

LB Ealing's Responses to the Inspector's Initial Questions to the Council

Please note, the Inspector's questions are set out in **bold red** text and the Council's response that follows is in *italic* text.

DEVELOPMENT SITES DPD

(My comments relate to the Development Sites DPD with Minor Track Changes EDS2)

Consistency with the Core Strategy

- 1. One of the key legal tests for the Plan is whether it is consistent with the Development/Core Strategy (CS). The CS is a recent document which sets out an approach to the distribution of development giving targets for employment, housing and retail in the development corridors. The Development Sites DPD is set out in a different way, identifying 5 areas and not specifying numbers or details of types of development (where mixed use) to be provided by the allocations.**
- 2. Whilst the earlier Options Plan provided some guidance on numbers and types of development, for various reasons this is not carried through to the published document. However, I need assurance in the form of detailed information that the development sites will provide the necessary development in the right locations.**
- 3. Therefore, an up-to-date position statement should be provided for housing, retail and employment setting out the distribution requirements of the CS, and demonstrating how these will be/are being met by the development sites. Detailed trajectories identifying numbers and types of development for all of the development sites should be provided as part of the position statements. This information is over and above the detail provided in the AMR - it should link directly to the development strategy for the CS, the Development Sites Plan and the site allocations within it.**

***Council Response:** The CS seeks to identify and promote those areas within the borough that accommodate growth and either have good public transport access, the capacity to accommodate growth, are in need of regeneration, or can deliver jobs and infrastructure. These locations are primarily along the Uxbridge Road/Crossrail and the A40 Corridor/Park Royal corridors. These two east-west corridors include Ealing's main town centres, Park Royal Industrial Estate (the largest in Europe), and the borough's five Crossrail stations which will provide a major impetus for growth and development.*

The strategy for managing growth has therefore been established in the CS following consideration of alternative growth options that were documented and rejected through the sustainability appraisal and

consultation processes. The Development Sites DPD (DS) translates this strategy to the sites level, focusing on the key sites within those areas most able to accommodate growth.

The allocations contained within the DS are very consistent with the CS approach to supporting growth and sustainable development, and the location of the proposed sites has been strongly influenced by the local policies in the CS which direct development to the borough's main town centres, the Park Royal Opportunity Area, areas in need of regeneration, and other highly accessible (e.g. Crossrail) areas. The DS is organised into sections which reflect these growth area, and the Area Spatial Strategies serve to place the site allocations within the context of the wider strategic objectives for each town centre area.

The Development Sites DPD gives effect to the CS and is therefore justified by the evidence base gathered in preparation of the CS. Collectively, the site allocations will provide sufficient capacity to help meet the strategic housing, employment and retail needs of the borough; the inclusion of larger sites provides the opportunity to deliver new infrastructure such as community uses and open space.

Residential

The London Plan contains an annual monitoring target of 890 new homes per annum for Ealing. While there are a number of elements that contribute to the borough's housing supply, the housing/mixed-use allocations within the DS form a key part of the Council's progress towards meeting its housing delivery targets.

The land allocated for housing within the DS reflects the objectives of the London Plan to optimise housing potential in sustainable places, and the site allocations are broadly in the locations that the CS identifies for new housing growth. As set out in Section 2, residential use is an appropriate use for sites within town centres unless otherwise indicated in the allocation; 43 sites require or support residential development.

The initial database of sites included over 100 sites from a variety of sources, most notably the 2009 London Strategic Housing Land Availability Assessment (SHLAA). The London SHLAA is designed to provide an essential component of the evidence base for the London Plan and borough Local Plans. It provides a robust indication of London wide housing capacity across London at borough level, built up from a range of sources on individual site capacity and robust assumptions on the contributions of small sites.

The information in the SHLAA on individual 'potential' sites (including capacity) is treated in confidence because the release of detailed information on these sites could lead to misunderstanding as to its status and to its misapplication, which in turn might undermine current uses, pre-empt the statutory planning decision process, and affect land values.

Ealing therefore does not publish detailed information about the sites included within the SHLAA/Housing Trajectory beyond that necessary to

demonstrate a five year deliverable supply. The majority of the site allocations are projected to come forward in years 6-15 of the plan; those within the first five years of the plan period have been assessed as deliverable against the relevant NPPF guidance. Further information is provided in response to subsequent questions and in Appendix A.

Employment – Offices

Ealing Town Centre is defined as a category A centre for office development in the London Plan 2011, meaning that it is promoted as an area for speculative office development and active management of the existing stock. While outer London office centres in general are set to decline in both relative importance and absolute floor area, the 2012 London Office Policy Review notes that Ealing Town Centre shows the true locational advantage of West London, with its offices attracting some of the highest rents outside Chiswick Park.

However, Ealing's office market is currently vulnerable due to its relatively small size in relation to other centres in London and it is necessary to support its role as an office centre both through the protection of existing stock and the development of new and higher quality floorspace. The borough's Employment Land Review (2010) identifies a net demand of up to 90,000sqm office floorspace over the plan period within the town centre to ensure that the office market maintains a sustainable critical mass.

Policy 1.2(b) of the CS therefore identifies a provision of up to 90,000sqm over the plan period within Ealing Town Centre, with the potential for some net increase at Park Royal and Greenford although this is not quantified. To meet this demand, Policy 2.5(d) of the CS directs new business development to the office quarter along the Uxbridge Road, between Ealing Broadway and West Ealing.

The DS is consistent with this approach; the site allocations within the office quarter support the objectives of the CS by promoting large floor plate office development while limiting the freedoms to change the use of buildings as this would be detrimental to function of the area. Elsewhere, site allocations within town centres retain the flexibility to provide office accommodation in response to market demand.

Employment – Industrial Land

Ealing has the largest built area of industrial land of any London borough (512ha); including the largest part of Park Royal, itself the largest industrial estate in Europe. Industrial land makes a significant contribution to the borough's economic well-being and development. As set out in the 2010 London Industrial Baseline (GLA), vacant employment land across Ealing as a whole is currently 4 percent, half of the 8 per cent benchmark considered normal in a healthy market and substantially lower than many other London boroughs.

Industrial sites are designated precisely to separate classic bad neighbour uses from potentially sensitive uses and are currently managed at the London level, through the London Plan 2011 and the Land for Industry

and Transport SPG, according to policies that restrict any contradictory use.

All of the industrial areas identified as Strategic Industrial Locations (SIL) or Locally Significant Industrial Estates (LSIS) in the CS/DS form part of the minimum baseline of projected demand for industrial uses in the borough, and relate to the borough's realistic share of London's industrial needs. Understanding of these sites should not be disaggregated as the loss or erosion of any land below the market baseline will adversely affect the economics of the whole market for this type of use. There is no capacity to provide additional housing on industrial sites through means other than strategic release carried out through the plan making process.

Ealing is actively managing its employment land to provide additional residential units and to ensure the replacement and redevelopment of aging and unsuitable stock across industrial sites. Ealing has by far the highest proportion (76 percent) of its industrial uses located within designated industrial sites of and London borough, and by extension the lowest percentage of industrial uses in mixed use areas.

Ealing's economic strategy for industrial land is set out in the Policy 1.2(b) of the CS and based on the evidence of the ELR (2010), with the policy allowing for limited transfer of 14ha of industrial land to mixed use development, coordinated through the DS and OAPFs for Park Royal and Southall. The ELR was undertaken in parallel to the SHLAA, as advised by the NPPF (paragraph 161).

A summary of the proposed consolidation and strategic release of industrial land taken forward by the DS is included in Appendix B. This has been confirmed as appropriate by the GLA, subject to the existing industrial land within OIS7 Greenford Green being designated as SIL to ensure conformity with the London Plan.

Retail

The London Plan 2011 sets out the town centre hierarchy across London, and defines the role/function that the various categories of town centres should fulfil. Policy 1.2(c) of the CS encourages provision of up to 98,500sqm comparison retail floorspace and up to 29,900 sqm convenience retail floorspace, to be delivered through the area based policies for Acton, Ealing, Greenford, Hanwell and Southall. These quantum were identified in the Retail Needs Study (RNS) Update 2010, which will be updated by 2015/16.

