EALING LDF
CORE STRATEGY REVIEW
Integrating LB Ealing’s Regeneration Ambitions
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1. **AN OVERVIEW OF THE REVIEW**

**The purpose of this Commission**

1.1. Shared Intelligence (SI) has been engaged to assist London Borough of Ealing in responding to the PAS Challenge on integration of the Borough’s regeneration aspirations with the Spatial Plan. The Brief required SI to take a fresh look at the context for the Ealing Local Development Framework and provide an overarching narrative for development, growth and improvement in Ealing and for the policies contained within the LDF.

1.2. PPS 12 (CLG June 2008) states that every local planning authority should produce a core strategy which, amongst other things, should include “an overall vision which sets out how the area and the places within it should develop”. The vision should be in general conformity with the Regional Spatial Strategy (in this case the London Plan) and should closely relate to the Sustainable Community Strategy. It should set out Strategic objectives that form the link between the high level vision and the detailed strategy. The Core Strategy must make clear spatial choices about where developments should go in broad terms.

1.3. This report sets out the conclusions of our short review of the LDF Core Strategy. In accordance with the Brief, the review is principally concerned with the coherence of the Core Strategy and with the adequacy of the vision and spatial framework in light of the Borough’s development potential and the Council’s regeneration ambitions. It is not a comprehensive review - the LDF Core Strategy must address a much broader set of issues and must be developed in accordance with the requirements of Planning Policy Statement 12.

1.4. Changes to the Core Strategy arising from this review will therefore need to be considered in relation to the requirements of PPS 12 including the evidence base, the options considered and the basis for preferred options, engagement with the Local Strategic Partnership and the demonstrable relationship between the LDF and the Community Strategy and so on. Whilst we have put forward recommendations and indicated some areas in which further testing and evidence are required, these recommendations are not exhaustive. Ongoing review of the efficacy of the process against all of the requirements of PPS 12 is essential.

1.5. This review report is designed to assist Ealing officers in identifying some high level messages about Ealing’s development and regeneration potential. With Members’ endorsement, and with engagement of the Local Strategic Partnership, the key messages can inform the further development of the LDF Core Strategy.

**The Review Process**

1.6. The first stage of the commission was a review of the project documentation, including the Draft Core Strategy and a number of its supporting documents.
Next, a series of interviews was conducted with Ealing officers. A Challenge Session was held in which the consultant team set out a number of emerging messages and challenges to a group of Ealing officers including the lead Executive Director, Director and Head of Service, LDF Policy Manager and a wider group of officers with a stake in elements of the LDF Process. The presentation made at the challenge meeting is attached (Appendix 1). Attendees at the Challenge Meeting are listed in the attachment, Appendix 2. Based on the emerging messages and the Challenge Meeting, Ealing’s officers discussed draft findings with Members and held further informal meetings with officers. Feedback from these reflections was provided to the Shared Intelligence Team, on issues of process and content for the LDF Core Strategy. The feedback informed the content of this report.

The structure of this report

1.7. Section Two sets out a number of issues emerging from discussions with officers, from a challenge meeting, and from our review of the documentation made available to us. Section Three sets out a narrative for regeneration and development in Ealing. This narrative is intended to propose an outline framework through which Ealing’s regeneration and growth potential can be articulated in a way that responds to some of the emerging messages. This section also seeks to identify some spatial elements that might be used to provide structure for the Core Strategy. Section Four proposes some indicative objectives to be considered for inclusion in the Core Strategy that reflect the ambitions contained in the narrative. Section Five contains recommendations and proposals for further work arising from the findings of the review.
2. EMERGING MESSAGES

2.1. The review of the project documentation and the interviews with officers identified some important issues to be considered in setting Ealing’s Spatial Strategy, and a number of emerging messages were captured about expectations for its overall style and content. This section summarises the factors and sets out the emerging messages. These have informed the narrative (Section 3), the proposals for Objectives (Section 4) and the recommendations (Section 5) that follow.

General Perceptions of the current LDF

2.2. The development of the draft Core Strategy has given rise to a number of comments about the style and content of the document. Some respondents seek a document which is more like a development prospectus. The Core Strategy serves a much wider purpose but it should itself be sufficiently precise so that subsequent work to secure delivery of key sites and area regeneration can be easily developed from and linked back to the Core Strategy document. It should tell the “Ealing Story” and describe its spatially distinctive elements.

2.3. Despite Ealing’s considerable locational strengths, there has been a historic tendency to understate them. The LDF Core Strategy should strike a new direction in setting a more confident tone.

2.4. Overall, the existing draft LDF Core Strategy does not yet set out a clear statement of vision and ambition – a pro-active look at where Ealing wants to get to as a Borough. Greater clarity is needed about what is distinctive – an answer is needed to the question “What is Ealing’s USP?”

The emerging messages

2.5. Officers commented on the draft and offered views about how the document should be further developed. A strong view was that the LDF Core Strategy should be an eye catching, interesting document – a promotional tool to secure delivery. It should contain key messages about Ealing’s distinctive approach to development.

2.6. The key messages include:

- Ealing has a “can do” approach to development with clearly defined parameters.
- The Borough is an attractive location for development and the Council and its partners are ready to support and encourage growth and development in the right places of the right quality.
- Ealing has identified the places where change is necessary, desirable and realistic. The Borough is ready to work in partnership with landowners,
investors and stakeholders to secure development in line with the Borough Vision.

- Equally, the Borough has an excellent built and human environment along with exceptional green spaces. These assets will be conserved and strengthened. The LDF Core Strategy will provide reassurance and confidence that there is a clear commitment to protecting the Borough from the wrong type of development in the wrong places.

