

## **Council Response to Inspectors' Questions 2: OIS8 (now referred to as OIS7) Greenford Green**

### **1. Can you confirm the status of the UDP policies which relate to the OIS7?**

The component areas of OIS7 have been subject to several historical designations in the UDP, including Major Employment Location, Special Opportunity Site and Development Site.

With the adoption of the Development Strategy DPD, UDP Policy 6.1 Supply of Land & Property for Business Use expired, replaced by London Plan Policy 4.4 and Development Strategy Policy 1.2(b). As set out in Policy 1.2(b), management of SIL/LSIS (known as Major Employment Locations in the UDP) will involve the limited transfer of 14ha over the plan period, to be coordinated through the Development Sites DPD and any relevant OAPFs.

The boundaries of existing Major Employment Locations, and which of these are also identified as Strategic Employment Areas by the GLA (now known as SIL in the London Plan 2011), are set out in Schedule 10.14/Map Sheet 1 of the UDP. The portion of OIS7 to the north of the canal and the Hovis Bakery is identified as MEL/SIL (refer to map extract in Appendix 1).

UDP Policy 2.2 Regeneration of Special Opportunity Sites also expired with the adoption of the Development Strategy DPD, with guidance for those sites which have not been built out contained within Schedule 10.21/Map Sheet 15 of the UDP, and the related site-specific SPGs.

The Butler's Wharf Site portion of OIS7 (refer to map extract in Appendix 1) is identified as Development Site 80 in Schedule 10.21, with the preferred use identified as employment. The related Site 80 SPG sets out the preferred uses as general /light industrial uses and warehousing, with complementary amenities for employees, while identifying potential for some high density mixed uses in the south of the site.

### **2. Can you explain how the Development Strategy (DS) deals with the development site as a whole including any distinctions for the land referred to by SEGRO and how the DS Inspectors' report dealt with the site? Did the GLA make representations about this land at the DS stage?**

The Development Strategy DPD deals with OIS7 at Policy 3.6 and Policy 4.2; as set out in the supporting text delivery of proposals for the area will be facilitated by the Development Sites DPD and a separate SPD. Policy 4.2 refers to the promotion of regeneration proposals on key sites, including Butlers Wharf, for 'appropriate mixed use development', and that 'the retention of employment on this site will be strongly encouraged'.

The submission version of the Development Strategy DPD proposed a minor change to the text of Policy 4.2 which deleted reference to the extension of the 'special opportunity site' designation to the entirety of OIS7. The Inspector's Report on the Development Strategy DPD does not make specific reference to OIS7 or its component sites, or to Policies 3.6 and 4.2.

Following submission, the Council proposed deletion of the policy relating to special opportunity sites included in the Development Strategy DPD. As set out in examination document ED84 – LPA5 Special Opportunity Sites of the Development Strategy DPD EiP, the Council considered that specific development sites carried over from the UDP were best dealt with through the Development Sites DPD. The deletion of reference to 'special opportunity sites' was considered sound as set out in paragraph 19 of the Inspector's report on the Development Strategy DPD.

Similarly, as set out in examination document ED81 – LPA2 Vision and Objectives of the Development Strategy DPD EiP, the Council considered that the limited transfer of industrial land was best dealt with through the Development Sites DPD and relevant OAPFs. This approach to managing employment sites was considered sound as set out in paragraphs 42-48 of the Inspector's report on the Development Strategy DPD.

The GLA did not make representations about this particular site at the Development Strategy stage. In regards to Policy 1.2(b) they supported the managed release of certain employment sites in principle, however highlighted to need to engage in further discussion regarding where the areas of release would be located and advised that these areas be clearly identified on the proposals map (Representation 657 of EAL12b Submission Document to the Development Strategy EiP). The Council responded that the locations of release would be delivered through the Development Sites DPD.

### **3. Can you show me where the boundary of SIL is defined and who defined it? Is development site OIS7 changing/creating a defined SIL boundary?**

The locations of SIL are shown symbolically on the Development Strategy DPD Key Diagram and in Map 2.7 of the London Plan 2011. As set out in paragraph 2.83 of the London Plan, the boundaries of SILs should be defined in LDFs. Where changes have occurred to the boundaries of the borough's LSIS/SIL as a result of the managed release of employment sites through the Development Sites DPD, these changes are reflected on the Policies Map.

