

Rep: DS-MM1 (1)	Name: John McManus
On behalf of: Tramore Properties Limited	Main Mod ref: MM15
<p>Representation: High Speed 2 is now being routed underground and "the safeguarding requirements arising from High Speed 2" referred to in MM15 might therefore be omitted. There is altogether insufficient consideration and reference to the accommodation of the bus interchange and terminal in Rockware Avenue and the major use by H.GV.s accessing the SIL and industrial areas to the north and west of Rockware Avenue. All of the traffic to and from the A40 currently bootlenecks through Rockware Avenue. This requires total replanning. " The active frontages at ground floor level and legible attractive and well overlooked pedestrian routes to Westway Cross and Greenford Station" is a very laudable aspiration but it will be impossible to achieve with the bus terminus stops and shelters on the already narrow and congested footway fronting our land. We strongly recommend the provision of a Bus Plaza on the north side of Rockware Avenue and a rearranged road layout to improve the safety and appearance of the steetscape. Generous and safe pedestrian zones must be provided separated as far as practical from Heavy Goods and Bus movements. We therefore submit that additional sentences be added to MM16 on Page 112. <i>" A new Bus Plaza is to be included and Rockware Avenue replanned to better accommodate H G V traffic and the free and safe movement of pedestrians from Greenford Station to Westway Cross in an open and attractive environment with high quality landscaping and rest areas"</i></p>	
<p>Council Response: At the time of the EiP, the safeguarding direction has not been issued for this part of the borough therefore the Council considers that it is prudent to indicate that the HS2 route, whether surface level or underground, is a constraint on this site. The remainder of the representation does not relate to the main modifications as published, however the relocation of bus stops/shelters in order to achieve an improved public relam to Rockware avenue is a detailed design matter most appropriately dealt with through the planning application process and the related negotiations with TfL/London Buses.</p>	
Rep: DS-MM2 (1)	Name: Paul Robinson
On behalf of: Highways Agency	Main Mod ref: All
Representation:	

The Highways Agency have no comments
Council Response: Noted.

Rep: DS-MM3 (1)	Name: Claire McLean
On behalf of: Canal & River Trust	Main Mod ref:
Representation: The Canal & River Trust have no comments	
Council Response: Noted.	

Rep: DS-MM4 (1)	Name: Graham Saunders
On behalf of: English Heritage	Main Mod ref:
Representation: After considering the details provided we have no further comments to make, other than those already expressed through our Statement of Common Ground and previous correspondence on the development of the Development Sites and Development Management Development Plan Documents.	
Council Response: Noted.	

Rep: DS-MM5 (1)	Name: Claire Graham GL Hearn
On behalf of: Hovedean Properties	Main Mod ref: MM9
Representation: Hovedean Properties support the Council's aspirations for promoting high quality public spaces. However, it is concerned about the proposed modification to Policy SOU6 (ref: MM9) which relates to Southall East. The proposed modification suggests that the site should provide public open space in the form of a "small local park". A planning application is currently being prepared for the redevelopment of the site, which will include a significant contribution towards public space provision, through high quality public realm proposals, designed to take account of the overall scheme and wider proposals. Whilst public realm provision will play an important role for the whole scheme, there are a number of competing objectives to be delivered as part of the site, namely providing the optimum number of residential units to serve the needs of the borough. Therefore, it is considered that it is not appropriate for the policy to be too prescriptive at this stage about the specific form or function of certain elements to be provided on site.	

It is considered that the proposed modification of the text for the site to provide a public open space that functions as a “small local park” would place inappropriate restrictions on the future redevelopment of the site, and potentially result in any future scheme becoming unviable.

Beside public realm provision, a number of other community benefits are being considered to be provided on the site as part of the planning application. Taking this into account, it is important that the future viability of the site is protected and unrealistic expectations or requirements do not prevent the site coming forward.

As such, Hovedean Properties object to this proposed amendment to the policy.

Council Response:

The main modification serves to clarify the scale of public open space provision required on site, and how the requirements of Development Management Policy 7D Open Space will be applied in the site specific circumstances. As set out in the borough's Green Space Strategy and London Plan Table 7.2, small local parks/open spaces can range in size from 0.4ha to 2ha and provide a combination of gardens, sitting out area, children's play spaces or other areas of a specialist nature; homes should be less than 400m from this type of open space. SOU6 is a strategic site, capable of providing c. 900 homes (as set out in the borough's most recent Housing Trajectory, which in determining potential site capacity has taken into account the need for on-site POS provision of the scale required) therefore the Council considers it reasonable to require new POS provision on-site as this is required to make residential development acceptable in planning terms, and to further specify the nature of this POS provision based on site specific circumstances including site size, proximity to existing areas of POS and overall levels of open space deficiency in the wider area. There is sufficient flexibility inherent in the size range of what would be deemed to be a small local park to ensure the optimum number of residential units is achieved with a viable scheme. On a site of this size, provision of on-site POS is considered a normal site-specific development cost and no evidence has been submitted by the respondent to indicate that overall this requirement would make residential development unviable. Moreover, as set out in ED10 detailed viability testing of all sites within the plan preparation process is neither possible nor desirable and it is not considered that by providing further detail on the nature and scale of POS provision required the main modification places the delivery of the DPD as a whole at risk.

