

**EALING COUNCIL  
LOCAL DEVELOPMENT FRAMEWORK**

**Supplementary Planning Documents (SPD)  
June 2006**

**PRE-ADOPTION CONSULTATION  
STATEMENT  
(REGULATION 18(4)(b) STATEMENT)**

Planning Policy and Development Advice Section  
[www.ealing.gov.uk/planpol](http://www.ealing.gov.uk/planpol)  
Ealing Council

## 1. Introduction

Ealing Council has prepared a number of Supplementary Planning Documents which supplement the policies in the Adopted 2004 Plan for the Environment, (Ealing's Unitary Development Plan), and which form part of the Local Development Framework for Ealing.

This statement sets out the process undertaken by the Council in order to produce the adopted Supplementary Planning Documents. It seeks to demonstrate how the Council has complied with Regulation 17 and 18 of the Town and Country Planning (Local Development) (England) Regulations 2004 by describing the public participation that has taken place during the drafting of each of the Supplementary Planning Documents.

This consultation statement accompanies the following Supplementary Planning Documents and should therefore be read in conjunction with them.

SPD 1 Affordable Housing  
Revised SPD 2 Community Facilities\*  
SPD 3 Sustainable Transport\*\*  
SPD 4 Residential Extensions  
SPD 5 West London Tram  
SPD 6 Twyford Avenue Community Open Space

\*This SPD has been revised to take into account a late representation from the Metropolitan Police Authority.

\*\*Note that this SPD is now divided into three separate SPDs, SPD 3 Low Car Housing in Controlled Parking Zones, SPD 7 Car Clubs and SPD 8 Crossovers and Parking in Front Gardens.

June 2006

## **2. Record of Public Participation (Regulation 17 Statement)**

### **2.1 Summary of Consultation: SPD 1 Affordable Housing**

The Affordable Housing SPD was prepared jointly by Ealing Council's Planning Policy and Housing services.

Consultation was initially carried out as part of an update of draft supplementary planning guidance notes, which were placed on deposit alongside proposed modifications to the UDP, in the spring of 2004. When the UDP was adopted in October 2004, this document was agreed by Council as an approved draft supplementary planning guidance note for development control purposes. However, as a result of comments received during the spring consultation, Council identified that some amendments were needed in order to take account of new information from government and the Housing Corporation. Therefore this document could not be adopted as SPG, but was taken forward under the new Planning and Compulsory Purchase Act 2004 as a draft supplementary planning document.

To initiate discussions on the revised draft, questionnaires were sent to interest groups, e.g. housing developers who had made representations in previous rounds of consultation, Registered Social Landlords (RSLs) via the Ealing Housing Development Forum, and made available through wider consultation as part of the LDF process. Meetings with the Ealing Housing Development Forum are convened 2-3 times a year, and the draft SPD was raised as an item for discussion on this agenda as revisions came forward.

The main issues raised during this consultation were:

- Revision of the SPD - premature in light of impending changes to PPG 3;
- The definition of affordable housing – the definition was questioned;
- Lack of conformity of the SPD with the Adopted 2004 Unitary Development Plan;
- Uncertainties over funding;
- The appointment of preferred RSLs; and
- That the guidance was too prescriptive with respect to residential mix.

We addressed these issues in the SPD in the following way:

- The policy context was updated to reflect emerging government policy;
- The definition of 'affordable housing' now includes student housing;
- The SPD now conforms with the more flexible 'saved' UDP policy;
- Changes have been made to incorporate the latest Housing Corporation investment policy;
- The position regarding RSLs has been clarified; and
- Conclusions of the 2005 Housing Needs Study have been used to support the housing mix policy.

## **2.1 Summary of Consultation: SPD 2 Community Facilities**

Consultation was initially carried out as part of an update of draft supplementary planning guidance notes, which were placed on deposit alongside proposed modifications to the UDP, in the spring of 2004. When the UDP was adopted in October 2004, this document was agreed by Council as an approved draft supplementary planning guidance note for development control purposes. However, as a result of comments received during the spring consultation, Council identified that some amendments were needed in order to clarify arrangements and mechanisms for assessing the social impacts of new development. Therefore this document could not be adopted as SPG, but was taken forward under the new Planning and Compulsory Purchase Act 2004 as a draft supplementary planning document.

In the preparation of the draft Community Facilities Supplementary Planning Document, we consulted with the following bodies to gather their views on this document:

- The Planning and Community Working Group (comprising members from the following organisations: Ealing Community Network (an umbrella organisation for voluntary sector groups in Ealing), Ealing Civic Society, East Acton Residents Association, Southall Community Alliance, Sure Start Acton, Acton Community Forum, Access for Support & Development (Southall), Lohana Community West London, Joseph's Drive Residents Association, South Acton Service Improvement Group, Acton Housing Association)
- Ealing Primary Care Trust
- Ealing Education Services
- Ealing Legal Services
- Ealing Planning Services (Development Control)
- Ealing Development Control Users Group (membership represents residents and local businesses who are interested in development)

To this purpose we used a series of meetings dedicated to the topic of the Local Development Framework, in conjunction with consultation on the draft Statement of Community Involvement. On-going meetings were held with Ealing Community Network, the Ealing Primary Care Trust and Ealing Education Services. The SPD was discussed at the Development Control Users Group and Planning and Community Working Group meetings on several occasions.

The main issues raised during this consultation were:

- Social Impact Assessment – how to most appropriately assess the community, social, health and educational impacts of new developments, at what threshold of development activity to consider such impacts, and how best to tailor this to different scales of development;
- Making the document less complicated and jargonistic for community groups;
- Making linkages between the SPD and the Council's Statement of Community Involvement;
- Achieving community input to s106 agreements

- The need to ensure that community facilities are not only available, but that they are accessible and affordable to the communities who wish to use them;
- Increasing the emphasis in the document on the need to assess health as well as social/community impacts;
- Updating the document to reflect the latest guidance, strategies and policy directions.

We have addressed these issues in the SPD by:

- Redrafting sections of the Social Impact Statement assessment form, and the section on preparing a social impact statement;
- Rewording the document in plainer English where possible;
- Highlighting the linkages between the Statement of Community Impact and the SPD on Community Facilities, for example in relation to thinking about community facilities during discussions on planning proposals,
- Initiating new procedures for community involvement in legal agreements and cross relating this to the Statement of Community Involvement;
- Updating the section on education facilities so that it more closely reflects the latest guidance, and the section on health facilities to reflect the latest government policy on provision of health services.

### **2.3 Summary of Consultation: SPD 3 Sustainable Transport**

This was a new document to provide clarification of aspects of the UDP policy on low car housing and the policy on parking in the front gardens of residential property.

In connection with the preparation of the Sustainable Transport Supplementary Planning Document, consultation was undertaken internally with Highways Management, Transport Planning, Legal Services and Development Control through informal one to one meetings; and externally with the Smartmoves - City Car Club, Ealing Local Agenda 21, and Friends of the Earth, by circulating a copy of the initial draft document for their comments.

The main issue raised in this round of consultation was the need to provide clarity in relation to the application and implementation of low car housing schemes, particularly those in Controlled Parking Zones's (CPZ's).

This was addressed in the SPD by providing specific advice with respect to the issuing of parking permits for low car housing in CPZ's, and in the final section of the guidance, providing advice in respect of Car Clubs, which are also likely to be particularly relevant as part of low car housing schemes.

Smartmoves – City Car Club, requested that the document be amended to reflect the need for schemes to be viable, and that the developer is not expected to maintain the car club in perpetuity. They also requested that in setting up a commitment to a car club for occupiers of a development, that a car club operator with a track record of success, i.e. an accredited car club operation, be engaged. Wording to address both these issues has been included in the SPD.

Additional content on garden depth and crossovers was also requested by Highways Management, and on flooding and other environmental impacts by Ealing LA21. This information was incorporated into the SPD.

## **2.4 Summary of Consultation: SPD 4 Residential Extensions**

This is a new document to provide clarification on the policy for extensions and alterations to private houses and gardens. Initial work focussed on draft guidance on alterations to bungalows, which was produced in partnership with residents in Ravenor Park and endorsed at Greenford Area Committee.

As with other supplementary guidance, this needed to be progressed through the procedures of the Planning and Compulsory Purchase Act 2004. The opportunity was taken to add supplementary material on other aspects of residential extensions, as prepared by development control and conservation officers. In addition, Southall Councillors requested advice on outbuildings within residential property.

The initial decision to prepare this guidance followed discussions with local residents in the Ravenor Park area of Greenford, where, in spite of UDP policy which is consistent with good design principles, there are examples of alterations to bungalows in the area which breach these principles. At the Public Inquiry into the UDP, the Council gave a commitment to work with Ravenor Park Residents on the production of 'supplementary planning guidance' (SPG) on the design of alterations to bungalows. The draft was prepared in conjunction with a nominated 'contact group' of residents of the Ravenor Park area, and the Ealing Access Committee.

Although initially the draft concentrated on bungalows, some residents raised the concern that it was not just bungalows that were vulnerable to inappropriate development. As a result, the ambit of the document was extended to include alterations to all residential dwellings.

The brief then widened to include all residential extensions, and on this basis, further consultation was undertaken with the following bodies to gather their views on this document: (internal) Planning Services (development control officers), Ealing Conservation Officers, the Regeneration and Major Projects Team, Legal Services, (external) the Development Control User Group (mentioned above), the Ealing Access Committee, English Heritage and members of Conservation Area Panels and residents of the Ravenor Park Estate in Greenford.

To this purpose we met on a one to one basis with Planning Services officers (who had drafted aspects of the original draft document), and attended meetings held by the Development Control User Group, Conservation Area Panels and local residents of the Ravenor Park Estate. Verbal and written comments were received as a result of these meetings.

The main issues raised in this round of consultation were the style of the document in relation to its target audience, and the appropriate information to include on extensions in Conservation Areas, and to bungalows.

We addressed these issues in the SPD by including drawings and diagrams to illustrate technical and urban design advice, using plain English wherever possible, and incorporating additional material on extensions in Conservation Areas, and to bungalows, at the request of the various groups.

## **2.5 Summary of Consultation: SPD 5 West London Tram**

This is a new document to supplement the UDP policy on the Tram project. It indicates UDP policies which the developer of the tram project should take particular account of, and which developers interested in property along the route should bear in mind. It refers to the route safeguarding process, clarifies street names along the tram route, and advises on other legislation relevant to the project.

Internal consultation was initially undertaken with the Council's Regeneration and Major Projects Team, Development Control, Conservation and Tree Officers, The Ealing Tram Team, Ealing's Parks and Countryside Service, Legal Services and with the Transport for London Tram project team. A number of minor changes were suggested to clarify the wording, which were reflected in the draft SPD.

We then informally consulted a range of bodies with an interest in the tram project, to gather their views on this document (See Appendix A).

To this purpose we used a draft of the document, with a covering letter inviting comments. The letter and draft were issued on 5 August 2005, and comments were invited by 23 September 2005.

One response was received. This suggested that Section 5 be strengthened by including a definition of sustainability. There were also suggestions regarding the tram project's scope and content and the presentation of its effects, which fall outside the scope of the Supplementary Planning Document.

We addressed these issues in the SPD by revising para 5.1 to include the definition of sustainability found in section 1.1 of the Adopted 2004 Plan for the Environment. The remaining issues raised will be taken into account in the continuing project design, the Environmental Statement and the Statement of Case which will be prepared if the project is subject to a Public Inquiry.

## **2.6 Summary of Consultation: SPD 6 Twyford Avenue Sports Ground Open Space Brief**

It became Council policy to designate the Twyford Avenue sports ground as community open space in 1996. This was deposited as an alteration to the then statutory UDP in 1997. There were representations in support and against the proposal, and it was held in abeyance until Council decided to undertake a full replacement UDP in 2000.

The proposed designation was considered at the UDP inquiry in 2003, and the Council's proposal was upheld by the Inspector. The site is designated community open space in the adopted 2004 UDP. Throughout this process there had been strong community support for the protection and use of this open space by the community. During the discussions at the UDP inquiry, the Council agreed to work with local residents and others on a supplementary guidance note, as part of a proactive approach to the appropriate use of the site. Initial work was done, but the introduction of regulations pursuant to the Planning and Compulsory Purchase Act 2004 meant that the procedure for supplementary planning documents had to be followed.

In the form of a draft Supplementary Planning Document, we consulted with the following bodies to gather their views: Ealing Council Services - Active Ealing, Education, Development Control, Parks (Arboricultural Team)

External consultees: members of the Creffield Area Residents Association (CARA), Twyford High School, Indigo Planning on behalf of Wasps Football Club (the operators) and Sorbon/Michael Shanly Homes (the owners),

A draft of the open space brief was also reported to Acton Area Committee in April 2005.

A draft was initially prepared through partnership working with members of Creffield Area Residents Association (CARA), Twyford High School and various internal services, including Development Control, Active Ealing, Education and Arboriculture. Discussions started with an initial framework to which the various partners contributed information. Preparation of the draft was a highly iterative process, and involved numerous meetings with the various partners. Meetings were held with representatives of the owner of the site (Sorbon/Michael Shanly Homes) and comments were received which were considered in drafting the document. These included considering housing on the site, which would be contrary to the UDP policy. The draft brief was circulated to the owner of the site and to the local schools prior to reporting a copy of the brief to the Acton Area Committee in April 2005.

Internally, Education Services have provided useful information regarding the needs of the local schools for open space/recreation facilities, which has been incorporated into the draft. Similarly, Active Ealing have also supplied useful contributions regarding the need for new sports/recreation facilities within this locality. The Arboricultural Team have provided advice in respect of the trees of value on the site. This information has been incorporated into the draft brief.

More recently a number of meetings were held with the operators of the site - Wasps Football Club (the amateur rugby club) and their agents. Various comments have been received/submitted which have been considered in finalising a draft. These related to correcting factual details regarding the site, including the history and present use of site, and changes were made to the document to reflect this. Other comments received were taken forward into the formal public participation.

### 3. Consultation under Regulation 18

Formal consultation on the draft supplementary planning documents took place over a five week period from **06 January 2006** to **10 February 2006**.

- The supplementary planning documents, including a statement of the proposals matters was made available in the boroughs public libraries at: Acton, Ealing Central, Greenford, Hanwell, Jubilee Gardens, Northfields, Northolt, Perivale, Pitshanger, Southall, West Ealing, and Wood End, and at the Council's reception areas at 22-24 Uxbridge Road, Ealing and Perceval House, 14-16 Uxbridge Road, Ealing.
- The supplementary planning documents and proposals matters were available on our website [www.ealing.gov.uk/planpol](http://www.ealing.gov.uk/planpol), with a statement explaining where and when paper copies of the document were available for inspection.
- We placed an advertisement in the Ealing Gazette, which was carried on 6 January 2006.
- We sent a notification letter with the statement of matters and details of where the documents were available for inspection, to the individuals and organisations listed in **Appendix A**.
- We further publicised the draft Supplementary Planning Documents through a number of local forums/organisations, including at meetings which we attended, of the following:
  - Local Area Committees
  - The Local Strategic Partnership's Sustainability Forum
  - Ealing Access Committee
  - The Development Control Users Group,
  - The Planning and the Community Working Group,
  - The Ealing Community Network,
  - Local Residents Associations (including Save Ealings Streets),
  - Ealing Primary Care Trust,
  - Ealing Housing Association Forum

Internal consultation with officers was undertaken through the LDF Steering Group (which has sign-off rights for Cabinet, is chaired by the Director of Built Environment, and includes the service heads of Transport, Planning Policy, Development Control, Regeneration and Major Projects, Community Strategy and Legal Services) and the LDF Contact Group (which includes a named officer from each service across Council).

The main purpose of this exercise was to give an opportunity for the community and other stakeholders to have a further input into the development of the draft Supplementary Planning Documents.

We enclose a copy of the notification letter, response forms, the Statement of Matters, and the public advertisement in **Appendix B**. A bound copy of the draft supplementary planning documents is available alongside this document, or on our website.

We received 216 points of representations from 38 organisations/individuals on the draft SPDs. Below is a summary of the main issues raised, and subsequently addressed through changes to the final SPDs. A detailed record of the representations received, and our responses to these, are in **Appendix C**.

### **3.1 Summary of Changes to the SPDs**

#### *SPD 1 – Affordable Housing*

- Incorporate updated information from the new Housing Needs Survey for Ealing - on scale of need, affordability, and size of units;
- Update references to Mayor of London's planning guidance on Housing, particularly on calculating the affordable housing proportion required in development;
- Broaden the range of affordable housing providers, and clarify that the list of registered social landlords is not exclusive;
- Clarify that the possibility of a change to the 15 unit threshold needs to be taken up as a Development Plan policy change rather than a matter for the SPD;
- Expand on what would be sought in planning obligations, such as making the affordable housing providers party to the agreement;
- Provide clarity on sustainability of housing provision.

