

## **Examiners' Matter 3: Vision, Objectives and Spatial Strategy**

### **Issue [Focus – Policies SP1-SP4]**

Whether the Vision and Spatial Strategy for the Borough is justified, effective, in general conformity with the London Plan, consistent with national policy and positively prepared.

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### **Vision and Objectives. Questions 1 and 2**

#### **EM response**

As set out in EM Representation 15, and the SEC Representation on Ealing Metropolitan Town Centre, Ealing Matters does not think the Plan is ambitious and neither is it likely to achieve its apparent objectives. Whether, in fact, it will or not will never be known as the Plan's objectives are too woolly in their wording for their achievements to be measurable.

Though the Plan itself does not say so, it is clear from its statements that the Council's first priority is (very rightly) the delivery of affordable homes for the existing community. We shall show in the session on Matter 3, Housing that the Plan's policies in this direction are not likely to be achieved.

The Plan is not well aligned with the London Plan. This is reflected in the Statement of Common Ground which includes many areas of conflict between the GLA and the Council, but other areas are missing from Ealing's Plan which the London Plan says should be included. These include, but are by no means restricted to, a Metropolitan Town Centre Strategy (required under LP Policies SD7 and SD8), and policies on form, character and capacity for growth (LP D1(B)), Heritage conservation and growth (LP HC1(B)), culture and creative industries (LP HC5(A)) and waterways (LP SI14(A) and (B) and SI 16). While the GLA may not have identified these in its SOCG they reflect concern land use issues that are of great and very legitimate importance to the Ealing Community and EM believes either that the plan should provide for them or proper reasons given as to why it does not.

### **Spatial Strategy – general issues: Questions 3 to 5**

#### **EM response**

The IIA appears to have been written after the Spatial Strategy was prepared and so cannot have flowed logically from it. Greatly concerning, is the poor extent to which the location of the Borough in West London, midway between the City and Heathrow Airport and with its excellent rail and road links to the Midlands, Bristol, South Wales and the South West is understood. Its location potentially provides the borough with extraordinary opportunities which the draft plan entirely overlooks. This is nowhere more the case than in Ealing Metropolitan Town Centre for which, despite its locational advantages, there is no strategy to reverse its steep and unnecessary decline in recent years.

Instead, Policies SP2-SP4 is little more than a long jumble of aspirations against which few will argue but which provide little clue as to how land use in the Borough should be managed in the Plan.

### **Infrastructure: - Questions 6 to 10**

#### **EM response**

As set out in EM Representation 3, Ealing Matters does not consider the Plan's approach to infrastructure planning to be sound, particularly when considering the extraordinary rate of planned residential growth in the Borough. We would flag here the concern that most of the infrastructure schemes in the Plan have delivery dates 'tbc' against them. The overwhelming concern is that these projects will never see the light of day.

### **Policy SP3: Question 12b**

#### **EM response**

LBE originally adopted the target of making the whole borough carbon neutral but more recently refined this claim to just LBE's own activities. However as far as EM is aware, they have never presented a set of proposals to measure this aspiration. We thus have no idea whether their measures will be effective, or if they implement them, whether they have been.