The DS is consistent with this approach; it highlights where significant retail capacity can be delivered to meet identified needs, for example ACT2 Acton Gateway, EAL3 Arcadia, HAN3 Wickes and SOU5 Southall West, while retaining the flexibility on smaller sites to respond to changing economic conditions through a more general mixed use allocation. Schemes will be determined through the DM process, having regard to both the site allocation as well as relevant Council policies and standards, which include designated primary and secondary frontages where retail use is prioritised.

The Council considers that the overall approach taken to the site allocations and the detailed requirements for each allocation are sufficiently clear and justifiable having taken account of the NPPF, the London Plan, CS and DM policies, views expressed through consultation, advice and recommendations from key agencies and relevant evidence. It supports the strategic development needs set out in the Council's adopted CS and the London Plan, providing a practical, effective and flexible framework for assisting decision making that supports high quality development in the right places.

As set out in Section 2 of the DS, the requirements identified for each site are not exhaustive, highlighting key objectives and site-specific constraints/opportunities rather than repeating policies covered elsewhere. As such, the allocations do not set out detailed prescriptions relating to development capacity as the actual quantum of development to be achieved on sites may be determined by a range of factors that can only be considered once detailed designs have been submitted through the planning applications process.

The allocations are intended to provide sufficient clarity for landowners, potential developers and others bringing forward proposals regarding the key issues, potential requirements and opportunities to consider at the planning application stage. Including detailed development quantum within the allocations would result in insufficient flexibility and limit the ability of the Plan to adapt to rapid changes, therefore placing its overall deliverability at risk.

Delivery

- 4. One of the main questions to be addressed is whether the Plan will be effective in delivering the CS development strategy. This is a matter about which I am concerned and this will form a main issue at the Hearing sessions.**
- 5. The detailed information requested for demonstrating consistency with the CS (in particular trajectories which include the development sites) will go some way to demonstrate the short and long term strategy for delivery. My concern is that many sites for the first phase of the plan are identified as delivering development from 2011. Clearly, as it is now 2013, I would like the Council to demonstrate that delivery on those sites has commenced and, if not, how this will affect CS targets for development.**
- 6. In addition to concern about sites coming forward for the first phase of the plan (2011 – 2016), I am concerned that the second phase is only 3 years away. What measures is the Council taking to ensure that those sites identified for 2016 will be delivered within the identified time period?**
- 7. With specific regard to housing, the National Planning Policy Framework seeks a 5 year housing land supply plus a buffer of 20% for those Council's where there is a persistent under delivery. Please could the housing position statement requested above, amalgamate figures for the last 5 years of housing (2008 –**

2012 inc) setting out targets and delivery. The figures should indicate whether the Council is on target to meet the figures in the CS Inspector's report paragraphs 23 and 24. It should also include an update of those figures based on recent information. Do you consider that the 20% buffer is necessary and if so what is the relevant 5 year land supply figure for 2011 – 2016 and 2013 – 2017? What measures are in place to achieve the target figures?

Council response: *The development industry must have sufficient capacity to deliver any new development and this is not within the sole control of a local planning authority. The Council is committed to facilitating development in the right circumstances, in the right places, and the Council will endeavour to ensure that any barriers to future development, where it is deemed appropriate, are removed or ameliorated.*

By its nature, the development industry is open to change and differing levels of complexity such that there will never be absolute certainty that a site will be delivered. The Council has made every effort to ensure that allocated sites will come forward during the plan period, having undertaken extensive engagement with landowners and other relevant stakeholders, and is confident that the site allocations will assist in meeting the objectively assessed needs for housing, employment land and retail as set on in the CS.

Within the DS, the Council has given priority to deliverable and developable brownfield land. The plan preparation process provided the opportunity to review potential land allocations from a range of sources and consider the relative need for different land uses. As a result, a number of restrictive land use designations have been deleted and where appropriate a flexible, mixed use allocation proposed.

The mix of site sizes, ranging from the significant Southall West to smaller sites which are more typical of Ealing' built-up character, should help contribute to a supply of housing and other uses across the plan period – the larger sites will deliver over several years, in some cases beyond the end of the plan period, while the smaller sites tend to be more easily developed and, subject to being granted planning permission, have the capacity to deliver development in the short to medium term.

The indicative delivery timetables included in the DS are estimations of the five year time period within which a site is most likely to come forward, based on available evidence. Those within the first five year period (2011-2016) are considered deliverable and those within the time periods 2016-2021 and 2021-2026 are considered developable, as assessed against paragraph 47 of the NPPF. The status of the eleven site allocations projected to come forward within the period 2011-2016 is included in Appendix A.

A five-year supply of deliverable housing sites, in accordance within NPPF requirements, is demonstrated in the borough's most recent Housing Trajectory as published in the 2011/12 AMR and included as Appendix A.

This is the most up-to-date information available from the London Development Database; due to the time gap between publication of the Final Proposals and examination, some of those sites within the five year deliverable supply may be included in the DS with an indicative timetable for delivery of 2016-2021.

The London Plan contains an annual target of 890 net additions, resulting in a five-year requirement of 4,450 units. The housing trajectory anticipates that 5,957 units would be delivered from 2012/13 – 2016/17, exceeding the target by 34 percent. The five-year calculation is based on historical trends in minor completions (set at 217 per year) and a detailed analysis of major sites under construction, with planning permission, and within the planning pipeline.

The capacity estimates within years 6-15 of the Housing Trajectory are in the majority based on the London SHLAA constrained capacity for identified sites, which take as a starting point the mid-point of the density range for the applicable PTAL and setting to provide a realistic yield from individual housing sites.

However where further local level work on refining these figures has been carried out, for example through documents such as the Southall OAPF Development Capacity Study and the Ealing Town Centre Spatial Development Framework, it is these figures that inform the housing trajectory. This approach is fully in accordance with national and regional policy and best practice guidance.

If the projected completions in future years are realised, Ealing will meet a cumulative target calculated on the basis of the current annual target until the end of the plan period (2026/27), despite the marginal performance of the past two years; future projections suggest delivery below target will not occur during the plan period. Ealing is expected to meet its 15 year housing target 2 years early, in 2024/25. Moreover, while the Monitor line falls below zero during the period 2011-2015, from 2015 onwards there is a significant increase in the number of dwellings above cumulative allocation.

Based on the Housing Trajectory and the Council's generally good record of housing delivery, there is no need to identify additional land for housing. It is considered that the DPD has been positively prepared and will be effective in contributing to delivery of relevant Development Strategy and London Plan objectives. As set out below, delivery will be monitored on an annual basis and review of this and other plans will identify any future requirement for additional housing land, particularly in light of the current update to the London SHLAA.

Viability

- 8. Tied up with effectiveness and deliverability is the viability of the Plan. How has the plan and the development sites within it been tested for viability? Has the Council taken into account the costs associated with demolition/abnormal site costs and the proposed**

Development Management Policies? How will the Council ensure flexibility within the Plan to enable development to be delivered during the current economic climate? The Plan should openly take into account any implications of uncertainty and consider the "what if" situation.

- 9. How has the Council taken into account the effect on viability/deliverability of those sites affected by water supply capability and waste water services referred to by Thames Water Utilities Ltd.?**

***Council Response:** Due to the complexity, fluctuations and pressures of the London land market, detailed viability testing of all sites is not possible nor desirable; this is recognised by Harmen in his support for a sample based approach to viability testing to support planning policy, as set out in his report *Viability Testing for Local Plans* (June 2012).*

The Council acknowledges the importance and influence that overall scheme viability will have on the ability of the DS to be delivered within the plan period. The overall approach of the DS recognises and responds to this, by avoiding overly prescriptive allocations and identifying known site constraints.

Viability considerations have been taken into account when assessing whether a site is deliverable or developable, informed by on-going engagement with landowners and developers on the viability of sites and the likely phasing of development. Viability evidence relating to affordable housing (2010) and CIL (2012/13) indicates that a broad range of policy compliant uses/forms of development can be viable in Ealing.

Thames Water has identified a potential, rather than definite, need to improve water supply capability and waste water services in relation to several of the identified development sites. As advised by Thames Water, the preference is for site specific capacity surveys and any resultant upgrades to be undertaken as and when the identified development sites come forward; this approach also allows for any changes in the water supply/waste water capability over the plan period to be taken into account. This approach is consistent across London/areas with Thames Water service and is not considered to put implementation of the identified development sites or the plan as a whole at risk.