#### *SPD 2 – Community Facilities*

- Add requirement to take account of the cumulative social impact of development, and the need for providers of community facilities (eg primary care trust) to be involved;
- Edit to improve expression;
- Add references to older children's needs, and that young people themselves must be involved in this;
- Add references to the university sector and Thames Valley University.

#### *SPD 3 – Sustainable Transport*

- Divide the SPD into three different documents – Low Car Housing, Car Clubs and Crossovers & Parking in Front Gardens (participants indicated that the heading 'Sustainable Transport' was confusing and did not adequately describe a document which deals with three specific issues; car clubs, low car housing, and crossovers. The final content was presented in the form of three separate SPDs, each covering one of the above subjects. The crossovers SPD also incorporated some design advice on gardens which had previously been included in SPD 4 Residential Extensions);
- Add reference to the safety of cyclists in relation to applications for new vehicle access to property;
- Edit to improve expression – including in respect of legal requirements;
- Add reference to street trees in consideration of crossovers;
- Clarify that crossovers are not appropriate if they would cause loss of more than one on-street parking space;
- Boost references to environmental issues relating to front garden parking, and include the text on front gardens which is currently in draft SPD4;

- Indicate that applicants for vehicle access should indicate planting, boundaries and materials in layout of front garden.

#### *SPD 4 – Residential Extensions*

- Edit to improve expression;
- Clarify and correct references to legislation;
- Increased reference to design requirements for Conservation Areas/Listed buildings and expansion of relevant policies;
- Improve diagram referencing;
- Add guidance on planning application drawings;
- Delete text on front gardens and add this to SPD8 (Crossovers and Parking in Front Gardens), but retain a cross-reference within SPD4.

#### *SPD 5 – West London Tram Route*

- Edit to improve expression;
- Add further information in respect of the use of sustainable urban drainage systems and the promotion of resource efficiency;
- Add reference to preparing policy statements and supplementary planning documents for sites which are cleared as part of the tram scheme;
- Amend text to confirm that planning obligations will be secured in line with government guidance on planning obligations;
- In terms of achieving high quality design, add text to indicate that the tram development respects and enhances the character, and appearance of heritage assets such as Conservation Areas, listed buildings etc, and to balance the interests of different users of the highway.

#### *SPD 6 – Twyford Avenue Community Open Space*

- Edit to improve expression;
- Update the section on 'site history' to reflect recent changes of ownership and management of the site;
- Amend text to confirm that S.106 monies will be sought in line with government guidance on legal agreements;
- Add text to reflect the work of London Wasps Community Team and Wasps Football Club in promoting community use;
- Update section on Archaeological/heritage value, and acknowledge proximity of site to listed building at Twyford High School, and the need to protect its setting.

#### *Sustainability Appraisal of the SPDs (published alongside the SPDs)*

- No changes needed. However, statutory consultees have identified additional sources to update the baseline data.

### **3.2 Revised SPD 2 – Community Facilities**

Cabinet agreed the draft Supplementary Planning Document 2: Community Facilities in December 2005 for public consultation. The consultation period ended on 10<sup>th</sup> February 2006, and Members were asked to consider people's representations and to consider proposed responses to them, including amendments to be made to the document as a result, at the 6 March 2006 Cabinet meeting. The wording of the amendments to the SPD were agreed by the Transport and Planning portfolio holder, and the document was adopted on the 29<sup>th</sup> March.

Subsequent to this process, officers were contacted by the Metropolitan Police Authority (MPA) in April, querying a misplaced representation that had not been taken into account through the above process. On consideration of the representation, officers decided that the changes to the SPD requested in this representation should be incorporated into the document. Legal advice was therefore taken as to how to incorporate the representation – and it was advised that a revision to the SPD should be made and then re-adopted. This is the process that was taken. The revised SPD was adopted by Cabinet in June 2006.

The revised SPD includes the following additions:

- contact details for the MPA added to Table 1 – list of community contacts;
- additional wording under Section 3 on Social Impact Assessment, to include the MPA as a consultee in this process, and to set out the MPA's threshold for commenting on major applications,
- an additional question (16) in the Social Impact Assessment in Appendix One of the SPD, to request developers to contact the MPA for their comments on major planning proposals, and how these proposals might affect the Authority in terms of providing police facilities and services.

A copy of the representation from the MPA is included in Appendix D.

## 4. Sustainability Appraisal of the SPDs

The sustainability appraisal of the SPDs is an iterative process, helping to shape the final SPDs. In addition to actually testing the sustainability of the individual SPDs, a key aim of the process is to identify scope for enhancing the sustainability of the SPDs, and addressing conflicts with the SA objectives where these arise.

The initial stage of the appraisal process following the establishment of the SA framework required an appraisal of the SPD objectives, to test if these were compatible with the SA objectives. This was key, since the SPD objectives framed the content of the SPDs themselves. This process allowed us to identify and address any conflicts at an early stage, and refine the SPD objectives where necessary. Whilst the compatibility test for the individual SPDs did identify some potential conflicts, it was not felt that there was a need to refine the SPD objectives further at this stage. In particular it was recognised that certain objectives will always inherently be in conflict, particularly given the broad scope of sustainability, which covers environmental, social and economic issues. It was not felt however that these objectives should be discounted or deleted. Instead it was important to recognise where these conflicts had arisen, and consider how any significant effects could be minimised or mitigated through the drafting of the SPDs.

Following the appraisal of the SPD objectives, the development of alternative options was considered for each of the SPDs, which were then subsequently appraised against the SA objectives. In the case of these SPDs, which supplement policies in the saved Adopted UDP, the only options that were considered suitable for appraisal were the 'with an SPD' option and the 'no SPD' option. Both options were appraised for each SPD against the SA objectives. Not surprisingly the 'with an SPD' option was considered to be most sustainable of the two options. This preferred option was to form the basis for the drafting of the SPDs.

Up to this point, only the objectives and potential options for the SPDs had been appraised. Having completed this iterative process, drafts of the individual SPDs were prepared. As with the earlier appraisals of the SPD objectives and options, the draft SPDs were then appraised against the SA objectives. As part of the appraisal of the draft SPD where significant adverse effects have been identified, appropriate mitigation has been identified, to ultimately improve the sustainability of the SPD. Moreover, in those instances where the influence of the SPD has been positive or neutral, consideration has been given to how positive effects can be enhanced/maximised.

Various changes to the SPDs were recommended as a result of this appraisal:

- Affordable Housing - additional text to minimise any potential conflict that may exist between achieving affordability and good design.
- Residential Extensions SPD - additional advice in respect of designing out crime, accessible design and sustainable design.
- Sustainable Transport SPDs - further advice with regard to the hardstanding of front gardens associated with crossover development.
- West London Tram SPD – additional advice in respect of sustainable design.
- Twyford Avenue Sports Ground - reference to promoting the application of sustainable design techniques, including energy conservation measures and SUDS included.

## **4.1 Consultation bodies – input to the SA process**

The actual process itself has also been shaped by the consultation bodies who responded to the Scoping & Options Report and the Draft Final SA Report. In response to the Scoping and Options report comments were received from the Environment Agency and English Nature. A number of these comments included recommendations on the SA objectives. In particular, in response to these comments it was agreed to include reference to minimising flood risk as part of objective 17. A further 9 points of submission were received from the Environment Agency, English Heritage, the Countryside Agency and English Nature in response to the draft final SA report. A summary of these submissions can be found in section 7 of Appendix C of this document. A number of these submissions reiterated earlier comments made by the statutory consultees to the Scoping and Options report. No further changes were however agreed to the SA objectives, although it was agreed that the baseline data should be updated in light of further sources of information identified by the statutory bodies. This will be undertaken as part of an ongoing process of updating and reviewing the baseline data, which will be necessary for monitoring purposes.

## **4.2 Monitoring the performance of SPDs**

In respect of monitoring, it is essential that the performance of the SPD's is regularly monitored to ensure that they are meeting their objectives and that any negative impacts are minimised/eliminated. This monitoring will also be key to ensuring that the SPD's remain current and relevant. Reviewing and updating the baseline data will be particularly important in the monitoring of the draft SPD's. In particular this data will allow us to check if the SA predictions of sustainability effects outlined in this report were accurate, and to see if the SPD is contributing to the achievement of the SA objectives. This monitoring exercise will also allow us to identify if the recommended mitigation/enhancement measures are having the correct effect. Where unforeseen adverse effects are identified as part of this monitoring process, consideration will be given to the need to review the SPD's to mitigate against these concerns. This monitoring process will form part of the overall annual LDF monitoring exercise, with an Annual Monitoring Report being published in June each year.

## 5. Appendices:

- Appendix A – List of bodies consulted for SPD 5 – West London Tram (Regulation 17)
- Appendix B - List of Consultation Bodies for Regulation 18
- Appendix C – Notification Material:
  1. Letter of Notification to Consultees
  2. SPD Representation Form
  3. SPD Statement of Matters and Availability of Documents
  4. Public Notice – Ealing Gazette
- Appendix D– Summary of representations and Councils responses
- Appendix E – Representation from the Metropolitan Police Authority on SPD 2

## **Appendix A List of Bodies Consulted for SPD5 West London Tram (Regulation 17)**

Living Streets (Mr Donald Allwright)	Gordon Road and Surrounding Streets  (Ms Sue Deans)
Save Ealing's Streets (SES) (Mr Will French) (Ms Shelley Bennett) (Ms Victoria Burke) (Mr Paul Hemsley) (Mr Sukh Sira)	Acton Town Residents' Association (Mr Patrick Driscoll)  Local Agenda 21 Transport Group (Mr Martin Eady)
Hanwell Steering Group (Mr Nigel Bakhai)	Ealing Friends of the Earth (Mrs Christine Eborall) (Ms Virginia Fassnidge) (Mr Nic Ferriday) (Mr Ron Simpson) (Mr Mike Tyzack)
Ealing Passenger Transport Users' Group (Mr John Beeston) (Mr John Gashion) (Mr Simon Rowley)	Central Ealing Residents' Association (Mr Julian Edmonds) (Mr Will French)
St Joseph's Drive (Southall) Residents' Association (Mr D S Bhasin)	Hanger Hill Garden Estate Residents' Association (Mr Hein Du Toit)
Lyndhurst Avenue Residents Association (Mr Leonard Brooks)	Residents' Association of Madeley and Westbury Roads (Mr Andrew Fletcher)
Ashfield Road Residents' Association (Ms Maria Budzynska)	Hanger Hill East Residents' Association (Mr Graham Fowler)
Ealing Passenger Transport Users' Group / Local Agenda 21 Transport Group (Mr Peter Chadburn)	Margil Limited (Mr Michael Fowler)
Walpole Residents' Association (Mr Patrick Chapman)	East Acton Residents' Association (Mr Charles Gallichan)
Goldsmith Residents Association (Mr John Chapple)	Hanwell Neighbourly Care (Mrs Elizabeth Gammon)
St Mary's Neighbourhood Association (Mr Stephen Cole)	South Acton Residents Action Group (Mr John Gashion)
Golf Links Tenants and Residents' Association (Ms Leta Coward)	Class Designs (Ms Mary Gill)
Ealing Community Network (Mr Bill Davidson)	Ealing Cycling Campaign (Mr Martin Gorst)
Northfield Avenue Traders Association (Mr Brian Davis)	Southside Action Group Ealing [SAGE] (Ms Christine Gratus)

Ealing Civic Society  
(Dr Robert Gurd)

Creffield Area Residents' Association  
(Ms Liza Halim)  
(Mr Tim Poulston)

Park View Road Residents Assoc.  
(Ms Vivienne Hanreck)

Age Concern Hanwell  
(Ms Angie Harris)

Park Community Group  
(Mr David Hughes)

Warwick Rd Residents' Association  
(Ms Hazel Humphries)

Bromyard Avenue Residents'  
Association  
(Ms Julia Hunt)

Boston Manor Residents Association  
(Mr Andrew Isitt)

BEDFORD PARK SOCIETY  
(Mrs Helen Jameson)

Ealing Fields Residents' Association  
(Mr Roger Jarman)

Action Acton  
(Ms Sue Jollands)

W13 residents  
(Mr Alan Jones)

Pitshanger Community Association  
(Mr Martin Kelly)

London Transport Users' Committee  
(Ms Libby Kemp)

EALING CHAMBER OF COMMERCE  
(Mr Patrick Kennedy)

Residents' Association for Woodville  
Gardens and Regency Close  
(Mr Anthony Lewis)

Ealing Cycling Campaign  
(Mr David Lomas)  
(Mr Colin McKenzie)  
(Mr Robin Segulem)

Ealing Village  
(Ms Penelope Mason)

Grange Grove Residents' Association  
(Mr John Noakes)

Springfield Neighbourhood Watch  
(Ms Edith Oakes)

Five Roads Forum  
(Mr Laurence Peacock)

Churchfield Community Association  
(Mr Nigel Perkins)

Ascott Avenue Residents' Association  
(Mr Ian Richardson)

Acton Green Residents' Association  
(Mr Geoffrey Rippengale)

Haven Green Court Residents'  
Association  
(Mr Laurie Rosenbaum)

Ealing Common Society  
(Mr Christopher Rowe)

The Southall Chamber of Commerce  
(Mr Harbans Singh Sandhu)

The Elthornes Residents' Association  
(Ms Caroline Schimmelpfennig)

West Acton Residents' Association  
(Ms Sheela Selvatjothy)

Quadrant Residents' Association  
(Mr V Sharma)

The Southall Chamber of Commerce  
(The Secretary)

Southall Broadway Traders  
(Mr Harjit Sidhu)

Olde Hanwell Residents' Association  
and Neighbourhood Watch  
(Mr Derek Smith)

Ealing Centre for Independent Living  
(Ms Wendy Starkie)

Avenue Road / Villiers Road Residents'  
Association  
(Mr F Sullivan)

Ealing Centre Partnership  
(Mr Mike Tyzack)

Southall Regeneration Partnership Ltd  
(Mr Ash Verma)

Ealing Borough Senior Citizens Action  
Group  
(Mr P Viggers)

Acton Vale Tenants and Residents  
Association  
(Mr Jim Wong)

Kingsdown Residents' Association  
(Mr Nick Woolven)

Keswick Mews Residents Association  
(Mrs Alison Yapp)

THE Grange Residents Co Ltd  
(Mr Nicholas Young)

## **Appendix B - Consultation Bodies for Regulation 18**

Mayor of London  
Countryside Agency  
Environment Agency  
English Heritage  
Greater London Archaeology Advisory Service  
English Nature  
BT Group plc  
Vodafone Group Plc  
Orange  
O2 (cellnet)  
T-Mobile (UK) Limited  
Hutchison 3G UK Ltd  
BBC  
Strategic Rail Authority  
Highways Agency  
London Borough of Brent  
London Borough of Hillingdon  
London Borough of Hounslow  
London Borough of Hammersmith & Fulham  
London Borough of Harrow  
London Development Agency  
North West London Strategic Health Authority  
Ealing Primary Care Trust  
Economy Power Limited  
Good Energy Limited  
ScottishPower  
SWEB Energy Limited  
Utility Link Limited  
Atlantic Electric and Gas  
British Gas  
Ecotricity  
London Energy Plc  
Npower  
Opus Energy Limited  
Powergen  
Scottish Gas  
Scottish Hydro Electric  
Seaboard Energy Limited  
Southern Electric  
SWALEC  
Telecom Plus PLC  
Utilita Electricity Limited  
Virgin HomeEnergy Limited  
Zest4 Electricity Limited  
Abingdon Energy Limited  
Countrywide Farmers Plc  
Monal Utilities  
ScottishPower  
Total Gas & Power Limited  
British Gas Properties  
London Waste Regulating Authority  
Anglian Water  
Thames Water  
Three Valleys Water  
West London Waste Authority  
National Grid Company Plc  
Thames Water Property Services  
National Grid  
British Wind Energy Association  
Metropolitan Police  
British Waterways London  
EDF Energy Networks Ltd  
GOL  
TfL  
Perivale Library  
Northfields Library  
Acton Library  
Jubilee Gardens Library  
Hanwell Library  
Northolt Library  
Pitshanger Library  
Southall Library  
West Ealing Library  
Wood End Library  
Ealing Central Library  
Greenford Library  
Planning Policy, Borough of Lewisham  
Royal Borough of Kensington & Chelsea  
London Borough of Bexley  
London Borough of Merton  
London Borough of Haringey  
London Borough of Havering  
London School of Management  
Northolt Memorial Hall Trust  
The Park Community Group  
The Covenant Movement Ealing  
Southall Local History Society  
West London YMCA  
Ealing Centre Partnership  
Action Acton  
Ealing Women's Aid  
The Southall Chamber of Commerce  
West London Alliance  
Hanwell Steering Group  
Northolt Village Forum  
Southall Regeneration Partnership  
Park Royal Partnership  
Greenford Town Centre Association  
Society for the Protection of Ancient Buildings  
Ancient Monuments Society  
Ealing Arts Council  
Biodiversity Strategy Team