- The Borough’s growth will provide value that can be used to strengthen the Borough’s qualities. Value will be invested in physical and social infrastructure and in programmes to strengthen cohesion and provide access to opportunities.

2.7. For all the above points, the LDF needs to be specific – about locations, priorities and principles. The over-riding sense must be of a Borough that knows what it wants, where it wants it and on what terms. The Core Strategy should provide clarity about the areas in which the Borough is supportive of regeneration and convey the high level messages about the Borough’s pragmatism combined with its expectations about the factors requiring high quality design solutions. The document should provide sufficient hooks so that key projects can be worked up with those involved in delivery. Therefore the strategy needs to be clear about what are the key projects and programmes and communicate a sense of the short, medium and long term. The high level framework in the Core Strategy needs to provide the basis upon which further Development Plan Documents can be established in the future.

**Responding to cross Borough issues**

2.8. The Core Strategy should take account of the fact that two areas are single functioning economic entities that cross Ealing’s Borough Boundaries. These are

- Heathrow Airport and its hinterland and
- Park Royal Industrial Estate and the A40 corridor.

2.9. Given that Heathrow Airport and its economic hinterland forms a single entity, adjacent Boroughs may consider it necessary to treat it as such through a Joint Area Action Plan in planning terms and through a Multi Area Agreement in delivery terms. Consultation and agreement on the preferred approach should proceed with LB Hounslow. In our view, Ealing does not itself need to promote a JAAP for Heathrow given that the core project is outside the borough, but it does need to demonstrate it has taken account of the cross- Borough issues in its own Core Strategy. However, should LB Hounslow decide to promote a JAAP for Heathrow, then Ealing would need to consider its position and decide whether to support such an approach, and signal its intentions in its Core Strategy.

2.10. In any case, the Core Strategy must clearly show that it has taken account of the contiguity of this area and its cross boundary character.
2.11. The same point is true for Park Royal. At this stage the Core Strategy needs to have anticipated and signalled what the future planning strategy will be for this cross borough area - i.e. whether a JAAP is envisaged, or whether policies are likely to be developed through a Supplementary Planning Document. In our view, Park Royal’s basic spatial structure is settled and there is not a need for a JAAP. However, this assumption needs to be evidenced and tested.

The impact of Crossrail

2.12. Crossrail will provide a major impetus for new growth and development and will assist in shielding a number of the Borough’s local centres from the worst effects of the downturn. The LDF needs to clearly establish the Borough priorities for each of the centres affected by Crossrail.

2.13. There is a sub-text that the growth leveraged from host developments along the Ealing portion of the route must not contribute to paying for Crossrail. The Core Strategy must therefore set out the high level principles for the “shopping list” of infrastructure and other investment requirements needed to build high quality places and sustainable communities along its route.

North-South Transport Links

2.14. There are a series of growth and regeneration priority areas and places running along a north-south axis linking South Action, Acton Central, and Acton Mainline up to North Acton Central Line Station at Park Royal Southern Gateway. There is a question about whether a case can or should be made for a spatial component of the Core Strategy based on improving connectivity between and though these areas.

Estates Regeneration

2.15. A number of Ealing’s Housing Estates provide real opportunities for regeneration and the Council has considered its position – identifying “High Intervention” estates¹.

2.16. The housing stock in the Northolt/ Greenford areas is generally in better condition than the estates referred to above. There are some development opportunities and there is a need to explore how to take advantage of these. Some officers drew attention to the need and potential for social and economic regeneration in these areas. This should be evidenced to provide the basis for policy objectives in the Core Strategy.

Housing Strategy

2.17. The Mayor of London has set a housing target for Ealing of 900 per year of which 507 per year should be affordable. The Borough has suggested that a more realistic target is 2400 for the next three years with 355 affordable.

The Borough has also suggested that a target for habitable rooms is more realistic.

2.18. Ealing needs family accommodation rather than flats – the emphasis should be on habitable rooms (per hectare and across the Borough) rather than on numbers of housing units. There is not currently the demand for more 1 and 2 bedroom flats than the housing market has delivered to date.

2.19. The current Council housing stock is 16,000 units. Of these, approximately 4,500 are contained within 10 “high intervention” estates. These will be made available for disposal and redevelopment.

2.20. The Private Sector strategy is in the process of being updated.

2.21. There is much development potential at Southall. The Gasworks has capacity for 4,000 homes. The Middlesex Business Park and Havelock Estate have the capacity for maybe 6,000 more.

2.22. The Core Strategy will be challenged at Inspection to either demonstrate contiguity with the London Plan or clear evidence and rationale for departure from it. Attempts to secure agreement with the Mayor on the principles above are therefore critical to the ability to progress the strategy successfully. It is recommended that further advice on the integrity of the proposed approach in relation to the likely challenge at Inspection Stage be sought.

**Housing Delivery (Messages to the Homes and Communities Agency)**

2.23. The Core Strategy should provide a planning framework (that can be further developed through subsequent Development Plan Documents) to underpin the borough’s work on housing delivery and to support its relationship with the HCA. In addition to the points above, the following points were made:

- Housing need in Ealing includes significant numbers of residents who are able to take part in equity share / shared ownership. There is a substantial constituency in employment and also in housing need. Affordability is the issue for this group, given the high house prices.
- Ealing has cleared sites with no planning constraints within which social housing can be replaced by mixed housing development. Opportunities exist for public sector gap funding offering equity that can be recouped.
3. TOWARDS A NARRATIVE FOR THE CORE STRATEGY

3.1. This section seeks to provide potential answers to the challenges of clarity and focus. It seeks to provide the basis for a short narrative at the introduction to the Core Strategy in the form of a strategic spatial vision for the Borough, expressing the spatial aspects of Ealing’s aspirations for regeneration and development. (The Core Strategy as a whole needs to express the spatial ambitions and aspirations of the Sustainable Community Strategy. The Core Strategy therefore needs to be further reviewed in relation to the Borough’s environmental and social ambitions).

