

Further Statement

LBE/Matter 4 – Do the allocations in the Development Sites DPD represent the most appropriate strategy in the circumstances?

17 May 2013

EALING COUNCIL

4. MATTER 4 – DO THE ALLOCATIONS IN THE DEVELOPMENT SITES DPD REPRESENT THE MOST APPROPRIATE STRATEGY IN THE CIRCUMSTANCES?

4.1 Are the alternative proposals that have been put forward in representations appropriate and deliverable? Have they been subject to sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

A full list of the sites put forward during the public consultation on the Initial Proposals/Call for Sites (September 2010) and the Final Proposals (June 2012), as well as sites from other sources considered during the plan preparation process, is included as Appendix A. The Final Proposals (EDS1) set out the sites considered during the plan process and not carried forward, including the justification as to why sites were excluded based on the site selection criteria.

The consultation on the Final Proposals version of the Development Sites DPD was the third round of public consultation on the Development Sites DPD. The two previous rounds of consultation included the opportunity to put forward new sites for inclusion in the DPD. New sites put forward during the Final Proposals stage of the plan production process are unable to be included in the DPD as they will not have been the subject of public consultation. However for completeness they have been assessed against the site selection criteria.

The preparation of Ealing's CS was informed by the SA of that document, which forms the context for the DS. The SA of the DS therefore did not seek to revisit the appraisal of the CS and the spatial strategy/levels of growth set out therein, but instead focused on the performance of the site allocations against the sustainability objectives established in the Scoping Report.

The SA for the site allocations sought to identify any additional positive or negative impacts that could be attributed to the site allocations approach, beyond that attributed to the more general CS and DM policies. The SA of the DS was therefore based on a two-tier approach, which firstly considered the overall performance of the DS against Ealing's sustainability objectives and secondly appraised the performance of each site allocation included in the DS against the sustainability objectives.

Where a site has been identified as having a potential negative impact(s) in relation to a particular objective(s), this does not mean that overall the allocation of the site is unsustainable. The SA process enables the DS policies to be modified to avoid unwanted consequences/mitigate adverse impacts and maximise desired outcomes/beneficial effects. Earlier on in the SA process this entailed appraising alternative allocations for a site; more recent appraisals sought to refine the preferred/final allocation for that site.

In addition to informing how individual site allocations should be developed with regard to their environmental, social and economic impacts, the SA process has also helped to confirm that there is a positive sustainability impact overall from the decision to allocate sites and that the sites themselves represent sustainable options and will support Ealing's sustainability objectives.

In selecting sites for inclusion in the DS, a number of criteria were used as set out in Section 2 of the document; the approach taken to the land uses/design principles for each site was determined within the parameters of the London

Plan, Ealing CS and DM DPDs, which themselves have been subject to SA. The full assessment of the sites that have been included within the DS is included in the SA Full Technical Report.

As set out in Section 2 of the DS, the exclusion of a site from the DS does not imply that the site is unimportant. While a large proportion of the development in the borough occurs on smaller sites that when taken together make an important contribution to achieving the vision for Ealing, the borough-wide development policies are sufficient to guide planning decisions on these small sites individually.

In preparing the DS, Ealing has examined a number of proposed alternative development sites that have not been allocated, based on these sites not satisfying the criteria set out for inclusion in the DS and, where applicable, the absence of compelling evidence put forward in support of proposed allocations that would override the site selection criteria.

Because the site selection criteria were developed in conformance with higher tier policies which have been subject to SA and provided a robust and decisive framework for decision-making, it was not considered necessary that excluded sites be subject to a site-level SA assessment against the sustainability objectives to the same level of detail conducted for those sites that are included in the DS. An SA should only be undertaken of those sites which can realistically be delivered, are necessary and in conformity with higher level policies (through delivering the CS objectives).