London Wildlife Trust  
 Save Ealing's Open Space  
 Acton History Group  
 Friends of the Litten  
 Brent River and Canal Society  
 BTCV  
 GRASS  
 Brentham Society  
 Selborne Society  
 Ealing Civic Society  
 Hanwell Preservation Society  
 Ealing Family Housing Association  
 Ealing Civic Society  
 Hertfordshire and Middlesex Badger Group  
 Ealing Friends of the Earth  
 Churchfield Community Association  
 Overdale Neighbourhood Watch  
 Park Community Group  
 Pitshanger Community Association  
 Halsbury Action Group  
 National Trust  
 WATCH GROUP  
 Greenford Trading Association  
 WOWGA  
 Childrens & Residential Homes  
 The Open Spaces Society  
 Ealing Beekeepers  
 Royal Society for the Protection of Birds  
 Acton Law Shop  
 West London YMCA  
 Womens Development Agency  
 Womens Institute  
 Acton Town Central, Acton Park Conservation Area  
 Panel  
 Acton Green & Bedford Park Conservation Area Panel  
 Brentham Garden Conservation Area Panel  
 Bedford Park Conservation Area Panel  
 Ealing Common Conservation Area Panel  
 Ealing Green Conservation Area Panel  
 Hanwell & Canals (West) Conservation Area Panel  
 Hanwell & Canals (East) Conservation Area Panel  
 Haymills Estate Conservation Area Panel  
 Haven Green Conservation Area Panel  
 Hanger Hill Garden Conservation Area Panel  
 Northolt Village Conservation Area Panel  
 Old Oak Common Conservation Area Panel  
 Oldfields Circus Traders  
 The Georgian Group  
 Crime Prevention Design Advisor  
 Ealing Chamber of Commerce  
 Ealing, Hammersmith and West London College  
 Acton Asian Association  
 Brentham Society  
 Greenford Station Action Group  
 S.A.R.A.H.  
 West Ealing Council  
 Hanwell Home Beat Officers  
 London Sports Board  
 Sure Start  
 Northolt Village Community Centre  
 Hanwell Community Centre  
 Ealing Common Society  
 Inland Waterways Association Middlesex Branch  
 National Playing Fields Association  
 Hazadous Installations Directorate, Health and Safety  
 Executive  
 The British Wind Energy Association  
 Energy  
 British Geological Survey  
 Centre for Ecology and Hydrology  
 Civil Aviation Authority  
 Commission for Architecture and the Built Environment  
 English Partnerships  
 Commission for Racial Equality  
 Crown Estate Office  
 Campaign to Protect Rural England  
 Equal Opportunities Commission  
 Forestry Commission  
 Health and Safety Executive (HSE)  
 Learning and Skills Council  
 National Playing Fields Association  
 Sport England  
 Women's National Commission  
 Age Concern  
 The Coal Authority  
 Help the Aged  
 Road Haulage Association  
 Friends of the Earth  
 British Waterways London  
 Wind Energy Association  
 Council For British Archaeology  
 Twentieth Century Society  
 Campaign for Real Ale Limited  
 The Victorian Society  
 The Garden History Society  
 Church Commissioners  
 Diocesan Board of Finance  
 The House Builders Federation  
 Housing Corporation  
 Piara Khabra MP  
 Steve Pound MP

Ogaden Community Association  
United Anglo-Caribbean Society  
Ealing Somali Community Welfare  
Horn of Africa Advice Centre  
Ashra-Asian Carers Project  
Asian Family Counselling Services  
Caribbean Environment Watch  
Apna Centre-Careways Ltd  
East African Asian Senior Citizens Association  
Eshu Independants  
Greenford Community Centre  
Greenford Cultural Activities Club  
Ealing Law Centre  
Southall Rights  
Asian Parents Carers Association  
El-Djazir  
Arya Samaj London  
Acton Group for Ethiopians in Ealing  
Afghan Academy  
African Caribbean Initiative  
African Womens Forum  
Tibetan Community  
Polish Community Centre  
Society of Afghan Residents  
Somali Community Association - Southall  
Southall Black Sisters  
Southall Day Centre Ltd  
United Anglo Caribbean Society  
West Indian Saturday School  
Iranian Association  
Irish Support & Advice Service  
Jinah School of Urdu  
Khudamil Ahmadiyya Association  
Milap Day Centre  
Bahai Community of Ealing  
Ealing Liberal Synagogue  
Greenfor Gospel Church  
Institute of Sikh Studies  
Muslim College  
Hindu Youth Organisation  
Westminster Interfaith  
Southall Church of God  
Park View Residents Association  
Ascott Avenue Residents Association  
Walpole Residents Association & Ealing Green  
Conservation Panel  
Olde Hanwell Residents Association  
MPRTA Medway Parade Residents & Traders  
Association

Walpole Residents Association  
Acton Green Residents Association  
Shaa Road Residents Association  
West Twyford Residents Association  
Grange Grove Residents Association  
Central Ealing Residents Association  
Northolt Village Residents Association  
Creffield Residents Association  
Birkdale Area Residents Association  
Hanger Hill Garden Estate Residents Association  
St Stephens Residents Association  
Boston Manor Residents Association  
St Catherines Court Residents Association  
Buckingham Avenue Residents Association  
Lyndhurst Avenue Residents Association  
West Twyford Residents Association  
Wendover Court Residents Association  
South Acton Residents Action Group  
Oldfields Circus District Centre  
Haven Green Court Res Association  
Manor Residents Association  
Bedford Park Society  
Acton Town Residents Association  
Cuckoo Estate Residents Association  
The Lawns Residents Association  
Havelock Estate Residents Association  
Wood End Residents Association  
Golflinks Residents Association  
Norwood Green Residents Association  
East Acton Residents Association  
Golden Manor Residents Association  
Ealing Village Residents Association  
Gloucester Road Residents Association  
Birkbeck Residents Association  
Hanger Hill Tudor Estate  
Westbury and Madeley Road Residents Association  
Twyford Ave Sport Grnd Residents Association  
Cuckoo Estate Residents Association  
Warwick Road Residents Association  
Bromyard Residents Association  
Toplocks Residents Association  
Ealing Fields Residents Association  
Lamborn Close Residents Association  
Greenford Green & District Residents Association  
Churchfields Residents Association  
Gunnersbury Estate Residents Association  
Grove Avenue Residents Association  
Freeland and Inglis Road Residents Association  
Wesley Estate Residents Association

South Acton Residents Association  
Hanger Hill Estate Residents Association  
Goldsmith Area Residents Association  
Residents of The Wood End Estate  
Park View Road Residents Association  
Ravenor Park Residents Association  
Cranmer District Res. Association  
Sudbury Town Residents Association  
Cumberland Park Residents Association  
Farndale and Hedgerley Residents Association  
Avenue Road/Villiers Road Residents Association  
Dormers Wells Residents Association  
North Greenford Residents Association  
North & South Residents Association  
The Grange Residents Association  
Perivale Residents Society  
Durham Road Residents Association  
West Road Residents Association  
Northolt Grange Residents Association  
Yeading Green Tenants Association  
Kingsdown Residents Association  
Five Roads Forum  
TFL Streets  
General Aviation Awareness Council  
Transport for London, West London Tram  
Network Rail  
Freight Transport Association  
Great Western Trains Company Limited  
Transport for London  
Rail Freight Group  
Silverlink Trains  
White Young Green  
Howard Sharp and Partners  
Save Ealing's Streets  
Nigel Perkins  
V L Corani  
Mr L Cortnell  
Andrew Fletcher  
Mr Richard Watson  
Mr James Kelly  
Mr Harsev Bains  
Ms Brenda Robins  
Jamie Powell  
Mr Mark Harrington  
S Kamyab  
Ms Amanda Hodder  
Mrs A Fraser  
Mr M Williamson  
Mr Nigel Bakhai

Ms J Ashley  
P A Steinhardt  
Mr Martin  
Ms Maureen Ontano  
Mr C A Pearce  
Mr S Rowley  
Mrs Harding  
Mr F Fruzza  
Mr David Blackwell  
Mr H Gadd  
Ms Eleanor Brewer  
Mr Andy Turner  
Mr D Dwyer  
Mr Peter Nolan  
Mrs P Agate  
Ms Tammy Alston  
Mrs J Ansell  
Mr Malcolm Ede  
Mr Ron Johnson  
Ms Diane Murray  
Ms Beti Allocco  
Mrs M Elliott  
Ms S King  
Mrs L Woodcock  
Ms Ann Dempsey  
Mr Nigal Timmins  
Mr R J Collins  
Ms Myrtle Gee  
Mrs Thompson  
Mr R Deadman  
J Matthews  
Mr D Briscoe  
Mrs Smith  
Mr D Haynes  
Ms A Edwards  
Mr L Wallis  
Lynn Scivener  
Mr K Patterson0  
Mrs Wiltshire  
Mr Warner  
Ms A Laver  
Ms N Gordon  
Ann Tierney  
Mr Ben Owen  
Ms P Jones  
Mrs Linda Kouparis  
Disabled Persons Transport Advisory Committee  
Disability Rights Commission  
Barker Parry Town Planning Ltd

G L Hearn	Faber Maunsell
St Catherines Court (Chiswick) Ltd	Peacock & Smith
Accent BDA Architects	Eversheds
Tetlow King Planning	AERC
Barton Wilmore Planning	Thames Water Plc
Rapleys LLP	Greenpeak Ltd
Level Consulting Ltd	Denton Wilde Sapte
Drivas Jonas	Dialogue
Quad Architects	Hepher Dixon
United Development Ltd	PDP
Town and Country Plannig Association	Taylor Woodrow
Ravenocean Ltd	Alan Camp Architects
Nathaniel Lichfield and Partners	Landmark Information Group
Arup Partnership	Malcolm Judd & Partners
Collin Buchanan and Partners	Durkan Homes
Bissco and Stanton Chartered Surveyors	Cushman & Wakefield
PPServices Ltd	Thomson Ecology
RSG	Scott Brownrigg
Henry Butcher	Montagu Evans
Northfields Independent	Durston House
Fairview Homes PLC	Drivers Jonas
WLH Estates	Hunters Solicitors
Japan Services	The London Planning Practice
Gifto	South Thames Region
Southall Merchants Association	Jowitt Associates
Swan Hill Homes	Derek Horne & Associates
TR Suterwalla & Sons Ltd	King Sturge
Leonard Tridgell Associates	Biscoe Craig Hall
Saloria Drawing Services	Faber Maunsell
Hepher Dixon Planning & Regeneration	Peacock & Smith
PDP	Eversheds
Taylor Woodrow Developments Ltd	AERC
Alan Camp Architects	Thames Water Plc
Landmark Information Group	Greenpeak Ltd
Malcolm Judd & Partners	Denton Wilde Sapte
Durkan Homes	Pinsent Masons
Cushman & Wakefield Healey & Baker	John Sharkey & Co.
Thomson Ecology Ltd	Savills Planning
Scott Brownrigg	Lewis Trust Group
Montagu Evans	LCP Securities
Durston House	Foxtons Estate Agents
Drivers Jonas	Kingmead Ltd
Hunters Solicitors	Ceba Properties Ltd
Turley Associates	R.G Elms & Son Ltd
The London Planning Practice	J D Asset Management Plc
South Thames Region	Middlesex Property Management Ltd
Jowitt Associates	Townhouse Developments Ltd
Derek Horne & Associates	West London Health Estates
King Sturge	Colin Bibra & Co
Biscoe Craig Hall	Dotebroom Ltd
	Advanced Property Management

Property Investment Advice & Management Ltd  
CB Estates  
Jorich Investments  
United Controls Ltd  
D.S Bhasin  
Hantons  
Choicehome Property Management  
Sharan Properties Ltd  
Homeseach Ltd  
Hartwood Property Management Ltd  
Vikas Intercontinental Developers  
Live Dubai Ltd  
Ghazal Investments Ltd  
A & D Homes Ltd  
St. Mowden Properties Plc  
St. James's Investments  
Discovery Properties Ltd  
City & Provincial Properties Plc  
HBG Properties Ltd  
Development Securities Plc  
Landmark Developers Ltd  
Crest Nicholson Developments Ltd  
Burland TM Ltd  
Sentinel Developents Ltd  
Roseberry Homes (Group) Ltd  
Linden Homes Chiltern Ltd  
St. James Securities (London) Ltd  
Mason & Partners Commercial Property Consultants  
and  
Westfield Property Consultants  
Frogmore Investments Ltd  
Stanhope Plc  
Manhattan Lofts Corporation  
Costains Construction Ltd  
Servite Homes  
Kajima Europe Ltd (UK Holdings)  
Devplan UK  
CgMs Consultants  
Jones Lang LaSalle  
Legal and General Assurance Society Ltd  
Rapeleys LLP  
Royal Mail Holdings plc  
British Chemical Distributors and Traders Association  
Department for Environment, Food and Rural Affairs  
London Fire and Emergency Planning Authority  
CgMs Consultants  
Department for Culture, Media and Sport  
Department of Constitutional Affairs  
Department of Education and Skills

Department of Health  
Department of Trade and Industry  
Department for Transport  
Department of Works and Pensions  
Home Office  
Ministry of Defence  
Office of Government Commerce  
The Gypsy Council  
Traveller Law Reform Coalition  
Bellway Homes  
Innisfree Housing Association  
Metropolitan Housing Trust  
Apna Ghar Housing Association Ltd  
Womens Pioneer Housing Ltd  
Shepherds Bush Housing Association  
Warden Housing Association  
Family Housing Association  
Catalyst Housing Group  
Genesis Housing Group  
ASRA Housing Association  
Notting Hill Housing Trust  
Look Ahead Housing and Care Ltd  
Network Housing Group  
Griffin Housing Association  
Acton Housing Association  
Stonham Housing Association  
Thames Valley Housing  
MOAT Housing Society  
YWCA  
Housing For Women  
Northcote Housing Association/Ealing Family HA Ltd  
MHT South Thames  
Ealing Somali Welfare  
The Guinness Trust  
Westway Housing Association  
OMID Housing Association  
Central & Cecil Housing Care & Support  
Armenian Hayashen  
Inquilab Housing Association  
Westlon Housing Association  
RPS Planning  
Ealing Centre for Independent Living  
Ealing Access Committee  
Ealing Mencap  
Alzheimers Concern Ealing  
RADAR  
Scope

## **Appendix B:**

- 1. Letter of Notification to Consultees**
- 2. SPD Representation Form**
- 3. SPD Statement of Matters and Availability of Documents**
- 4. Public Notice – Ealing Gazette**



- SPD 4 Residential Extensions
- SPD 5 West London Tram Route
- SPD 6 Twyford Avenue Community Open Space

These documents are accompanied by:

- DRAFT Interim Guidance Note on Education Impact for Developers (October 2005 - this is not an SPD itself, but should be read in conjunction with SPD 2 Community Facilities).
- The Sustainability Appraisal Report on the Draft Supplementary Planning Documents – this document sets out the statutory Sustainability Appraisal of these documents.

Copies of all of the above documents are available in the same variety of ways as the SCI.

Now is also a good opportunity to alert you to the fact that we are also commencing our initial consultation on our Core Strategy and Sites Allocations Development Plan Documents (DPDs). This is called the Issues and Options stage. This informal consultation period will run on from the SCI consultation, from the 17 February to the 31 March 2006. An Issues and Options consultation paper will be prepared in January for this purpose, and a number of consultation events are planned, which we will contact you about shortly.

The Core Strategy, once prepared, will replace the strategic policies in the existing Unitary Development Plan. Based on a wide consultation with the community and other agencies, it will set out the type, mix and location of development in the borough. The Sites Allocations DPD will identify specific sites to implement the strategy - based on evidence that they are fit for purpose. Sites for delivering housing, employment, retail, leisure, community facilities, essential public services and transport infrastructure will be included.

As you can see, the New Year is going to be a busy period for us! So I would like to thank you for your contribution to the process to date, and we look forward to your continued involvement in 2006.