Monitoring

- 10. Another essential element of the effectiveness of the Plan is monitoring and the Council should consider including a monitoring section within the plan. This is important, as where uncertainties exist that may affect the delivery of development requirements, planned contingencies with appropriate monitoring and trigger mechanisms need to be included.**
- 11. Therefore, the Council should explain how it will monitor the delivery of the development sites and what options they will consider if development is slower or different to that anticipated.**

Council Response: *It is considered that appropriate arrangements and in plan to monitor delivery of the Plan. Policy 1.2(o) of the Development Strategy DPD sets out the Council's approach to monitoring the implementation of the local development framework [Local Plan]. The Development Sites DPD will therefore be monitored through the Authorities' Monitoring Report (AMR), the publication requirements of which are set out in the Localism Bill.*

Site allocations will be monitored on an annual basis to assess progress on implementation; this will be in addition to the Council's Housing Trajectory and the requirement to demonstrate that there is a rolling five-year supply of deliverable housing sites. It is recognised that circumstances may arise which result in difficulties or delays to delivery of the site allocations. The AMR will enable the Council to identify shortfalls in delivery provisions and respond to these appropriately.

DEVELOPMENT MANAGEMENT DPD

(My comments relate to the Development Management DPD with Minor Track Changes EDM2)

- 12. The Plan should consider using an easier format to guide development in the Borough as two documents (one consolidated with the London Plan variation policies) may be confusing. Although this is a matter of style, I would like the Council to give some thought to a single document. This will form a topic for discussion at the hearing sessions. Where tables or figures are referred to from the London Plan these should be included in full (even if as an annex) for ease of reference.**

Council Response: *LBE ultimately proposes only one format for the DM DPD; a document that is fully consolidated with the London Plan 2011. This would be available in paper and electronic form. Our own policies/local variations would need to be differentiated by their format from the policies in the existing London Plan.*

In the electronic version, it may be possible to prepare an interactive version, which would allow the reader to turn on or off the GLA policies, in order to allow them to read policies in context, or separately. Ultimately this will come down to the practicalities and cost involved in preparing the electronic version.

Whatever approach is adopted, the final document will include all tables and figures necessary to apply the policies it contains.

For the purposes of the publication documents, LBE has deliberately chosen to present only Local Policies and Local Variations which are subject to the current examination.

- 13. I note that considerable modifications have been made to the wording of the policies and their justification in the light of representations received. Therefore, many of the detailed aspects**

of this Plan including an up-to-date justification for the policies and its effectiveness will be dealt with at the hearing sessions. However, answers to some initial questions as follows would be helpful:

- **Policy 4A (B) – I have read the Council’s response to representations about this policy. However, I remain concerned that there is some conflict in the wording - if employment use is unviable, would seeking a mixed use replacement be justified? What does the Council mean by mixed use in these circumstances?**

Council Response: *This policy is designed to take a sequential approach to the retention of existing employment uses. Where a straight replacement of existing employment uses is unviable then it is reasonable to explore the opportunity for a mixed use scheme that nevertheless retains the largest viable proportion of jobs.*

Where the applicant can demonstrate that retention of the whole site in employment use is not viable, either in its existing form or for an alternative employment use, then the policy seeks to test whether an alternative form of economic use could be made viable by the release of some portion of the site to a more profitable use such as housing. For example, a given site may be unviable in industrial use but viable as mixed housing and small office uses. The LPA will therefore always seek the retention of some employment use on these sites but will permit a change to other uses where no suitable and viable use can be accommodated.

Mixed uses in this context could potentially be any employment generating use or uses that would not otherwise be constrained by policy on the given site, plus that portion of alternative use necessary to make the development viable and secure a reasonable financial return. The alternative use would most likely be residential but the policy allows this to be any use that is otherwise acceptable in policy terms and which enables a viable employment use on the site.

- **Policy 4B (A) – Is the policy aim for ‘100% retail in Primary Frontages’ flexible enough to cope with the existing economic circumstances?**

Council Response: *The Policy is intentionally specific, provides clarity to applicants and ease of use by officers in response to applications. Inspector’s appeal decisions in the past have identified the absence of specific policies incorporating %s (in the former UDP policies) and this is something we have sought to rectify with the suggested Development Management retail policies.*

Policy 4B (A) and 4B (B) should be read together. The flexibility in relation to existing economic circumstances is provided in where to apply each policy. We commissioned a detailed survey (including identification of unit address, occupier and use class) of all shopping parades and units across

the borough, undertaken in August–November 2011, and used this to inform a review of retail designations. This has sought to consolidate (and in some instances contract) the retail cores of town centres and other parades across the borough within designated 'Primary frontages' (see Policy 4B (A), whilst providing the flexibility and scope to allow and encourage other compatible uses in designated 'Secondary frontages' (see Policy 4B (B)).

Importantly, the survey of shopping parades informed where we can reasonably aim for 100% retail (in those parades where a high proportion of units were already in retail use and/or represent a core shopping area of the town/other centre), but has also informed proposals to contract/delete former UDP 'designated frontages' (in which there was also a presumption against non-retail uses) to 'Secondary frontage' designations, in which there is now increased scope to allow and encourage other compatible uses, comprising up to 60% non-retail uses. The proposed Secondary frontage designations have been informed by survey findings of parades where a high proportion of non-retail uses and/or high number of vacant units were evident.

In light of the aim for 100% retail uses in Primary frontages, the % A1 retail use sought in Secondary parades recognises the existing economic circumstances, is lower than the %s proposed/adopted by other comparable boroughs/neighbouring authorities in order to allow and encourage a mix of complementary uses and manage change where appropriate, to help provide a range of goods and services within the wider town centres and shopping areas. The aim for 100% retail in the proposed Primary frontages is therefore considered justifiable as it is balanced with the increased opportunity for provision of non-retail uses elsewhere. Furthermore, Policy 4B (C) provides additional flexibility in allowing change of use from retail and other uses.

The Policies map (Map 7, EPM 5 Feb 2013) shows the spatial distribution of proposed primary and secondary frontages. These are new designations which are not directly comparable with what has gone before, however the extent of the change (reduction) from former UDP 'designated' to Policies Map Primary frontage can be seen by comparing this map to Sheet 10 in Volume 2 of the UDP (where designated frontage is shown in purple). These changes result from a complete re-examination of retail frontages in the Borough to ensure their appropriateness to current conditions and plan objectives

The proposed designations also aim to provide convenient access to local shops from all residential areas (See Policy 4B (D)). Whilst previous UDP policies designated some shopping parades as 'designated frontages', in accordance with NPPF requirements all shopping provision in the borough is now designated as within either Primary or Secondary frontage, and the relevant policy will apply in response to individual applications for change of use according to the site's designation. Whilst other authorities have chosen to apply different percentages and/or further differentiation by hierarchy of centre, the proposed Ealing policies intend to provide a justified, clear and easily applied approach as to where different uses

should be directed, with appropriate flexibility in the Secondary frontages to help achieve a healthy balance of uses across all of the borough's shopping areas.

- **Policy 4B (A) – Has this been viability tested to see what the impact will be for town centres over the life of the plan?**

Council Response: *The purpose of the policy is to protect the viability of the borough's town centres and parades as a whole to ensure all residents have access to essential shops.*

Whilst no specific viability testing has been undertaken, the Retail Needs Study (RNS) Update 2010, (used as evidence base for the adopted Development Strategy), confirms the range of demand for retail floorspace across the borough to 2026. Furthermore, the retail Needs Study will be updated by 2015/16 and the findings, alongside monitoring information, can be used to inform any alterations to policy if the evidence indicates this is required.

