

London Borough of Ealing

Development Sites DPD
Final Proposals Consultation

Response to the Inspector's Questions

Prepared on behalf of Workspace

May 2013

**BARTON
WILLMORE**
Planning · Design · Delivery

London Borough of Ealing

Development Sites DPD
Final Proposals Consultation

Response to the Inspector's Questions

Prepared on behalf of Workspace

Ref Numbers 165, 166, 167 and 168
Rep Number DC21

Project Ref:	11132/A5/Response to Inspector's Matters
Status:	Final
Issue/Rev:	01
Date:	17 May 2013
Prepared by:	Ed Hanson
Checked by:	Iain Painting

Barton Willmore LLP
7 Soho Square
London
W1D 3QB

Tel: 020 7446 6888
Fax: 020 7446 6889
Email: Edward.Hanson@bartonwillmore.co.uk

Ref: 22232/A5/EH
Date: 17 May 2013

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

CONTENTS

PAGE

1.0 RESPONSE TO THE INSPECTOR'S MATTERS AND ISSUES

1

APPENDIX 1 : REDLINE BOUNDARY PLAN

1.0 RESPONSE TO INSPECTOR'S MATTERS AND ISSUES

1.1 These representations are submitted on behalf of Workspace. Workspace owns over 100 properties in London providing 5.4 million square feet of space that is home to some 4,000 businesses employing over 30,000 people. Workspace provides business premises tailored to the needs of new and growing companies across London. The previous representation submitted in August 2012 explains more about Workspace operations, including their land holdings at The Arches Business Centre, Southall.

Planning Application

1.2 Workspace is currently preparing a planning application for 'The Arches' element of the wider Middlesex Business Park site considered under policy SOU6 of the Development Sites consultation document. **Appendix 1** contains a redline boundary plan of the Workspace site. Workspace is currently scoping the planning application content with the Council and has sought and received detailed pre-application advice. A request for a screening opinion will be submitted in due course.

1.3 Paragraph 14 of the National Planning Policy Framework states that there is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking. For **plan-making** this means that:

- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.

For **decision-taking** this means:

- Approving development proposals that accord with the development plan without delay; and
- Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.

1.4 In bringing forward a detailed application now, Workspace must ensure that the relevant development site policies are not overly prescriptive and allow for flexibility. With regard to paragraph 14 of the NPPF, the proposed development is considered to be 'sustainable' and is in accordance with the emerging policy setting.

Response

1.5 This statement has been prepared with regard to the Council's suggested minor amendments contained in their Development Sites Minor Track Change DPD (EDS2) dated February 2013. This statement also addresses the specific matters and questions outlined in the Draft Schedule of Matters and Issues dated April 2013.

MATTER 3 – SITE SPECIFIC ISSUES FOR DEVELOPMENT SITES DPD

Area 5 – Southall

3.11 Overarching issues for Southall are whether the development sites will revitalise Southall Town Centre and whether sufficient land been identified for additional community buildings to meet local need, as envisaged by the CS. Should there be a greater provision of open space?

3.12 *Additional site specific matters include:*

- *SOU6 – Are the allocated uses justified/too restrictive/viable? Are the design principles clear, justified and flexible enough to be effective? What is the status of the Southall Opportunity Area Planning Framework? How has it/will it influence the design principles?*

1.6 The following section breaks down the Inspector's questions in the order they appear.

Are the allocated uses justified/too restrictive/viable?

1.7 Workspace support the provision of enhanced employment land that better meets the needs of the market. However, the approach of the allocation (which provides both jobs and replacement floorspace as a measure of employment provision) confuses quantum of provision with quality. The measure should be job creation and opportunity rather than floorspace and should be informed by a review of the existing offer, why it is failing, the needs of the market and how best they can be achieved on site. In this respect the reference to employment being flexible B1 should also be removed as it is too restrictive. The objective must be to ensure that commercial floorspace meets the needs of the market both now and in the future. The viability of development must also be considered. Poor quality will be reflected by falling rents, with a resultant yield that is not sufficient to support redevelopment. The costs of redevelopment based on market value alone may also be prohibitive and the Council should actively encourage the use of other revenue generating uses to support renewal.