Yours faithfully

**Anita Longworth**

Principal Policy Planner

Planning Policy and Development Advice Section

Ealing Council

# Ealing Council

LOCAL DEVELOPMENT FRAMEWORK  
Supplementary Planning Documents

Public Participation 2006



## REPRESENTATION FORM

Please return all completed forms to the Planning Policy Team:

Email Address: [planpol@ealing.gov.uk](mailto:planpol@ealing.gov.uk)

Postal Address:

Planning Policy Team

Environment Group

Ealing Council

Perceval House

14-16 Uxbridge Road

London W5 2HL

*Planning Policy Team Contact Details*

Website: [www.ealing.gov.uk/planpol](http://www.ealing.gov.uk/planpol)

Phone: 020 8825 5428

Fax: 020 8579 5453

### For Office Use

Reference:

Date received:

Acknowledged:

Entered:

Please use this form to set out your representations on any aspect of the published Supplementary Planning Documents or the accompanying Sustainability Appraisal Report. **Please use a separate form for each section of the document you wish to comment on.** You may also download an electronic version of this form at [www.ealing.gov.uk/planpol](http://www.ealing.gov.uk/planpol). You may photocopy this form or obtain further copies from the Planning Policy Team. If you need any help with completing the form, please contact the Planning Policy Team.

If you are using a paper copy, please complete all sections in block capitals, in black ink.

### 1. Name and Address

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Postcode \_\_\_\_\_

Organisation

Email address

Daytime Telephone No.

### 2. Agent's Name & Address (if applicable)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Postcode \_\_\_\_\_

Fax

Email address

Telephone

3. Please state which Supplementary Planning Document/Sustainability Appraisal Report you are commenting on, and if appropriate, please indicate the section of the document you are commenting on:

In broad terms, are you:  
(please tick as appropriate)

Objecting

or

Supporting

4. Please use this section to set out your views on the matter referred to in box 3 above, and the reasons for them (continue on a separate sheet if necessary).

5. If your comments refer to one of the Supplementary Planning Documents/Sustainability Appraisal Report, please state the wording you would like to see added to, or replacing, text in the existing document (continue on a separate sheet if necessary).

Signature

Name

Date

Please notify me when the SPDs are adopted: Yes No

Please return all completed forms by **5pm, 10 February 2006**. Each form will be acknowledged and responded to. The Council may not be able to take your comments into account if they are received later than 10 February 2006.

## Equal Opportunities Monitoring Questionnaire

To help us to meet the needs of our diverse community and improve ways of making our consultations and services available to all, could you please complete the following questions:

1. Are you filling in this questionnaire as an individual  or as a member of an organisation?

2. What is your age group?  
Under 16  16-24  25-44  45-64  Over 65

3. Are you male  or female?

4. What is your ethnic group?  
Choose ONE section from A to E, then tick the appropriate box to indicate your cultural background.

**A. White**

British  
 Irish  
 Any other White background, please write in

**B. Mixed**

White and Black Caribbean  
 White and Black African  
 White and Asian  
 Any other Mixed background, please write in

**C. Asian or Asian British**

Indian  
 Pakistani  
 Bangladeshi  
 Any other Asian background, please write in

**D. Black or Black British**

Caribbean  
 African  
 Any other Black background, please write in

**E. Chinese or other ethnic group**

Chinese  
 Any other, please write in

5. Do you have a disability? Yes  No

Thank you. To return this questionnaire you should save it as your own document, fill it in, and attach it to your own e-mail in response. The information will not be given to anybody else. Under the Data Protection Act 1998 we need your consent to process it. By returning it to us we assume you are giving your consent for this to occur.

## STATEMENT OF MATTERS AND AVAILABILITY OF THE DOCUMENTS

<p>Proposed Title of Documents and Subject Matter</p>	<p>The following Draft Supplementary Planning Documents will supplement the policies in the Adopted 2004 Plan for the Environment Ealing's Unitary Development Plan), and will form part of the Local Development Framework for Ealing.</p> <p><b>SPD 1 Affordable Housing</b> - this document was agreed by Council as an approved draft supplementary planning guidance note in October 2004. Amendments have been made to take account of new information from government and the Housing Corporation, and to reflect the statutory requirements of the Planning and Compulsory Purchase Act 2004.</p> <p><b>SPD 2 Community Facilities</b> - this document was agreed by Council as an approved draft supplementary planning guidance note in October 2004. Amendments have been made to clarify the assessment of the social impacts of new development, and to reflect the statutory requirements of the Planning and Compulsory Purchase Act 2004.</p> <p><b>SPD 3 Sustainable Transport</b> - a new document to provide clarification of aspects of the low car housing policy and the policy on parking in the front gardens of residential property.</p> <p><b>SPD 4 Residential Extensions</b> - a new document to provide clarification on the UDP policy for extensions and alterations to private houses and gardens.</p> <p><b>SPD 5 West London Tram Route</b> - a new document which supplements the UDP policy to promote the Tram project. It indicates UDP policies which the developer of the tram project should take particular account of, and which developers interested in property along the route should bear in mind. It refers to the route safeguarding process, clarifies street names along the tram route, and advises on other legislation relevant to the project.</p> <p><b>SPD 6 Twyford Avenue Community Open Space</b> – this document was drafted as supplementary planning guidance. It supplements the UDP policy to designate the sports ground at Twyford Avenue W3 as 'community open space'. It clarifies the types of open space use appropriate to the site. Amendments have been made to reflect the statutory requirements of the Planning and Compulsory Purchase Act 2004.</p> <p><b>Guidance for developers on making an initial assessment of the impact for education from new housing developments in Ealing</b> - This is an Education Service document which is put forward to be used in conjunction with SPD 2 on Community Facilities. It will assist in identifying whether developers should contribute to education facilities in the vicinity of the site. It is not a supplementary planning document.</p>
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Sustainability Appraisal Report	The draft Supplementary Planning Documents are accompanied by the following report: <b>Sustainability Appraisal of the Draft Supplementary Planning Documents (SPD 1 - 6)</b>
Geographical Coverage	The whole area falling within the jurisdiction of the London Borough of Ealing.
Consultation Period	Friday 06 January to Friday 10 February 2006
Address for representations	Planning Policy and Development Advice Section Ealing Council 5 <sup>th</sup> Floor Perceval House 14-16 Uxbridge Road Ealing W5 2HL
Requests to be notified	Any representation may be accompanied by a request to be notified at a specified address that the SPD(s) have been adopted.
<p>The draft Supplementary Planning Documents, Education Guidance Note and accompanying Sustainability Appraisal Report will be available for inspection from 06 January to 10 February 2006 at the following locations:</p> <p>Council offices:</p> <p>Planning Services counter of the Council's <b>Customer Service Centre</b>: ground floor, Perceval House, 14-16 Uxbridge Road, Ealing, W5, from 06 January 2006 until 10 February 2006, between the hours of 8.30am and 5.00pm, Monday to Friday.</p> <p>Local libraries:</p> <p><b>ACTON</b> Mon, Fri, Sat 9am-5pm; Tue, Wed, Thur 9am-7.45pm  <b>EALING CENTRAL</b> Mon, Fri, Sat 9am-5pm; Tue, Wed, Thur 9am-7:45; Sun 2pm-5pm  <b>GREENFORD</b> Tue, Wed, Thur 9am-7:45pm; Fri, Sat 9am-5pm  <b>HANWELL</b> Tue, Thur 9am-1pm, 2pm-7:45pm; Fri, Sat 9am-1pm, 2pm-5pm  <b>JUBILEE GARDENS</b> Tue, Thur 9am-1pm, 2pm-7:45pm; Fri, Sat 9:30am-1pm, 2pm-5pm  <b>NORTHFIELDS</b> Tue, Thur 9am-7:45pm; Fri, Sat 9am-5pm  <b>NORTHOLT</b> Tue, Thur 9am-7:45pm; Fri, Sat 9am-5pm  <b>PERIVALE</b> Tue, Thur 9am-7:45pm; Fri, Sat 9am-5pm  <b>PITSHANGER</b> Tue, Thur 9am-7:45pm; Fri, Sat 9am-5pm  <b>SOUTHALL</b> Mon, Fri, Sat 9am-5pm; Tue, Wed, Thur 9am-7:45; Sun 2pm-5pm  <b>WEST EALING</b> Tue, Wed, Thur 9am-7:45pm; Fri, Sat 9am-5pm  <b>WOOD END</b> Tue, Thur 9am-1pm, 2pm-7:45pm; Fri, Sat 9am-1pm, 2pm-5pm</p>	

## PUBLIC NOTICE

PLANNING AND COMPULSORY PURCHASE ACT 2004  
The Town and Country Planning (Local Development) (England) Regulations 2004

### Ealing's Local Development Framework

Ealing Council is preparing a Local Development Framework (LDF) to guide land use planning and development of the borough. So far, this emerging framework includes the Unitary Development Plan (Ealing's 'Plan for the Environment' adopted October 2004), the Local Development Scheme, Annual Monitoring Report and the Draft Statement of Community Involvement (SCI). A number of DRAFT Supplementary Planning Documents have also been prepared, which are listed below:

- SPD 1 Affordable Housing
  - SPD 2 Community Facilities
  - SPD 3 Sustainable Transport
  - SPD 4 Residential Extensions
  - SPD 5 West London Tram Route
  - SPD 6 Twford Avenue Community Open Space
- Plus:
- Note to accompany SPD 2: Guidance for developers on making an initial assessment of the impact for education from new housing developments in Ealing
  - Sustainability Appraisal of the Draft Supplementary Planning Documents

Further documents will be produced, and these are listed in the Local Development Scheme (Adopted March 2005).

#### Statement of Community Involvement - Notice of Submission to the Secretary of State

The SCI will set out how the Council intends to involve local communities in the preparation of LDF documents and in the determination of planning applications. Individuals and organisations in the community were invited to participate in drafting the SCI over a period of three months, from 24/08/05 to 23/11/05. The Council has now considered the representations that have been received, and has made a number of changes accordingly. The amended SCI is now submitted to the Secretary of State for independent examination under section 20 of the Act. Representations on the Submission SCI are now invited.

#### Public Participation on the Supplementary Planning Documents

The supplementary planning documents set out above have been prepared through informal consultation with the community. Formal representations on these documents, and on the accompanying Sustainability Appraisal Report, are now invited. Council will consider any representations received, make any changes as they deem these appropriate, and will then adopt the SPDs. SPDs are not subject to independent examination by an Inspector.

The SCI for submission, the SPD documents and representation forms, can be viewed on Ealing Council's website, [www.ealing.gov.uk/planpol](http://www.ealing.gov.uk/planpol) and completed representation forms can be emailed to [planpol@ealing.gov.uk](mailto:planpol@ealing.gov.uk).

Paper copies of the documents can be inspected at the Planning Services counter of the Council's Customer Service Centre: ground floor, Perceval House, 14-18 Uxbridge Road, Ealing, W5, from 08 January 2006 until 17 February 2006, between the hours of 8.30am and 5.00pm, Monday to Friday.

Copies are also available for inspection at local libraries as follows:

**ACTON** Mon, Fri, Sat 9am-5pm; Tue, Wed, Thur 9am-7.45pm  
**EALING CENTRAL** Mon, Fri, Sat 9am-5pm; Tue, Wed, Thur 9am-7.45; Sun 2pm-5pm  
**GREENFORD** Tue, Wed, Thur 9am-7.45pm; Fri, Sat 9am-5pm  
**HANWELL** Tue, Thur 9am-1pm, 2pm-7.45pm; Fri, Sat 9am-1pm, 2pm-5pm  
**JUBILEE GARDENS** Tue, Thur 9am-1pm, 2pm-7.45pm; Fri, Sat 9.30am-1pm, 2pm-5pm  
**NORTHFIELDS** Tue, Thur 9am-7.45pm; Fri, Sat 9am-5pm  
**NORTHOLT** Tue, Thur 9am-7.45pm; Fri, Sat 9am-5pm  
**PERIVALE** Tue, Thur 9am-7.45pm; Fri, Sat 9am-5pm  
**PITSHANGER** Tue, Thur 9am-7.45pm; Fri, Sat 9am-5pm

# APPENDIX C

## Supplementary Planning Documents

### Consultation 2006

### Representations and Proposed Responses

- Section 1:        SPD1 Affordable Housing**
- Section 2:        SPD2 Community Facilities**
- Section 3:        SPD3 Sustainable Transport**
- Section 4:        SPD4 Residential Extensions**
- Section 5:        SPD5 West London Tram Route**
- Section 6:        SPD6 Twyford Ave Community Open Space**
- Section 7:        Sustainability Appraisal of SPDs**

**SPD1: Affordable Housing**

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
002 . 01	<p><i>Asra Housing Association</i> SPD1 -</p> <p>Does the recent Housing Needs Survey provide statistics/ data to indicate levels of disabled adapted + mobility units required and levels of supported housing required, which could be put in as targets within the Affordable Housing SPD?</p>	NO CHANGE HNS provides some data; UDP policy 5.3 includes mobility targets.
006 . 04	<p><i>Mr V Corani</i> SPD1</p> <p>Respect to find accommodation for those native to UK, as unable to buy a house/home as unemployed. Ensure SPD1 applies to British born citizens, not immigrants.</p>	NO CHANGE Policy applies to all residents.
008 . 01	<p><i>Greater London Authority</i> SPD1</p> <p>The UDP policy and SPD 1 were drafted prior to the Mayor's Housing SPG and draft PPS3 being published. When updating the SPD and UDP policy, as part of the core strategy, these documents will need to be considered.</p>	CHANGE. New para 4.27 reflects MoL's Housing SPG on calculation of affordable housing.
. 02	<p><i>Greater London Authority</i> SPD1 page 5, para.4.5</p> <p>Ealing's housing target should refer to the London Plan proposed alterations target of 915 a year for 2007/8 to 2016/7. The intermediate housing threshold given in para 4.5 should also be updated to reflect the Mayor's Housing SPG (£16,400 to £49,000). This paragraph should also be explicit in stating that these London Plan definitions apply in Ealing.</p>	CHANGE. Reference is made in para 2.2 to Proposed Alterations. Para. 4.5 will incorporate revised incomes figures and make reference to London Plan.
. 03	<p><i>Greater London Authority</i> SPD1 Page 6, para.4.6</p> <p>The GLA supports reference to reducing the threshold for affordable units from 15 to 10 in para. 4.6 of the SPD.</p>	NOTED
. 04	<p><i>Greater London Authority</i> SPD1 Page 9, para 4.24</p> <p>Paragraph 4.24 - Off-site provision should refer to the criteria given in the Mayor's Housing SPG</p>	CHANGE. Reference to the Mayor's SPG is now made in para 4.1
. 05	<p><i>Greater London Authority</i> SPD1 Page 10, para 4.25</p> <p>Paragraphs 4.25 and 4.26 refer to residential mix. Further reference should be added with regard to the sub-regional and regional needs in addition to the local needs. In this regard guidance is given in the Mayor's Housing SPG.</p>	CHANGE. Reference to the Mayor's SPG is now made in para 4.1
. 06	<p><i>Greater London Authority</i> SPD1 Page 14, appendix 3</p> <p>Appendix 3 'Size and type of affordable housing sought' - The proportion of 4 bedroom plus social rent housing appears low at 14%. It is advised that the Mayor's Housing SPG, which is based on London's Housing Requirements Study, indicates a figure of 42% for 4 bed plus. Further justification is required as to why Ealing has adopted a significantly lower figure.</p>	CHANGE. Reference to the Mayor's SPG is now made in para 4.1. Ealing's Housing Needs Assessment (2005) provides updated basis for SPD.

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
009 . 08	<p><i>English Heritage - London Region</i> SPD1                      Para 2.6</p> <p>Expand point on good design to include the need for all development to respect and enhance the character and appearance of the built environment. We would encourage the Borough to only accept proposals for affordable housing if accompanied by a design statement which considers the historic environment.</p>	NO CHANGE. As an issue, point will be taken up in re-consideration of UDP policy 4.1.
011 . 01	<p><i>Ealing Civic Society</i> SPD1                      Para 2.1</p> <p>The Council has agreed to increase housing target from 650 to 915 homes p.a. How can the planning process ensure that this enormous provision is of satisfactory quality and all residents have access to community facilities, schools, parks, and opportunities for local employment. Where will this additional population be accommodated?</p>	NO CHANGE Mayor's increased strategic target not yet adopted. These matters will be more appropriately considered under LDF Issues and Options.
. 02	<p><i>Ealing Civic Society</i> SPD1                      Para. 2.6</p> <p>Policy 5.5 requires more than good design. Affordable housing should not be substandard. It should have private amenity space, adequate playspace for children, an attractive outlook, incorporate green principles etc. The aim should be sustainable development, not a quick fix for housing need. Include all policy points in text.</p>	NO CHANGE Agreed that affordable housing should not be sub-standard. Standards are set out in the UDP, where reference may be made to the relevant policies.
. 03	<p><i>Ealing Civic Society</i> SPD1                      4.16C</p> <p>Sole emphasis should not be on affordable housing. If it is the primary objective on all sites, the community will lose employment sites, community facilities, and open space deficiency will never be rectified.</p>	NO CHANGE Affordable housing is the primary, but not the only, objective. Policy 1.1, the UDP's Overall Aim, recognises the wider sustainability issues.
012 . 01	<p><i>Acton History Group &amp; West London Organic &amp; Wildlife Gardening</i> SPD1                      Page 6, para. 4.8</p> <p>Para 4.8 final sentence 'It is proposed that for...2005/6 version' does not make sense. Suggest inserting 'should be used as the basis for such appraisal'?</p>	CHANGE. See 39.06
. 02	<p><i>Acton History Group &amp; West London Organic &amp; Wildlife Gardening</i> SPD1                      Page 8, para. 4.17</p> <p>Para 4.17 - 'Appendix 3' should be corrected to 'Appendix 2'</p>	NO CHANGE. SPD has three appendices.
015 . 01	<p><i>DP9</i> SPD1</p> <p>The document is unclear about the Council's possible intention to lower the threshold from 15 to 10 units. The SPD is not the mechanism to introduce this change of policy. SPD should make it clear that the Council will not be applying the policy at this stage.</p>	CHANGE. Para. 4.16 indicates that the Council is considering changing the threshold, but change will need to be made to the Development Plan first. Text to clarify (see 030.12).
016 . 01	<p><i>Home Builders Federation</i> SPD1                      Paras 4.17, 4.18</p> <p>The SPD implies that the Council will be reluctant to consider any other form of affordable housing provision rather than delivery by RSLs. This is contrary to 6/98. SPD should be amended to recognise other means of provision.</p>	CHANGE. Reference to RSLs broadened to Affordable Housing Providers. See 039.09.

