

Further Statement

LBE/Matter 2 – General issues for Development Sites DPD

17 May 2013

EALING COUNCIL

2. MATTER TWO – GENERAL ISSUES FOR DEVELOPMENT SITES DPD

2.1 Would the scale, type and distribution of the allocated sites conform to London Plan policies and be consistent with the Development/Core Strategies (CS)? Should the potential number and type of development be specified for each development site?

The purpose of the Development Sites DPD(DS) is to identify key development sites in the borough on which proposals are likely to come forward during the plan period and to allocate these sites for preferred uses that will assist in delivering the policies and objectives of the CS and the London Plan.

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 Area Spatial Strategies serve to highlight how the identified site allocations will contribute to 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.

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.

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.

Where appropriate and justified, policies throughout the CS identify quantitative targets for provision, including for numbers of new homes, square footage of office and retail, managed release of strategic industrial land and tonnage of waste to be managed.

The Council therefore considers that the quantitative targets within the CS are sufficiently clear and measurable to support monitoring and delivery of the Local Plan, including the contribution of the site allocations to meeting these targets. Otherwise, spatially based policies are best monitored against the achievement of their spatial objective, or that the desired outcome has been achieved, which in practice is largely a qualitative process.

2.2 Having regard to the scope of adopted and programmed CS, are there any obvious omissions, in terms of provision for particular needs, from the submitted Plan?

The Council considers that the DS appropriately translates the spatial objectives articulated in the CS to the site level, and that the nature of the sites identified, their location and the preferred development approach will make an appropriate contribution to achieving the aims of the adopted CS. The Council is also producing a Joint West London Waste DPD and School Sites DPD to identify sites for to meet the particular needs of these uses.

2.3 Is the amount of land allocated for housing sufficient to meet the needs of the borough over the short, medium and long term? If not, how will the plan ensure that an appropriate housing land supply will be maintained? Will they provide for an appropriate housing mix, including affordable housing, in the right locations? How and when will the need for Gypsy and Traveller sites be addressed?

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 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. Additionally, a five-year supply of deliverable 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 of ED5. This is the most up-to-date information available.

The London Plan annual target of 890 net additions, results 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 for site allocations which fall 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 delivering, there is no need to identify additional land for housing. The CS and DM DPDs include policies to ensure achievement of an appropriate housing mix, including affordable housing; the variety of site sizes will also help contribute to an appropriate mix of housing across the plan period. Where site context supports a particular type of provision, for example larger family units, this potential has been highlighted in the design principles.

The Council will undertake an update to the borough's Strategic Housing Market Assessment (SHMA) in the second half of 2013. This will include an examination of the needs of Gypsies and Travellers within the borough, the result of which will be reflected in the borough's Housing Strategy. DM DPD Policy 3B Special Residential Accommodation stipulates reference to the published evidence base, which includes the SHMA, when determining applications for Gypsy and Traveller accommodation.

2.4 Are the location and scale of the retail, employment, mixed use allocations clearly justified? Is 'mixed use' a clear enough term to guide development? Is there a reasonable prospect of the safeguarded land being used for that purpose within the life of the Plan?

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; refer to Appendix 1 of the Council's Response to Matter 5 for further information.

In combination with the definition of town centre uses included in Section 2, the term 'mixed use' is considered sufficiently clear to guide development where it is used in site allocations that fall within a town centre boundary. Outside of town centres or for those allocations where more detailed guidance is necessary due to the local context/objectives of the CS, the nature of mixed use development to be achieved is described.

Policy 1.2(b) of the CS identifies a provision of up to 90,000sqm office floorspace 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 freedom to change the use of buildings as this

would be detrimental to the function of the area. The ELR and evidence of renewal in the office quarter coupled within regional level support (refer to ED6 the Mayor's Draft Town Centres SPG and ED7 London Office Policy Review 2012) indicates that there is a reasonable prospect of the land being used for office purposes in this area.

Ealing's strategy for industrial land is also 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).

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.

A summary of the proposed consolidation and strategic release of industrial land taken forward by the DS is included in Appendix B of ED5. 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. Current occupation levels (refer to London Industrial Baseline 2010) and evidence of renewal on safeguarded sites indicate that there is a reasonable prospect of the safeguarded land being used for industrial purposes.

2.5 Are the allocations deliverable and viable, when considering expected sources of funding, an assessment of infrastructure requirements and the requirements of the development management policies? Are the sites deliverable where comprehensive development is expected and sites are occupied and /or in multiple ownership? Will the Plan be effective?

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 out 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. Guidance within the site allocations reflects the approach of the DM DPD.

Where sites are occupied and/or in multiple ownership, the site allocations serve to support delivery by identifying site-specific issues, opportunities and constraints and providing guidance as to how these should be addressed in future development proposals to ensure that all landowners are aware of the site potential and can therefore develop proposals which respond appropriately.

The Infrastructure Delivery Plan provides further detail on the infrastructure necessary to support development and, once Ealing CIL is adopted, the accompanying Regulation 123 list will set out the priority infrastructure projects in the borough to which CIL income will contribute and help deliver.

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. This approach will ensure that the Plan is effective in ensuring that site allocations contribute to achievement of sustainable development and CS objectives, providing an appropriate level of detail to help applicants make successful applications.

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 (EB28, 2010) and CIL (2012/13) indicates that a broad range of policy compliant uses/forms of development can be viable in Ealing.

2.6 Does the Plan deal adequately with uncertainty? What provisions have been made to ensure flexibility given the current economic climate? Is sufficient consideration given to monitoring and triggers for review?

The overall approach of the DS recognises and responds to the current economic climate, by avoiding overly prescriptive allocations and promoting flexible use of land where this would not compromise achievement of CS and London Plan objectives.

It is considered that appropriate arrangements are in place 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 Act 2011.

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.