1.8 Workspace raised this issue within our submission representations and we note minor amendments to the policy wording have been made. In this instance the Council has deleted the following from page 91 of EDS2.

Proposals will also be required to demonstrate significant job generation across the site as a whole, measured against the existing level of jobs currently provided across the site.

- 1.9 Removing the above text does not address the issue and we note that allocations will still be based on a floorspace approach. This results in a policy that is inconsistent with the emerging Development Management DPD. The allocation does, however, provide for a mix of commercial to the ground floor with residential above which is supported.
- 1.10 With respect to the provision of residential on the wider site, it is considered that the wording of the allocation in relation to the proposed form of residential is too prescriptive. For example, it is appropriate for the allocation to identify the importance of achieving a high quality residential environment, however to state that all units should be dual aspect is overly prescriptive. This is a matter, together with whether the scheme provides balconies and/or communal space, to be tested at application stage having regard to the residential quality of the scheme as a whole, the constraints of the site and the wider area and the application of standards at that point in time.

Are the design principles clear, justified and flexible enough to be effective?

- 1.11 In general Workspace agrees with the design principles and considers that they are in part justified and flexible. However, we consider that the proposed policy wording is too prescriptive. We are also concerned that the need for some elements are not justified or have not been demonstrated. For example, specific concern is raised with the element of the allocation which identifies that the Metropolitan Police have indicated a requirement to retain a community policing facility in this broad location which must be accommodated on this section of the site. No evidence of need and the appropriate location needs has been demonstrated.

What is the status of the Southall Opportunity Area Planning Framework?

- 1.12 The London Plan 2011 identifies Southall as an Opportunity Area with a minimum growth capacity of 4,000 homes and an employment capacity of 2,000 (Policy 2.13 and Table A.1.1). The Development Strategy DPD 2012 identifies the intention to release Middlesex Business Centre and environs from the Strategic Industrial Land designation as part of the regeneration of the wider area following a strategic and local review of industrial land capacity.

- 1.13 The OAPF has yet to be published and the draft allocation in advance thereof as opposed to informing the DPD.
- 1.14 The proposed allocation provides the opportunity to support strong, vibrant and healthy communities by identifying residential as part of the intended mixed use development. This will contribute to providing a supply of housing to meet the needs of present and future generations and the housing growth envisaged by the Opportunity Area designation and the housing targets within the Development Strategy DPD 2012.

How has it/will it influence the design principles?

- 1.15 The emerging allocation from 2012 stated the following:

“Due to the size of the site and poorly defined local context, incremental or piecemeal development based on landownerships will not be acceptable. While change on this site may be achieved through comprehensive or phased development, any proposals brought forward must be based on a masterplan for the site as a whole that addresses the urban design objectives and realises the full potential of the site”.