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
016 . 02	<p><i>Home Builders Federation</i> SPD1 Appendix 2</p> <p>The Council is entitled to have its own list of preferred partners provided that it is not a definitive list. The Council should be prepared to work with anyone who has the finance in place and the practices and mechanisms to ensure satisfactory long term management.</p>	NO CHANGE. Para. 4.17 explains that the list is not exclusive.
. 03	<p><i>Home Builders Federation</i> SPD1 Para 4.18</p> <p>It is not always possible to start negotiations with social housing providers prior to the submission of an application. The SPD should reflect this.</p>	NO CHANGE. Discussion (and agreement) is encouraged prior to processing planning applications.
. 04	<p><i>Home Builders Federation</i> SPD1</p> <p>HBF objects to the unreasonable instructions relating to off-site provision and provision of alternative sites. Developers are under no obligation to find an alternative site. The Council needs to exercise flexibility - some types of provision e.g, family housing might be more suitably provided off-site.</p>	CHANGE. UDP policy refers to '...payment to provide for an equivalent amount of housing elsewhere in the borough', not provision of alternative sites. However, Mayor's SPG (para 18.17) refers to identification of alternative sites.(see 39.07).
. 05	<p><i>Home Builders Federation</i> SPD1 Appendix 3</p> <p>According to the Housing Needs Survey the affordable housing target is such that it will not be met through the current development plan target. The main issue is one of maximising supply of new affordable housing. There is a need for all sizes and types; the Council should not be too prescriptive and should apply the mix flexibly.</p>	NO CHANGE. Appendix 3 reflects the findings of Ealing's Housing Needs Assessment and the changes made emphasise the need to meet prevailing needs and priorities.
017 . 01	<p><i>Imperial College</i> SPD1 Para 4.3</p> <p>ICL welcomes the definition of affordable housing as including student residential accommodation. It should be modified however to include converted as well as purpose built accommodation.</p>	NOTED for further consideration.
. 02	<p><i>Imperial College</i> SPD1</p> <p>As recognised in para.4.27 there is no national definition of key worker housing. Academic staff should be considered key workers and eligible for key worker housing.</p>	NO CHANGE. Developments in the definition of key workers will be followed with interest.
. 03	<p><i>Imperial College</i> SPD1</p> <p>ICL should be considered as an RSL and consulted on appropriate schemes. Early discussion between developers and higher educational establishments should be encouraged. ICL should be included in Appendix 2. Development undertaken by a higher educational establishment should be used by that establishment and its use for student housing secured by legal agreement.</p>	NO CHANGE. ICL has a specific rather than a general interest in the provision of affordable housing, but consultation will be carried out, and legal agreements pursued, as appropriate.

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
019 . 01	<p><i>Taylor Woodrow Developments</i> SPD1</p> <p>It is important that guidance is applied with appropriate flexibility. While it is helpful to set out guidance in respect of the preferred mix of size and types of affordable accommodation, it would be inappropriate for this to be interpreted as a rigid requirement. High density schemes for example may not be able to support a high proportion of large family housing.</p>	NO CHANGE. Agreed that guidance should be applied with appropriate flexibility, taking into account the Council's objectives and economics of provision.
. 02	<p><i>Taylor Woodrow Developments</i> SPD1                      Paras 4.16 and 4.22</p> <p>The use of the word 'unforeseen' is inappropriate. Circular 6/98 refers to 'particular costs associated with the development of the site'. Application of the Affordable Housing Development Control Toolkit will enable the relevant costs to be taken into account.</p>	CHANGE. Delete para. 4.22 and last sentence of 4.16 C. See also 039.08.
. 03	<p><i>Taylor Woodrow Developments</i> SPD1                      Para 4.10</p> <p>The comment that total price to developer has been based on 65% of TCI is inaccurate and misleading e.g at Grand Union Village the relevant TCI figure has been 100%. In any event, seeking to control elements of a commercial transaction is not the function of planning policy. It is affordability which is relevant. Policy should include criteria to define affordability.</p>	NO CHANGE. Para. 4.8 expects developers to provide sufficient financial information for an appraisal to be carried out. Affordability criteria as part of policy can be considered at the relevant stage of the LDF process.
. 04	<p><i>Taylor Woodrow Developments</i> SPD1                      Paras 4.11 and 4.14</p> <p>The second sentence of para 4.11 is an unduly crude expression of the desire to seek 50% affordable housing where this is to be provided off site. The application of the Affordable Housing Development Control Toolkit should be used equally in off site provision situations.</p>	NO CHANGE. The Affordable Housing Development Control Toolkit is recognised as an acceptable appraisal method. Para 4.11 confirms that 50% is the Council's target.
022 . 01	<p><i>Castlemore Securities/National Grid</i> SPD1                      Page 6, para 4.7</p> <p>Para. 4.7 - Object to the requirement that developers should make arrangements before planning permission can be issued, to ensure that affordable housing can be provided at an affordable level unless this only means that a suitable worded S106 Agreement (or unilateral) should be in place. If this is not what is meant then the 'upfront' requirement is unnecessary and unreasonable</p>	NO CHANGE. Discussion (and agreement) is encouraged prior to processing planning applications.
. 02	<p><i>Castlemore Securities/National Grid</i> SPD1                      Page 6, para 4.10</p> <p>Para. 4.10 - It is normal that the total grant available is based on 100% TCI albeit these are now to be phased out.</p>	NO CHANGE. Uncertainty over use of the indicator is recognised in the text.
. 03	<p><i>Castlemore Securities/National Grid</i> SPD1                      Page 18, para. 4.18</p> <p>Para. 4.18 - It is not necessary for 'the basis of an agreement with an RSL to be resolved before permission is granted'. If a suitably worded S106 is in place, this is sufficient. This should be made clear.</p>	NO CHANGE. Discussion (and agreement) is encouraged prior to processing planning applications.
. 04	<p><i>Castlemore Securities/National Grid</i> SPD1                      Page 9, para 4.23</p> <p>Para. 4.23 - Object to the requirement for 'pepper potting' within buildings. A broad spread of housing tenure across larger sites should be open to discussion with the Council's officers.</p>	NO CHANGE. 'Pepper potting' is mentioned as an alternative solution, not necessarily as a requirement.

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
022 . 05	<p><i>Castlemore Securities/National Grid</i> SPD1 Page 10, para. 4.26 Para 4.26 - It should be emphasised that whilst preferred proportions may be suggested by the Council it will not always be possible to achieve this and that this will be a matter for negotiation. This also needs to be made clear in Appendix 3.</p>	<p>NO CHANGE. Policy 5.4 in the UDP indicates that the range on a site is a matter for negotiation.</p>
023 . 01	<p><i>Barton Willmore Planning Partnership</i> SPD1 Private and affordable dwelling sizes/ space standards should not be specified in any LDF/SPD related documents, It is important that purchasers should be given the freedom to choose the size of residential units, which in turn ensures that units remain affordable. Housing developments should be able to meet market demand rather than be onerously prescribed.</p>	<p>NO CHANGE. An indication of mix is given to help meet identified housing needs.</p>
027 . 01	<p><i>Government Office for London</i> SPD1 In drafting the SPD consideration should be given to the recently published draft PPS3, in particular paragraphs 23 and 29 on affordable housing.</p>	<p>NOTED. Draft PPS3 has been considered. The Companion Guide, will be considered, when available, in reviewing Development Plan policy.</p>
. 02	<p><i>Government Office for London</i> SPD1 Is the 915 units figure correct? The proposed figures for Ealing in the Draft London Plan Alterations doc is 8450 units (an annual target of 845 units over the period 2007/8 to 2016/17). Does the 915 figure arise from the actual 2004 HCS?</p>	<p>NO CHANGE. 915 units has been proposed in the Draft Alterations to the London Plan, published in 2005.</p>
028 . 01	<p><i>Central Ealing Residents' Association</i> SPD1 Page 3, para.2.3 Para. 2.3 - The 15 unit threshold encourages developers to bring forward sites of 14 units or less, to avoid triggering the 50% requirement. To avoid this situation the affordable housing requirement should be stepped e.g. from 15 to 24 units so that the full 50% is not triggered until say, 25 units are proposed. This should help to avoid threshold abuse. The SPD should deal with applications which seek to avoid affordable housing provision by proposing excessively large units or through developing sites in phases to avoid the 15 unit trigger.</p>	<p>NO CHANGE. Policy relates to potential site development as much as to the nominal proposal. The target is to achieve 50%, not only on 25+ unit proposals. The calculation can be based on habitable rooms rather than dwellings (new para. 4.27)</p>
. 02	<p><i>Central Ealing Residents' Association</i> SPD1 Page 8, para 4.16 Para. 4.16 (c) 'Economics of provision' - Further guidance is needed on how this policy will be applied to sites in commercial use which may already have a high existing use value. Redevelopment of such sites for housing should not be discouraged (unless protected by other policies), but this will occur if a 50% affordable housing requirement is imposed without regard to liability</p>	<p>NO CHANGE. Agreed that development should not be discouraged; financial assessment should include viability of affordable housing provision.</p>
. 03	<p><i>Central Ealing Residents' Association</i> SPD1 Page 7, para. 4.13 Para. 4.13 'Cash in lieu' - For those circumstances where cash in lieu may be acceptable, it would be helpful if a table could be provided of the actual financial contributions to be sought. This would assist negotiations and allow applicants to quantify payments in advance.</p>	<p>NO CHANGE. The payments sought would vary from site to site to reflect land values. A financial appraisal would demonstrate what was achievable.</p>

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
028 . 04	<i>Central Ealing Residents' Association</i> SPD1 Page 12, appendix 1 Appendix 1 - TCI - TCI's are being replaced so it will be necessary for a TCI 'equivalent' to be substituted.	NO CHANGE. The information is not currently available.
030 . 11	<i>Thames Valley University</i> SPD1 p2,para 1.2 SPD should set out relevant policy numbers in the UDP	NO CHANGE. The policies identified are those which are particularly relevant.
. 12	<i>Thames Valley University</i> SPD1 p4 para 4.6 and p8 These paragraphs should confirm that the Council is not intending to use the SPD to create any new policy to reduce the threshold at which an affordable housing requirement would apply.	CHANGE. Add, for clarification, to 4.16 B '...as UDP policies are reviewed...'
. 13	<i>Thames Valley University</i> SPD1 4.16A Final sentence incomplete.	CHANGE. Insert 'consideration' after 'Therefore'.
. 14	<i>Thames Valley University</i> SPD1 p8 para 4.16C This is an attempt by the LPA to use the SPD to create new policy and should be deleted. It is inappropriate for the LPA to set out which of its policy objectives will take precedence.	NO CHANGE. SPDs may express other non-planning objectives and priorities of the Council.
. 15	<i>Thames Valley University</i> SPD1 p8 para 4.18 Is an attempt to create new policy through SPD and should be deleted. It would not be appropriate for all occupiers of affordable housing (as defined by LBE) to be achieved through nominations eg where student accommodation is proposed.	NO CHANGE. Para 4.18 supplements UDP policy by indicating procedures and matters to be taken into account, including non-planning matters where appropriate, in implementing policy.
. 16	<i>Thames Valley University</i> SPD1 p10, para 4.26 As student accommodation is within the UDP definition of affordable housing, LBE should consult TVU prior to publication of the annual Housing Needs Survey	NO CHANGE. The Housing Needs Survey itself is not carried out annually but if consultation on the review of Appendix 3 is carried out TVU could be consulted. Referred to Housing.
. 17	<i>Thames Valley University</i> SPD1 p10, para 4.26 a)TVU should be consulted when LBE review, and prior to publication of, the proportions of affordable housing to be sought in new developments. b) Also reference to 'SPG' should be 'SPD'.	a) NO CHANGE. TVU will be included on list of consultees. b) CHANGE - Reference to 'SPG' should be 'SPD'
. 18	<i>Thames Valley University</i> SPD1 14, Appendix 3 Table on size and type of housing sought should include student study bedrooms/studio rooms.	NO CHANGE. Appendix 3 is for general application.
031 . 04	<i>British Waterways London</i> SPD1 Should acknowledge the potential stock of residential moorings can contribute to the affordable housing stock as an affordable and alternative choice to add to the borough's housing mix. BW willing to work with LBE to identify sites or stretches of the GU Canal that may be appropriate	NO CHANGE. Residential moorings are not included in the definition of affordable housing.

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
032 . 01	<p><i>Howard Sharp &amp; Partners</i> SPD1                      Para. 4.15 Para 4.15 on live/work units should be removed. Live/work is sui generis and should not be included in any assessment of affordable housing. 6/98 refers to housing only. Workspace and living space are inextricably linked and Inspectorate has not favoured affordable housing type s.106 arrangements.</p>	NO CHANGE. The Mayor's Housing SPG clearly indicates that live/work units should be treated as housing provision.
039 . 01	<p><i>Ealing's Housing Association Development Forum</i> SPD1 Update reference to latest government and regional guidance, and in particular the Ealing Housing Needs Survey 2005.</p>	CHANGE
. 02	<p><i>Ealing's Housing Association Development Forum</i> SPD1                      para 4.3 Delete refs to shared ownership and low cost homes for sale.</p>	CHANGE. These tenures are included below as intermediate.
. 03	<p><i>Ealing's Housing Association Development Forum</i> SPD1 Refer to Affordable Housing Providers, typically RSLs.</p>	CHANGE. Scope for provision by Providers other than RSLs acknowledged.
. 04	<p><i>Ealing's Housing Association Development Forum</i> SPD1                      Paras 4.5 - 4.6 Define affordability in terms of incomes, on basis of latest information in Ealing's Housing Needs Survey, and incorporate the Survey's assessments of housing need.</p>	CHANGE. Updated information.
. 05	<p><i>Ealing's Housing Association Development Forum</i> SPD1                      Paras 4.7 Developers should be required to make arrangements for an affordable housing provider to acquire and manage units before applying for planning permission. Social housing should be provided in perpetuity, and intermediate housing should be subject to legal agreements. Developers should not assume grant availability.</p>	CHANGE. Additional information on procedure and requirements supplementary to UDP Policy 5.2
. 06	<p><i>Ealing's Housing Association Development Forum</i> SPD1                      Para 4.8 Expand section on financial appraisals. Developers would need to demonstrate the quantum of affordable housing that could be viably provided from development value. Clarify situation regarding Social Housing Grant (SHG). Add that applicants would be expected to identify a unit breakdown of the price of affordable housing at application stage.</p>	CHANGE. Clarification.
. 07	<p><i>Ealing's Housing Association Development Forum</i> SPD1                      Para 4.13 Add that off-site provision would need to be in a suitable location, completions would need to be at same time as market units, and feasibility in terms of planning consent would need to be considered at the same time as the on-site units.</p>	CHANGE. Agreed in part (reference to suitable location covered in para 4.24) but add ' where sites can be identified'.
. 08	<p><i>Ealing's Housing Association Development Forum</i> SPD1                      Paras 4.16 and 4.22 C Economics of Provision - Delete reference to unforeseen costs making a reduced amount of affordable housing more acceptable. Delete para 4.22 which also refers to unforeseen costs.</p>	CHANGE. Financial appraisal to ensure that all identified costs taken into account.