The purpose of the SA is not to make decisions about which sites are included or excluded, but to take a systematic approach to the assessment of potential impacts and to consider how any negative impacts identified may be mitigated. The SA is a helpful tool in establishing whether the allocation of sites will foster sustainable development, consistent with the CS, and serves to ensure integration of the full range of environmental, social and economic considerations into the plan preparation process.

Overall and individually, the site allocations within the DS have been appraised as performing strongly against the broad spectrum of Ealing's SA Framework. Revision and refinement of the site allocations has been conducted in line with previous SA recommendations, external representations and development of the evidence base. There will be some uncertainties; however no significant negative effects were identified through the appraisal.

The Council therefore considers that the allocations in the DS DPD represent the most appropriate strategy in the circumstances, and that alternative proposals put forward in representations have been fully assessed against the site selection criteria, including being the subject of public consultation, and that the site allocations included in the DS have been appropriately informed by the SA process.

TABLE 1 Sites Not Carried Forward from Initial Proposals (September 2010) and Final Proposals (June 2012)

Reference	Name	Justification
ACT01	South Acton Estate	All required approvals/agreements achieved; under construction.
ACT04	Acton Town Hall Complex	Phase I underway; principle for Phase II conversion of Town Hall to residential established. Priory Community Centre identified as location for primary school.
ACT05	Acton Bus/Tram Depot	Under construction.
ACT11	West Acton Community Centre	The Development Sites DPD will not identify sites for new schools.
ACTX02	Redback Public House, 264-278 High Street	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
ACTX03	Crown Street/Mill Hill Terrace	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
ACTX04	Horn Lane/Steyne Road	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
ACTX05	High Street Buildings	Incremental improvements to individual buildings most appropriately brought forward through the planning application process.
ACTX06	St Aidan's Church, Old Oak Common Lane	Currently in active use as a church.
ACTX07	Acton Vale Industrial Park	Employment Land Review (September 2010) recommends retention of employment status (Locally Significant Industrial Site) of the site due to high level of demand, particularly from local businesses.
EAL01	Green Man Lane Estate	All required approvals/agreements achieved; currently onsite.
EAL04	Dickens Yard	Under construction.
EAL12	Former St Helena's Home	Planning permission P/2011/4513 granted April 2012. No clear link to delivery of Development Strategy objectives.
EAL13	Abacus House	Employment Land Review (September 2010) recommends retention of employment status of the site due to active existing uses and unsuitability for residential uses.

Reference	Name	Justification
EAL15	45a St Mary's Road/Warwick Place	Majority of site redeveloped for residential by P/2009/3436. Remainder has no clear link to delivery of Development Strategy objectives.
EAL16	Boundary House	No clear link to delivery of Development Strategy. Most appropriately brought forward through the planning application process.
EAL18	48 The Mall	Planning permission P/2009/0938 granted August 2010 for residential fronting Northcote Avenue. Remaining land to read at 45a The Mall small site with no clear link to delivery of Development Strategy objectives.
EAL21	22-24 Uxbridge Road	Under construction.
EAL24	171-175 Uxbridge Road	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
EAL25	64 Broadway	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
EAL33	King Farhad Academy	The Development Sites DPD will not identify sites for new schools.
EALX01	Land Adjoining Daniels	Indicative delivery timetable beyond the plan period (as determined by the London Strategic Housing Land Availability Assessment)
EALX03	Wickes/Co-op	Indicative delivery timetable beyond the plan period (as determined by the London Strategic Housing Land Availability Assessment)
EALX04	Queens Drive	Indicative delivery timetable beyond the plan period (as determined by the London Strategic Housing Land Availability Assessment)
EALX05	Former Hanger Lane Nurseries	Indicative delivery timetable beyond the plan period (as determined by the London Strategic Housing Land Availability Assessment)
EALX06	Impact Car Care Centre	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
GRE05	Greenford Depot	Development Strategy Policy 4.3 safeguards the future use of the site for waste, environmental and transport services and seeks to optimise the potential of the site for these uses.
GRE06	Cardinal Wiseman School	The Development Sites DPD will not identify sites for new schools.