Rep: DS-MM6 (1)	Name: Simon Vince Heathrow Airport Limited
On behalf of: Heathrow Airport Limited	Main Mod ref:
Representation: Aerodrome Safeguarding Aerodromes important to the national air transport system are officially safeguarded by the Civil Aviation Authority and the process of ensuring that their operation and development is not inhibited is an integral part of the town planning system. A	

safeguarding map is derived from a series of protected three-dimensional surfaces above and around the aerodrome. The extent of the zone around Heathrow Airport shown on the official safeguarding map published to each council. Within this area the Planning Authority must consult the Airport Operator on development where the height of any building, structure, erection or works would affect the operation of the airport or the safe movement of aircraft i.e. potentially penetrate the protected surface. The aerodrome uses a variety of navigational aids, radio aids and telecommunications systems to facilitate air traffic control and aircraft movements. A new building, structure or extension because of its size, shape, location or construction materials can affect this equipment so the aerodrome must also be consulted to enable an assessment to be made of the potential impact on navigational aids. In addition, at night and in low visibility conditions pilots rely on approach and runway lights to align their plane with the runway and touch down at the correct point. Lighting elements of a development also have the potential to distract or confuse pilots, particularly in the immediate vicinity of the aerodrome and the aircraft approach paths. Safeguarding assessments therefore also consider the impact of lighting proposals for developments.

Bird strikes can cause damage and sometimes catastrophic accidents to aircraft. Over 80% of bird strikes occur on or close to aerodromes as birds cross the airfield and its approaches as they move between sites. Aircraft are particularly vulnerable to collisions with large or flocking birds such as swans and flocks of geese, starlings, pigeons and gulls. Birds can be attracted to the vicinity of an aerodrome or to cross flight paths by the types and location of development, the design of buildings, landscaping and the creation of open standing water. The objective of the safeguarding process is to prevent any increase, and where possible reduce risk to the lowest practicable level, by designing out bird hazards, controlling development and ensuring proper maintenance and management. The developments likely to cause most concern are: facilities for the handling, compaction, and treatment of putrescible waste; the creation of areas of standing water in quarries, sewage works, nature reserves, lakes, ponds, wetlands and sustainable urban drainage systems. The types, form and height of planting in landscaping schemes may also create a bird hazard e.g. a starling roost. Whether or not a development is likely to attract birds will depend not only on the nature of the development itself but also its location in relation to other land uses. Buildings may be attractive to birds depending on the design and use of the building and the availability of food nearby. Pigeons and Starlings are the most common birds to be found roosting in and around buildings whilst gulls may rest on flat and shallow roofs. Wherever possible, the design of buildings in close proximity to an aerodrome should incorporate all possible measures to minimise their attractiveness to birds.

In order to protect aerodromes and aircraft in flight against the hazards of bird strike, safeguarding maps also draw a circle with a 13 kilometres radius from the aerodrome reference point within which the Planning Authority must consult the Aerodrome Operator on any development likely to attract birds. The extent of this zone around Heathrow Airport shown on the official safeguarding map published to each council. [alternatively the Proposal Map may show the safeguarded aerodrome reference point from which this distance should be measured if the airport is within the authority's area].

Government advise that applicants should initiate discussions with the Planning Authority and the Airport Operator at an early stage before submitting an application to ensure that they understand the constraints and provide the information which will be needed for a detailed assessment to be made of the proposal e.g. a construction methodology, navigational impact assessment, bird hazard risk assessment and bird hazard management plan. If the Planning Authority propose to grant permission or impose conditions contrary to the safeguarding advice of the Airport Operator, they must notify the Civil Aviation Authority and demonstrate they have assessed the application in the light of Government guidance* and provide a statement of reasons. Ultimately, the application could be referred to the Secretary of State who has the power to issue a Direction.

Safeguarding issues should only prevent development taking place were absolutely necessary to maintain the safe operation of the airport and the movement of aircraft. The safeguarding process rather seeks to mitigate the adverse impacts of development through; alternative design, appropriate landscaping and planting schemes, by conditions restricting how a development operates and may be extended. Legal agreements will be used to deal with aspects of a development, such as implementation of a Bird Hazard Management Plan, which cannot be satisfactorily covered by planning conditions.

Council Response:

Noted.