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
039 . 09	<p><i>Ealing's Housing Association Development Forum</i> SPD1            Para 4.17</p> <p>Clarify by adding: '...Affordable Housing Providers (AHP) which will typically, but not exclusively be Registered Social Landlords' and 'This list of Ealing's RSL Development Partners will be updated from time to time. Developers will be expected to identify their preferred Affordable Housing Provider at pre-application stage'.</p>	<p>CHANGE. Clarification. Scope for provision by Providers other than RSLs acknowledged, and list itself not exclusive.</p>
. 10	<p><i>Ealing's Housing Association Development Forum</i> SPD1            Para 4.18</p> <p>Negotiations should include suitability of mix for housing need, and design and layout to achieve sustainability. The impact of service charges will require assessment. The importance of high density should also be recognised.</p>	<p>CHANGE. Clarification of matters for negotiation.</p>
. 11	<p><i>Ealing's Housing Association Development Forum</i> SPD1            Para 4.25</p> <p>Delete 'Particular consideration will be given to family accommodation, the needs of women, the elderly, minority groups, people with disabilities, and students.'</p>	<p>NO CHANGE. Housing Needs Assessment draws attention to needs of specific groups.</p>
. 12	<p><i>Ealing's Housing Association Development Forum</i> SPD1</p> <p>Calculation of affordable housing proportion - new paragraph incorporating guidance from the London Plan Housing SPD, recognising that calculations may be based on number of habitable rooms or floorspace rather than no.of dwellings; that proportion should relate to gross rather than net provision; and live/work units should be treated as housing.</p>	<p>CHANGE. Incorporate new guidance from Mayor of London.</p>
. 13	<p><i>Ealing's Housing Association Development Forum</i> SPD1            Para 4.32</p> <p>Add to what would be sought in a planning obligation: make the AHP party to the agreement; confirm the cost of the affordable housing to the AHP; design brief to include mechanism for confirming design standards are achieved; and provision to link timescale of completion of affordable units to occupation of market units.</p>	<p>CHANGE. Changes expand on what would be sought in legal agreements.</p>
. 14	<p><i>Ealing's Housing Association Development Forum</i> SPD1            Appendix 3</p> <p>Add: 'The developer's proposed mix should be set out in a table which defines the overall residential proposals by tenure - private sale, intermediate, social and other - and also by unit size and type.'. Include reference to West London shortfall in affordable rented accommodation, and that a higher proportion of larger units may be required as a condition of SHG funding.</p>	<p>CHANGE. Proposed changes expand on information supplementing UDP policy 5.4, 'Range of Dwelling Sizes and Types'.</p>

**SPD2: Community Facilities**

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
006 . 02	<p><i>Mr V Corani</i> SPD2 Creation of supporting facilities and not just endless office blocks.</p>	NOTED for further consideration under Issues.
008 . 07	<p><i>Greater London Authority</i> SPD2 Page 23, para. 2.2.3 Support statement that community facilities should aspire to be models of good practice in terms of sustainable design. It should however be made explicit in the SPD that renewable energy and energy efficiency are policy requirements</p>	CHANGE – Add at end of 3rd para add 'For major developments, policy 2.9 expects developments to incorporate equipment for renewable power generation so as to provide at least 10% of their predicted energy requirements.'
. 08	<p><i>Greater London Authority</i> SPD2 Page 23, para. 2.2.4 Para 2.2.4 - the reference to the need for proposals for community facilities to submit green travel plans and be accessible to all is welcomed. This should however be strengthened to state that developers will be expected to submit an access statement.</p>	CHANGE Add at end of 2.2.5 ' including submission of an Access Statement.'
. 09	<p><i>Greater London Authority</i> SPD2 Page 27, Section 4 The SPD does not provide sufficient detail in respect of planning obligations. Section 4 should be elaborated to clearly specify when and what type of planning obligations would be expected from a developer, including details on on site provision, provision in kind, provision in land etc. Reference should also be added to the tests which planning obligations must meet as set out in Circular 05/05. The SPD should also specify a formula for calculating contributions.</p>	CHANGE (Part) - At this stage the potential impacts of any (re)development are assessed on their own merits and relevant contributions requested on this basis; no formulas have been produced for calculating contributions. The Council are hoping to produce a separate SPD on legal agreements which will include more detail.
. 10	<p><i>Greater London Authority</i> SPD2 Page 26, para. 3.2 Para 3.2 'Preparing a Social Impact Statement' - the impact of developments on local community facilities should not be considered in isolation. Reference should be added to considering the cumulative impact. Reference should also be included to the scope for pooling contributions</p>	CHANGE (Part) - Add reference to cumulative impact. It will be appropriate to consider the potential for pooling contributions when the Council produce a separate SPD on legal agreements.
. 11	<p><i>Greater London Authority</i> SPD2 Page 27, para. 4 Planning obligations should not just cover the provision of new facilities, but should also address improving existing facilities. Contributions could also be made towards revenue costs of a facility as well as initial capital costs</p>	CHANGE – (Part) Reference to securing 'enhanced' facilities on existing sites is already made. Add before final sentence of first para ' This could include contributions to the revenue costs as well as initial capital costs'.
. 12	<p><i>Greater London Authority</i> SPD2 Page 28, Section 5 Section 5 'Specific Guidance on Community Facilities' is welcomed, although headings for the different types of facilities should reflect those in the London Plan policy 3A.15: Children's play and recreation facilities, services for young people, older people and disabled people, libraries, community halls, meeting rooms, places of worship and public toilets of public toilets.</p>	CHANGE The section 5 headings follow the order of the relevant policies in the adopted 2004 Plan for the Environment. Most facilities listed are covered under these headings. Will edit to ensure all London Plan categories are included.

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
008 . 13	<p><i>Greater London Authority</i> SPD2 Page 28, para. 5.2</p> <p>Paragraph 5.2 'facilities for young children' - this section is welcomed, but further information should be provided in respect of the needs of older children (teenagers) in addition to the needs of young children. This section should also identify that skills attainment and childcare are barriers to work, and that such facilities could be secured through planning obligations.</p>	<p>CHANGE Add reference to the needs of older children. Add also before final sentence 'Skills attainment and childcare can be barriers to work, and appropriate contributions could be secured through planning obligations to address these issues where relevant.' Further consideration will be given to this when the Council produce a separate SPD on legal agreements. NB Para 5.2 needs to be changed to refer to saved policy 8.6 not 8.7.</p>
. 14	<p><i>Greater London Authority</i> SPD2</p> <p>The SPD includes reference to the scope for dual use of school facilities for adult education etc. The SPD should explore further whether planning obligations could be used as a mechanism for increasing the shared use of existing, or proposed community facilities.</p>	<p>NO CHANGE. This possibility is included within the scope of the SPD as it is currently drafted.</p>
009 . 07	<p><i>English Heritage - London Region</i> SPD2 2.2.3 et seq.</p> <p>We welcome the intention of seeing a high standard of design and would encourage the Council to expand this point to respect and enhance the historic environment in general. Amend Conservation Area reference to also include listed buildings and their settings.</p>	<p>CHANGE. Agree that reference to good design should be enhanced as suggested.</p>
011 . 04	<p><i>Ealing Civic Society</i> SPD2</p> <p>This draft needs editing. Definition does not include recreation and open space. High density development is allowed with inadequate private amenity space. Public and private open space should be acknowledged in both text and social impact statement, If site too small, commuted payment required. Parks should be a consultee. Lack of childrens' playspace must have an undesirable social impact.</p>	<p>CHANGE. Agree editing needed to include these points.</p>
. 05	<p><i>Ealing Civic Society</i> SPD2 p.17</p> <p>More of wide range of guidance available should be in SPD. With affordable housing the prime objective for planning obligations, how can the requirement for a community facility be achieved unless supported by incorporation in this document and subject to consultation. It will be unenforceable through planning obligations</p>	<p>NO CHANGE. The issue of affordable housing is dealt with in other UDP policy and in SPD1.</p>
. 06	<p><i>Ealing Civic Society</i> SPD2 Para 2.1</p> <p>Very expensive for community groups to find places to meet. The Council demands high rents. Public Houses with meeting rooms being replaced by flats/restaurants and there is strong demand for change of use. Implications that one CF is as good as another leads to loss of facilities. Social impact statement welcomed, but not clear on what basis cultural service recommendations made. Concerned about cumulative impact of small schemes.</p>	<p>NO CHANGE. The purpose of the SPD is to address these issues, and it does so. It is also related to Statement of Community Involvement which indicates how community and cultural interests can influence development.</p>

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
012. 03	<p><i>Acton History Group &amp; West London Organic &amp; Wildlife Gardening</i> SPD2 Page 29, para. 5.4</p> <p>Paragraph 5.4 should include the possibility of providing allotment space or similar as part of meeting the London Food Strategy and to meet the Council's aims for healthy living and sustainable living.</p>	CHANGE. Agree editing to introduce this issue.
030 . 01	<p><i>Thames Valley University</i> SPD2 page 17</p> <p>In final paragraph, reference is made to a wide range of guidance on potential impacts of (re)development of community facilities on the amenity of neighbours. This should be listed and details provided of how it can be obtained.</p>	NO CHANGE. The information is at the end of the document.
. 03	<p><i>Thames Valley University</i> SPD2 18</p> <p>The SPD should recognise that Community facilities in any one location may serve the needs of more than one borough, particularly where the location is close to a borough boundary.</p>	NO CHANGE. The document does not preclude consideration of this type of situation.
. 04	<p><i>Thames Valley University</i> SPD2 18, 27</p> <p>Support the desire that large scale developments should contribute towards the cost of community infrastructure where relevant. Also, where applications involve disposal of a community facility to provide a new one elsewhere in the area, contributions should not be required.</p>	NO CHANGE. Clearly, this eventuality would be taken into account in the consideration of the social impact.
. 05	<p><i>Thames Valley University</i> SPD2 19 &amp; 20, Table One</p> <p>The umbrella community organisations referred to (listed in Table One) should include Thames Valley University, as the only Higher Education Institution in the borough.</p>	CHANGE. Agree to this editing change.
. 06	<p><i>Thames Valley University</i> SPD2 25</p> <p>The SPD should encourage developers to contact TVU direct with respect to the potential impact of a development on higher education in the borough.</p>	CHANGE. Agree to this editing change.
. 07	<p><i>Thames Valley University</i> SPD2 p26, p27 (final para),</p> <p>The SPD should clarify that this guidance on preparing a Social Impact Statement (SIS) is not adopted policy. Contrary to central Govt guidance, this SPD has been produced without assessment of need/demand for community facilities in the area. The SPD should be removed until this has been done.</p>	NO CHANGE. The document complements the existing information and the additional work being undertaken on the need for community provision.
. 08	<p><i>Thames Valley University</i> SPD2 28 &amp; 29 (Section 5.3)</p> <p>There is no mention of Thames Valley University in this section on Education facilities. This omission should be remedied.</p>	CHANGE. Agree to this editing change.
. 09	<p><i>Thames Valley University</i> SPD2 32</p> <p>This advisory part of the SPD should refer developers to contact TVU in matters relating to higher education, as the LEA is not responsible for providing higher education in the borough.</p>	CHANGE. Agree to this change. However, note that the local authority is interested in higher education in the borough, and for the borough's residents.

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
030 . 10	<p><i>Thames Valley University</i> SPD2 p26 para 3.2</p> <p>This part of the SPD (Preparing a Social Impact Statement) fails to take into account that a site subject of a proposed (re)development may be part/wholly used as a community facility already, and that disposal proceeds will be used to invest in a new community facility in the area. Consider a contribution would not be appropriate in this instance.</p>	<p>NO CHANGE. The social impact statement allows for factual information to be assembled which will assist in determining the proposed development, and there is no reason why it cannot include consideration of alternative facilities provided elsewhere.</p>
031 . 05	<p><i>British Waterways London</i> SPD2</p> <p>British Waterway's role in facilitating and providing community facilities should be recognised in the SPD eg their Learning Services Manager and the floating classroom</p>	<p>CHANGE. Agree to this editing change.</p>
036 . 06	<p><i>Ealing Primary Care Trust</i> SPD2</p> <p>In broad terms, support the SPD. Reference should be made to the current work of North West London Health Urban Planning Initiative with HUDU (Healthy Urban Development Unit) in trying to establish a joint memorandum of understanding between the PCT and Local Authority</p>	<p>CHANGE. Agree to this editing change.</p>
. 07	<p><i>Ealing Primary Care Trust</i> SPD2</p> <p>How will the LPA aggregate population increases for smaller developments to trigger the threshold for Health Impact?</p>	<p>NO CHANGE. The document operates within existing strategic and local authority policy, and current legislation. The potential for a tariff for this purpose is still subject to consideration at government level, and the outcome will be examined with a view to updating this document.</p>
. 08	<p><i>Ealing Primary Care Trust</i> SPD2</p> <p>Commitment should be strengthened to retain Community facilities for D1 use to support current NHS Strategy, particularly with respect to agreeing joint policy on land values and District Valuer opinion on affordability.</p>	<p>NO CHANGE. Agreed – these factors can be taken into account in implementing the guidance as it stands.</p>

**SPD3: Sustainable Transport**

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
<u>General</u>		
008 . 15	<p><i>Greater London Authority</i> SPD3</p> <p>The purpose of SPD3 is unclear. Its title implies that it will include details on promoting sustainable modes of transport etc. It is recommended that the document title is reworded to reflect its content</p>	CHANGE Agree – divide the draft SPD into three separate documents.
031 . 06	<p><i>British Waterways London</i> SPD3</p> <p>Despite the title, the SPD currently has a narrow purpose. Given the title, the SPD should recognise the Blue Ribbon Network for cycling, walking, transport of waste and aggregates, leisure and tourist traffic and potential for water buses and taxis on the West London canal Network,</p>	CHANGE Agree – divide the draft SPD into three separate documents. The confusion arises because three separate aspects of policy which contribute to sustainable transport are included under the one heading. The SPD does not purport to deal with all aspects of sustainable transport.
<u>Low Car Housing Developments in CPZs</u>		
008 . 16	<p><i>Greater London Authority</i> SPD3</p> <p>The inclusion of low car housing and city car clubs is supported. Consideration should be given to promoting Car Capped housing where on-site parking is limited and all residents are exempt from eligibility to permits. The developer/estate manager is then responsible for allocating the on-site parking spaces to the residential</p>	NO CHANGE. The SPD does cap the car spaces allocated to dwellings and the heads of terms of the legal agreement relating to each application will specify the addresses of the units, so that this is clear to the Parking Enforcement Service.
011 . 07	<p><i>Ealing Civic Society</i> SPD3</p> <p>Low car housing - Is policy 9.8 'adopted' or 'saved'? What evidence is there with any planning application that car ownership and use will be low enough to justify limited parking spaces? Even an equal division between market/affordable seems a recipe for conflict. Naïve to assume there will be no impact on local street parking. No permits should be allowed in low car housing; night time supervision?- expensive and unpopular.</p>	NO CHANGE. The SPD does not seek to remove rights from existing residential development, but deals with additional units proposed, in as equitable a way as possible.
. 08	<p><i>Ealing Civic Society</i> SPD3</p> <p>what happens when disabled drivers living in or visiting the development exceed the number of parking spaces? There is no flexibility as in a normal housing scheme. Where do visitors park?</p>	NO CHANGE. Experience too date indicates that the pressure for parking by residents and their visitors has not reached the levels suggested in this representation. Where an individual with a disability does experience a problem, provision for dedicated parking bays is considered.
021 . 06	<p><i>Hanwell and Canals Conservation Advisory Panel</i> SPD3</p> <p>Further clarification is sought in respect of the implications of low car housing in terms of CPZ's.</p>	NO CHANGE. Advice on specific issues which arise is available from the Transport and Planning Policy Service.
042 . 01	<p><i>Lorena Martin</i> SPD3</p> <p>It is unfair to prevent new residents having a parking permit. People would need to move if family circumstances changed. Instead should be looking at longer-term solutions such as alternative fuel vehicles.</p>	NO CHANGE. The alternative to this policy for low car housing is to refuse a planning application for residential development which is perfectly sound in all aspects apart from its transport impacts. There are many parts of London where parking cannot be accommodated and families live without a private car. The UDP indicates flexibility if alternative fuel vehicles are proposed and pollution rather than congestion is the main problem.