Reference	Name	Justification
GRE07	Former GSK Sports Ground	The Development Sites DPD will not identify sites for new schools.
GRE08	Greenford High School	The Development Sites DPD will not identify sites for new schools.
GREX01	Telephone Exchange and Post Office	Telephone exchange is currently operational with no plans to decommission.
GREX02	19-25 Oldfield Lane South/Greenford Hall/Methodist Church/2-12 Ruislip Road	Currently in active use; Greenford Hall recently refurbished.
GREX03	458-462 Greenford Road	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
GREX04	19-31 The Broadway	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
HAN01	Cambridge Yard	Under construction.
HAN02	Hanwell Locks	Planning permission P/2010/2539 granted October 2010 for residential and office/light industrial use.
HAN03	79-101 Uxbridge Road	Planning permission P/2011/3777 (pending legal agreement) for residential to rear of site. Remaining land fronting Uxbridge Road small site most appropriately brought forward through the planning application process.
HANX02	Access Storage	Indicative delivery timetable beyond the plan period (as determined by the London Strategic Housing Land Availability Assessment)
HANX03	Tennyson Road	Designated as Community Open Space and Green Corridor.
HANX04	11 and 11a-c Boston Road	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
NOR01	Rectory Park Estate	All required approvals/agreements achieved.
NOR02	Former Mandeville School	The Development Sites DPD will not identify sites for new schools.
NOR03	West London Academy	The Development Sites DPD will not identify sites for new schools.

Reference	Name	Justification
NORX01	Telephone Exchange	Telephone exchange is currently operational with no plans to decommission.
NORX02	Rear of Tangmere Gardens, Ruislip Road	Indicative delivery timetable beyond the plan period (as determined by the London Strategic Housing Land Availability Assessment)
NORX03	Car Lot, Mandeville Road/Eastcote Lane North	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
PER001	Perivale Park Sports Village	The Development Sites DPD will not identify sites for new leisure facilities.
SOU02	Golf Links Housing Estate	Preferred development partner expected and full planning application to be submitted Summer 2012
SOU08	Former Featherstone Road Primary School	Under construction
SOU09	Salisbury Depot	Planning permission P/2011/0811 granted April 2012 for residential
SOU10	Adelaide Depot	Employment Land Review (September 2010) recommends retention of employment status of the site due to active existing uses.
SOU14	Carroll's Yard	No clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
SOU16	57B Beresford Road	No clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
SOU17	Glade Lane and Maypole Dock	Designated as Metropolitan Open Land; proposals for canal spur extension to Maypole Dock to be considered in Southall Opportunity Area Planning Framework
SOU18	Former Boatyard, Tentelow Lane	Planning permission P/2010/1894 granted on appeal establishing principal of residential use
SOU19	Dormers Wells High School	The Development Sites DPD will not identify sites for new schools.
SOUX01	TA Centre	Indicative delivery timetable beyond the plan period (as determined by the London Strategic Housing Land Availability Assessment)
SOUX02	Cranleigh Gardens Industrial Estate	Employment Land Review (September 2010) recommends removal of employment status of the site due to existing mix of uses on the site. Change of use of existing

Reference	Name	Justification
		employment use most appropriately brought forward through the planning application process.
SOUX03	Heller House	Indicative delivery timetable beyond the plan period (as determined by the London Strategic Housing Land Availability Assessment)
SOUX04	AXA House	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
SOUX05	The Fairground	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
SOUX06	Albert Dane Centre	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
SOUX07	Manor Court Nursing House	No clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
ACT6	Colonial Drive W4	Planning permission P/2012/0338 granted December 2012 for residential
OIS7	Allen Court Estate UB6	Planning permission P/2012/3391 granted December 2012 for residential and reconfiguration of the Ridding Lane Public Open Space