- **Policy 4B (A) – Is there up-to-date evidence of demand/need for Primary Frontages to be 100% retail for the early stage of the Plan?**

Council Response: *See above as to justification for proposed Primary and Secondary frontage designations based on survey findings and the increased flexibility provided by other policies. The RNS 2010 provides evidence of demand for retail floorspace to 2026 and the proposed policy seeks to consolidate, maintain and encourage retail uses in shopping parades where they currently predominate. A review of the RNS is to be undertaken within 5 years of the Development Strategy to help update retail floorspace demand/need, and the borough-wide survey of all shopping parades will also be undertaken every two years to monitor change. This will also be useful where changes of use have occurred which have not required permission and have therefore not been captured through analysis of planning decisions.*

The outcome of monitoring will help determine how we react and manage further change if required, through a further review of designations to re-confirm where the policy should apply.

- **Policy 4B (A) – Is there a conflict with policy 4C's identification of main town centre uses, some of which are non-retail?**

Council Response: *All 'Main town centre uses' are public facing uses with strong implications for the public realm wherever they are found, whether within or outside town centres. The provisions of Policy 4C are therefore considered appropriate and proportionate to the management of these uses.*

There is not considered to be any conflict between Policies 4B 'Retail' and 4C 'Main town centre uses' because the requirements of 4B for retail uses

concerns defined areas set out on the Policies Map. Main town centre uses other than retail will be appropriate outside of the primary frontage and in up to 60% of the secondary frontage.

- **Policy 5.2 – I am concerned about the application of the last paragraph of the justification of this policy asking for post-construction monitoring – what is the purpose of this if development meets the criteria set out in the policy? By what means will this be secured and what will the Council do with the monitoring information? Also, have you tested the implications of this policy on the viability of development?**

Council Response: *The proposed addition to the supporting text (or reasoned justification) of Policy 5.2 is intended to provide clarity regarding the implementation of Policy 5.2 of the London Plan. This text does not alter the existing provisions of Policy 5.2 of the London Plan which the Council will continue to apply. The additional supporting text is intended to clarify what evidence it will expect developers to submit as part of their planning application to demonstrate compliance with this policy.*

To achieve the required CO2 emission saving targets set out in Policy 5.2, applicants will typically need to utilise/deploy various renewable and/or low carbon energy technologies, such as solar panels, heat pumps, CHP etc.

To date, most applicants would typically employ accredited modelling software tools to demonstrate compliance with the energy policies. Whilst such modelling should continue to form a key element in the planning stages of development, and is particularly important in measuring the contribution of those measures proposed higher up in the energy hierarchy, such software tools do have recognised limitations; primarily that compliance is demonstrated through predicted energy output, rather than actual energy generation. There can at time be some disparity between the predicted and actual energy generation. Under such arrangements it is therefore impossible to verify with certainty actual compliance with policy.

This reliance on modelled data in verifying compliance with policy is unsatisfactory. Accordingly as of March 2013, the Council now expect developers to submit actual data post construction/installation. Whilst this evidence base requirement is new, based on our experience of the process, it is not considered to place an unreasonable burden on applicants/developers. Where developers have chosen to deploy renewable/low carbon installations in order to satisfy policy, in most instances they will already undertake monitoring of the energy generated in order to claim Feed in Tariff, Renewable Heat Incentive, ROCS etc. Moreover, developers will also be keen to ensure that their investment in such technologies has been realised.

In recognition of the fact that some developers will be less experienced in undertaking such monitoring, the Council have procured a platform in the

form of an Automated Energy (& CO2) Monitoring Platform to assist them in satisfying this requirement. In order to provide this platform the Council will have to levy a modest fee on the applicant which is secured through a S106 contribution. The costs are calculated based on the number/complexity of installations which require monitoring, and so will vary from application to application, although will typically not exceed £3,000, and accordingly can be easily accommodated within overall development costs. Developers are not compelled to use the Council's own monitoring platform however, and as noted above a number will opt to use their own monitoring platform.

The primary objective in collecting this data is to allow the Council to confirm actual compliance with policy. In the event that a development failed to achieve its agreed targets, the Council would initially investigate the cause of poor performance. In some instances this may have resulted from incorrect installation, and such issues can usually be rectified fairly easily. Unless under performance can be easily remedied, it is not the Council's intention to pursue such matters. The collection of data provides an important evidence base for the Council with regard to the utilisation of different technologies and their effectiveness in the borough. The Council will use this data to inform its consideration of future applications.

DEVELOPMENT SITES DPD DEVELOPMENT MANAGEMENT DPD

Duty to Co-operate – Preparation of the Plan

- 14. My examination has to establish whether the Council has complied with the Duty to Co-operate. The Town and Country Planning (Local Planning) (England) Regulations section 4 prescribes 12 bodies, the local enterprise partnership and local nature partnership as the bodies required to co-operate.**
- 15. The documents ref EDS6a and EDMA6a provide a list of consultees and the AMR report page 133 provides other information on the methods of co-operation but not all the prescribed bodies are noted.**
- 16. Please can I have an updated schedule setting out the prescribed bodies and partnerships, and the process of co-operation (where necessary) with these organisations.**

Council Response: *Clause 4 (1) of Part 2 of the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended) lists a number of public bodies that are prescribed for the purposes of conforming to the duty to cooperate. The following briefly describes how the Council has interacted with each body.*

(a) Environment Agency (EA) – Regular engagement through consultation processes. No further discussions requested or required as no strategic or substantive matter were raised, and this is reflected in the fact that many of the representations were of support. There was also direct input by EA into the SA process (including the SA scoping reports) which in turn impacts the plan production.

(b) The Historic Building and Monuments Commission for England (known as English Heritage (EH)) – Extensive discussions and meetings take place on a regular basis and in particular while producing the Development Sites and Development Management DPDs there were a number of discussions concerning heritage and tall buildings matters. This dialogue enabled the approach in these DPDs to be tailored to meet the expectations of EH.

This is evidenced by a Statement of Common Ground between the Council and EH (see ED1 in the examination library, dated February 15th 2013).

There was also direct input by EH into the SA process (including the SA scoping reports) which in turn impacts the plan production.

(c) Natural England – Regular engagement through consultation processes. No further discussions requested or required as no strategic or substantive matter was of concern and this is reflected in the fact that no negative representations was received on either the Development Sites or Development Management DPDs. Natural England had direct input to the SA and HRA process which in turn impacts the plan production.

(d) Mayor of London – For many strategic and substantive issues the Mayor of London engages the London Boroughs in the process of cooperative activity thus negating the need for this to be tackled at an individual local level. Similarly, Ealing as a Borough ensures that the Mayor of London is engaged with the process of producing the Ealing's Local Plan bringing consistency to the approach to planning. Having consulted the GLA on the submission draft of the Development Management and Development Sites DPDs, the Mayor of London has confirmed that these are in general conformity with the London Plan.

(e) Civil Aviation Authority (CAA) – Regular engagement through consultation processes. No strategic planning matters were raised, no further discussions were required and no representations received.

(f) Homes and Communities (HCA) – In London the HCA now only exists as a regulator. Responsibility for housing and regeneration activity in London lies with the Greater London Authority. Regular engagement was undertaken with the HCA through the consultation processes. No further discussions were requested or required as no strategic or substantive matter was of concern and this is reflected in the fact that no negative representations were received on either the Development Sites or Development Management DPDs.

(g) Primary Care Trusts (PCT) – The Ealing Primary Care Trust (PCT) and other Ealing responsible public health bodies are engaged regularly in the local planning process. In particular, in producing the Infrastructure Delivery Plan evidence base document, extensive meetings and discussions were undertaken. No further discussions were requested or required as no strategic or substantive matter was of concern and this is reflected in the fact that no negative representations were received on either the Development Sites or Development Management DPDs. The PCT had direct input to the SA process (including the SA scoping reports) which in turn impacts the plan production.

(h) Office of Rail Regulation (ORR) – Engagement with Network Rail, TfL, Crossrail, HS2 Ltd and the train operating companies is undertaken on a regular basis, particularly in relation to proposals for Crossrail and HS2 and any associated station redevelopments. No representations or comments have been received from the ORR and the Council do not believe there are any issues.

(i) Transport for London (TfL) – There has been a continual set of meetings that ensure cooperation between TfL and Ealing Council when producing Local Plans and implementing them. TfL's comments form part of the response from the Mayor of London.

(j) Integrated Transport Authorities – See entry for TfL.

(k) Highway Authorities – See also the entry for TfL.