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
<u>City Car Clubs</u>		
004 . 02	<i>Watch (RSNC) Residents' Association</i> SPD3 3.5 Good practice needed on city car clubs.	NO CHANGE. This document deals with the planning application process. As the car club movement develops, good practice will be established through dialogue between the local authority, the operators and car club members.
011 . 09	<i>Ealing Civic Society</i> SPD3 City car clubs seem a good idea but evidence is needed. Examples not named and operators' expectations are inadequate justification for overdevelopment. Developers' subsidies may not be enough; unreasonable for non-drivers to support the scheme; schemes need to be linked to improve prospects of long term viability.	NO CHANGE. The car club deals with transport impacts, but does not imply permission for overdevelopment. The whole community benefits from the reduction in car use, and the SPD facilitates wider involvement in a car club than the residents in a proposed development. Note that the name City Car Club has been adopted by an individual operator, and the SPD will be changed to refer to 'car clubs'.
. 10	<i>Ealing Civic Society</i> SPD3 Para 3.10 The Civic Society strongly objects to the provision of car club vehicle spaces being located on the highway. They should be located within the site, not obscuring visibility, making access for service vehicles more difficult, or journeys to school more dangerous.	NO CHANGE. On street spaces will make car club use more easily available to the whole neighbourhood and therefore contribute to reduced car use generally, and to the viability of the car club. Agree that on-street parking spaces should not be allowed to create the difficulties referred to in this representation.
. 11	<i>Ealing Civic Society</i> SPD3 City Car Clubs - Ealing has many streets that are at capacity with residents parking at night. Low car housing will make matters worse with service vehicles and fire engines trying to gain access. Parking in front gardens will result in loss of amenity, increased loading on surface street drainage, and flash flood risk.	NO CHANGE. Agree that on-street parking spaces should not be allowed to create the difficulties referred to in this representation. The issue of parking in front gardens is dealt with elsewhere in this SPD.
012 . 04	<i>Acton History Group &amp; West London Organic &amp; Wildlife Garden</i> SPD3 Page 39, para. 3.1 Para. 3.1 - 'indicted' should be 'indicated'	CHANGE. Thanks for pointing this out!
022 . 10	<i>Castlemore Securities/National Grid</i> SPD3 Page 41, para.3.11 Paragraph 3.11 - Request that the final sentence of paragraph 3.11 be deleted as it is not considered reasonable to require such an indefinite commitment. Such issues should be reviewed periodically, to assess their necessity and value.	NO CHANGE. The approach in the SPD represents current good practice. The guidance can be reviewed if the monitoring process provides evidence that indicates a need for an alternative approach.
<u>Crossovers and Parking in Front Gardens</u>		
004 . 03	<i>Watch (RSNC) Residents' Association</i> SPD3 4.1 Interests of all road users. Cycling developments missed. Safety to cyclists from crossovers not	CHANGE. The SPD deals with the interests of all road users, but does not specifically mention cyclists. Agree that this should be remedied.
. 05	<i>Watch (RSNC) Residents' Association</i> SPD3 Omissions - crossovers and front garden greenery. Percentage that needs to remain not stated i.e. only 66% surfaced.	NO CHANGE. The appropriate design of individual front gardens should not be prescribed in any more detail in this SPD. There needs to be room for reasonable flexibility, in the context of the broad principles indicated.
. 06	<i>Watch (RSNC) Residents' Association</i> SPD3 Effect on street trees reduction not mentioned. Need to increase street trees.	CHANGE. Agree – add reference to street trees in 4.10ii.

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
011 . 12	<i>Ealing Civic Society</i> SPD3 Table 5H Table 5H has a discrepancy between point 1 and highlighted note at end. Whilst it is copied correctly from the UDP, the opportunity should be taken to insert in the note after 'important to use the right materials' 'retain existing trees and hedges'.	NO CHANGE. Table 5H point one and the end note complement each other and a change is not needed.
. 13	<i>Ealing Civic Society</i> SPD3 Para 4.10 There s no reference to street trees in this list. They should be retained.	CHANGE. Agree – add reference to street trees in 4.10ii.
. 14	<i>Ealing Civic Society</i> SPD3 Controlled gates should be discouraged. They cause delays in busy roads and make streets feel less safe for pedestrians. It should be noted that gates over one metre in height require planning permission.	CHANGE. Add reference to the need for planning permission for high boundary walls etc and that the impact of the proposed boundary on the character of the area and on crime prevention will be considered.
012 . 05	<i>Acton History Group &amp; West London Organic &amp; Wildlife Garde</i> SPD3 Page 42, para. 4.4 Para. 4.4 - add 'v) effect on environment by adding run-off to current water systems and by depeleting natural habitats by reducing green corridor available to flora and fauna (may be covered by 4.11?)	NO CHANGE. This point is covered in para 4.11.
. 06	<i>Acton History Group &amp; West London Organic &amp; Wildlife Garde</i> SPD3 Page 44, para. 4.10 Para. 10 - add additional criteria indicating that crossovers shall not be provided within X m of an existing width restriction.	NO CHANGE. This idea cannot be justified on highway safety grounds.
021 . 04	<i>Hanwell and Canals Conservation Advisory Panel</i> SPD3 Page 41, section 4 Guidance on crossovers and parking in front gardens is welcome.	NOTED.
. 05	<i>Hanwell and Canals Conservation Advisory Panel</i> SPD3 Page 41, para.4 Concern that despite permission being refused for crossovers in certain cases, development has proceeded unlawfully.	NOTED. Consideration will be given to the enforcement regime required in the light of the SPD.
029 . 01	<i>Norwood Green Residents' Association</i> SPD3 Page 44, para. 4.10 Paragraph 4.10 - request that additional paragraphs be added in section 4.10 as follows: '.vii. Permitted pavement parking spaces that may be affected by a crossover should be avoided. Unauthorised excavations of the land between a property and the carriageway for any purpose including for the construction of unauthorised crossovers is a criminal offence. The unauthorised removal of existing pavements, grass verges etc for any purpose constitutes theft. In all such cases the Council will seek a criminal	NO CHANGE. However, consideration will be given to the enforcement regime required in the light of the SPD.
045.01	<i>Ealing LA21</i> SPD3 Page 41 para 4.1 The guidance contradicts policy 9.9, which seeks to 'make the best of available road space for all road users'. Crossovers effectively reserve the road space in front of them for the property owner. Evidence shows that crossovers and front garden parking lead to a net gain in parking spaces from 1.3 to 2 per house.	CHANGE. The issue raised is dealt with to a degree in 4.10vii. However, agree that the principle should apply to all road space, and related to where a crossover would remove more than one on-street car space.
045.02	<i>Ealing LA21</i> SPD3 Page 43 paras 4.6 – 4.10 The London Assembly commissioned a report on front garden parking which showed that another London Borough successfully refuses crossover applications where they lead to loss of road space for on-street parking. This should be done in Ealing.	CHANGE. The issue raised is dealt with to a degree in 4.10vii. However, agree that the principle should apply to all road space, and related to where a crossover would remove more than one on-street car space.

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
045.03	<p><i>Ealing LA21</i> SPD3 Page 43 para 4.8 The suggestions in paragraph 4.8 seem likely to increase the amount of hard surfaced required and therefore it is particularly important to ensure that a link is made to point 2 in Table 5H (minimum area of hard surfacing).</p>	CHANGE. Add cross reference to table 5H, and amend drawing to indicate ways of accommodating the turning space within the plot.
045.04	<p><i>Ealing LA21</i> SPD3 Page 43 para 4.9 The proposed safety zone to prevent a parked vehicle being parked right up against an entrance has merit as a means of restricting the size of front gardens which are available for parking (but would appear to be impossible to enforce once the crossover has been constructed).</p>	NO CHANGE. However, consideration will be given to the enforcement regime required in the light of the SPD.
045.05	<p><i>Ealing LA21</i> SPD3 Page 44 para 4.10iv This would increase the amount of hard surfacing in a front garden, and by removing the line of the traditional front boundary structures would be out of keeping with most of the front gardens and the streetscape in most residential roads in the borough.</p>	CHANGE. Add reference to the need for planning permission for high boundary walls etc and that the impact of the proposed boundary on the character of the area and on crime prevention will be considered.
045.06	<p><i>Ealing LA21</i> SPD3 Page 44 para 4.10v The proposed 600m height limit should apply to all front garden boundary structures including those such as railings which could be considered not to restrict visibility but nevertheless also have undesirable effects, such as being out of keeping and unfriendly / intimidating (e.g. fortress-style railings).</p>	CHANGE. This issue can be referred to in 4.11 in so far as it can be advised as good practice in cases where planning permission is not needed.
045.07	<p><i>Ealing LA21</i> SPD3 Page 44 para 4.10vii The proposal to avoid the construction of crossovers in defined on-street parking areas such as CPZs has been used by other local authorities, e.g. LB Camden. We do not support it for Ealing, because:</p> <ul style="list-style-type: none"> <li>• It could create even more difficulties in getting CPZs accepted</li> <li>• It could create a rush to get crossovers installed before a CPZ is put in (this happens already because some people seek to avoid the charges, but this would create even more incentive)</li> <li>• The principle of the road being available for parking by everyone in the CPZ should apply to non-CPZ areas as well.</li> <li>• The proposal will be unnecessary if all crossovers are resisted – as outlined above.</li> </ul>	CHANGE. Agree that the principle should apply to all road space, and related to where a crossover would remove more than one on-street car space.
<u>Other</u>		
004 . 04	<p><i>Watch (RSNC) Residents' Association</i> SPD3 Safe routes to schools involve safe cycle tracks (none existing presently except in parks)</p>	CHANGE The SPD doesn't deal with cycle tracks, but the confusion arises because three separate aspects of policy which contribute to sustainable transport are included under the one heading. The SPD does not purport to deal with all aspects of sustainable transport. Action – divide the draft SPD into three documents with relevant titles.
021 . 07	<p><i>Hanwell and Canals Conservation Advisory Panel</i> SPD3 Concern that the Blue Badge scheme is being abused.</p>	NOTED. Consideration will be given to the enforcement.



**SPD4: Residential Extensions**

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
004 . 10	<i>Watch (RSNC) Residents' Association</i> SPD4 Sustainability - materials need to be from sustainable sources.	NO CHANGE – Cross reference to Greening Your Home SPG
. 11	<i>Watch (RSNC) Residents' Association</i> SPD4 Green building advice should be provided for builders and residents alike.	NO CHANGE – Cross reference to Greening Your Home SPG
. 12	<i>Watch (RSNC) Residents' Association</i> SPD4 All new building should provide for energy generation and rain water collection.	NO CHANGE – Cross reference to Greening Your Home SPG
. 13	<i>Watch (RSNC) Residents' Association</i> SPD4 When a building is sold all contraventions of planning requirements need to be reversed.	NO CHANGE – The planning permission relates to the property and not the owner.
004 . 14	<i>Watch (RSNC) Residents' Association</i> SPD4 Out buildings cannot be used for residents once buiding extension has used 1/3 of garden - no more should be allowed.	NO CHANGE – There are limitations in the scope for policy and guidance due to permitted development rights.
007 . 01	<i>Mill Hill Park Residents' Association</i> SPD4 Suggest adding further illustrations and photographs to the SPD where possible.	NO CHANGE – There needs to be a balance between comprehensiveness and brevity.
009 . 08	<i>English Heritage - London Region</i> SPD4 Many areas of repetition, poor quality illustrations, mismatch of information noted. Some advice inaccurate e.g on satellite dishes. Some parts of guidance lack diagrams to help illustrate good design e.g. 11.0 Boundary Walls, Satellite Dishes and Hard Surfacing.	CHANGE – Correct satellite dishes advice. The illustrations are simple and useful
. 09	<i>English Heritage - London Region</i> SPD4 It might be helpful , for members of the public, to explain different forms of planning consent and Article 4 Directions.	CHANGE – Link to info elsewhere
. 10	<i>English Heritage - London Region</i> SPD4 2.0 No mention is made of the need for design statements. These should be submitted with proposals.Details of what constitutes a good design statement should also be explained in the guidance.	CHANGE – Design statements where necessary
. 11	<i>English Heritage - London Region</i> SPD4 Following the section 3.0 General Principles, it might be more useful to introduce the section on Development in a Conservation Area next. The current order implies that developments in CA s are secondary in importance whereas much of the Borough is covered by these designations	NO CHANGE – The current order of the document allows progression from simple cases (the majority) to complex (less frequent) cases.
. 12	<i>English Heritage - London Region</i> SPD4 We are concerned that some of the advice provided could be rigidly applied at the expense of undermining the	NO CHANGE

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
009.12	existing character and appearance of the building being extended. Suggest that the guidance reinforces the need for architectural details to reflect the original building.	
. 13	<i>English Heritage - London Region</i> SPD4 Some of the drawings could lead applicants to submit inappropriate designs. Implication that poorer quality acceptable if not visible from the public realm.	NO CHANGE – This is not accepted . Clearly the implications for the public realm are important in addition to the architectural quality of individual development.
. 14	<i>English Heritage - London Region</i> SPD4 Different design standards exist across the Borough e.g in Conservation Areas traditional types of dormer windows required but not elsewhere. What does traditional mean? SPD should aim to achieve good design regardless of where the extension takes place within the Borough.	NO CHANGE – The SPD is a brief pointer to assist applications. More specific advice will be forthcoming in relation to conservation areas.
. 15	<i>English Heritage - London Region</i> SPD4 Section 11 Under section 11.0 little reference is made to the introduction of Article 4 Directions. This includes Article 4(1) and Article 4(2)'s. Permitted development rights are often withdrawn for this type of development and I would assume the same would apply in Ealing.	CHANGE – Correct references to Article 4 Directions.
. 16	<i>English Heritage - London Region</i> SPD4 12.0 Little reference is made to the use of Conservation Area Appraisals, Conservation Character Statements and/or Conservation Management Plans. If available these should be fully utilised.	NO CHANGE – These documents are proposed in LDS. Non-material change will be made when in place.
. 17	<i>English Heritage - London Region</i> SPD4 A significant concern relates to the lack of guidance relating to proposed developments to Listed Buildings and within their setting. Need to make the special circumstance relating to listed buildings very clear.	CHANGE – Correct reference to Listed Buildings
011 . 15	<i>Ealing Civic Society</i> SPD4 This is a welcome attempt to clarify the problems of extending dwellings in the Borough. Some improvements: - the tick and cross system should be applied to all the drawings; detached and terraced houses also get extended not just semis as in most diagrams; the third drawing in fig 4.1 encourages roof detail which would look out of place on a single story extension.	NO CHANGE – The drawings provide examples of design which might be appropriate, subject to individual site circumstances.
. 16	<i>Ealing Civic Society</i> SPD4 Side extensions - dimensions. Please add to 'the single storey extension should follow the depth of the house' - 'and setback at the frontage - see below'.	CHANGE – Agree, though with word 'generally' added.
. 17	<i>Ealing Civic Society</i> SPD4 Position - second para out of three should not start with 'finally'. Both neighbouring properties need to be taken into account. What is overdominance? Does it include taking sunlight and daylight?	CHANGE – delete finally and replace 'overdominance' with dominance.
. 18	<i>Ealing Civic Society</i> SPD4 Dormer Windows - Notes on fig 4.6 . What does dormer window not spoil? Section is muddled and repetitive. What dormer windows suitable for side of roof? What is a traditional dormer? Revisions suggested.	CHANGE – Agree that editing needed for clearer expression.

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
011.19	<i>Ealing Civic Society</i> SPD4 Bungalows - Fig 9.1 and 9.2 repeat the same point. It gives too much emphasis to front dormers. Delete Fig 9.1	NO CHANGE – It is reasonable to indicate that dormers can be acceptable if designed appropriately
. 20	<i>Ealing Civic Society</i> SPD4 Hard Surfacing - reference to planning permission is incorrect. Either copy from SPD3 or cross reference. Please add death of trees and hedges because water is diverted from the subsoil. The problem of our Victorian drainage system is overloading, not just creaking. Sewerage capacity is inadequate when it rains heavily.	CHANGE – Add to SPD3, with editing as suggested.
. 21	<i>Ealing Civic Society</i> SPD4 Conservation Areas - Surely Conservation Officer's time should not be used to check whether a property is listed or in a Conservation Area. Another name should be quoted. Section is repetitive of earlier pages, Cross refer from earlier.	NO CHANGE - There is a wide range of contacts indicated.
. 22	<i>Ealing Civic Society</i> SPD4 Roof Extension 3rd Point. - 'Dormer windows should be of traditional design' - Problems can arise in making exact replicas because building regulations require thicker insulation which alters proportions. Revised wording suggested.	NO CHANGE – This gives general approach. The guidance will be interpreted in light of specific circumstances.
. 23	<i>Ealing Civic Society</i> SPD4 Porches - Replace 'in other situations' by 'Where they are acceptable the design...' This clarifies that it is not always acceptable.	CHANGE – Agree improved wording.
. 24	<i>Ealing Civic Society</i> SPD4 Front boundary walls - Add to first point 'Where hedges and fences are part of the street scene they should be retained to maintain the local character' because not all Conservation Areas are Victorian. Residents may think they are improving their property by replacing a hedge by a wall.	CHANGE – Agree improved wording
012 . 06	<i>Acton History Group &amp; West London Organic &amp; Wildlife Garden</i> SPD4 Page 67, section 11 Section 11 'Boundary Walls, Satellite Dishes and Hard Surfacing' - Support policies outlined in section 10 on hard surfacing. The Council should consider piloting some streets as best practice examples.	NOTED – Will consider the proposal.
021 . 01	<i>Hanwell and Canals Conservation Advisory Panel</i> SPD4 Support content of SPD. How can we ensure that developers/applicants will adhere to the guidelines in the SPD?	NOTED – Policies and guidance not guarantee. Will promote with help of residents and amenity groups.
. 02	<i>Hanwell and Canals Conservation Advisory Panel</i> SPD4 Concern regarding piecemeal development on individual properties. Is there any way of regulating piecemeal development of a property to ensure that overdevelopment is prevented?	NOTED – The SPD will play a part in this. Further policies in sections 4 and 5 of the UDP.
021 . 03	<i>Hanwell and Canals Conservation Advisory Panel</i> SPD4 Hard surfacing of front gardens in conservation areas	NO CHANGE – The SPD must indicate what is possible with existing legislation.

should require planning permission.