3.2. The structure of the narrative is as follows:
- Ealing today
- The Drivers of Ealing’s further development
- Ealing’s potential in light of the drivers for development

**Ealing Today**

**Ealing in context**

3.3. Ealing is a high performing Gateway and contributor to the success of London, the World City. It sits at the point where the Thames Valley (the UK’s highest performing sub region) meets Metropolitan London.

3.4. The M4 and the M40 provide fast, easy access to the West. The Central, Piccadilly and District Lines all offer excellent connectivity into London. The West End is 20 minutes away.

3.5. Ealing has a highly valued built environment and landscape reflecting its development as a successful London suburb over 150 years. Ealing also makes a distinctly contemporary contribution to London life:
- There are few places in London with a comparable employment base.
- It hosts a Metropolitan Shopping Centre at Ealing Broadway;
- Southall is a key London’s hub for Sikh and Hindu communities from the Indian Continent. More generally Southall serves as a major point of arrival for a significant proportion of London’s in-migrating communities;
- Park Royal, Europe largest industrial business Park, sits on Ealing’s north eastern edge and Heathrow International Airport sits at its West. These together provide a substantial portion of London’s industry and commerce based on the size of London’s market for city serving industry and its specific strengths in sectors drawing on skilled labour such as in media and creative industries. There are also a number of smaller employment locations throughout the Borough which add to the overall capacity.
**Ealing’s character and the identity of its built environment**

3.6. In the past, Ealing has emphasised its identity as the "Queen of the Suburbs", the epithet attached to the Borough by its Victorian Developers.

3.7. Whilst its suburban qualities endure and need to be preserved, Ealing now has many contemporary characteristics. Today Ealing is more than a suburb. It is bigger than Cardiff and nearly as big as Belfast. It has diverse attributes. A number of Ealing’s older districts perform like Clapham, Wandsworth and Wimbledon in terms of their urban or mature suburban qualities. Other districts have an outer London character and a Middlesex identity. Moreover, approaching London from the West, Ealing is the place where one experiences arrival in the City.

3.8. The layers of London suburban development featured in Ealing’s districts include:

- High End suburban development typical of affluent outward movement from London pre 1850 (when the ability to move outwards depended on access to private transport);
- Victorian Rail Suburbs 1850 to WW1 – as the extension of rail infrastructure made mass housing development possible beyond the city core;
- “Metroland” suburbs of the inter-war period reflecting the further development of rail infrastructure and the development of the tube network that led to an explosion of speculative housing development based on the archetypal semi detached suburban form;
- Post war municipal development and further private development reflecting the extended “reach” given by the car and continued pressure to develop remaining sites;
- Post War Estates developed through comprehensive redevelopment reflecting modernist design and planning.

3.9. The Council and its partners are committed to preserving the successful elements of the Borough and investing in the distinctive character and qualities of Ealing’s districts. The Council and its partners continue to articulate and review the attributes of the Borough it seeks to preserve through its Conservation Area programmes and linked Character Appraisals. The need has been identified for regeneration in the places where change is required and the continued preservation, investment in and facilitation of the further development of good quality suburban amenities for local centres.

3.10. Ealing has one metropolitan centre (Ealing Town centre), one Major centre (Southall) and several established district and local centres supporting commercial and retail activity. Southall’s identity is unique as a major Town Centre and cultural capital.

3.11. Commercial and Industrial development gives a specific employment character to the zones along the M4 and the A40 corridor and to the Heathrow hinterland. Employment and residential development tends to be bounded, with limited opportunities for mixed uses within employment areas.
That said, boundaries are tightly knit and the conflict between different uses needs to be managed and mitigated.

The Drivers of Ealing’s further development

3.12. In the short-term, the recession may result in the slowdown or stopping of new development. However, the growth targets in the London Plan remain extant and new conditions for investment and development will re-emerge, even though the basis and terms for those conditions are not yet clear\(^2\). In the medium to long term, London will experience continue to experience growth in residential, commercial and other forms of development\(^3\). Ealing, given its unique qualities and competitive attributes relative to the rest of London, will take a share of that growth\(^4\). Some areas will emerge from recession sooner than others and Ealing is likely to be among the more competitive parts of London given its historic strengths.

3.13. The key driver of demand for new development is the relationship between Ealing’s places and its transport infrastructure\(^5\). The highest demand occurs at the best connected local centres, with the pattern modified by the nature, mix and value of existing development in each locality as well as by the supply of available development sites.

3.14. The forthcoming opening of Crossrail will make a substantial addition to the transport infrastructure and will fundamentally alter the overall demand for new development and its spatial distribution across the Borough\(^6\). Increased demand will be experienced at each of the five proposed Crossrail Stations in Ealing. The Borough has established its priorities for overall growth, mix of development and for infrastructure investment required at each locality. A number of masterplans for town centres have been prepared. In due course, additional development plan documents will be prepared as follows:

- Southall Station environs
- Acton Mainline environs

3.15. The outstanding qualities of the Borough set out in 3.6 to 3.11 above will continue to underpin demand for new development. The Borough’s conservation policies will ensure that new development is constrained and focused so that those exceptional attributes are preserved.

