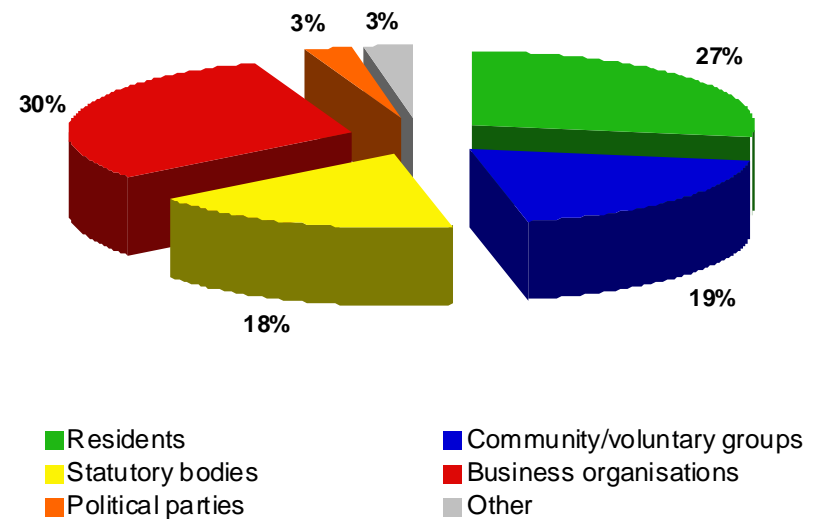
- Publication of the Development Sites Initial Proposals document and its availability for inspection at the council's Customer Services Centre, Perceval House and all of the borough's twelve libraries (Acton, Ealing Central, Greenford, Hanwell, Jubilee Gardens, Northfields, Northolt, Perivale, Pitshanger, Southall, West Ealing and Wood End) and its distribution to key statutory bodies and other consultees
- Announcement of the consultation process and availability of the Development Sites Initial Proposals, summary leaflet and additional material on the Council's website
- A public notice advertising the consultation published in the local "Ealing Gazette" newspaper at the commencement of the consultation period
- Letters or emails to a wide selection of amenity and residents groups, businesses and individuals on the council's LDF consultation database
- Leaflets available at the various information points listed above and distributed with letters or various public events
- An article and associated announcement of the consultation process in Around Ealing which is delivered to every address in the borough
- A briefing note and copies of the leaflets distributed through ward forums
- 10 evening public meetings, including two themed meetings on transport and infrastructure delivery planning, in venues in Acton, Ealing, Greenford, Hanwell, Park Royal and Southall
- Two youth conferences organised in conjunction with the careers and education services hosted by a facilitator in venues in Ealing
- Other meetings with specific interest groups

## 2 Statistical Analysis of Responses

2.1 A total of 738 representations were received from 73 respondents. Appendix 3 lists the respondents, and Appendix 4 details representations received and officer responses. Representations were submitted by businesses, community/voluntary groups, political parties and statutory organisations. A breakdown of the number of respondents by type is shown in Figure 1. As can be seen, respondents were relatively evenly distributed across the types.

Figure 1 Respondents by type

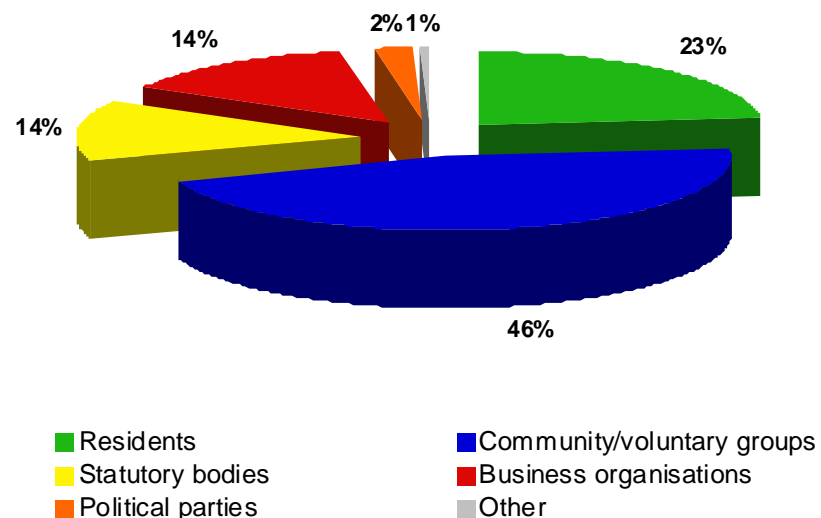
Respondent Type	Total Number
Residents	20
Community/voluntary groups	14
Statutory bodies	13
Business organisations	22
Political parties	2
Other	2
<b>Total</b>	<b>73</b>