(l) Marine Management Organisation (MMO) – As the rivers in Ealing are not tidal, the MMO does not have specific jurisdiction over the Development Sites or Development Management DPDs. No further discussions are required as there have been no negative representations received.

(m) Local Enterprise Partnership (LEP) - In London the Local Enterprise Partnership is the London Enterprise Panel (LEP) which is led and organised by the Mayor of London, who is consulted and engaged with regularly by Ealing Council. The LEP operates as a single pan London partnership and complements existing working arrangements between London business, the Mayor and the boroughs and contributes to the delivery of the Mayor's Economic Development Strategy. Government approved the establishment of the LEP on 17 February 2011 and it has met quarterly since its inaugural meeting on 21 February 2012. The LEP is a non-incorporated consultative and advisory body established by the Mayor under sections 30 and 34 of the Greater London Authority Act 1999. As a mayoral appointed body with no separate, independent or corporate legal status the Panel must operate through the Greater London Authority (GLA) which may be required to act as its "accountable body" if funding arrangements are entered into with the Government or European Commission on the Panel's behalf. For many strategic issues the Mayor of London engages the London Boroughs in the process of 'cooperative' activity thus negating the need for this to be tackled at a local level. Similarly, Ealing as a Borough ensures that the Mayor of London is engaged with the process of producing Ealing's Local Plan bringing consistency to the approach to planning. Having consulted the GLA on the submission draft of the Development Management and Development Sites DPDs, the Mayor of London has confirmed that these are in general conformity with the London Plan. The Council therefore considers that the Development Management and Development Sites DPD's are sound with respect to the objectives of the London Plan and the Mayor's Economic Strategy and that we have complied with the duty to co-operate in this regard.

(n) Local Nature Partnership - An amendment to the Town and Country Planning (Local Planning) (England) Regulations 2012 legislation was made on the 8th October 2012 and came into effect on the 12th November 2012 which adds to the list of bodies prescribed for the purposes of S.33(A) of the Planning and Compensation Act each Local Nature Partnership, whereby this means a body, designated by the Secretary of State, established for the purpose of protecting and improving the natural environment. The Local Nature Partnership for London is the All London Green Grid (ALGG) Partnership, which has a variety of partners, including London boroughs such as Ealing Council. The Greater London Authority coordinates and supports this partnership. The work and objectives of the ALGG Partnership are expressed through supplementary planning guidance (SPG). The Council have worked closely

with the All London Green Grid Partnership in developing their SPG, and in the preparation of two framework plans for the Brent Valley & Barnet Plateau and the River Colne & Crane. Work on these documents also informed the preparation of the adopted policies in the Council's Development (or Core) Strategy, and its Green Space Strategy. Where appropriate this work has also underpinned the content of the Development Management and Development Sites DPDs. As noted above policy 2.18 of the London Plan provides the relevant policy hook for the ALGG SPG, which calls for the protection, promotion and management of London's green infrastructure. The Council are proposing a local variation to policy 2.18 of the London Plan through its Development Management DPD, which extends the scope of the policy to the local level. Having consulted the GLA on the submission draft of the Development Management and Development Sites DPDs, the Mayor of London has confirmed that these are in general conformity with the London Plan. The Council therefore considers that the Development Management and Development Sites DPD's are sound with respect to the objectives of the London LNP, and that we have complied with the duty to co-operate in this regard.

Gypsies and Travellers

- 17. Policy B of the Planning Policy for Traveller Sites (PPTS) (which replaces previous national planning policy) sets out a number of requirements for Local Plans in respect of this issue. CS policy 1.2(n) says that there is provision to 2011. As it is 2013, can you provide me with an update on Gypsy and Traveller needs and how they will be catered for over the next five years.**

Council Response: *The current traveller site at Bashley Road has 24 plots. Currently there is one void plot and we are expecting another within the month and another later in the year.*

The current waiting list has 5 households on it, 2 of whom are travelling at present, two are housed in bricks and mortar, and one is living on another site in a neighbouring borough. One of the families has been waiting since 2009, however this is one of the travelling families and we have not been able to confirm recently whether they are still awaiting an allocation on our site.

The arrangements for the management of the site have recently changed and the new managing agents are in the process of reviewing the waiting list and allocations policy.

The introduction of the welfare benefit reforms will have an impact on the affordability of the site for most of the current residents and we will be reviewing the charging policy later in the year as a result of this.

- 18. DM Policy 3B indicates that Gypsy and Traveller development will be assessed on the basis of need and that their needs will be set out in a published evidence base, but there is no indication of when this will be done. Can the Council set a timescale for this?**

Council Response: *The Housing Department is planning to refresh our Strategic Housing Market assessment before the end of the calendar year and this will include an examination of the needs of Gypsies and Travellers within the borough. A new Housing Strategy will then be produced to reflect this and other housing needs.*

Policies Map

19. My examination relates to the Development Sites and Development Management Development Plan Documents. The Policies Map does not appear to be part of these plans and is not therefore part of the examination. In any event, the Policies Map should only be a visual representation of policies contained in Plans. If the Council wish they can include a list of changes in an annex to the development sites DPD to include it within the Plan discussion.

Council Response: *The Council recognises that the Policies Map is not a separate DPD in its own right, but rather illustrates geographically the application of policies in the other DPDs forming the Local Plan for the borough. To date these include policies adopted in the London Plan, our own Development (or Core) Strategy and those policies set out in the emerging Development Management and Development Sites DPDs.*

Currently the adopted Policies Map is the 2004 UDP Proposals Map, incorporating changes arising from the Development Strategy. These changes were considered alongside the Development Strategy in 2011, examined in November 2011, adopted in April 2012, and detailed in the 'Atlas of changes to the UDP Proposals Map 2004' (EB2). Since the adoption of these changes in April 2012, further changes have been identified. The Council had initially intended to progress the Policies Map as a separate DPD, and so were planning to publish these changes alongside the full document itself, to coincide with the consultation on the Development Sites and Development Management DPD. Whilst the Policies Map is no longer seen as a separate DPD in itself, we have been equally rigorous in our approach to publishing these documents.

For consultation purposes, to aid the reader in understanding the document, we have highlighted changes between the consultation draft and earlier iterations of the map (i.e. UDP Proposals Map incorporating Core Strategy changes). Whilst these changes have been emphasised in the consultation document, the Council have published the map (and associated map booklet) in full, and have welcomed comments on all aspects of the map irrespective of whether changes are proposed. The Local Plan will replace the UDP in its entirety and accordingly associated mapping must be considered afresh rather than just a refinement of what has gone before. Consultation on the new set of mapping has been undertaken alongside the preparation of these other DPDs. Two formal stages of consultation were undertaken. The first in summer 2012 and the second in autumn 2012, coinciding with consultation on the

publication draft of the Development Sites and Development Management DPDs.

In the large part where mapping changes are proposed these designations depend on policies set out in the DPDs currently being examined. The relationship between the designations on the Policies Map and policies in the DPD is set out in Appendix 1 of the Policies Map Booklet (EPM6) and in appendices to the Development Management DPD (Appendix 1 in EDM2 and EDM3 and Appendix 3 of EDM4). Given that the majority of these designations rely on policy hooks set out in the London Plan or our own local Development Management DPD this table is appended to the Development Management DPD. Only one designation 'Development Site' relies directly on the Development Sites DPD.

As has been established elsewhere, and particularly in respect of the Development Management DPD, the Council's approach to developing DPDs has been to avoid duplicating policies covered in regional and national policy. Accordingly a number of allocations on the Policies Map do rely on policies in the regional plan (London Plan) to support the basis of this designation and to guide development in relation to such designations. Whilst such policies in the London Plan are not the subject of this examination, and the Council wishes to avoid duplicating such policies at the local level, we do nonetheless need to identify the spatial application of such policies and this will need to be examined.

In our view it is not possible to accurately identify the geographical extent of policy coverage through written policy text alone. Moreover the form that our Local Development Management Policies have taken, essentially defining criteria for managing applications, is not intended to define policy coverage. Clearly the geographical scope of policy coverage can only be effectively illustrated in mapped form, and policies can only be implemented if this is understood.