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\(^2\) See for example Bridget Rosewell’s presentation at the Bank of England on 17\(^{th}\) February 2009 Bridget “focused on the greater volatility of the London economy than the UK in recent decades and that the current recession will probably last two years”. (Quoted in Volterra Newsletter available from achatrai@volterra.co.uk). The presentation can be viewed at http://www.volterra.co.uk/publications/newsletters/email/BankofEnglandInflation_NL0209.pdf

\(^3\) The population of West London is projected to grow by 1,404,100 by 2016 (London Plan Sub-Regional Framework, West London, GLA May 2006). See updates for Ealing in Annual Monitoring Reports – we had access to the December 2007 AMR

\(^4\) Ealing’s population was forecast to grow by 7% over 20 years from its position in 2006 (Nomis mid year estimates GLA 2006 quoted in Ealing Metropolitan Centre Spatial Development Framework 2008, Tibbalds et al)

\(^5\) See for example the significance given to Transport Corridors for Ealing’s regeneration in Ealing Economic Regeneration Strategy, Rosecliffe Associates 2006. Diagram page 3 and elsewhere.

\(^6\) See for example West London Economic Development Strategy, West London Partnership, December 2004; which explores the impact of Crossrail on inward investment and development potential, quoted in Ealing Metropolitan Centre Spatial Development Strategy pg 10
3.16. The opening of the Westfield shopping centre near to the Borough in Shepherds Bush will impact upon the retail hierarchy of west London. How this will affect Ealing Town Centre is not yet certain. The Borough’s policies are designed to reinforce the differentiation and bolster the competitiveness of its retail centres to mitigate the impact of competition from Westfield.

**Ealing’s potential in light of the drivers for development**

3.17. Ealing’s potential can be articulated in the form of a series of spatial elements. These can provide the elements that together form the primary spatial structure for the borough of Ealing around which future growth will be configured:

- Major development opportunity sites
- Two Cross Borough Zones
- Transport Corridors
- CrossRail and the Uxbridge Road Corridor
- The A40 Corridor
- Key town Centres
- Housing Estate Regeneration
- The Perivale Sports and Leisure Hub
- The Green Grid
- Areas of Quality for Protection and Enhancement

**Major Development Opportunity Sites**

3.18. The Sites DPD will set out detailed proposals in respect of development opportunity sites. Some of the primary sites and area proposals make a significant contribution to the overall strategy and its spatial specificity and should be considered for inclusion in the Core Strategy. In parallel, the Conservation Area strategy should work in contiguity with the development strategy, clearly indicating which areas will be protected and how the balance of development and protection will be managed.

**Transport Corridors**

3.19. The Borough is incredibly well connected. The Broadway is a superb multi-modal transport node that will soon be augmented by CrossRail. Park Royal (North Acton) is improving as a transport node with better connectivity.

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7 See for example the major sites identified within the Development Frameworks produced for Town Centres, including the Acton Town Centre Development Framework June 2008 (East, URS, DTZ); Ealing Metropolitan Centre Spatial Development Framework May 2008 Tibbalds et al), Tribal Urban studio Framework for Southall 2008; Tribal Urban Studio Park Royal Southern Gateway Position Statement April 2008. Also the LDF Sites Draft for discussion documents for a series of localities produced by the LDF Team November 2008.
between the Central Line and other routes. The Central, District and Piccadilly Lines give excellent access between Ealing’s districts and Central London.

3.20. The main corridors providing spatial structure to the Borough are predominantly East-West corridors: M40, M4 and The Uxbridge Road (see 4 below), and the Piccadilly, Central and Main Rail lines.

3.21. North South Movement (Orbital routes) is generally more problematic. The connectivity given by the north circular road is important but suffers from frequent congestion. Weaker but important connectivity is given by other north south corridors and these need to be strengthened:

- Horn Lane
- North Circular Road
- A4127 (Greenford road)
- A312 (West of Southall)
- The Canal Corridor, principally for leisure and local amenity

3.22. The M4 and the A40 are both economic corridors as well as high performing connections. Along with the railway lines, the downside of these corridors is the lack of permeability across them, expressed in the built form as well as in the general hostile environments for movement across the transport arteries. The Borough as a whole is cut by Railway lines and roads. Street patterns frequently don’t cross the major infrastructure lines. The strategy needs to emphasise the fine grain “stitching” across the north south transport routes.

3.23. The problems are very local in one sense, but their combined impact affects the sustainability of some of the Borough’s neighbourhoods. Local districts such as Greenford, Perivale and Northolt depend on local connectivity in order that they can share in wealth and benefit from Ealing Broadway, Heathrow/Southall and Park Royal and the fast connections into Central London.

3.24. The negative environmental impact of transport movement through the Borough needs to be mitigated. The biggest priority is to offset the problems of pollution and noise from the A40.

3.25. More local issues of congestion and parking also need to be addressed.

**CrossRail and the Uxbridge Road Corridor**

3.26. CrossRail will provide a new artery at the heart of the Borough, underpinning physical, economic and social change and providing growth, wealth creation and value at a series of stations through the heart of the Borough. The

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8 See for example the analysis of traffic congestion hotspots in the Ealing Borough Transport Strategy (undated draft?) and the forthcoming Network Management Plan.
9 Op cit
10 Ealing Transport Strategy op cit

**SHARED INTELLIGENCE**
CrossRail corridor runs near to the Uxbridge Road corridor. Together these two through routes can form the spine through the centre of Ealing.

3.27. The Uxbridge Road links a number of the local centres where growth potential will increase as a consequence of CrossRail. At present, one arrives at a series of local centres with local identities, but the unifying identity of the Borough is not clear either at its entry points or at each of the local places.