TABLE 2 New Sites Put Forward During Consultation Not Carried Forward

Name/Location	Justification
Twyford Abbey	The Green Space Strategy does not recommend the removal of the existing MOL and SINC designations, and these designations preclude the possibility of enabling development. Conversion of the Abbey to residential use is most appropriately dealt with through the planning application process.
Police Station, 190 Norwood Road UB2 4JT	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
Motor Repair Depot, Rodwell Road UB5 5QP	The principle of the proposed use is already established on the site
81,83,85 Madeley Road & 58,60,62 Hanger Lane W5 4LP	The principle of the proposed use is already established on the site
1-10 (inclusive) Green Man Gardens and 30-32 Green Man Lane	The principle of the proposed use is already established on the site
Aladdin Business Centre, 426 Long Drive	The land is designated as Strategic Industrial Land by the London Plan 2011, and the Park Royal OAPF (January 2011) does not identify this site as being acceptable for mixed-use development incorporating residential uses.
Europa Studios , Victoria Road; Acton Business Centre; Park Royal Business Centre, Park Royal Road; Westwood Business Centre, 98 Victoria Road; 28 - 30 Park Royal Road; 2 and 10 Cullen Way	The principle of the proposed use is already established on the site
Royal Mail's Ealing DO (Ealing Green, W5 5EH)	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
Royal Mail's West Ealing DO (Manor Road, W13 0HY)	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.

Name/Location	Justification
Royal Mail's Hanwall DO (21A Edinburgh Road, W7 3JZ)	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
Land between 38-40 Uxbridge Road, Hanwell	Designated as Metropolitan Open Land and the Green Space Strategy does not recommend removal of this designation.
2 Creswick Road, Acton, W3 9HD	The principle of the proposed use is already established on the site
Land at Twyford Sports Ground, Twyford Ave, Acton W3 9QA	Designated as Community Open Space and the Development Strategy retains this designation.
Tesco Store and town centre car park, Greenford UB6 8QY	Acceptability of the proposed allocation has been established through the planning application process
Clayponds Village, Sterling Place, Ealing, London W5 4RA	The principle of the proposed use is already established on the site
Norwood Yard	Acceptability of the proposed allocation has been established through the planning application process
Norwood Vauxhall Garage, Poplar Avenue	Small site with no clear link to delivery of Development Strategy objectives. Most appropriately brought forward through the planning application process.
Daniels Department Store	The principle of the proposed use is already established on the site
South East corner of junction of Mattock Lane with Culmington Road	The Development Sites DPD will not identify sites for new schools.
West World, Westgate, Hanger Lane, W5 1DT	Designated as Strategic Industrial Land (SIL), and the Park Royal OAPF (January 2011) does not identify this site as being acceptable for mixed-use development incorporating residential uses.
Hanwell Police Station	Put forward during the Final Proposals consultation therefore unable to be included in the DPD as they as not have been the subject of public consultation; small site with no clear link to delivery of Development Strategy objectives.
Development site to north of Western Avenue, bounded by	Put forward during the Final Proposals consultation therefore unable to be included in the DPD as they as not have been the subject of public consultation; designated as Metropolitan Open Land

Name/Location	Justification
the Central London Underground and Network Rail line to the south and Coronation Road to the north	and Green Corridor.
13-19 The Green, Southall	Put forward during the Final Proposals consultation therefore unable to be included in the DPD as they as not have been the subject of public consultation; small site with no clear link to delivery of Development Strategy objectives.
325 Oldfield Lane	Put forward during the Final Proposals consultation therefore unable to be included in the DPD as they as not have been the subject of public consultation; designated as Strategic Industrial Land (SIL)