Clearly the decision not to recognise the Policies Maps as a DPD did create a considerable dilemma for us. We have however made every effort to publicise mapping alongside the preparation of the other DPDs and are keen to ensure that representations made by interested parties on such mapping are seen to be addressed albeit by reference back to their relevant DPD or London Plan context.

The approach we have taken has also been tested in earlier discussions with the Planning Inspectorate in front-loading/advisory visits and PAS/PINs hosted seminars on plan preparation. The advice received emphasised the need to provide a clear audit trail of any proposed changes using the Adopted UDP Proposals Map as a baseline.

It would therefore be unfortunate if issues arising from this mapping could not be treated as part of the examination of the relevant DPD policy to which it relates. We would therefore respectively request that mapping issues be considered as part of the relevant DPD examination process.

London Borough of Ealing
Development Sites and Development Management Development Plan Documents

As indicated above our preference was to append the schedule showing relationship between the designations on the Policies Map and the relevant DPD policy to the Development Management DPD as the majority of the mapping issues relate back to that DPD. If required we would also be happy to also append this schedule to Development Sites DPD and will look forward to receiving further direction on this matter. Should this not be possible we would welcome advice on how, if at all, the content of such mapping should be considered through the plan making process.

Appendix A

Appendix A: Five Year Supply of Deliverable Sites

Major sites (10+ units) under construction

Sites DPD Ref	Application No.	Permission Date	Site Area (ha)	Site Name	Address	Net Gain	2012/13	2013/14	2014/15	2015/16	2016/17
N/A	P/2012/0708 and previous	2004	26.5	South Acton Housing Estate	Acton W3	737	0	0	106	0	131
N/A	P/2008/0156	Nov-09	1.8	Dickens Yard	Longfield Avenue/New Broadway W5 2XA	698	70	100	100	100	100
N/A	P/2006/4025	Aug-07	1.1	Cambridge Yard	Cambridge Road, Hanwell W7 3UP	130	130	0	0	0	0
N/A	P/2011/0808	Mar-11	0.9	Former Featherstone Road Primary School	Featherstone Road, Southall UB2 5AG	143	143	0	0	0	0
N/A	P/2009/4376 P/2008/2643	Sep-10	2.7	Bromyard House	Bromyard Avenue W3 7BE	76	76	0	0	0	0
N/A	P/2006/4648	Feb-08		Creffield Lodge	2-4 Creffield Road W5 3HP	11	11	0	0	0	0
N/A	P/2008/1576	Nov-10	0.16	White Hart Public House	37 Greenford Road UB6 9AY	14	14	0	0	0	0
N/A	P/2008/1250	Mar-10		104 Western Road	UB2 5EA	13	0	13	0	0	0
N/A	P/2010/1894	Appeal Allowed Jun-11	0.34	Former Boatyard	Tentelow Lane, Southall UB2 4LF	30	0	30	0	0	0
N/A	P/2010/2909	Appeal Allowed May-11	0.37	Heath Lodge	3 Church Road, Hanwell W7 3HP	28	0	28	0	0	0
N/A	PP/2010/3594	Aug-11	0.37	Servite House	45 Queens Walk, Ealing W5 1LT	18	18	0	0	0	0
N/A	PP/2010/4585	Jul-11	0.5	Westel House	32-38 Uxbridge Road, Ealing W5 2BS	129	0	0	129	0	0
N/A	P/2009/1648	Appeal allowed Dec-2009	0.4	Acton Bus/Tram Depot	283-303 Uxbridge Road W3 9QU	85	85	0	0	0	0

Sites DPD Ref	Application No.	Permission Date	Site Area (ha)	Site Name	Address	Net Gain	2012/13	2013/14	2014/15	2015/16	2016/17
N/A	P/2009/3548	Appeal allowed Jul-2010		2 Bollo Lane	W4 5LE	56	56	0	0	0	0
N/A	P/2010/0419 P/2010/0418	Sep-10	4.9	Green Man Lane Housing Estate	Green Man Lane, West Ealing W13 0UF	242	0	60	60	60	62
N/A	P/2010/2539	Oct-10	1	Hanwell Locks	St Margaret's Road/Trumpers Way, Hanwell W7 2HF	77	0	77	0	0	0
N/A	P/2007/1071	May-08	1.2	41-159 Bromyard Avenue	W3 7JS	281	63	92	75	51	0
N/A	P/2010/1583	Apr-10	0.5	Phase 12 Grand Union Village	Broadmead Road UB5 6RJ	85	85	0	0	0	0
N/A	P/2008/4886	Aug-10		12-14 Osterley Park Road	Southall UB2 4BN	15	15	0	0	0	0
SOU8	P/2005/4387	Sep-08	8.3	Phoenix House	The Green Southall UB2 4AX	149	0	149	0	0	0
TOTAL UNITS							766	549	470	211	293
TOTAL AREA							7.40	11.89	4.49	1.78	3.69

Major Sites (10+ units) with planning permission, not yet started or subject to legal agreement

Sites DPD Ref	Application No.	Permission Date	Site Area (ha)	Site Name	Address	Net Gain	2012/13	2013/14	2014/15	2015/16	2016/17
N/A	P/2006/3688	Jul-08	0.1	171-175 Uxbridge Road	Ealing W13 9AA	14	14	0	0	0	0
N/A	P/2012/3052	Nov-12	4.5	Golf Links Estate	Fleming Road, Southall UB1 3PE	60	0	0	0	60	0
N/A	P/2008/0736	Jun-08	0.1	13-15 Osterley Park Road	UB2 4BL	12	12	0	0	0	0
SOU5	P/2008/3981	Mar-10	37.2	Southall West	The Straight, Southall UB1 1QZ	3750	0	0	0	200	200

Sites DPD Ref	Application No.	Permission Date	Site Area (ha)	Site Name	Address	Net Gain	2012/13	2013/14	2014/15	2015/16	2016/17	
N/A	P/2011/0811	Apr-11	0.63	Former Salisbury Depot	Salisbury Road, Southall, UB2 5QJ	103	0	0	0	103	0	
N/A	P/2007/3230	Appeal Allowed Jun-2008	0.05	107-111 Churchfield Road	W3 6AH	14	0	14	0	0	0	
N/A	P/2007/4855	Pending Legal	0.11	Land Adjacent to Central Acton Station	East Churchfield Road	12	0	12	0	0	0	
N/A	P/2009/1461	Aug-09	0.15	128-144 Boston Road	Hanwell W7 2HJ	12	0	12	0	0	0	
N/A	P/2010/0333	Jun-12	0.06	Cooper Court	41 Melbourne Avenue, West Ealing, W13 9BW	10	0	10	0	0	0	
N/A	P/2010/1380	Jun-10		Peel House	32-34 Church Road, UB5 5AB	12	0	12	0	0	0	
N/A	P/2007/4416	Pending Legal	0.3	Top Lock Depot/Norwood Yard	Melbury Avenue/Popular Avenue	10	0	10	0	0	0	
N/A	P/2011/1041	Mar-12	0.54	81, 83, 85 Madeley Road	58, 60, 62 Hanger Lane, W5 2JH	18	0	18	0	0	0	
N/A	PP/2011/5199	Mar-12	0.1	Carlyle House	Carlyle Road, Ealing, W5 4BE	10	0	10	0	0	0	
N/A	P/2009/3255	Appeal Allowed Mar-12	0.37	75 High Street, Southall	UB1 3DB	26	0	26	0	0	0	
N/A	P/2010/1377	Mar-12	0.1	Land Adjacent to 65 Belvue Road, Northolt	UB5 5HP	16	0	16	0	0	0	
N/A	P/2011/4513	Apr-12	0.3	Former St Helena's Home	51 Drayton Green Road	21	0	0	21	0	0	
N/A	P/2012/3391	Pending Legal	1.1	Allen Court Housing Estate	Ridding Lane, Greenford UB6 0LA	24	0	0	24	0	0	
N/A	P/2011/5045	Pending Legal	4.5	Rectory Park Housing Estate	Northolt, UB5 6BU	58	0	0	58	0	0	
							TOTAL UNITS	0	166	104	363	297
							TOTAL AREA	0.00	1.98	2.90	6.99	4.86

Major sites (10+ units) in the planning pipeline and where the principle of development has been accepted