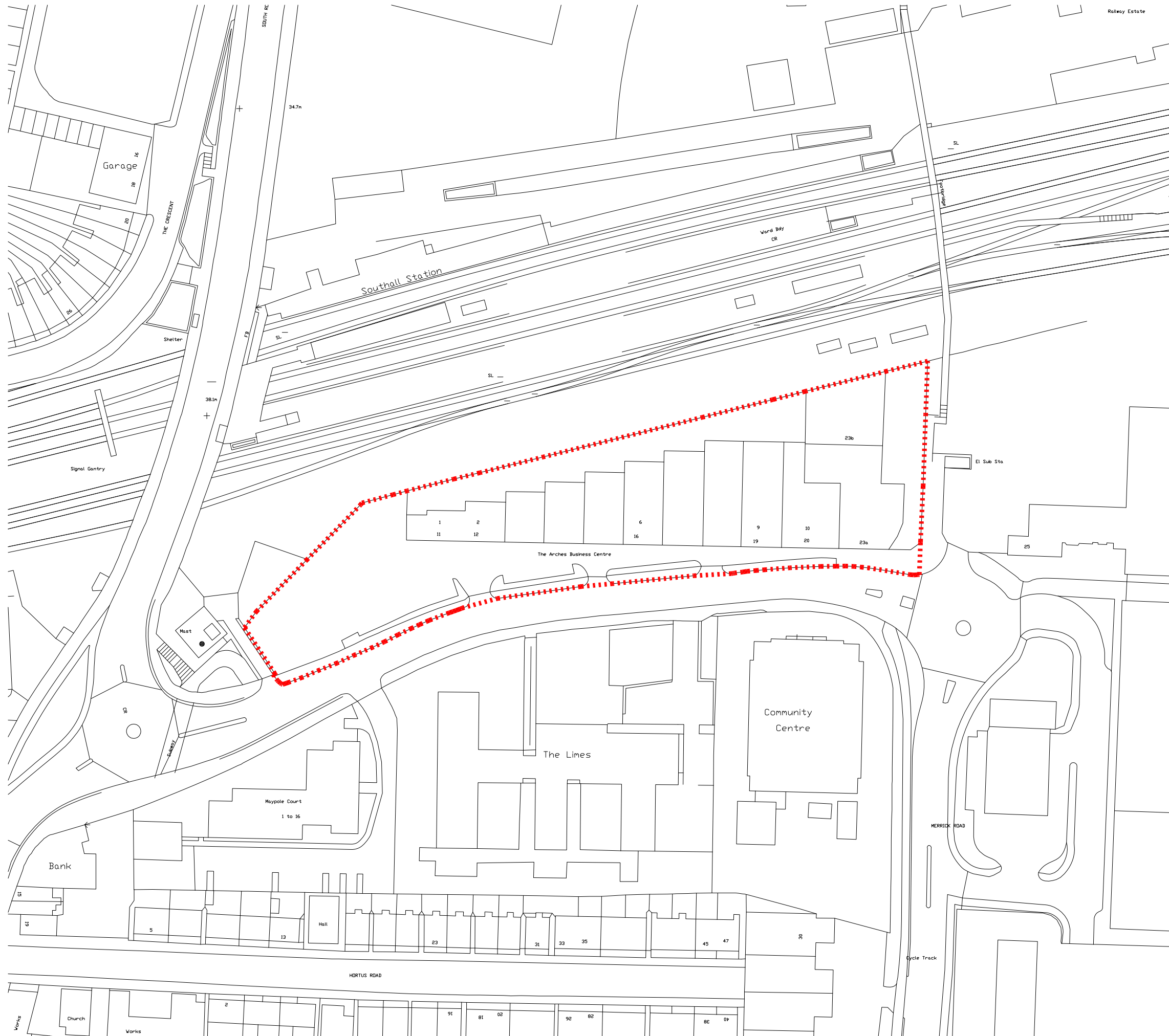
- 1.16 Workspace note that the revised text in EDS2 states the following:

“Due to the size of the site and poorly defined local context, piecemeal development based on land ownerships will not be acceptable. While change on this site may be achieved through comprehensive or incremental development, any proposals brought forward must satisfy the urban design objectives as set out within the OAPF development brief and support realisation of the full potential of the site.”

- 1.17 Workspace are committed to bringing forward their respective land holdings to provide improved employment offer and contribute to the regeneration of the wider area. Previously it was considered that a masterplan requirement for the whole site could in fact cause delivery issues should some areas/sites not wish to be involved.

1.18 Whilst the need to ensure a comprehensive approach is recognised. There is no need for a single master plan if the policy provides sufficient guidance and clarity, whilst avoiding overt prescription. It is for individual applicants to demonstrate, through the DAS for example, how proposals will contribute to the wider strategic objectives. Key design principles can be set out in the policy or through the OAPF or other SPD. However, renewal should not be delayed pending preparation or adoption of such documents.

**APPENDIX 1
REDLINE BOUNDARY PLAN**



The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
-	-	-	-

Project
**Middlesex Business Park
 Southall**
 Drawing Title
**Red Line Boundary
 The Arches**

Date 16.05.13	Scale 1:1000@A3	Drawn by AB	Check by PJ
Project No 19924	Drawing No PL-001c	Revision -	



Planning • Master Planning & Urban Design
 Architecture • Landscape Planning & Design • Project Services
 Environmental & Sustainability Assessment • Graphic Design

bartonwillmore.co.uk



Offices at Reading London Bristol Cambridge Cardiff Ebbsfleet Edinburgh Leeds Manchester Solihull