2.2 Of the 738 separate representations received, just under half were from community/voluntary groups. Refer to Figure 2 for a breakdown.

Figure 2 Representations by respondent type

Respondent Type	Total Number of representations
Residents	173
Community/voluntary groups	342
Statutory bodies	101
Business organisations	101
Political parties	17
Other	4
<b>Total</b>	<b>738</b>



2.3 Table 1 provides a breakdown of representations relating to individual sites by respondent type. It should be noted that some of the representations made reference to all sites within an area, rather than an individual site, which are identified as 'General' . New sites put forward are identified as 'New' at the end of the table.

Table 1 Representations received on individual sites by respondent type

Site	Description	Residents	Community/voluntary groups	Political parties	Business	Statutory bodies	Other	Total
ACT GENERAL	Acton					1		1
ACT01	South Acton Housing Estate		1			1		2
ACT02	Oaks Shopping Centre		1		7			8
ACT03	North London Line Yard	1	3			1		5
ACT04	Acton Town Hall Complex		4					4
ACT05	Acton Bus / Tram Depot		1					1
ACT06	Colonial Drive / 2 Bollo Lane		1					1
ACT07	Acton Mainline Station		1					1
ACT08	Castle Timber and Building Materials		2			1		3
ACT09	307 Horn Lane	2	3			1		6
ACT10	Western Avenue (A40) Sites	3	2			7		12
ACT10 A	Western Avenue (A40) Sites A					1		1

Site	Description	Residents	Community/voluntary groups	Political parties	Business	Statutory bodies	Other	Total
ACT10 B	Western Avenue (A40) Sites B					1		1
ACT10 C	Western Avenue (A40) Sites C					1		1
ACT10 D	Western Avenue (A40) Sites D					1		1
ACT10 E	Western Avenue (A40) Sites E	1	1			1		3
ACT10 F	Western Avenue (A40) Sites F	1	1			1		3
ACT10 G	Western Avenue (A40) Sites G					1		1
ACT10 H	Western Avenue (A40) Sites H					1		1
ACT10 I	Western Avenue (A40) Sites I					1		1
ACT10 J	Western Avenue (A40) Sites J					1		1
ACT10 K	Western Avenue (A40) Sites K					1		1
ACT10 L	Western Avenue (A40) Sites L					1		1
ACT10 M	Western Avenue (A40) Sites M	1	1			1		3
ACT11	West Acton Community Centre	1	3					4
ACTX01	Beechworth House		1					1
ACTX02	Redback PH		1					1

Site	Description	Residents	Community/voluntary groups	Political parties	Business	Statutory bodies	Other	Total
ACTX03	Crown Street / Mill Hill Terrace		1					1
ACTX04	Horn Lane / Steyne Road		1					1
ACTX05	High Street Buildings		1					1
ACTX06	St Aiden's Church	1	1					2
ACTX07	Acton Vale Industrial Park		1					1
EAL GENERAL	Ealing	14	27					41
EAL01	Green Man Lane Housing Estate		1					1
EAL02	Copley Close Housing Estate		1					1
EAL03	Dean Gardens Housing Estate		2					2
EAL04	Dickens Yard		1		1			2
EAL05	Arcadia Centre	24	44	9	11	1		89
EAL06	Ealing Broadway Shopping Centre	14	9		6			29
EAL07	Ealing Broadway Station	2	16	7		1		26