Rep: DS-MM6 (2)	Name: Simon Vince Heathrow Airport Limited
On behalf of: Heathrow Airport Limited	Main Mod ref:
<p>Representation: Within the Safeguarding Zone(s) around [Heathrow Airport shown on the official safeguarding map published to each council, developments will be permitted which demonstrate that:</p> <p>a) the height of construction equipment, the height of the completed development and associated landscaping will not penetrate the protected surface of the safeguarding zone; development may have to follow an agreed construction methodology, restrictions may be imposed on future extensions and the height of landscaping to maintain the integrity of the protected surface</p> <p>b) the position and height of construction equipment, buildings, telecommunications equipment, landscaping and external lighting arrangements will not interfere with the visual and electronic navigational aids of the airport; restrictions may be imposed to enable further assessment of any proposed changes</p> <p>c) the design and construction of buildings, mining, engineering and other operations (including landscaping, water</p>	

features and sustainable urban drainage schemes) and material changes of use of land will not increase the bird hazard risk to the safe operation of the airport or the movement of aircraft; the implementation of a bird hazard management plan will be made the subject of a legal agreement.

Council Response:

Noted.

Rep: DS-MM6 (3)

Name: Simon Vince Heathrow Airport Limited

On behalf of: Heathrow Airport Limited

Main Mod ref:

Representation:

Wind Turbine Developments

The safeguarding requirements for Heathrow Airport includes a circle with a 30 kilometres radius drawn from the aerodrome reference point to indicate the area within which the Planning Authority must consult the Airport Operator on proposed wind turbine development. This recognises the fact that the introduction of wind-powered generator turbines as an alternative energy policy can create problems for aviation. In addition to their potential for presenting a physical obstacle to air navigation, wind turbines can affect radar and other electronic aids to air navigation from radio frequency interference (the rotating blades create electromagnetic disturbance which can degrade the performance of these systems and cause incorrect information to be received). The amount of interference depends on a number of factors; the number of turbines, their size, construction materials, location and shape of blades. A wind turbine development is also likely to be the subject of consultation with the Civil Aviation Authority (CAA), NATS En Route Ltd. (NERL) and the Ministry of Defence (MOD).

Government advise applicants to initiate discussions with the Planning Authority and the Airport Operator at an early stage in the process and before submitting an application to ensure that they understand the constraints and provide the information to enable a detailed assessment to be made of the proposed development i.e. a navigational impact assessment study. Where it is determined that a planning application for a proposed development may have an effect on navigational or other aeronautical systems, simulation or other types of interference modelling of the effects of the development may need to be conducted before a decision can be made on the application. It is usual for the developer to bear the cost of the modelling.

Within the safeguarding zone around Heathrow Airport shown on the official safeguarding map published to each council, wind turbine development will be permitted that demonstrates for the duration of the construction period and during operation it will not adversely affect the operation of Heathrow Airport Ltd or the navigational aids, communication or surveillance equipment used for air navigation at Heathrow Airport Ltd.

Council Response: Noted.

Rep: DS-MM7 (1)	Name: Will French
On behalf of: Save Ealing's Centre (SEC)	Main Mod ref: General
<p>Representation: As has been the case for a number of previous consultations, the purpose of this document is not easy to understand. Its complex format offers very little chance for Ealing people to comprehend what is happening in the Borough and it deters public comment on matters that may have major implications for them. Use of the full document (EDS2) would have made it easier to appreciate what is being proposed – or failing that, at least a reference to it in the consultation document that has been used. Furthermore, the consultation is not advertised on either the Council's 'Local Plan' or 'Planning Policy' webpages. Only those on the Planning Policy's email bulletin list will have heard about it. This is very unfortunate. It is not consistent with the Council's SCI and with the Government aims for engagement with communities as described in the NPPF</p>	
<p>Council Response: The consultation was on the website - http://www.ealing.gov.uk/info/200921/local_plans/1243/latest_consultation Everyone on the LDF mailing list was sent either a letter or a email informing them about the consultation. It was advertised in the Ealing Gazette on the 28th June.</p>	

Rep: DS-MM7 (2)	Name: Will French
On behalf of: Save Ealing's Centre (SEC)	Main Mod ref: MM1
<p>Representation: We note that paragraph 3 of this introductory statement is included as a main modification, but not paragraphs 1 and 2. There seems no justification for this as paras 1 and 2 are much more than 'minor textual and grammatical amendments'. They form part of the overall policy mix relating to town centres in the Borough and we think they should be open to comment. For instance, the statement that 'Residential use is also appropriate in town centres, but is not a town centre use for the purposes of the Development Sites' is opaque and imprecise, and as a statement of overall policy its appearance in this sites document is inappropriate. It could be interpreted in ways that impact on the overall purpose and viability of designated town centres. Similarly, the new reference to student accommodation in the last paragraph of para 2 is also much more than just a 'minor textual and grammatical amendment'. Such uses can have a significant effect on the role of town centres and their character.</p>	

Council Response:

The representation does not relate to the main modifications as published, however the Council considers that paragraphs 1 and 2 serve only to clarify that the NPPF definition of town centre uses applies to the DPD, as consistent with the definition set out in the Development Management DPD. Similarly, reference to student accommodation again serves to clarify how this use (as defined in the Use Classes Order) applies within the DPD as the use is referenced as being appropriate within several allocations.