3.28. An opportunity exists to invest in the corridor in order to present a clear sense of arrival – a distinctive set of qualities, with each of the localities offering encouragement to stop. Ealing Boulevard (with its evocations of a tree lined street, a place for strolling, interest, pleasant, affluent) could offer a brand for the unified approach to the corridor - with a distinctive character; connecting a series of unique high performing centres in a linked chain.

3.29. There is an opportunity for a linked narrative about council services – management and maintenance – refuse collection / safety that could reinforce the notion of a single approach to the Uxbridge Road corridor.

### The A40 Corridor

3.30. The A40 Corridor also provides a unifying spatial element, linking the important industrial and employment locations of Park Royal outwards through Perivale and beyond, a corridor of excellent road accessibility; high public transport accessibility given by the underground stations, all giving rise to good site development potential.

### Two Cross Borough Zones

3.31. Two areas of London significance each straddle Borough boundaries and operate as single entities, requiring unified planning and management. These are:

3.32. Park Royal Industrial Estate and the A40 Industrial Corridor - The emphasis should be on protecting the core industrial land asset but supporting the modernisation of the business park and the development of its supporting infrastructure and amenities. There is some limited scope for release of employment land at the periphery for housing development, where this clearly supports the wider strategy of strengthening the employment location.

3.33. Heathrow and its economic hinterland – a single approach is needed for Southall / Hounslow – a strategy for the airport and its hinterland building on the economic strengths given by the airport economy and mitigating the negative consequences of the Gateway for Southall.

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11 See the discussion of a corridor approach to Transport along Uxbridge in the Ealing Borough Transport Strategy op cit p22
12 Both identified as Opportunity Areas in the London Plan (see London Plan Sub Regional Development Framework West London, 2006
13 Park Royal Draft Opportunity Area Planning Framework GLA February 2008
**Town Centres**

3.34. The main Centres acting as anchors for the Borough are Ealing Town centre, Southall and then Acton Hanwell and Greenford.

3.35. Ealing and Southall are both are strategic centres for London and provide locally significant retail, commercial and residential development and local services. In each case there is large scale mixed development potential.

3.36. **Ealing Town Centre** – offers a major opportunity for commercial, retail and residential growth given by Crossrail, with masterplanning and site development work in hand. The threats to Ealing Town Centre’s retail offer arising from the opening of Westfield should be mitigated.

3.37. **Southall** - Distinct from the strategy for the airport and its hinterland, the Core Strategy should provide a specific focus on Southall as a town centre and neighbourhood. Southall is a unique contributor to London’s performance as a world city. There are long standing obstacles that have hindered progress on large scale development opportunity sites, most notably but not only Southall Gasworks. An integrated strategy is needed that unlocks the sites, rebalances employment and housing areas, addresses over-development, overcrowding transport congestion and the poor public realm and capitalises on the increased public transport accessibility to Heathrow and central London. The strategy for Southall should include land swap to increase residential development near the station, with employment further away.

3.38. Although Southall derives many of its dynamic qualities from its proximity to Heathrow Airport, it also suffers from some negative impacts flowing from its status as a Gateway, including population churn and related social impacts. The physical strategy needs to be linked to strategies to mitigate the negative consequences of the airport for the locality and to address linked skills and cohesion issues including those given by high community churn.

3.39. Acton, Hanwell, Greenford are also important centres and their distinctive contribution to the fabric of the Borough needs to be specified, with priorities for change and for protection clearly spelt out.

**Housing Estate Regeneration**

3.40. The focus for housing regeneration is on 10 “high intervention” estates – through comprehensive redevelopment, increasing density and reconnecting with the surrounding areas in terms of physical fabric, permeability and social mix.

3.41. The aim in terms of mix is to increase densities, thereby securing additional housing units (but with the focus on bedrooms per hectare) – giving

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14 Op Cit Ealing Metropolitan Centre Spatial Development Framework May 2008
15 See “A Framework for Southall Tribal Urban Studio with Michael Beamam Ltd, 2008, proposing a framework for Southall, designed to be a response to the potential for change
opportunity to emphasise provision of larger family units). Changing the mix of tenures and type can contribute to the wider aspiration of re-establishing the connection with the wider area. Currently the estates are radically different in terms of built form and layout.

3.42. The development strategy for the 10 estates is to sell them off to developers whilst providing a framework for overall standards and for securing linkages, improving permeability and defining heights and densities.

3.43. The design strategy for estates is a return to a traditional street pattern, with some signature blocks. In general the aspiration is to move away from having identifiable council estates – therefore the approach is to look beyond the red lines of the estate, addressing routes through and connections. The grain should be more akin to the conventional development form of the suburban communities of the surrounding areas. This involves re-configuring the urban fabric so that the urban form including street pattern, scale and housing type is integrated successfully with the surrounding area.

3.44. A number of the problematic estates are in the middle of affluent areas – notably South Acton Estate (Acton), Green Man Lane (West Ealing) and Copley Close (Hanwell). These areas have relatively high land values and good transport connectivity. The strategy needs to address and overcome polarisation by mixing tenures and blending new development with existing communities. Therefore the potential exists for investors/ developers to maximise potential whilst also using value to stitch the areas back in to the urban grain. The proposed redevelopment of ten estates could offer approximately 3500 extra units – nearly doubling the density.

**Perivale Sports and Leisure Hub**

3.45. The Gurnell Leisure Centre, Perivale Athletics Track and the Sports Pitches together already perform as a cluster of sports and leisure facilities set in Metropolitan Open Land. The opportunity exists to continue to protect the Metropolitan Open Land whilst improving the quality of the assets that make the area successful as a leisure hub.

**Green Grid and Areas of Quality for Protection and Enhancement**

3.46. Ealing’s green spaces comprise a variety of typologies – from manicured Parks through to wild spaces and natural habitats along Flood Plains. Together these make an important core contribution to the Borough’s character and provide contrast and form for the Borough’s built environment.

