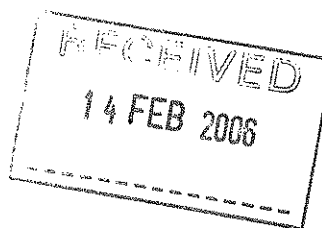




Planning Policy Team
Environment Group
Ealing Council
Perceval House
14-16 Uxbridge Road
London
W5 2HL



By email & post

9th February 2006

Dear Sir/ Madam,

**Local Development Framework: Consultation on Submission Statement of
Community Involvement and Draft Supplementary Planning Documents**

- SPD 1- Affordable Housing
- SPD 2 - Community Facilities
- SPD 3 – Sustainable Transport
- SPD 4 – Residential Extensions
- SPD 5 – West London Tram Route
- SPD 6 – Twyford Avenue Community Open Space

Thank you for your consultation letter dated 3rd January (received 9th January), regarding Ealing Council's Local Development Framework and the above consultations.

Please find attached British Waterway's comments on these consultation documents. I hope these representations are clear and concise and can be taken into account in the LDF preparation process. Should you wish to discuss any aspect of the representations, please do not hesitate to contact me at your earliest convenience.

Yours faithfully,



**Anna Chapman
Planner - London**

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SUBMISSION STATEMENT OF COMMUNITY INVOLVEMENT

- 2.1** British Waterways is pleased to see that British Waterways is now named under the list of “general consultation bodies” and that our contact details have been amended.
- 2.2** British Waterways (BW) acknowledges that the Council keeps a register of consultees which is referred to when consulting on planning applications. Since this information is not detailed separately in the SCI, BW request that the Council ensure this register reflects the requirements of The Town & Country Planning (General Development Procedure) (Amendment) Order 1997 (Article 10(1) of the 1995 Order - paragraph (za)), which introduces a requirement for a local planning authority to consult the British Waterways Board before the grant of planning permission for development likely to affect specified inland waterways, reservoirs, canal feeder channels, watercourses, let offs and culverts.

British Waterways must be consulted on any matter that falls within its statutory consultee designation, i.e. those applications which *‘have the potential to affect the safety and integrity of any waterway, reservoir, canal feeder channel, watercourse, let off or culvert owned or managed by British Waterways’*. The zone of consultation extends 150 metres either side from the centre line of the waterway or feeder, or 150 metres from the edge of a reservoir.

British Waterways is also keen to comment on pre-application discussions on such development and request that this also be acknowledged.

- 4.5** British Waterways is also pleased that the section on consultations on planning applications reflects the fact that, for statutory consultees the 21-day deadline does not start until the statutory consultee has received all the information it needs to provide an informed response.

SUPPLEMENTARY PLANNING DOCUMENTS

SPD 1- Affordable Housing

BW feels the Affordable Housing SPD should acknowledge the potential of residential moorings in appropriate locations to contribute to the affordable housing stock. Residential moorings can offer an affordable and alternative housing choice to add to the borough's housing mix.

Residential moorings also add vitality and life to a canal corridor and contribute to the local economy. BW considers that any further guidance on the provision of affordable housing should highlight the merits of residential moorings as an affordable type of housing. BW would welcome the opportunity to work with the borough to identify any sites or stretches of the Grand Union Canal that may be appropriate.

SPD 2 - Community Facilities

BW's role in facilitating and providing the community facilities should be acknowledged in the Community Facilities SPD.

BW has an education role in the community. BW employs a Learning Services Manager to work with local schools and the community to assist in the awareness and promotion of the historical, environmental, social, sustainable and economic role of the inland waterways within modern life.

BW promotes the use of Beauchamp, a floating classroom for education and community groups. Beauchamp is able to navigate the canals and provide school children with a fascinating insight into the waterways. It can also provide an imaginative and creative environment for learning and achieving.

BW recognises that there must be specific provision for healthcare, education, skills development and community needs in development frameworks, including access to green space and active travel to promote physical activity. In respect of the last points, it is considered that the towpaths have significant potential for achieving better access to green space and active travel (walking, jogging and cycling).

SPD 3 – Sustainable Transport

Despite its title "Sustainable Transport" this SPD appears to have a rather narrowly Defined purpose, to provide clarification on how developers can achieve successful low-car development (by agreeing limits on the availability of parking permits in controlled parking zones and by introducing 'city car clubs'), and to indicate how developers can ensure that vehicle access and parking at the front of residential property does not prejudice highway safety or environmental problems.

Given the title BW would like to see the SPD recognise the role of the Blue Ribbon Network for cycling, walking, transporting waste and aggregates, leisure and tourist traffic. In terms of integrated and sustainable transport planning, British Waterways is also exploring opportunities for water buses and taxis on the West London Canal Network.

The canal towpath can be used to support walking and cycling as forms of active travel between destinations e.g. commuting. To enable the towpath to offer an attractive resource for walking and cycling it is necessary to ensure a walkable and inviting towpath, which can contribute positively to the public realm. BW therefore seeks improvements to the towpath itself (including signage and interpretation and measures such as CCTV, lighting, graffiti removal, towpath resurfacing, landscaping and street furniture) and access to the towpath in the vicinity of a new development as types of on-site transport measures and facilities in order to encourage use of towpath for walking etc.

Waterborne transport (of passengers and in particular freight) also has a role to play in reducing traffic congestion and providing alternative non-car modes of transport improving air quality. The SPD should therefore give recognition to the role of the Blue Ribbon Network for reducing traffic congestion, improving air quality and providing alternative non-car modes of transport through waterborne transport.

SPD 4 – Residential Extensions

BW has no comments.

SPD 5 – West London Tram Route

In terms of integrated and sustainable transport planning, British Waterways is exploring opportunities for water buses and taxis on the West London Canal Network and would be interested in developing water bus and taxi stops in the vicinity of the proposed tram. The SPD should therefore give recognition to the benefit and potential of developing an integrated transport system between the tram and water buses/ taxis for reducing traffic congestion, improving air quality and providing alternative non-car modes of transport.

SPD 6 – Twyford Avenue Community Open Space

BW has no comments.