Although the West London Sub-Regional Development Framework (GLA 2006) does identify indicative boundaries of the Strategic Employment Locations (now SIL) within Ealing at Map 3 of Annex 2, the UDP does not

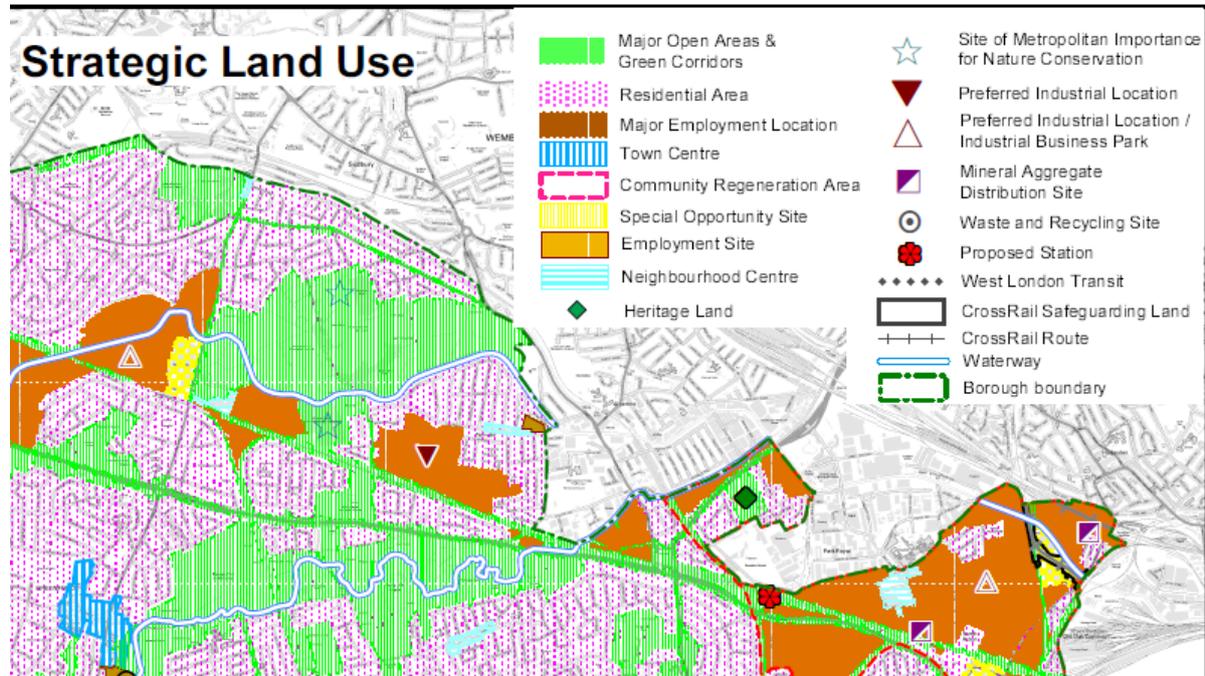
differentiate between those Major Employment Locations that are of regional importance other than symbolically.

OIS7 is therefore formalising an indicative SIL boundary, and reflects Ealing's identification in the London Plan as a 'limited transfer' borough and the corresponding benchmark for release of industrial land. As set out in paragraph 3.27 of the Mayor's Land for Industry and Transport SPG, when identifying a new portfolio of sites to retain in industrial use or the release of surplus sites to other uses, it must be borne in mind that the release benchmarks apply to all sites, whether designated in DPDs or not.

In responding to the Final Proposals (June 2012), the GLA considered that, in failing to apply a SIL designation the portion of OIS7 south of the canal, Ealing was not in conformity with London Plan guidance on reconfiguration of a strategically important area of industrial and warehousing capacity.

## Appendix 1 UDP Site Boundaries

Schedule 10.14 Northolt-Greenford Major Employment Location (and Preferred Industrial Location)



Schedule 10.21 Site 80 Butlers Wharf Site, Rockware Avenue