TABLE 3 UDP Sites Not Carried Forward

Reference	Name	Justification
Acton		
1	Government Buildings, Bromyard Avenue	Developed
2	62 Horn Lane	Small site
3	75-77 Berrymead Gardens	Small site
4	St Aidans Church & Buildings, Old Oak Common Lane	Currently in active use as a church.
5	Chiswick Park	The Development Sites DPD will not identify standalone sites for transport improvements
6	South Acton Housing Estate	All required approvals/agreements achieved; under construction.
7	Churchfield Road/Hoopers Mews	Part developed, Car Park carried forward into Final Proposals
8	Crown Street/Mill Hill Terrace	Existing active uses and recent refurbishment
9	10-20 Horn Lane	Small site
10	264-278 High Street	Recent refurbishment
12	Acton Town Hall and Baths	Phase I underway; principle for Phase II conversion of Town Hall to residential established.
15	Crown Street and King Street	Market Square developed
Southall		
23	Adelaide Depot	Employment Land Review (September 2010) recommends retention of employment status of the site due to active existing uses. Development Management DPD provides

Reference	Name	Justification
		criteria based policies for the release of employment land.
24	Former AEC Site, Windmill	Part of the Great Western Industrial Estate Strategic Industrial Location (SIL). Acceptable uses established through London Plan Policy 2.17
25	Glade Lane	The designation of Special Opportunity Site was not carried forward in the Development Strategy
30	220 Uxbridge Road	Small site
31	1-63 (odd) High Street	Part developed
32	75 High Street, 4-8 North Road	Small site
37	35-43 (odd) The Green	Small site
39	1-5 King Street	Small site
40	Havelock Road (rear of St John's Church)	Developed
41	26 Regina Road	Small site
45	Norwood Road	Small site
46	Garage, Southall Broadway	Small site
96	Tentelow Lane	Developed
Ealing		
47	Land at Westgate, Hanger Lane	Part of the Park Royal Strategic Industrial Location (SIL). Acceptable uses established through London Plan Policy 2.17
19	Twyford Abbey	No clear link to delivery of Development Strategy objectives
48	Redwood Grove, off Northfields Avenue W5	Small site
50	Singapore Road Car Park	Park of Green Man Lane estate redevelopment under construction
52	Waitrose, Drayton Green	Developed

Reference	Name	Justification
	Road	
53	Gosai cinema, Northfields Avenue	Developed
55	Ealing Green Site	Extant planning permission largely implemented; no clear link to delivery of Development Strategy objectives
56	Former Marks and Spencer, The Broadway	Developed
58	Town Hall Annex and Car Parks	Developed
65/93	26-30 Uxbridge Road	Developer
94	Liverpool Victoria Sports Ground	The Development Sites DPD will not identify sites for open space/leisure
Hanwell		
67	Windmill Park Phase 2B	Developed
68	Cambridge Yard	Developed
69	Hanwell Community Centre	Small site
70	Waterside Trading Estate	Employment Land Review (September 2010) recommends retention of employment status of the site due to active existing uses; designated as a Locally Significant Industrial Site, with removal of implemented residential permission.
72	11a-11c Boston Road	Small site
73	1-5 Seasons Close	Small site
74	16 Boston Road	Small site
75	7a-11 Cherington Road, 33-35 York Avenue	Small site
77	3-21 Broadway Building, Boston Road	Existing active town centre uses

Reference	Name	Justification
78	79-101 Uxbridge Road and land to rear	Active planning permission granted for land to rear, remainder of land small site
95	St Margaret's Road, Hanwell	Designated as Community Open Space
Greenford/Northolt Perivale		
79	Lyons Tetley Site, Oldfield Lane North	Part of the Northolt-Greenford Strategic Industrial Location (SIL). Acceptable uses established through London Plan Policy 2.17
81	Ruislip Road Special Opportunity Site	Developed
82	CPC Site, Horsenden Lane South	Developed
83	Smiths Farm and Allendale, Kensington Road	The Development Sites DPD will not identify sites for open space/leisure
84	Viking Community Centre	The Development Sites DPD will not identify sites for open space/leisure
85	Town Centre Car Park	Active planning permission
87	19-25 Oldfield Lane South, Greenford Hall, Methodist Church, 2-12 Ruislip Road	Recent refurbishment
88	19-31 The Broadway	Small site
89	309 Ruislip Road	Developed
90	320 Ruislip Road East	Developed
91	458-462 Greenford Road	Small site