Site	Description	Residents	Community/voluntary groups	Political parties	Business	Statutory bodies	Other	Total
EAL08	Lammertons		7					7
EAL09	Bilton House		2		5	1		8
EAL10	Maitland Yard	4	5					9
EAL11	West Ealing Gateway	6	7					13
EAL12	Former St. Helena's Home		2					2
EAL13	Abacus House		2					2
EAL14	Westel House and Craven House		2		2			4
EAL15	45a St. Mary's Road / Warwick Place		2					2
EAL16	Boundary House	1	1					2
EAL17	Cinema	2	4					6
EAL18	48 The Mall		1					1
EAL19	51-53 The Mall and 1-9 Northcote Apartments		1					1
EAL20	Craven Avenue Car Park	13	8					21

Site	Description	Residents	Community/voluntary groups	Political parties	Business	Statutory bodies	Other	Total
EAL21	22-24 Uxbridge Road		1					1
EAL22	49-69 Uxbridge Road and 12 Mattock Lane		1			1		2
EAL23	91-113 Uxbridge Road		1					1
EAL24	171-175 Uxbridge Road		2					2
EAL25	64 Broadway		2					2
EAL26	66-78 Broadway	6	3					9
EAL27	59-75 Broadway		2					2
EAL28	77-103 Broadway and New Ealing House	6	3					9
EAL29	105-119 Broadway	2	3					5
EAL30	131-149 Broadway and 1-2 Uxbridge Road	6	4			1		11
EAL31	130 -140 Broadway	4	3					7
EAL32	1-10 Chignell Place, land to rear onto Singapore Road and 104-110 Broadway	7	7					14
EAL33	Former King Farhad Academy	6	6					12

Site	Description	Residents	Community/voluntary groups	Political parties	Business	Statutory bodies	Other	Total
EALX01	Land adjoining Daniels	2	3			1		6
EALX02	Telephone Exchange	2	4					6
EALX03	Wickes / Co-op	5	3					8
EALX04	Queens Drive		2					2
EALX05	Former Hanger Lane Nurseries		2					2
EALX06	Impact Car Care Centre	3	2					5
GRE01	Allen Court Housing Estate		1					1
GRE02	Ravenor Park Farm		1					1
GRE03	Greenford Crossroads		1					1
GRE04	Greenford Green		1		13	6		20
GRE05	Greenford Depot		1			1		2
GRE06	Cardinal Wiseman School		1			1		2
GRE07	Former GSK Sports Ground		1					1
GRE08	Greenford High School		1					1
GREX01	Telephone Exchange and Post		1					1

Site	Description	Residents	Community/voluntary groups	Political parties	Business	Statutory bodies	Other	Total
	Office							
GREX02	19-25 Oldfield Lane South / Greenford Hall, Methodist Church / 2-12 Ruislip Road		1					1
GREX03	458-462 Greenford Road		1					1
GREX04	19-31 The Broadway		1					1
HAN GENERAL	Hanwell	2	2					4
HAN01	Cambridge Yard		2			1		3
HAN02	Hanwell Locks		2			1		3
HAN03	79-101 Uxbridge Road	2	2	1	2	1		8
HAN04	64-88 Uxbridge Road	2	2		5	1		10
HAN05	144-164 Uxbridge Road	3	2			1		6
HANX GENERAL	Hanwell		1					1
HANX01	West London Nissan and Wickes	2	1			1		4
HANX02	Access Storage	2	2			1		5