Rep: DS-MM7 (3)	Name: Will French
On behalf of: Save Ealing's Centre (SEC)	Main Mod ref: MM5
Representation: The new paragraph seems not to be a 'design principle' as the heading suggests. It seems to relate to a matter of policy which is inappropriate in this document, but generally, its purpose is unclear and the requirement far too vague to be of value.	
Council Response: The paragraph provides further guidance on the acceptable mix of uses on the site and is considered necessary to ensure proposals which come forward have considered the appropriate quantum of acceptable uses in their design.	

Representation:**Council Response:**

Rep: DS-MM7 (4)	Name: Will French
On behalf of: Save Ealing's Centre (SEC)	Main Mod ref: MM6
Representation: MM6 constitutes a fundamental departure from the original proposal for EAL6 which is a highly strategic site at the heart of the town centre. As SEC commented at the Examination, it was a surprise to find that such significant modifications were being contemplated to the proposals for this site without established stakeholder groups like Save Ealing's Centre having been notified. This was not in accordance with the procedures set out in the Council's SCI. SEC commented extensively on the draft SPD relating to this site at the end of 2012 (ED45) so it is also unfortunate that our comments are not reflected in the modifications now being consulted on which were apparently prepared some time after our comments on the SPD were submitted, especially as our comments have not been responded to elsewhere. Since these documents appeared the Council has made some considerable progress in selecting a partner (Land Securities) to develop the site which will require its compulsory purchase. SEC and other groups have been in constructive discussion with Land Securities with the aim of ensuring that compulsory purchase would be in the overwhelming public interest as it is required. Our discussions have focused around the points we made in ED45, a number of which are not reflected in MM6.	

Representation:

Key points that MM6 needs to reflect are

- Intended uses of the site should be more clearly specified. The site should be reserved overwhelmingly for leisure and culture uses as the Tibbalds reports envisages. There must be a multi screen cinema, but provision must be made for a far wider range of cultural and leisure uses of which there is a well-documented dearth in Ealing. The LDF Core Strategy requires there to be a comprehensive range of cultural, heritage, social, sport and leisure facilities in the town centre. If they are not to be provided here in the heart of Tibbalds' 'cultural quarter' where will they be provided?
- There is no indication how much development the Council thinks the site can accommodate and the document is too vague what the maximum building heights should be. We would expect that the existing planning permission for redeveloping the cinema should guide overall plot ratios and heights. The justification for positioning the higher elements of the development on the south side is unclear, particularly given the proximity of the Grade I listed Pitzhanger Manor and entrance archway.
- References are required to the Conservation Area Appraisal and Management plans for both the Ealing Town Centre and Ealing Green Conservation Areas and what they imply for the redevelopment of the site. These are key planning documents that reflect the statutory duty of the Council to protect and enhance national heritage assets. Also missing, are references to locally listed buildings within and surrounding the site, which play a very important role in establishing the character of the town centre. What are the intentions for these important buildings, bearing in mind the intention to redevelop the site comprehensively?
- The role of Barnes Pikle as part of a larger north-south cycle route through the town centre must be made clear. This route is particularly important as a safe cycle route for children on their way to and from the many schools north and south of the town centre.

Council Response:

The main modification serves to reflect the publication of the Draft Cinema SPD, and ensure that the approach in the DPD is consistent for those sites where further supplementary guidance is under development, e.g. EAL3 Arcadia and SOU4 Southall Crossrail Station. The main modification does not relate to the mix of uses on the site, and retains the guidance which welcomes the inclusion of additional arts and cultural uses, studios/flexible office space and community uses. The remainder of the representation does not relate to the main modification.

Rep: DS-MM8 (1)

Name: David Hammond

On behalf of: Natural England

Main Mod ref:

Representation:

Natural England does not have any substantive comments to make in respect of the proposed modifications and would refer to our previous correspondence in respect of this consultation document - SOU6/Allocation Public Open Space and

Design Principles refer to soft landscaping and provision of a small local park. This is supported and to be encouraged. Although Natural England does not wish to make any substantive comments in respect of this consultation, we would offer the following general advice.

Biodiversity enhancements

Applications may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of sites from applicants, wherever possible. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.

Landscape enhancements

Applications also have the potential to provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.

Council Response:

Support for modification to SOU6 noted.

Rep: DS-MM9 (1)	Name: John Templeton
On behalf of:	Main Mod ref: MM6
Representation: MM6 Cinema SPD. I consider this strategic site, in view of its position in relation to the Cultural Quarter, should include cultural uses in addition to purely commercial uses. I propose that this policy be amended to read: 'The inclusion of additional arts and cultural uses will be required...'	
Council Response: The main modification serves to reflect the publication of the Draft Cinema SPD, and ensure that the approach in the DPD is consistent for those sites where further supplementary guidance is under development, e.g. EAL3 Arcadia and SOU4	

Southall Crossrail Station. The main modification does not relate to the mix of uses on the site, and retains the guidance which welcomes the inclusion of additional arts and cultural uses, studios/flexible office space and community uses.

