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17 May 2013

Representation Numbers: DS25, DM12, PM14
10/0384
BY POST & EMAIL

Dear Caroline,

**LONDON BOROUGH OF EALING DEVELOPMENT SITES AND DEVELOPMENT MANAGEMENT
DEVELOPMENT PLAN DOCUMENTS EXAMINATION IN PUBLIC: STATEMENT**

a. Background to Representations

We are writing in response to the request for additional statements from the Programme Officer in respect of the London Borough of Ealing Local Development Framework (LDF) Development Sites and Development Management DPDs Examination in Public (EiP).

We make these representations on behalf of Stolkin Greenford Ltd (SGL), owners of the former GSK site, Greenford, which forms part of the proposed Development Site allocation OIS7. We have notified the Programme Officer of our intention to attend the EiP hearing sessions on behalf of SGL.

b. Development Sites Representations

As set out in the Guidance Note, these representations address only the issues identified for the relevant hearing session for Matter 3 – specific issues for Development Sites DPD. Specifically, the representations are made in relation to Area 6 (Other Important Sites).

SGL are broadly supportive of the Development Sites DPD Allocation OIS7. It conforms with the adopted Ealing Core Strategy which in policies 3.6 and 4.2 state that this area will be promoted for high-density development. It stated that any scheme should provide for a mixed-use development including offices, housing, leisure, and community uses.

Since gaining ownership of the site in June 2011, SGL has sought to rationalise the site, focussing employment uses north of Berkeley Avenue where the buildings are more modern and more suited to this use, and progressing the area to the south of Berkeley Avenue for mixed use redevelopment.

North of Berkeley Avenue, planning permission was granted in June 2012 for the change of use of Horsenden House from B1 office use to D2 educational use, and is now in use by GSM London. The planning application was submitted to LBE in April 2012, and was determined within three months,

including referral to the Greater London Authority (GLA). This demonstrates the willingness of all parties to deliver the vision set out in the adopted Core Strategy and the emerging Development Sites DPD.

Glaxo Wellcome House continues to be marketed for B1 office use, in line with the submitted Development Sites DPD allocation.

South of Berkeley Avenue, SGL has been progressing with the production of a planning application for mixed use redevelopment. In doing so, it has carried out a comprehensive process of engagement with the local community, key local stakeholders and officers at the London Borough of Ealing (LBE). This included two public exhibitions on 6 and 7 February to discuss the development proposals, the feedback from which has fed into the ongoing design process.

SGL have carried out a formal pre-application process with LBE, and have also submitted a pre-application proposal to the GLA. A hybrid (part outline/ part full) planning application is currently being prepared for submission to LBE in summer/ autumn 2013. The planning application will comprise the development of a leisure hub facility with cinema (D2), retail (A1), and restaurant (A3) uses, and approximately 600 dwellings comprising a mix of houses and apartments.

It is considered that the two elements of the SGL strategy for the former GSK site together delivers the vision for the site which comprises 'revitalisation of the employment role of the site to provide high quality office/managed workspace and education facilities, supported by the introduction of residential, community and leisure uses.'

SGL would like to take this opportunity to confirm that the former GSK site (north of the Grand Union Canal) does not comprise Strategic Industrial Land. This is confirmed by the GLA response to the Ealing Development Sites DPD consultation (dated 4 September 2012).

SGL consider that some clarification may be required in the allocation, in reflection of the content of the submitted Development Management DPD. Policy 4A, on the change of use from employment uses applies to 'non-designated sites'. As such, SGL would request that it is clarified within the text of the OIS7 allocation (in the Development Sites DPD) that this policy does not apply to the site.

SGL also note that Policy 3.4 states that within Greenford, the appropriate density range will normally be urban. However, the OIS7 allocation states that the setting is suburban north of Rockware Avenue. This policy appears to be disjointed to the OIS7 allocation, as it would be logical for the former GSK site (the largest development site in Greenford) to reflect the densities as set out in Policy 3.4, which would also make the most efficient use of land and achieve the delivery of more homes in LBE. SGL supports that the local context and morphology will form the primary determinant of acceptability. However it is considered that the efficient use of land at the former GSK site may be constrained by the allocation wording at present. As such, it is considered that the text within the OIS7 allocation is amended to reflect an urban density across the whole site.

c. Development Management DPD Representations

In relation to Matter 5, the Development Management DPD, SGL support Policy 3A (affordable housing). It is considered key to the delivery of the new homes and vision for the Borough that LBE have the flexibility to review the proposed level of affordable housing. Particularly with the introduction of the mayoral Community Infrastructure Levy (CIL) and the emerging LBE CIL, applicants will find it increasingly difficult to provide the affordable housing required whilst ensuring the delivery of development in line with the development plan. As such, SGL supports the position taken by LBE on affordable housing.

We trust that this statement has been helpful in the Examination in Public process.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'DC' followed by a stylized flourish.

David Churchill
DIRECTOR

cc. Steve Barton, London Borough of Ealing Planning Policy Manager