Site	Description	Residents	Community/voluntary groups	Political parties	Business	Statutory bodies	Other	Total
HANX03	Tennyson Road	1	1		3	1		6
HANX04	11 and 11a-c Boston Road	2	1					3
HANX05	St. Bernard's Hospital	1	1					2
NOR01	Rectory Park Housing Estate		1					1
NOR02	Former Mandeville School		1					1
NOR03	West London Academy		1					1
NORX01	Telephone Exchange		1					1
NORX02	Ruislip Road, rear of Tangmere Gardens		1					1
NORX03	Car lot		1					1
PAR01	Southern Gateway	2	3			2		7
PAR01 A	Southern Gateway: Victoria Road/ Chase Road	1	1		8			10
PAR01 B	Southern Gateway: Esso	1	1					2
PAR01 C	Southern Gateway: Rear of Fairview	1	1		4			6

Site	Description	Residents	Community/voluntary groups	Political parties	Business	Statutory bodies	Other	Total
PAR01 D	Southern Gateway: NEC House	2	1					3
PAR01 E	Southern Gateway: Carphone Warehouse	1	1					2
PAR01 F	Southern Gateway: Talk Talk	1	1					2
PAR01 G	Southern Gateway: Perfume Factory	1	2			1		4
PAR01 H	Southern Gateway: Former BBC Costume Store	1	1					2
PER01	Perivale Park Sports Village		1			1		2
SOU GENERAL	Southall					1		1
SOU01	Havelock Housing Estate		1			1		2
SOU02	Golf Links Housing Estate		1					1
SOU03	Southall Gas Works		7			3		10
SOU04	Middlesex Business Centre		3		5	1		9
SOU05	Iceland / Quality Foods and Telephone Exchange		3					3
SOU06	Community Centre and The		1		2	2		5

Site	Description	Residents	Community/voluntary groups	Political parties	Business	Statutory bodies	Other	Total
	Arches Business Centre							
SOU07	Suterwalla		1			1		2
SOU08	Former Featherstone Road Primary School					1		1
SOU09	Salisbury Depot		1			2		3
SOU10	Adelaide Depot		2			1		3
SOU11	Gurdwara Sri Guru Singh Saba		1			1		2
SOU12	Park Avenue		1					1
SOU13	Southall Market							0
SOU14	Carroll's Yard		1					1
SOU15	Beaconsfield Road / South Road		1			1	4	6
SOU16	57B Beresford Road		1					1
SOU17	Glade Lane and Maypole Dock		2		14	1		17
SOU18	Former Boatyard		1			2		3
SOU19	Dormers Wells High Street							0

Site	Description	Residents	Community/voluntary groups	Political parties	Business	Statutory bodies	Other	Total
SOUX01	TA Centre		1			1		2
SOUX02	Cranleigh Gardens Industrial Estate		1			1		2
SOUX03	Heller House		1			2		3
SOUX04	Axa House		1					1
SOUX05	The Fairground		1					1
SOUX06	Albert Dane Centre							0
SOUX07	Manor Court Nursing Home		1					1
GENERAL		3	25		1	19		48
NEW SITE		2	2		12	9		25
<b>TOTALS</b>		<b>173</b>	<b>342</b>	<b>17</b>	<b>101</b>	<b>101</b>	<b>4</b>	<b>738</b>

2.4 As can be seen from Figure 3, half of the total representations received related to sites within the Ealing area. Figure 4 further disaggregates representations by area and type. Of the ten sites with the most representations, four of these were in Ealing – EAL05 (Arcadia Centre); EAL06 (Ealing Broadway Shopping Centre); EAL07 (Ealing Broadway Station); and EAL20 (Craven Avenue Car Park). Figure 5 details the ten sites that received the greatest number of representations, and Figure 6 further breaks down these results by respondent type.