Sites DPD Ref	Application No.	Permission Date	Site Area (ha)	Site Name	Address	Projected Net Gain	2012/13	2013/14	2014/15	2015/16	2016/17
n/a	P/2012/0338	Pending	0.7	Colonial Drive	W4 5LE	124	0	0	124	0	0
n/a	P/2012/3154	Pending	1.15	Oaks Shopping Centre	High Street, Churchfield Road, W3 6RE	146	0	0	0	146	0
n/a	P/2012/4061	Pending	0.5	Northolt Mandeville (Former Mandeville School)	Eastcote Lane, North Northolt, UB5 4AB	43	0	0	43	0	0
n/a	Pre-application	Manor Works	0.2	Manor Works	Manor Road, West Ealing	44	0	0	44	0	0
ACT1	n/a	n/a	0.14	Acton Town Station Approach	83-83 Gunnersbury Lane	21	0	0	0	0	21
ACT2	n/a	n/a	1.3	Acton Gateway	Steyne Road/High Street Acton W3	199	0	0	0	0	199
ACT4	n/a	n/a	0.1	Beechworth House	40-48 High Street	15	0	0	0	15	0
EAL13	n/a	n/a	1.46	Former BT Telephone Exchange	Castle House and Rome House Gordon Road West Ealing W13	157	0	0	0	0	57
HAN3	n/a	n/a	0.84	Wickes	83-101 Boston Road Hanwell W7	90	0	0	0	0	90
OIS1	n/a	n/a	9.9	Southern Gateway	Park Royal W3 6UP	1500	0	0	0	250	250
OIS7	n/a	n/a	19.7	Greenford Green	Oldfield Lane North/ /Rockware Avenue	400	0	0	0	0	100
OIS8	n/a	n/a	5	St Bernard's Hospital	Uxbridge Road Southall UB1	520	0	0	0	105	105
SOU4	n/a	n/a	4.79	Southall Crossrail Station	South Road/Park Avenue Southall UB1	184	0	0	0	0	84
SOU9	n/a	n/a	0.46	St John's Church Hall and Bus Depot	King Street/Western Road Southall UB2	20	0	0	0	20	0
TOTAL UNITS							0	0	211	536	906

Housing Trajectory

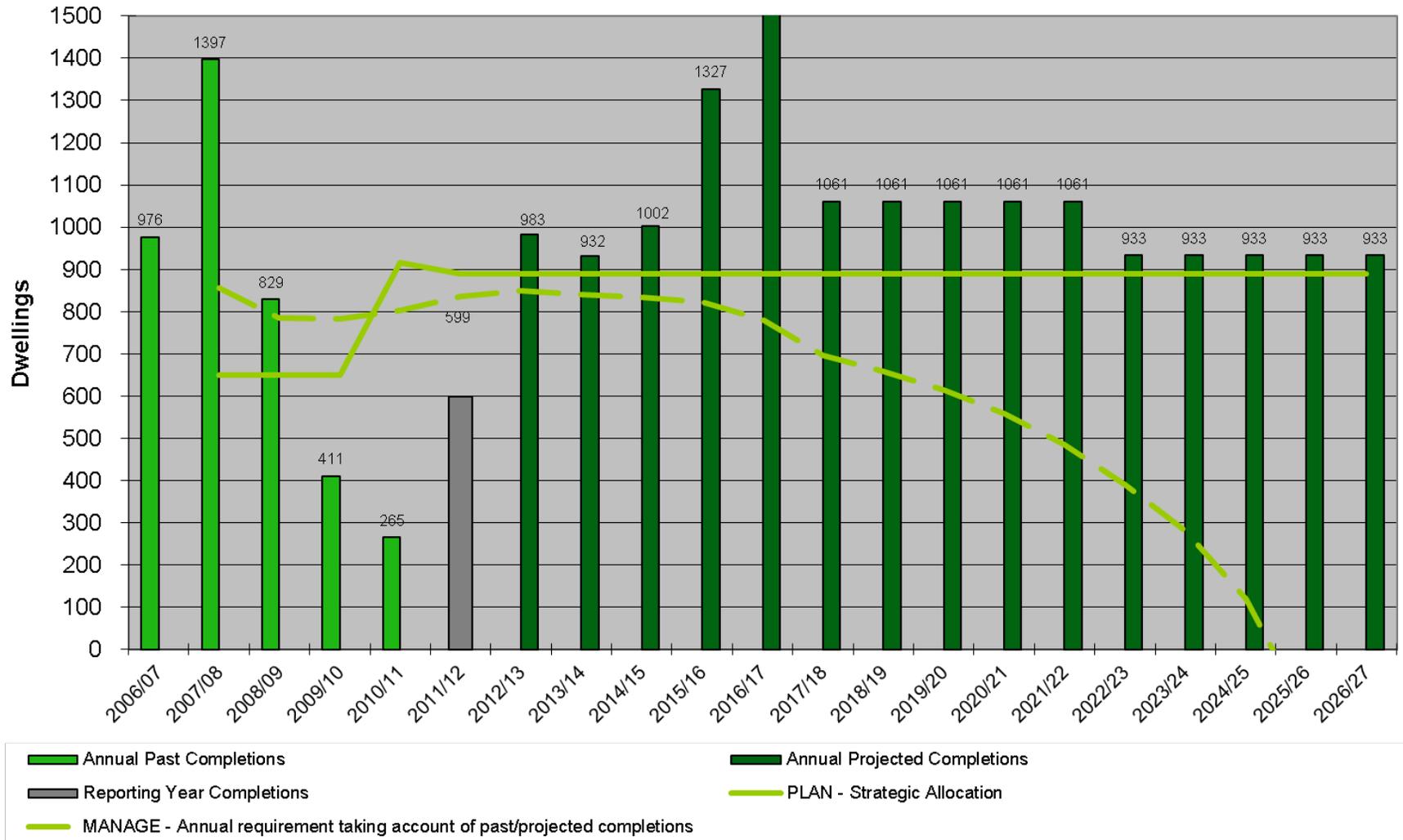
06/07 07/08 08/09 09/10 10/11 11/12 12/13 13/14 14/15 15/16 16/17 17/18 18/19 19/20 20/21 21/22 22/23 23/24 24/25 25/26 26/27																						
		Rep					1	2	3	4	5											
H2(a)		976	1397	829	411	265																
H2(b)							599															
H2(c)	Net additions							983	932	1002	1327	1713	1061	1061	1061	1061	1061	933	933	933	933	
	Hectares							7.40	13.87	8.79	13.38	19.07										
	Target		650	650	650	915	890	890	890	890	890	890	890	890	890	890	890	890	890	890	890	
H2(d)			855	785	783	804	835	850	841	835	822	780	695	659	614	558	486	390	282	119	-153	-696