Rep: DS-MM10 (1)	Name: Ed Hanson Barton Willmore
On behalf of: Workspace Management Ltd	Main Mod ref: MM8, MM9, MM10
Representation: Within the Proposed Modifications document there are three changes to policy SOU6 (MM8, MM9 and MM10). Before commenting on these specific changes, Workspace are disappointed to note that a number of areas discussed at the hearing session have not been amended in line with comments made. With respect to the provision of residential uses on the wider site, it is considered that the proposed form of residential design is too prescriptive. For example, it is appropriate for the allocation to identify the importance of achieving a high quality residential environment, but to state that all units should be dual aspect is overly prescriptive. As explained previously, 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 application of standards at that point in time. Workspace is still concerned that certain elements of SOU6 are neither justified or have not been demonstrated. For example, specific concern was raised with the Inspector regarding the Metropolitan Police who will retain a community policing facility within the Arches section of the site. No evidence of need has been demonstrated and Workspace continues to object on the basis this element is overly prescriptive.	
Council Response: This part of the representation does not relate to the main modification.	

Rep: DS-MM10 (2)	Name: Ed Hanson Barton Willmore
On behalf of: Workspace Management Ltd	Main Mod ref: MM8, MM9, MM10
Representation: The changes suggested at MM8, MM9 and MM10 all relate to the provision of enhanced public open space (POS). Whilst Workspace do not object to adequate POS provision across the site as a whole, the Council must not stifle the viability of development in this area through the enhanced requirement of non profit generating uses. As with the issue of dual aspect windows, the POS and amenity space provision should be tested at application stage having regard to the residential quality of the scheme as a whole, the constraints of the site and the application of standards at that point in time.	
Council Response:	

The main modification serves to clarify the scale of public open space provision required on site, and how the requirements of Development Management Policy 7D Open Space will be applied in the site specific circumstances. As set out in the borough's Green Space Strategy and London Plan Table 7.2, small local parks/open spaces can range in size from 0.4ha to 2ha and provide a combination of gardens, sitting out area, children's play spaces or other areas of a specialist nature; homes should be less than 400m from this type of open space. SOU6 is a strategic site, capable of providing c. 900 homes (as set out in the borough's most recent Housing Trajectory, which in determining potential site capacity has taken into account the need for on-site POS provision of the scale required) therefore the Council considers it reasonable to require new POS provision on-site as this is required to make residential development acceptable in planning terms, and to further specify the nature of this POS provision based on site specific circumstances including site size, proximity to existing areas of POS and overall levels of open space deficiency in the wider area. There is sufficient flexibility inherent in the size range of what would be deemed to be a small local park to ensure the optimum number of residential units is achieved with a viable scheme. On a site of this size, provision of on-site POS is considered a normal site-specific development cost and no evidence has been submitted by the respondent to indicate that overall this requirement would make residential development unviable. Moreover, as set out in ED10 detailed viability testing of all sites within the plan preparation process is neither possible nor desirable and it is not considered that by providing further detail on the nature and scale of POS provision required the main modification places the delivery of the DPD as a whole at risk.

Rep: DS-MM11 (1)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: MM1
Representation: Ealing Civic Society(ECS) object to this increase in complexity of the text of the Development Sites DPD. A new 3rd para on garden space is drawing attention to a management policy and its insertion shows the need for more integrated text. 3 separate volumes and a policy map and policy booklet is very confusing, The complexity that is added to by the need to refer to the National Planning Policy Framework (NPPF), the London Plan (LP) and additional Supplementary Guidance. The three volumes should be integrated and adequate cross references made for each site.	
Council Response: The main modification serves to clarify how the borough's approach to garden space applies in the context of the DPD.	

Rep: DS-MM11 (2)	Name: Judy Harris
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On behalf of: Ealing Civic Society (ECS)	Main Mod ref: MM2
Representation: ECS object to the increase in complexity by adding another appendix. Why not identify in the main text which sites Thames Water consider may have problems ?	
Council Response: The Council considers that for clarity the information regarding which sites are impacted is best placed together with the potential concerns which have been indentified.	

Rep: DS-MM11 (3)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: MM3
Representation: “ Annual Monitoring Report” is a better term than “Authorities Monitoring” Report if it is coming out annually	
Council Response: The term is set out nationally	

Rep: DS-MM11 (4)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: MM4
Representation: ECS is concerned that ‘ACT 3 ...a piecemeal approach that does not contribute to delivery of a cohesive scheme for the site as a whole is not acceptable’ might be interpreted as every part outlined has to be redeveloped. The traditional Victorian frontage to the High Street should be retained.	
Council Response: The main modification does not presuppose wholesale demolition and redevelopment.	