Figure 3 Total representations by area

Area	Total Number of representations
Acton	75
Ealing	375
Greenford	33
Hanwell	55
Northolt	6
Park Royal	38
Perivale	2
Southall	81
General	48
New site	25
<b>Total</b>	<b>738</b>

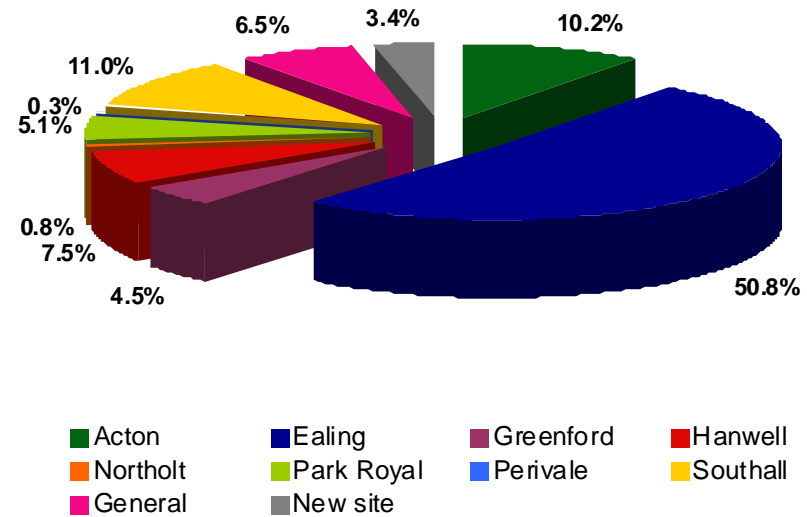


Figure 4 Total representations by area and type

Area	Residents	Community/ voluntary	Statutory bodies	Business	Political parties	Other
Acton	11	32	25	7		
Ealing	129	199	6	25	16	
Greenford		12	8	13		
Hanwell	17	19	8	10	1	
Northolt		6				
Park Royal	11	12	3	12		
Perivale		1	1			
Southall		34	22	21		4
General	3	25	19	1		
New site	2	2	9	12		