3.47. Existing and proposed Conservation Areas represent recognition of the need to preserve and enhance the high quality of parts of the Borough’s built and environment.

3.48. Both Green Spaces and Areas to Protect and Enhance should be clearly identified as layers within the spatial strategy.
3.49. Ealing’s high quality green spaces make a substantial contribution to the identity and quality of the Borough. The Core Strategy provides an opportunity to highlight their contribution to the urban fabric, setting out ways in which green space can be made to work harder – making them more visible, drawing out and improving their function for Ealing’s communities.
4. PROPOSED POLICY OBJECTIVES

4.1. Planning Policy Statement 12 sets out government guidance on Local Spatial Planning. PPS 12 explains the how the alignment between the Community Plan (the Sustainable Community Strategy and the Local Development Framework should work as follows:

4.2. The government intends that spatial planning objectives for local areas, as set out in the LDF, should be aligned not only with national and regional plans, but also with the shared local priorities set out in Sustainable Community Strategies where these are consistent with national and regional policy. To achieve this, the Local Government White Paper strongly encourages local authorities to ensure that:

- their SCS takes full account of spatial, economic, social and environmental issues;
- key spatial planning objectives for the area as set out in the LDF Core Strategy are in harmony with SCS priorities; and
- the LAA, as the delivery agreement with central government, is based on the priorities of the SCS and supported by local planning policy to deliver the outcomes agreed.

4.3. (PPS 12, Page 3, Para 1.6)

4.4. Therefore, the proposal to revise the LDF Core Strategy better to express regeneration ambitions is necessarily linked to a consideration of whether the LDF, the Borough Sustainable Community Strategy and the current LAA are all aligned and the Borough’s regeneration ambitions sufficiently well expressed in each.

4.5. Following the Review discussions and further internal consideration, Ealing’s Officers have suggested a structure for the LDF Core Strategy, which in our view provides a good structuring device for the further development of the Core Strategy and would provide a good basis for drawing together and describing the main spatial elements and for generating linked policy objectives.

4.6. The structure (set out fully in Appendix 3) is based on the following chapter headings:

- Ealing at the heart of West London
- Uxbridge Road/ CrossRail Corridor
- A40 Corridor
- Residential Hinterlands and North-South Links
- Ealing’s Green Spaces
- Sustainable Delivery
5. CONCLUSIONS AND RECOMMENDATIONS

5.1. This section sets out a series of conclusions and recommendations for next steps.

Conclusions

5.2. The integration of Ealing’s regeneration aspirations with the Spatial Plan can be achieved by restructuring the Core Strategy so that the priority areas for regeneration and growth are clearly identified, in a relationship to an overall spatial framework, supported by a set of policies that are clearly derived from and express Ealing’s expectations about how new investment in places will support wider ambitions for sustainable development. The policy objectives should cross reference to the policies and programmes of the Community Plan/Sustainable Community Strategy. The narrative set out in Section 3 is put forward as an indicative Framework, which can provide the starting point for the further re-drafting of the Core Strategy.

5.3. In re-drafting the Core Strategy, an opportunity exists to re-consider the relationship between the LDF Core Strategy and the Community Plan in line with Government policy as set out in Planning Policy Statement 12. Current work on the Core Strategy will provide an important source of evidence for the refresh of the Sustainable Communities Plan.

5.4. We considered how Ealing’s growth potential might be realised in light of the drivers for development. We set out (3.17 above) ideas for a number of spatial elements that might be used to build up an overall spatial framework for directing growth and regeneration. These ideas were derived from our reading of the baseline material made available to us and from our exchanges with officers, then tested informally with officers and members.

5.5. In line with the requirements of the regime and in anticipation of the Examination in Public, where these proposals are used to support a further draft of the LDF Core Strategy, the resultant draft and any proposed changes should be considered in relation to the Tests of Soundness, including the ability to demonstrate a clear audit trail for consultation, for option generation based on evidence, for the selection of preferred options and so on.

5.6. The Core Strategy will in time be complemented by a separate Development Plan Document addressing Development Control matters and setting out the approach to S106. The Borough may also consider adopting a “tariff” approach to development including the potential to use the forthcoming Community Infrastructure Levy. The Core Strategy must be high level but sufficiently specific about priorities to provide the basis upon which the subsequent DC DPD can be developed. The Borough already leverages investment in health, education and other social infrastructure. The priorities need to be reviewed to ensure that the Core Strategy contains sufficient “hooks” for leveraging value from development for infrastructure investment.
5.7. Advice from the Planning Advisory Service is to establish an infrastructure
delivery sub-Committee as a part of the Local Strategic Partnership to give a
“clear focus on delivery resources and maximising use of resources and public sector assets; [a] clear statement of standards and requirements for
existing and new development”\(^\text{17}\)

**Recommendations**

5.8. Re-draft the Core Strategy to more clearly express regeneration ambitions
using a narrative and spatial framework (Our suggested approach is set out
in Section 3 above).

5.9. Consider whether the Uxbridge Road Corridor (Ealing Boulevard) and the A40
Corridor provide suitable concepts and organising spatial principles for
growth and environmental improvement in the heart of the Borough

5.10. Review the masterplanning work that has been carried out for local places,
pick out and use elements to inform the re-draft of the Core Strategy,
reinforcing the latter’s specificity. (Check whether the evidence base and consultation on options for these masterplans has been sufficient to underpin
their proposed use to inform the Core Strategy – if not consider what extra
work needs to be done to provide a sufficient evidence base for Core
Strategy proposals based on local frameworks).