Rep: DS-MM11 (5)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: MM5
Representation: No comment on office space	
Council Response: Noted.	

Rep: DS-MM11 (6)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: MM6
<p>Representation: EAL 6 Design principles 1st para. ECS object to the reference to the Ealing Cinema Supplementary Planning Document (SPD) which has not yet been published in its final draft. The first two lines should be deleted because we do not know if the text objected to has been removed from the SPD. It is unsound to rely on unknown design principles. Add " Heights of proposed development at the perimeter of the site should respect the scale of Pitzhanger Manor Grade I listed building, Mattock Lane Houses, the listed town hall and locally listed former YMCA and should not harm the Ealing Green or Town Centre conservation areas" The high quality landscaping treatment of the southern frontage is welcomed but it is essential that the height and design contribute to the village feel of Ealing Green, the low rise Pitzhanger Manor built in 1801-3 by Soanes and the 3-4 storey houses of Mattock Lane Add to Para 1 " The height of the southern frontage should reflect the character of Ealing Green, the low rise Pitzhanger Manor built in 1801-3 by Soanes and the 3-4 storey houses of Mattock Lane" 2nd part para 1 "The inclusion of additional arts and cultural uses, studios/flexible office space and community uses are regarded as essential on a key site in Ealing's Cultural Quarter and should be included in the New Broadway frontage using the preserved facade as an entrance or possibly in the locally listed building former YMCA in Bond Street."</p>	
<p>Council Response: The main modification serves to reflect the publication of the Draft Cinema SPD, and ensure that the approach in the DPD is consistent for those sites where further supplementary guidance is under development, e.g. EAL3 Arcadia and SOU4 Southall Crossrail Station. The main modification does not relate to the mix of uses on the site, and retains the guidance which welcomes the inclusion of additional arts and cultural uses, studios/flexible office space and community uses. The remainder of the representation does not relate to the main modification, nor the content of the Draft Cinema SPD.</p>	

Rep: DS-MM11 (7)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: MM7
<p>Representation: SOU 4 Cross Rail Station new public space requirement seem acceptable but the text seems contradictory in requirement for hard landscaping which has to have a clearly defined purpose. Surely Hard surfaces are for pedestrians, sitting out or play areas require soft landscape. Southall is short of trees so that should be a requirement. Add "With tree planting and landscaped sitting out and play areas".</p>	

Council Response:
The Council considers that the level of detail proposed in the main modification provides a level of guidance appropriate to the DPD.

Rep: DS-MM11 (8)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: MM8
Representation: SOU 6 Public open space is welcomed	
Council Response: Support noted.	

Rep: DS-MM11 (9)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: MM9
Representation: SOU 6 new small local park. Southall is very deficient in Public Open Space. ECS is concerned that housing will be built on land that should be POS. The change from substantial to small is not sound in view of the deficiency. "Small" should be deleted so that the POS is provided with adequate facilities to function as a local park even if it is small.	
Council Response: The main modification serves to clarify the scale of public open space provision required on site, and how the requirements of Development Management Policy 7D Open Space will be applied in the site specific circumstances. As set out in the borough's Green Space Strategy and London Plan Table 7.2, small local parks/open spaces can range in size from 0.4ha to 2ha and provide a combination of gardens, sitting out area, children's play spaces or other areas of a specialist nature; homes should be less than 400m from this type of open space. SOU6 is a strategic site, capable of providing c. 900 homes (as set out in the borough's most recent Housing Trajectory, which in determining potential site capacity has taken into account the need for on-site POS provision of the scale required) therefore the Council considers it reasonable to require new POS provision on-site as this is required to make residential development acceptable in planning terms, and to further specify the nature of this POS provision based on site specific circumstances including site size, proximity to existing areas of POS and overall levels of open space deficiency in the wider area.	

Rep: DS-MM11 (10)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: MM14
Representation:	

OIS 8 uses S of Rockware Ave at Greenford station. The railway slope South of Rockware Ave is Green corridor which should be retained as green space.

Council Response:

The representation does not relate to the main modification which references HS2 safeguarding.

Rep: DS-MM11 (11)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: MM15
Representation: OIS 8 South of Rockware Ave. Safeguarding HS2 –Supported as this is Green Corridor	
Council Response: Support noted.	

Rep: DS-MM11 (12)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: MM2 - Appendix B
Representation: This is an over complication the information should be placed in the main text for each individual site in the section ‘local context’	
Council Response: The Council considers that for clarity the information regarding which sites are impacted is best placed together with the potential concerns which have been identified.	

Rep: DS-MM11 (13)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: Omission - Included in minor should be in main mod's
Representation: P9 ACT 5 justification text We object strongly to this new Justification. Redevelopment of the site with higher density uses will not be more efficient because it would impact on trees that help the sustainability of this site that is peripheral to Acton Town Centre. Trees provide shade that helps reduce the effects of the London heat island and vehicle pollution. Green Corridors are essential.	
Council Response: The Council considers that this change is appropriately identified as a minor modification.	