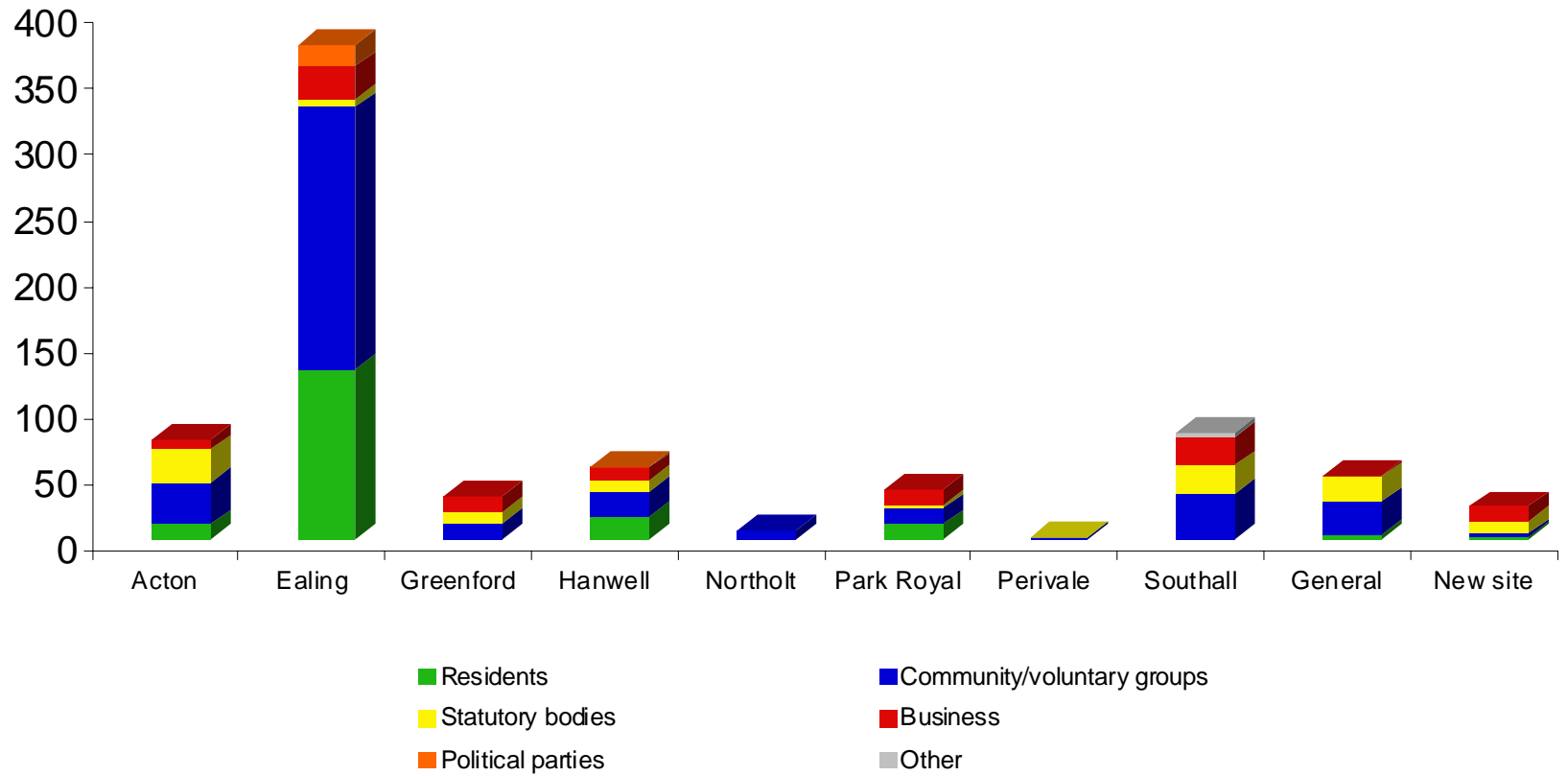
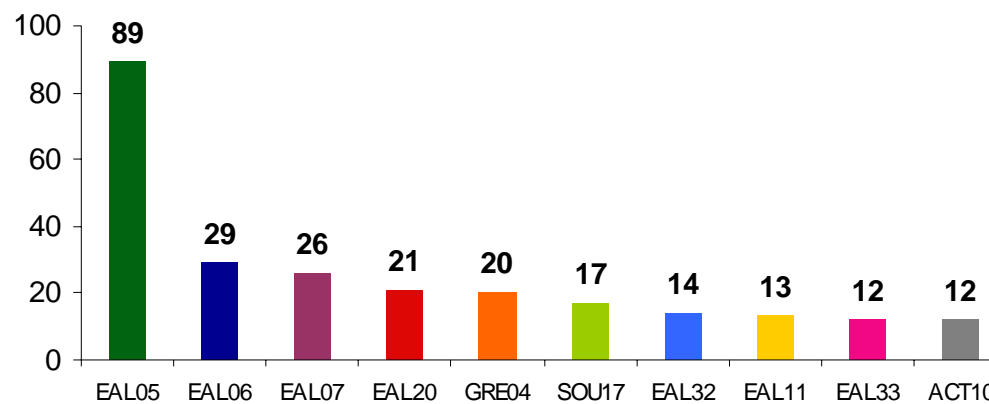


Figure 5 Top ten sites by number of representations received

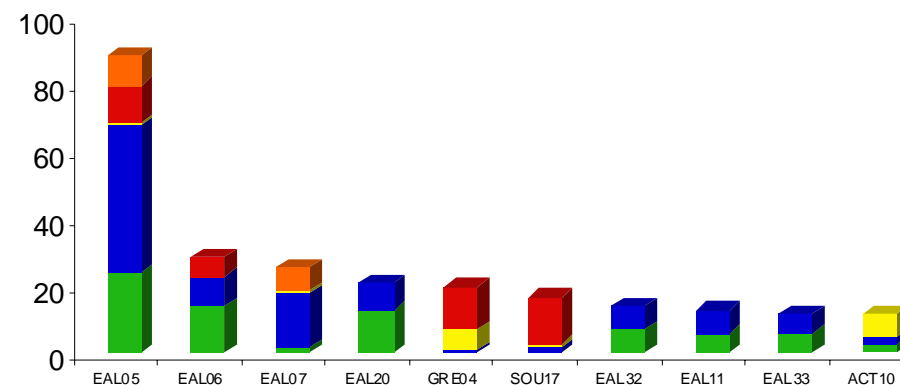
Site	Total Representations
EAL05	89
EAL06	29
EAL07	26
EAL20	21
GRE04	20
SOU17	17
EAL32	14
EAL11	13
EAL33	12
ACT10	12



