

**Matter 2 Representor 40**  
**Ealing Civic Society**

**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?**

2.1a The scale has been adapted during the long consultation period to exclude the smaller sites some of which make a contribution towards the housing targets.

2.1b The type of proposed allocations in the site briefs is too limited being confined to mixed use, town centre, residential, employment and retail. School use, POS and community facilities are scarcely mentioned in the DS DPD. London plan policy 7.1 on Building Neighbourhoods and Communities states boroughs should prepare plans to ensure infrastructure and services will be delivered to meet the need of existing and new development. A Site Brief is essential for all types of uses not just those large sites that maximize the housing targets.

2.1c The distribution in that it relates to two corridors does not conform with the London plan but it does to the Core Strategy. Communities are more important than transport corridors and the LP emphasizes this in policies 7.1 Building Londons neighbourhoods and communities. and 7.4 Local Character. The CS also quotes totals for Town Centres but if the undesignated employment sites all become housing sites they would make a significant contribution to the housing targets which would compensate for the slow take up of Town Centre Sites or the overoptimistic SHLAA estimates of site capacity.

2.1d The September 2010 Development Sites Initial proposals included more about the potential housing units and floorspace for other uses than could be accommodated on the sites. It gave rise to some strong objections from ECS because there was little reason for the figures given. Some sites such as Acton Central Station Yard had exaggerated totals (200 units on 0.6 hectares). The type of development is specified for a limited range of use but more imaginative uses should be considered and not just mixed use or sites for large housing and retail or employment The likely capacity for housing of DS DPD sites is recorded in SHAA but this is not part of the Core Strategy which only specifies totals for Town Centre and Corridors. This does give some flexibility .

**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?**

2.2a There is inadequate land for new schools. Two schools have recently been built on MOL. If MOL policy is to be maintained some of the sites identified for Mixed Uses should be allocated for school sites. It is unsound to expect increases in school places to be accommodated on existing school sites and open space which is protected by policy.

2.2b DS40(88, 110,104, 123,127-129) There is no land identified for rectifying the open space deficiency. This is needed at a number of sites including St Bernards hospital to support 600 new homes. Park Royal Southern Gateway is severely deficient in open space. The Council uses Table 7D2 to collect section 106 money to spend on existing open space but this is not a sound approach to relieving open space deficiency. Nearby parks for a range of open air facilities are needed for a healthy population. New parks are needed for the existing population Where there is green space in a deficient area, land should be identified in the Sites Schedule eg. Twyford Sports Ground W3 where the NE corner of the site is unused for pitches and could be used for POS.

2.2c DS40(46) Cultural Facilities are given little space. EAL 6 Cinema site is proposed for mixed use development appropriate to the town centre including a multi screen cinema, retail, commercial and residential potential for student accommodation. The Questors Theatre is a much loved amateur theatre, there is a picture gallery at Pitzhanger Manor and concerts are held in churches and the town hall. This metropolitan centre lacks leisure facilities which are otherwise confined to drinking, clubs, gambling and exercise gyms with a small arts centre in West Ealing. A cultural quarter should be encouraged either based on EAL6- the Cinema site, EAL 8- the police station north of the Questors as proposed by Tibbalds or in the town hall which has been renovated with Section 106 money from Dickens Yard.

**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?**

2.3a There is a limit as to how much intensification an outer London Borough can be redeveloped without changing the local character completely. In the long term more land is needed for schools and community use to support this population expansion. Appendix A p120 Nor 01 and Nor 02 have been removed on the grounds that the Development Sites Schedule does not identify sites for new schools. but it should do or all the sites available will have housing built on them.

**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?**

2.4a DS40(131,138,) Retail is identified on many town centre sites which would amount to an increase that needs to be related to the Core Strategy by the Council. ECS is concerned that on line shopping and competition from other centres such as Westfield in H& F, Croydon and Ealing Broadway will leave more empty shops in locations such as

Hanwell and West Ealing.

**2.4b DS40(71,92,95)Employment Land** The London Plan specifies Ealing as an area where there should be limited transfer of industrial land to other uses. Park Royal (part) Northolt Greenford and Perivale (Part) are defined as Preferred Industrial locations in Policy 2.17 where LDF should protect their functions to enhance their attractiveness and competitiveness for industrial type activities. The Core Strategy takes this up and policy 3.2 retains and attracts new businesses along the A40 corridor by maintaining a sufficient supply of industrial land. Policy 3.3 retains business and industry throughout the Park Royal Industrial Estate encouraging sustainable economic development. The Industrial land survey dates from Sept 2010 and it is difficult to estimate in 2013 how much industrial land is needed. The GLA DS59(2) accepts a 19 ha release of industrial land but we share their caution at the level of release that may occur from individual applications. We think to justify this 19 ha release the minimum period of 2 years for active marketing should be extended to 5 years. Policies for managed change are needed that do not leave residential uses impinging on the viability of industrial type uses.

**2.4c Mixed use - DM18 (18)** is defined in the London Plan as Development for a variety of activities on single sites or across wider areas such as town centres This is very general and tends to be interpreted by developers as residential with some work related use.

Allowing mixed uses ensures a change of use to housing or perhaps retail if there is plenty of parking space. Developers argue that there is no demand for live work units. Sites then become housing areas because they are more valuable as urban density housing than for other uses. See Appendix 1 planning application PP/2013/ 0568 pending for Manor Works

2.4 d Mixed uses are expanded in section 7 of the LP Housing SPG P154 which describes it as a Key theme of the London Plan. But in areas of outer London like Ealing, amenity for users of particular types of land uses has depended on zoning and segregation in the past and to introduce mixed uses into a zone where there is a conflict of amenity can harm either the existing or proposed uses. This is less likely to occur in town centres where the term town centre uses seems more appropriate and more likely to occur in relation to employment sites where problems arise from noise, pollution, security lighting, HGVs, cycles and pedestrian movement.

**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?**

DS40 (131, 138) The allocations in West Ealing do not seem viable because they depend on redevelopment for retail on the ground floor. Renovation is sustainable and improving parking and rear unloading facilities can be promoted through the Development Sites DPD.

**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 policies are being made increasingly flexible. Some planning consents such the St Bernards Hospital site emphasise housing to the detriment of other uses envisaged by DS DPD.

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