Rep: DS-MM11 (14)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: Omission - Included in minor should be in main mod's
Representation: DS37 ACT 7 Justification Text The alteration from 10 to 4 is noted. The conclusion from this frequency of Cross Rail should also be altered. i.e. "significantly" should be deleted.	
Council Response: The Council considers that this change is appropriately identified as a minor modification.	

Rep: DS-MM11 (15)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: Omission - Included in minor should be in main mod's
Representation: DS43 EAL 2 Justification Introduction of substantial refurbishment of Villiers House is a major change in policy because it would constrain the site so that the area to the east would lack access and space for access to the station would be constrained also. It is essential that Villiers House is not allowed to prevent development of high quality architecture.	
Council Response: The Council considers that this change is appropriately identified as a minor modification.	

Rep: DS-MM11 (16)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: Omission - Included in minor should be in main mod's
Representation: DS 83 EAL3 Design principles 3rd para alteration does not make sense	
Council Response: The Council considers that this change is appropriately identified as a minor modification.	

Rep: DS-MM11 (17)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: Omission - Included in minor should be in main mod's
Representation: DS104 EAL17 Site context 3rd para last sentence does not make sense	

Council Response:
The Council considers that this change is appropriately identified as a minor modification.

Rep: DS-MM11 (18)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: Omission - Included in minor should be in main mod's

Representation:
DS 126 GRE2 Design Principles 1st para We object to deletion of facade and group value which is correct and should therefore be retained. This is not a minor or technical change.

Council Response:
The Council considers that this change is appropriately identified as a minor modification.

Rep: DS-MM11 (19)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: Omission - Included in minor should be in main mod's

Representation:
DS187 SOU 9 Principles 2nd para We do not see how a disused burial ground can ideally increase the level of POS. This is only possible if graves are moved. Southall desperately needs more open space and proposals should be worked out and finance identified through section 106. Describing it as ideal is little help in achieving this. Add 'A management plan will be agreed that identifies an increase in POS.

Council Response:
The Council considers that this change is appropriately identified as a minor modification.

Rep: DS-MM11 (20)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: Omission - Included in minor should be in main mod's

Representation:
DS 207 OIS 4 Design Principles The text deleted is correct. The area adjacent has semi- detached dwellings and generous rear gardens. The justification is unsound because there is no repetition.

Council Response:
The Council considers that this change is appropriately identified as a minor modification.

Rep: DS-MM11 (21)	Name: Judy Harris
On behalf of: Ealing Civic Society (ECS)	Main Mod ref: Omission - Included in minor should be in main mod's
Representation: DS 225 OIS 8 Context 1sst para This area south of Rockware Ave is green corridor and should not be described as vacant because it is an important area of railway embankment with natural vegetation	
Council Response: The Council considers that this change is appropriately identified as a minor modification.	

Rep: DS-MM12 (1)	Name: David Churchill Iceni Projects
On behalf of: Stolken Greenford Ltd	Main Mod ref:
Representation: For clarity, it should be noted that the below comments make reference to OIS7 in relation to Greenford Green, as set out in the submitted Development Sites DPD, rather than the main modifications, which references Greenford Green as OIS8. SGL broadly supports the proposed main modification to site OIS7 of the Development Sites DPD. The main modifications achieve the London Borough of Ealing's (LBE) vision of achieving mixed use development within the OIS7 allocation. Notwithstanding broad support for the main modifications, SGL would recommend that further minor modifications are made to the wording of the policy for clarity. The proposed revisions to the text of the policy, as set out below, seek to clarify the different roles and functions of the two areas of the SGL land within OIS7. The area to the south of Berkeley Avenue contains older built stock that requires regeneration and redevelopment. The area to the north of Berkeley Avenue is occupied by the former GSK headquarters & the Greenwich School of Management (a higher-education facility). The proposed revisions to the text seek to clarify the respective roles of these distinctive areas of the wider OIS7 site. In light of the above and the on-going marketing of Glaxo Welcome House, it is clear that the southern site is not suitable for office use. Consequently, SGL has, in consultation with LBE and other key stakeholders, sought to provide a suitable mix of uses. As previously stated, these are in line with those uses outlined in the OIS7 allocation. In light of the above, it is considered that this section of the allocation wording be amended slightly to read: <i>'North of the Grand Union Canal, there is substantial potential for the revitalisation of the employment role of the existing buildings north of Berkeley Avenue to provide high quality office/ managed workspace and higher-education facilities,</i>	

*supported by the introduction of residential, community and leisure uses **to the south of Berkeley Avenue.**' [amended text in bold]*

The main modifications to the Development Sites DPD also confirm support for the provision of local convenience retail and café uses to support wider regeneration objectives for the site. SGL supports this modification as its proposals will include the provision of retail and restaurant/ café provision, which are designed to be at an appropriate scale, and in an appropriate location to meet local needs, and not harm nearby neighbourhood centres and local shopping parades. SGL also supports the removal of the provision of research and development facilities, and replacement with provision of managed workspace and higher-educational facilities, as this provides a more accurate reflection of the existing uses.