2.5 When analysed by geographical area, half of the representations related to sites within Ealing, notably the Arcadia site with 89 representations. Significant numbers of representations were also received relating to the Ealing Broadway Shopping Centre (29) and Ealing Broadway Station (26). Community/voluntary groups provided the largest portion of the total representations on the ten sites that received the most representations overall.

Figure 6 Top ten sites by type of representation

Site	Residents	Community /voluntary	Statutory bodies	Business	Political parties
EAL05	24	44	1	11	9
EAL06	14	9		6	
EAL07	2	16	1		7
EAL20	13	8			
GRE04		1	6	13	
SOU17		2	1	14	
EAL32	7	7			
EAL11	6	7			
EAL33	6	6			
ACT10	3	2	7		



■ Residents  
■ Statutory bodies  
■ Community/voluntary groups  
■ Business  
■ Political parties  
■ Other

2.6 A total of 21 new sites were put forward for potential inclusion in the next iteration of the Development Sites DPD: eight by statutory organisations; ten by businesses; two by local residents; and one by a community/voluntary group. Eleven of the sites were proposed for residential led mixed-use development, two for employment uses, seven for residential use, and one for primary school provision.

### 3 Key Issues Arising from Consultation

- 3.1 The 738 representations received commented on a wide variety of issues relating to the individual sites, however key themes emerged across the sites. For ease of use, a summary of key issues is presented below to provide a broad overview of the nature and content of representations received. However, officers have taken into consideration every comment when assessing sites to determine if they should be carried forward for allocation into the Final Proposals.
- 3.2 The following paragraphs outline the policy issues and/or sites where a significant number of representations were received, or where a representation resulted in the Council endorsing a significant change to the policy approach or a site within the DS DPD.

#### Location and Scale of Development

- 3.3 A significant number of representations from community/voluntary groups and residents objected to the majority of development sites being located in/close to town centres and the indicative quantity of development proposed on these sites. Concerns were expressed that the areas where sites have been identified are already congested and that existing infrastructure is already overstretched, and that additional development would be out of character with the local area.
- 3.4 Several representations sought further detail to provide greater clarity on the site and the implications of proposals, and questioned the need to redevelop sites. Specific concerns related to the ability of proposed sites to provide sufficient residential quality and amenity for existing and new residents.

#### *Council Response*

- 3.5 The Council remains committed to the view that new development should be encouraged in sustainable locations with good access to public transport and local amenities. The Development Sites DPD will provide a level of certainty about the nature and location of future development to support more effective planning of the infrastructure to support growth.
- 3.6 The final allocations will confirm the setting and PTAL to ensure that any development proposals brought are within the appropriate density range for the area as determined by the London Plan 2011 density matrix. Guidance on layout, built form and design will be included for each site, reflecting the local character of the area. The Development Management DPD will contain detailed policies relating to residential amenity against which planning applications will be assessed.
- 3.7 The final allocations will not identify specific quantities of floorspace to be delivered on site, instead focusing on the quality of the proposal and the site's role in the local area. To support this approach, each neighbourhood chapter will be prefaced by an area spatial strategy, that indicates the relationship of sites and the relevant Development Strategy policies and objectives which the sites together will contribute to achieving.