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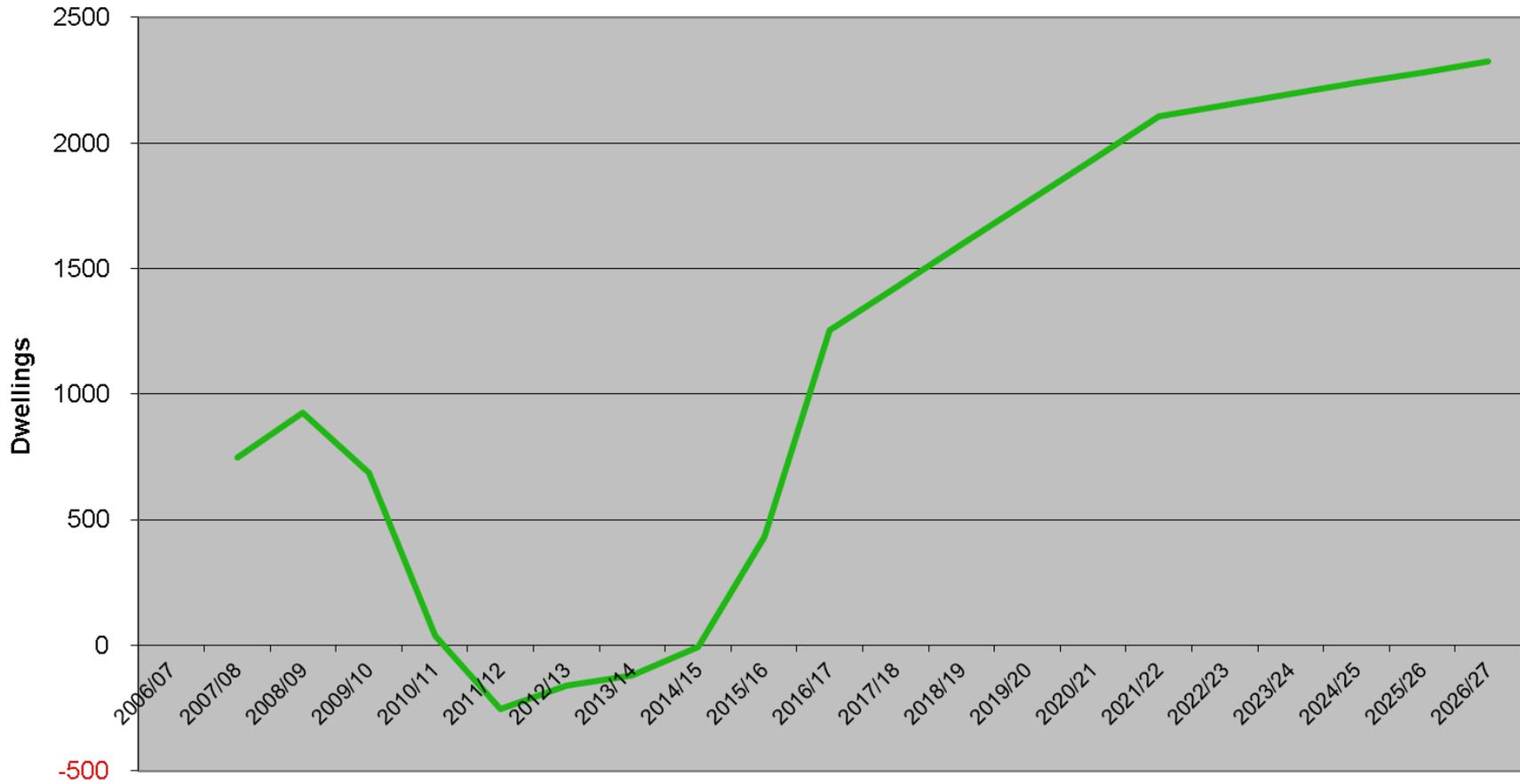
Five Year Deliverable Supply of Housing Land

Status	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18 - 2021/22	2022/23 - 2026/27	Plan Period Completions
Under Construction	766	549	470	211	293	478	250	3017
Planning Permission Not Started/Subject to Legal	0	166	104	363	297	500	500	1930
Planning Application Awaiting Decision	0	0	167	146	0	0	0	313
Sites DPD Allocations	0	0	44	390	906	3242	2832	7414
Forecast Major Completions								
	766	715	785	1110	1496	4220	3582	12674
Forecast Minor Completions (SHLAA Small Sites)								
	217	217	217	217	217	1085	1085	3255
TOTAL FORECAST COMPLETIONS	983	932	1002	1327	1713	5305	4667	15929
Total Forecast Completions per annum						1061	933	1062

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 Housing Trajectory and Managed Delivery Line



Housing Trajectory – Monitor Line of Cumulative Completions



— MONITOR - Number of dwellings above or below cumulative allocation

Appendix B

Changes in Ealing's Designated Industrial Land Supply Arising from the Development Sites DPD Final Proposals June 2012

1. The borough's UDP designations relating to designated employment land categorised Major Employment Locations (MEL) as the primary location for industrial and ancillary uses, and Employment Sites for offices, mixed use and where appropriate light industrial.
2. As such, Ealing considers that only MEL contributes to the designated industrial land supply, reflected in the Development Strategy's approach to employment uses which outside of SILs and LSISs manages loss of employment use through a criteria based development management policy. However for completeness those site allocations that encompass land that under the UDP was designated as an Employment Site have been included below for completeness.

ACT6 Colonial Drive

- Designated at MEL in UDP, site area of 0.70ha.
- ELR recommends release as partially vacant with poor access.
- 2 Bollo Lane has been developed for residential
- Represents of **loss of LSIS of 1.01ha** with no retention of employment use

ACT7 Acton Crossrail Station

- South of railway designated as an Employment Site in the UDP, site area of 0.62ha
- ELR recommends release of the commercial units south of the railway which have been vacant for longer than 18 months.
- Does not represent a loss of designated industrial land (Employment Sites do not contribute to the industrial land supply); site allocation supports intensification and consolidation of industrial uses to north of railway

EAL13 Former BT Telephone Exchange

- Designated as an Employment Site in UDP, site area of 1.46ha
- BT has confirmed site to be decommissioned, outside of town centre boundary and surrounded by residential so unsuitable for redevelopment for employment uses
- Does not represent loss of designated industrial land (Employment Sites do not contribute to the industrial land supply)

SOU4 Southall Crossrail Station

- Land between Park Avenue and railway designated as MEL (and SIL) in UDP, site area of 2.38ha
- ELR cautions that north of the railway line provides lower value units with low vacancy levels and short-medium term demand while rental levels remain lower than surrounding stock. Recommends that units should retain protection so long as low vacancy levels are evident.
- Majority of the site has been extensively fly-tipped, with single storey units to eastern end occupied by trade counters and similar. The location and constrained nature of the site makes it unsuitable for SIL or LSIS appropriate functions.
- Retention of employment uses therefore most appropriately ensure through criteria based development management policies rather than as a designated site.
- Represents a **loss of SIL of 2.38ha**

SOU6 Southall East

- East of pedestrian footbridge designated as MEL (and SIL) in UDP, site area of 7.52ha
- ELR assesses wider site and recommends that there should be no rush to release the site in its entirety, particularly as there are very few development opportunities on clear sites within the borough. Advises that occupied and viable employment uses should be strongly protected.
- Functionally, protecting the core of the site as SIL would preclude mixed use development which is more appropriate due to the site's close proximity to the Crossrail Station. The allocation therefore supports retention of the employment function of the site through requiring an uplift is flexible B1 uses, particularly on the eastern edge of the site to ensure that employment potential of the remaining SIL is supported and protected.

- Represents a **loss of SIL of 7.52ha**

SOU10 Johnson Street

- Designated as MEL in the UDP, site area of 2.89ha
- ELR recommends release of units along Johnson Street due to access issues through a residential neighbourhood
- The site allocation supports the retention of business uses on the site that do not generate HGV traffic, particularly west of the Caxon Road/Johnson Street junction to buffer the industrial uses on the wider MEL.
- As a non-designated site, any loss of employment uses would be managed through the criteria based Development Management policies.
- Represents a **loss of LSIS of 2.89ha**. Represents a minimal loss of industrial capacity because site allocation supports continued business (ie B class) uses compatible with limited access to site.

OIS1 Park Royal Southern Gateway

- Perfume Factory designated as MEL (and SIL) in UDP, site area of 1.11ha
- Park Royal OAPF sets out guidance for the mix of use appropriate within the Southern Gateway, which includes retaining industrial uses on the Perfume Factory site
- Does not represent a loss of SIL or designated industrial land

OIS8 Greenford Green

- North of the canal designated as MEL (and SIL) in UDP, site area of 9.13ha
- South of the canal designated as Special Opportunity Site for employment in UDP, site area of 9.47ha
- North of the canal does not have existing industrial use, and removal of the SIL designation does not represent a loss of industrial capacity.
- Represents a **loss of SIL of 9.13ha**, an **increase in LSIS of 9.47ha** south of the canal proposed in the site allocation.

Redesignation of Atlas Road (Park Royal)

- Based on Development Strategy DPD. This has not been included as a site allocation as the appropriate uses are set out within London Plan policy 2.17.
- Represents an **increase in SIL of 6.79ha**

Loss of SIL proposed: 19.03ha

Loss of LSIS proposed: 3.90ha

Additional industrial land supply from designation of new SIL/LSIS: 16.26ha

Total reduction in designated industrial land supply: 6.67ha

However, total reduction in actual industrial capacity is below this figure as only those sites that are partially occupied and functionally unsuitable for SIL/LSIS appropriate uses are being released.