Council Response:

Support for the main modifications noted. The remainder of the representation does not relate to the main modification, and the Council does not consider that the proposed further modifications to the text are necessary for clarity nor justified by the available evidence.

Rep: DS-MM13 (1)	Name: Austin Mackie Austin Mackie Associates Ltd
On behalf of: SEGRO	Main Mod ref: MM15
Representation: On 25th June, the Council published proposed modifications to the Sites DPD, in the form of both Main (ED78) and Minor (ED80) Modifications. Neither set of modifications make any attempt to address SEGRO's concerns and thus make no positive contribution to the need to enhance the delivery framework for the site. MM15 retains the proposed mixed-use designation on the slither of land between Rockware Avenue and the railway – the amendment noting that this is subject to any implications of the HS2 safeguarding. Even with HS2 now likely to be underground, this proposed residential element of site OIS7 would be sandwiched between the existing railway, a busy road and land that the LPA seeks to promote as SIL (suitable for low grade industry). Having regard to the fact that the text of the site allocation suggests that a convincing case would need to be made to show that the environmental conditions of the site were suitable for housing, we remain unconvinced that this is an appropriate approach to meeting housing needs for the area. This element of the allocation cannot be considered to accord with the principles defined under DS3 of, for example, securing "...the delivery of high quality homes..." The alternatives put forward by SEGRO for both the Wincanton and Tata sites represent more appropriate locations for residential development that can be properly laid out and planned alongside surrounding / emerging uses.	
Council Response: The representation does not relate to the main modification which references HS2 safeguarding.	

Rep: DS-MM13 (2)	Name: Austin Mackie Austin Mackie Associates Ltd
On behalf of: SEGRO	Main Mod ref: MM16
<p>Representation: MM16 seeks to clarify text in relation to the main SEGRO site. It introduces reference to “existing SIL” to the west and to ‘continued protection’ for industrial uses. Such a modification is clearly still inconsistent with the CS designation for mixed-use and so it is incorrect to refer to ‘continued’ protection.</p>	
<p>Council Response: As set out in ED78, the Development Strategy DPD did not designate the site for mixed use development; Policies 3.6 and 4.2 clearly state that delivery of proposals for the area, including any changes to the UDP designations, will be facilitated by the Development Sites DPD.</p>	

Rep: DS-MM13 (3)	Name: Austin Mackie Austin Mackie Associates Ltd
On behalf of: SEGRO	Main Mod ref: MM17
<p>Representation: MM17 refers to the former GSK land north of the canal, offering clarity on acceptable uses. This proposed modification serves to highlight the contrast between the flexibility that the LPA is willing to offer north of the canal to assist in delivery; with the highly restrictive and inflexible approach that it seeks to promote on SEGRO’s land, i.e., the approach is disproportionate and there is no evidence to suggest that the LPA seeks to encourage a viable and deliverable form of development within SEGRO’s part of OIS7(8) as envisaged in the CS.</p>	
<p>Council Response: The relevant evidence base for the main modifications is summarised in ED78.</p>	

Rep: DS-MM13 (4)	Name: Austin Mackie Austin Mackie Associates Ltd
On behalf of: SEGRO	Main Mod ref: MM17
<p>Representation: There is no evidence to support the LPA's position to deviate from the CS and no objective to suggest that their approach would achieve the objective of (I) enabling the site to come forwards and in doing so 9ii); to maximise the employment outputs of the site as a whole. In this context, the LPA’s approach to delivery in relation to SEGRO’s land is like ‘quick sand’, in that, the more SEGRO has demonstrated through the draft DPD stages that they will struggle to deliver the site allocation, the more difficult the</p>	

LPA has become. Such an approach neither accords with the spirit of the NPPF nor delivers the CS aspirations for the site.

Council Response:
The relevant evidence base for the main modifications is summarised in ED78. Moreover, as set out in ED10 detailed viability testing of all sites within the plan preparation process is neither possible nor desirable and it is not considered that by the application of a SIL designation to the portion of the site which is in active industrial use and functionally related to an adjacent area of SIL the main modification places the delivery of the DPD as a whole at risk.

Rep: DS-MM13 (5)	Name: Austin Mackie Austin Mackie Associates Ltd
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On behalf of: SEGRO	Main Mod ref: minor modifications
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Representation:
DS222 adds reference to CS policy 3.2, but of course such a high level policy needs to be considered in the context of the CS's specific promotion of SEGRO's land for mixed-use development. 3.2 offers no fresh justification for its proposed SIL designation.

Council Response:
The representation does not relate to the main modification.