5.11. Review, establish and clearly define the priorities for infrastructure
investment. Where the evidence base or option development and selection
has not yet been carried out, undertake further work to underpin high level
proposals in the Core Strategy. (Some of the more detailed work can be
undertaken later to underpin further Development\(^\text{18}\) Plan Documents;
separate Planning Advice should be sought on the level of work necessary to
support infrastructure proposals in the Core Strategy).

5.12. Review the evidence base for retail, commercial and residential demand
across the Borough and assess how overall demand may be distributed
across the Borough’s localities

5.13. Review assumptions about Ealing’s position in London’s retail hierarchy in
light of the opening and impact of Westfield Shopping Centre. Further work is
required to establish the case and the preferred approach.

5.14. Assess the growth potential given by Crossrail at each of its stops, review the
masterplan/ development framework proposals for each locality and establish

\(^{17}\) EPiSP May 2007, and Planning Advisory Service participant’s resource book, local development
framework seminars, Infrastructure Planning and Delivery November/December 2008
\(^{18}\) Our view is that some of the masterplanning work for local centres contain analysis of infrastructure
deficit; and for example the Transport Strategy sets out proposals for transport and public realm
investment at Crossrail Stations. There appears to be a need for a social infrastructure assessment and for
further work to validate all assumptions and to pull them together into an overall set of proposals. NB the
PAS proposal for a sub-group of the LSP to lead on this work.
priorities for leveraging investment into local requirements for improving public realm, providing social and physical infrastructure\textsuperscript{19} etc.

5.15. Establish the Car Parking strategy linked to Crossrail (e.g. establishing how Park and Ride will be resisted and modal shift promoted).

5.16. Refresh the Borough Economic Development Strategy (The Economic Regeneration Strategy was written in 2006. There have been significant changes in the economy, in development prospects in Ealing and in the government policy framework since then\textsuperscript{20}. A Review of the strategy is recommended and the specific evidence informing the Core Strategy assumptions needs to be considered for its currency).

5.17. Establish the high level evidence and Borough priorities for improving social infrastructure and community facilities (how and what) based on specific strategies for education, open space, leisure, libraries, health, arts and culture (i.e. Anticipate the future development of the Development Control Development Plan Document and a linked tariff system or Community Infrastructure Levy and ensure the Core Strategy provides sufficient basis for its future development).

5.18. Consider the Case for Fastbus linking South Acton through to North Acton (and linking to routes Wembley northwards and Chiswick/Kew/Richmond southwards) and more generally review the effectiveness of north-south transport links\textsuperscript{21}.

5.19. Establish the parameters to development – setting out the agreed priorities for protection of the built and landscaped environment and for wild spaces and other agreed constraints to development (again at a high level – ensuring the Core Strategy provides the Framework for future Development Plan Documents).

5.20. Ensure that proper consideration is given to the cross Borough planning issues given by Heathrow and its hinterland and also Park Royal (3.10 and 3.11 above).

5.21. Carry out further masterplanning work in respect of Southall Station environs and Acton Mainline environs.

5.22. Consider the evidence for the continued designation of Ealing as a metropolitan town centre and the realism of aspirations for further retail growth.

5.23. Review the evidence available as to why the “high intervention” estates were selected if they are to be individually referenced in the Core Strategy (to do so would add to the coherence and specificity of the plan).

\textsuperscript{19} Build on and validate the proposals in the Transport Strategy op cit


\textsuperscript{21} See the discussion of Fastbus in Ealing Transport Strategy op cit p22
APPENDIX 1: CHALLENGE PRESENTATION

Review of Ealing’s LDF Core Strategy

Towards a legible development narrative for Ealing

Lee Shostak & Michael Owens
Shared Intelligence
December 2008

Ealing LDF Core Strategy Review
The purpose of the review

A short review designed to establish the narrative and key messages for development and the LDF in Ealing

From the PAS Review in July 2008:

- The council should consider how best to integrate its aspirations for regeneration, and the ambitions and aspirations of the Sustainable Community Strategy, with the need to develop a strategic spatial vision for the borough as the next stage in the evolution of the core strategy.
Core Strategy
(sets out spatial vision and strategic objectives; spatial strategy, core policies)

- Much background research complete
- Issues and options consultation undertaken in Autumn 07
- PAS Review, July 08 - identified need for further work
- Current Local Development Scheme (timetable and programme) anticipated adoption end 2010 - now slipping
Your aspirations......

- A small number of clear and succinct messages and priorities that will underpin the LDF
- Clear statement about long term opportunities and Borough priorities for regeneration and development
- Eye-catching, interesting document to support communication with residents, funders, developers, investors, stakeholders
- Communicates Ealing’s clarity of purpose, priorities and parameters – a “can do” Authority

and more......

More aspirations......

- Clarity on housing strategy – relation to London Plan; growth targets; mix; location; link to area regeneration
- Clarity on what is needed to support growth and change (infrastructure)
- Articulate the development potential from Crossrail
- Reassure residents about commitment to preserving what’s good
- Hooks for Projects and Programmes

Ealing LDF Core Strategy Review

Emerging Priority Issues that underpin Ealing's LDF
Emerging issues: context and character

- Despite Ealing’s considerable locational strengths, there has been an historic tendency to understate them.
- Ealing’s suburban qualities endure and need to be preserved, but today Ealing is more than a suburb.