### Type of Development

- 3.8 Statutory organisations and businesses generally supported the proposals, however expressed concerns that identifying specific floorspace quantas would in many cases be overly restrictive. The GLA expressly sought further discussion around the release of industrial land; while the principle of release is acceptable, they emphasized the importance of not exceeding the borough's 14ha benchmark for release of industrial land.
- 3.9 Representations from local residents and community/voluntary groups noted that few sites were identified within the Initial Proposals for provision of the infrastructure required to support the anticipated level of development, particularly education and healthcare facilities. Representations emphasized that local businesses and facilities should not be seen as being pushed out by redevelopment, and queried the level of retail and office development proposed within town centre allocations. There was a concern that residential development would take precedence over all other uses, to the detriment of the vitality and viability of the borough's town centres

### Council Response

- 3.10 The Employment Land Review (2010) was published alongside the Initial Proposals, and its recommendation regarding the continued protection of employment land, specifically industrial land, will be reflected in the Final Proposals.
- 3.11 For those sites within town centres where it is considered that the mix of uses on the site can be established through various combinations to contribute to delivery of the Development Strategy, this flexibility will be reflected within the allocation. On those sites where it is considered that greater guidance is required to ensure a site optimises its contribution to the area, the final allocation will stipulate the acceptable mix of uses and their arrangement on site.
- 3.12 The provision of the infrastructure required to support development is addressed in the Infrastructure Delivery Plan, and the allocation of land for education and healthcare facilities is therefore outside the scope of the Development Sites DPD. The provision of education facilities will be addressed through a separate SPD, and to support the delivery of other social infrastructure alongside new development final allocations will confirm the acceptability of D1 uses as comprising an acceptable uses within mixed-use development sites, particularly in town centre.

### Historic Environment

- 3.13 A significant number of representations, notably including English Heritage, expressed support for the inclusion of additional information relating to the historic environment associated with the sites to ensure heritage assets were appropriately considered when detailing allocations. Concern was expressed by several representations about the potential negative impact of tall buildings in general, and on Conservation Areas in particular.

### *Council Response*

- 3.14 Each allocation will consider the historic environment in the vicinity of the site, and where appropriate provide guidance on how development proposals should respond to particular heritage assets. In line with the Development Strategy and CABI guidance, the Development Sites DPD will indicate locations where a tall building may be appropriate.

### **Proposed New Sites**

- 3.15 A total of 21 new sites were put forward for potential inclusion in the next iteration of the Development Sites DPD, including eleven of sites for residential led mixed-use development, two for employment uses, seven for residential use, and one for primary school provision.

### *Council Response*

- 3.16 All new sites put forward will be fully assessed, however only those sites considered central to delivering the policies and objectives of the Development Strategy, and likely to come forward during the lifetime of the LDF will be taken forward to the Final Proposals. Potential reasons for not including a proposed new site include:

- No clear link to delivery of Development Strategy objectives/policies
- The size of the site is insufficient (less than 0.1 hectares) to make a significant contribution to the delivery of the Development Strategy
- The principle of the proposed use has been previously established on the site
- The site has full planning permission for the proposed use
- The existing use(s) on the site are protected
- The proposed use is contrary to the Development Strategy and/or existing policy designations
- The indicative delivery timeframe is beyond 2026, as determined by the London SHLAA



## 4 Next Steps

- 4.1 All sites within the Initial Proposals and those new sites put forward during consultation on the Initial Proposals will be reassessed against the adopted Development Strategy to determine if they should be carried forward in the Final Proposals. This reassessment may require further research in addition to the existing evidence base, and will take into account the comments from consultation.
- 4.2 The next round of public and stakeholder engagement will take place in Spring 2012, seeking views on the Final Proposals version of the Development Sites DPD. All representation received on the Final Proposals will be taken into consideration, prior to submission of the final document to the Secretary of State for independent examination in Winter 2012.

# APPENDICES

**Appendix 1 Bodies/Individuals Invited to Make Representations to the Development Sites Initial Proposals (Regulation 25)**

**Appendix 2 Consultation Materials**

**Appendix 3 List of Respondents**

**Appendix 4 Representations Received and Officer Response**