Emerging issues: Housing Strategy

- London Plan growth targets – numbers / mix / affordability / family housing
- Estates Regeneration – achieving growth and regeneration – key to place shaping
- HCA Story – ready sites; emphasise equity share offer to employed residents in housing need

Emerging issues: Development Focus

Use key sites to strengthen specificity of Core Strategy:

- Ealing Broadway, Southall and the local centres
- Uxbridge Road Corridor
- Major Brownfield sites – including residential development at the perimeter of Park Royal
- The redevelopment potential of Housing Estates
- Unlocking Southall's major site opportunities linked to cohesion and town centre restructuring
Emerging issues: Development Drivers

- Maximise the impact of Crossrail …
  … especially on Ealing Broadway
- Treat Heathrow hinterland as a single area
- Capitalise on Southall’s London significance
- Acknowledge Park Royal’s enduring status
- Build on excellent transport connectivity

- NB The downsides need to be addressed

Emerging issues:
Priorities for leveraging value for investment in Infrastructure

Are you clear?

5

Ealing LDF Core Strategy Review
Emerging Spatial Principles
Spatial Principles

- Emphasise Context and Character – build cross borough story and local typology
- Use Development Priorities (especially Town Centres and Estates)
- Ealing Boulevard
- North – South Axis: South Acton – Park Royal?
- Develop Connectivity Story

Ealing LDF Core Strategy Review

The Challenge Questions

1. Is there a clear Vision and Ambition?
   1.1 - Ealing’s role in the sub region - undervalued strengths?
   1.2 - Is Ealing a suburb or a part of the city?
   1.3 - Embrace growth or preserve?
2. Is there a clear Regeneration narrative?
   2.1 - How best to maximise Crossrail's impact?
   - Impact on Ealing Broadway
   - Impact on Southall
   - Potential for the Boulevard along Uxbridge Road
3. Is the Economic Development Strategy up to date?
   3.1 - Impact of the recession?
   3.2 - Impact of Crossrail?
   3.3 - Response to the Sub National Review?
4. Ealing Altogether - a distinct identity or series of places?
5. Is there clarity on the Housing Strategy?
   - Agree or depart from London Plan?
   - Evidence for the focus on the Estates?
   - How to secure regeneration impacts
6. Do you have clear priorities for Community Infrastructure Levy/ S106?
APPENDIX 2: ATTENDEES AT LOCAL DEVELOPMENT FRAMEWORK MEETING

Nelson Room
15th December 2008

Michael Owens – Shared Intelligence
Lee Shostak – Shared Intelligence

EALING COUNCIL

Pat Hayes – Executive Director – Regeneration and Housing
Brendon Walsh – Director – Property and Regeneration
Susan Parsonage – Director Safer Communities
Noel Rutherford – Director of Built Environment
Eileen McKenna – Head of Property (strategy)
Kevin Gleeson – LSH
Dick Johns – Planning Policy Manager
Natalie Pace – Interim Head of Service
Trevor Davies – Interim Head of Environmental Health & Trading Standards
Alex Banner – Head of Housing Policy & Strategy
Jonathan Kirby – Head of Major Projects and Developments
Carol Sam – Senior Economic Regeneration Manager – Southall
Marianne Downie - Senior Economic Regeneration Manager – Ealing
Nilam Popat - Senior Economic Regeneration Manager – Greenford/Acton
Samantha Powell – Senior Planning Officer
Ian Weake – Planning Officer
Steve Barton – Senior Planner / Research Officer
Lucy Taylor – Head of Economic Regeneration
Geoff Warren - Head of Transport
Robert Turner – New Business Manager – Housing Supply
Shared

APOLOGIES

Gary Redhead – Interim Services to Schools Director
# APPENDIX 3: STRUCTURE FOR LDF DEVELOPMENT STRATEGY CHAPTERS

Proposed by LBE Planners March 09

<table>
<thead>
<tr>
<th>1. <strong>Ealing – at the heart of West London</strong></th>
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<tbody>
<tr>
<td>- Ealing’s strategic contribution to London, and its relationship to West London</td>
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<tr>
<td>- The borough as it is now, spatial characteristics and key statistics (as shown in Sustainable Community Strategy indicators)</td>
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<tr>
<td>- The spatial strategy for the borough – places to live, and for business and community activity to 2026.</td>
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<thead>
<tr>
<th>2. <strong>Uxbridge Road / CrossRail Corridor</strong></th>
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<tbody>
<tr>
<td>- Development and movement in the corridor</td>
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<tr>
<td>- Localities for growth in the corridor – in Acton, Ealing, Hanwell, Southall</td>
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<tr>
<td>- Heritage and environment – the mix of growth and low growth localities</td>
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<th>3. <strong>A40 Corridor</strong></th>
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<td>- Development and movement in the corridor</td>
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<tr>
<td>- Localities for growth – in Park Royal, Perivale, Greenford, Northolt</td>
</tr>
<tr>
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<th>4. <strong>Residential hinterlands and north-south links</strong></th>
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<tbody>
<tr>
<td>- The potential for north-south movement – North London Line, Fastbus, Greenford branch line etc</td>
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<tr>
<td>- Localities for growth – potential created by improved north south links</td>
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<tr>
<td>- Heritage and environment – the mix of growth and low growth localities</td>
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<th>5. <strong>Ealing’s green spaces</strong></th>
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<tbody>
<tr>
<td>- Green Belt and Metropolitan Open Land (area by area)</td>
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<tr>
<td>- Public, private and community open space</td>
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<tr>
<td>- Green Corridors and biodiversity</td>
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<th>6. <strong>Sustainable Delivery</strong></th>
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<tr>
<td>- Infrastructure – schools, health, transport, culture, leisure, security;</td>
</tr>
<tr>
<td>- Physical resources – land, water, air quality, waste, energy;</td>
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<tr>
<td>- Investment – business &amp; community investment and s106;</td>
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<tr>
<td>- Sustaining the Strategy – planning, monitoring and managing.</td>
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