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
028 . 05	<p><i>Central Ealing Residents' Association</i> SPD4 Page 49, Section 2.0</p> <p>Section 2.0 'Planning Permission' - reference is made under the heading 'professional advice' of the requirement to produce scaled drawings. In the case of some applications, the standard of drawings is inadequate. It is suggested that the Council set out some specific requirements for drawings submitted.</p>	CHANGE – Agree to include, and in respect of crossovers.
. 06	<p><i>Central Ealing Residents' Association</i> SPD4 Page 51, policy 4.1</p> <p>Policy 4.1 - An additional bullet should be added to emphasise the need to consider the safety of inhabitants of the property in case of a fire.</p>	NO CHANGE – Can not change UDP policy, which is included for info only. This is a matter for Building Control.
. 07	<p><i>Central Ealing Residents' Association</i> SPD4 Page 59, section 6.0</p> <p>Section 6.0 'Roof extensions' - Agreed that dormer windows should rarely be acceptable on front roof slopes. However the illustrations in section 9.0 'Bungalows' illustrate front dormers. The presumption against front dormers should apply to both single storey and two storey properties.</p>	NO CHANGE – The drawings provide examples of design which might be appropriate, subject to individual site circumstances.
. 08	<p><i>Central Ealing Residents' Association</i> SPD4 Page 67, section 11.0</p> <p>Section 11.0 - please clarify if there are any maximum height restrictions for boundary walls.</p>	CHANGE – will clarify 1m height.
029 . 02	<p><i>Norwood Green Residents' Association</i> SPD4 Page 62, Section 7.0</p> <p>Section 7.0 - Request that the second bullet point be rewritten as follows: 'would have a ground area (measured externally and including any roof overhang) of more than 2 metres..' It is also requested that 2 further bullet points be added as follows: 'would extend more than 1.4 metres from the main front or side wall of the house at any point including any roof overhang' and 'is in a conservation area.'</p>	CHANGE – as necessary to reflect statutory requirement.
029 . 03	<p><i>Norwood Green Residents' Association</i> SPD4 Page 63, section 8.0</p> <p>Section 8.0 - section 8.0 does not offer sufficient practical guidance for householders planning to erect outbuildings. Request that the following be added: '1) Planning permission is required for the construction of all outbuildings in a conservation area. 2) Outbuildings to the rear of a house higher than 2m or with a ground area exceeding 10 sq. m. must be either: of wooden or painted metal construction or brick faced on all sides or fully rendered over other materials such as breeze or concrete blocks, then whitewashed or painted white; any other colour should be mutually agreed with neighbours who have a view of the outbuilding(s) concerned may not be closer than 500mm to any boundary line. 3) Construction of outbuildings of a ground area of more than 10 sq. m. are subject to: prior application for a Certificate of Lawful Development, application for planning permission in cases where a certificate of lawful development has been refused, the same building control procedures as apply to house extensions with obligatory inspection before and after construction. 4) No boundary fence, stand of trees or hedge defining a boundary may be removed to facilitate construction of any outbuilding without the express written agreement of the adjoining landowner..'</p>	CHANGE – as necessary to reflect statutory requirement.
042 . 02	<p><i>Lorena Martin</i> SPD4</p> <p>Why should the Council only allow certain types of extensions? It is too regulatory and fails to recognise individuality or specific needs.</p>	NO CHANGE – reflects and clarifies policy in UDP, and involvement of local people.

- 045.08 *Ealing LA21*  
SPD4 Page 68  
This should mention, back gardens, which are also being hard surfaced at a worrying rate, for reasons which are not yet entirely clear. Their greater surface area means that the many of the detrimental effects are likely to be much greater and so the 1<sup>st</sup> and 4<sup>th</sup> paras should be revised accordingly.
- 045.09 *Ealing LA21*  
SPD4 Page 68  
It should refer to the many detrimental effects of hard surfacing set out in the appendix of this document.
- 045.10 *Ealing LA21*  
SPD4 Page 68  
It should refer to information available on the LA21 front gardens website ([www.london21.org/ealingfrontgardens](http://www.london21.org/ealingfrontgardens)) and on the Royal Horticultural Society website.
- CHANGE. An enhanced reference to back gardens can be added. Also, the whole section can be transferred to the Crossovers SPD, and a cross reference made in the residential extensions document.
- CHANGE. Agree that an introductory section referring to these issues can be added. Also, the whole section can be transferred to the Crossovers SPD, and a cross reference made in the residential extensions document.
- CHANGE. Agree add link and reference. Also, the whole section can be transferred to the Crossovers SPD, and a cross reference made in the residential extensions document.

**SPD5: West London Tram Route**

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
001 . 01	<p><i>Transport for London</i> SPD5 Page 78, Section 4 Paragraph 4.1 Should read "The TWAO application and deemed planning permission request"</p> <p>"Route Safeguarding" This title is not appropriate. The route will not be safeguarded, rather certain parts of the route will have land requirements. More appropriate to refer to this section as "Route Land Requirements".</p>	NO CHANGE
. 02	<p><i>Transport for London</i> SPD5 Pgh 3.1, Pgh 3.3 Pgh 3.1 After "A4020" insert "known as Uxbridge Road"</p> <p>Pgh 3.3 In Hillingdon the route is also known as Hillingdon Hill, Hillingdon Road and Uxbridge Road</p>	CHANGE - agree to make minor changes as requested. In paragraph 3.1 insert 'Known as Uxbridge Road' after 'A4020'. Amend paragraph 3.3 as follows: 'The route then continues along the A4020 (Hillingdon Hill, Hillingdon Road and Uxbridge Road) within the London Borough of Hillingdon and terminates at High Street, Uxbridge.
009 . 19	<p><i>English Heritage - London Region</i> SPD5 Consideration should be given to English Heritage national policy statements: 'Transport and the Historic Environment', 'Streets for All', and 'London Streets for All'.</p>	NOTED
009 . 20	<p><u>Ref:</u> <u>Summary</u> <u>Response</u> <i>English Heritage - London Region</i> SPD5 Point 2.2.4 Amendments suggested to strengthen reference to Listed Buildings, trees, areas of local distinctiveness etc.</p>	NO CHANGE - paragraph 5.5 recognises that the tram route may effect the setting of a number of buildings of architectural and historical interest (including both local and statutory listed buildings). It will be important therefore that development seeks to protect and is sympathetic to these settings.
. 21	<p><i>English Heritage - London Region</i> SPD5 Point 5.3 Add to list : Respect and enhance the character, appearance, and setting of heritage assets such as Conservation Areas, Listed Buildings, and Historic Parks and Gardens..</p>	CHANGE - agree to add additional bullet point vii) 'Respect and enhance the character, appearance, and setting of heritage assets such as Conservation Areas, Listed Buildings, and Historic Parks and Gardens.'
. 22	<p><i>English Heritage - London Region</i> SPD5 The current draft does not consider sufficiently sites subject to demolition and redevelopment. Guidance should be provided.</p>	NO CHANGE - This is beyond the remit of the SPD.
010 . 01	<p><i>Save Ealing's Streets</i> SPD5 The SPD fails to explain how the Council would expect the tram's promoters to comply with the policies set out in the adopted UDP. The SPD needs to draw attention to the UDP policies and be clear that TFL must observe these in their plans for the scheme.</p>	NO CHANGE - cross referencing is made throughout this document to policies in the UDP, particularly in section 5 'Planning Issues'. Moreover the 'introduction' to the SPD states that it supplements policy 9.3 of the UDP.

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
010.02	<p><i>Save Ealing's Streets</i> SPD5</p> <p>An SPD is not the right vehicle for the Council to be setting out policies of such significance as those that relate to the West London Tram. New policies should be introduced and tested through the LDD's and not through an SPD. By publishing its policies for developing the tram as an SPD the Council appears to be seeking to adopt them as policy without allowing them to be tested in front of an independent inspector.</p>	<p>NO CHANGE - The SPD does not introduce new policies, but supplements policies in the adopted UDP. Considerable cross referencing to UDP policies is made throughout the SPD.</p>
011 . 29	<p><i>Ealing Civic Society</i> SPD5                      Para 5.5</p> <p>Various concerns expressed at meeting of Tram Advisory Panel 9.2.06 about effect on sites and buildings at various locations. It may be appropriate to include a cross reference to these sites in SPD5.</p>	<p>NO CHANGE</p>
012 . 07	<p><i>Acton History Group &amp; West London Organic &amp; Wildlife Gardening</i> SPD5                      Page 78, para. 5.3</p> <p>Para. 5.3 - add safeguard the ability of cyclists to travel safely.</p>	<p>CHANGE - agree to add additional bullet point viii) 'safeguard the ability of cyclists to travel safely.'</p>
018 . 01	<p><i>Grange Grove Residents' Association</i> SPD5                      76, 2.2.4</p> <p>The issue of traffic displacement must be given adequate consideration in the SPD. Suggest amending para. 2.2.4 as follows: 'The design of the West London Tram system, including the associated infrastructure and the overall effect on local vehicle traffic patterns, will be required to adopt a structured, co-ordinated approach, presenting the West London Tram as a component of the London passenger transport system, while respecting the built environment through which it passes or effects. It will be required... This particularly applies where the West London Tram network effects Conservation Areas; or buildings, structures or trees considered to be of value, including Listed Buildings. These considerations also include any traffic pattern changes caused by the implementation of the West London Tram.'</p>	<p>NO CHANGE</p>
. 02	<p><i>Grange Grove Residents' Association</i> SPD5                      80, 5.8</p> <p>The issue of traffic displacement needs to be given greater consideration in the SPD. Suggest inserting the following text to paragraph 5.8: 'Traffic management solutions must be implemented to keep vehicle traffic in line with the road classification hierarchy set out in UDP section 10.20 and also to ensure the Tram is developed in accordance with UDP policy 9.9, with particular attention not to conflict with the following statement in policy 9.9 section 1: "Development which would generate significant traffic increases on local roads will be resisted".</p>	<p>NO CHANGE</p>
020 . 01	<p><i>Berkeley Group Plc</i> SPD5                      3.1 - 3.4</p> <p>Support the proposed route of the tram as outlined through paragraphs 3.1 to 3.4.</p>	<p>NOTED - Support noted</p>
. 01	<p><i>Berkeley Group Plc</i> SPD5</p> <p>Supports the purpose of the draft SPD 5 in safeguarding the route of the West London Tram</p>	<p>NOTED - support noted</p>
. 03	<p><i>Berkeley Group Plc</i> SPD5                      Section 5</p> <p>Supports the need to promote a good environment for all through the promotion of Sustainable Development. Supports the need to improve public transport and facilities as outlined in paragraph 5.1. Supports the Council's commitment to ensure that the design of the tram and its associated infrastructure is of the highest quality possible (see paragraph 5.3). Strongly support the</p>	<p>NOTED - Support noted</p>

statement in paragraph 5.7 that 'it is recognised that

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
	improvements in accessibility as a result of the tram may facilitate an increase in residential density in new developments in the vicinity of the tram'.	
022 . 06	<i>Castlemore Securities/National Grid</i> SPD5 The SPD supports the scheme (the Tram) without questioning the details or true impact, and seeks potentially significant contributions to the scheme that would be unreasonable and make some schemes unviable.	NO CHANGE - the SPD seeks to minimise any potential negative impacts arising from the Tram and associated
07	<i>Castlemore Securities/National Grid</i> SPD5 The sustainability appraisal document suggests that there are no negative impacts of the West London Tram.	NO CHANGE - The sustainability appraisal of the SPD's appraises the SPD's and not the projects themselves.
. 08	<i>Castlemore Securities/National Grid</i> SPD5 Page 77, para 2.2.5 Para. 2.2.5 - request that the word 'and government guidance on planning obligations' be added into on the third line after .. Relevant circumstances, to read 'relevant circumstances and government guidance on planning obligations, the..'	CHANGE - agree to add additional text to confirm that planning obligations will be secured in line with government guidance on planning obligations
. 09	<i>Castlemore Securities/National Grid</i> SPD5 Page 80, para. 5.8 Para. 5.8 - Request that the words 'and existing traffic routes' be added after the words interchange facilities on the fifth line.	NO CHANGE
024 . 01	<i>Res. Assoc.for Woodville Gardens and Regency Close</i> SPD5 An SPD is not an appropriate document for dealing with the issue of the West London Tram. The West London Tram should be included as an integral part of the Statement of Community Involvement. Relegating the tram to an SPD will deny the public the opportunity to participate in consultative planning.	NO CHANGE - this SPD supplements policies in the adopted UDP which have been fully tested from deposit to adoption. Moreover, the SPD itself has also been fully consulted on.
027 . 04	<i>Government Office for London</i> SPD5 SPD3 sets out the relevant UDP policy wording and supporting text, which is helpful to the reader. SPD 5 however only references the policies and does not set them out in full. For reasons of consistency it would be helpful to set out the policy text in full.	NO CHANGE - SPD 5 includes references to quite a number of UDP policies. To reference all of these policies in full would considerably lengthen this SPD and would not be user friendly.
031 . 07	<i>British Waterways London</i> SPD5 Potential for water buses and taxis on the West London canal Network should be explored, including water bus and taxi stops in the vicinity of the proposed tram, to help develop an integrated transport system with associated environmental benefits.	NO CHANGE - further consideration will however be given to the use of waterways for public transport as part of the development of the core strategy.
040 . 02	<i>Environment Agency</i> SPD5 SPD5 includes very little information with regard to flood risk. Additional information should be added in respect of the consideration of flood risk. In this regard reference should be added to the flood plain maps produced by the Environment Agency.	CHANGE - reference should be added in paragraph 5.2 to minimising flood risk. Reference will also be added to alert the reader to the Environment Agency produced flood plain maps.
. 03	<i>Environment Agency</i> SPD5 Page 78, para. 5.1 SPD5 makes no reference to the need to adopt sustainable drainage systems. Additional reference should be added to para. 5.1 which requires the need to	CHANGE - additional reference will be added in para. 5.2 for the need to consider the inclusion of SUDS.



consider the inclusion of SUDS as part of new development connected with the Tram. The SPD should

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
	also promote the use of water conservation techniques	
040 . 04	<i>Environment Agency</i> SPD5 Additional text should be added to this SPD to advise that in the case of new development which is close to rivers it will be expected to provide an undeveloped buffer strip between the proposed development and the brink of a watercourse.	NO CHANGE - Too prescriptive for this SPD.
. 05	<i>Environment Agency</i> SPD5           Page 78, para. 5.2 Additional text should be added to para. 5.2 which regard to the consideration of resource efficiency and waste disposal proposals.	CHANGE - Agree to add additional text to paragraph 5.2.
. 06	<i>Environment Agency</i> SPD5 Additional text should be added to the SPD which considers how environmental pollution is to be prevented during the construction and operation of the Tram service. Information should be provided in respect of Pollution Prevention and Control Contingency Planning, and with regard to the disposal of contaminated materials.	NO CHANGE - Too prescriptive for this SPD.

**SPD6: Twyford Avenue Community Open Space**

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
009 . 02	<p><i>English Heritage - London Region</i> SPD6</p> <p>In general we support the SPD but would not wish the SPD (or other SPDs) to adversely affect the physical and social value of the historic environment and its heritage assets</p>	<p>NOTED - support noted. Section 6 v) of the SPD recognises and seeks to protect the archaeological/heritage value of the site.</p>
. 03	<p><i>English Heritage - London Region</i> SPD6 Page 86, section 6v)</p> <p>Reference to 'Ancient Monuments Act' not appropriate - follow guidance in 'PPG6 Archaeology and Planning' instead, as well as UDP policy. Whilst prehistoric material has been found, site is not a scheduled ancient monument. Ref. to s33 of 1997 Act inaccurate; informative should require an archaeological desk based assessment with any application.</p>	<p>CHANGE - agree to amend section 6v) 'Archaeological/heritage value' as follows: 'The northern portion of this site is identified as forming part of an Area of Archaeological Interest. In particular the site is recognised as being of international importance for its prehistoric value, as one of the oldest inhabited sites in London, dating back over 100,000 years. See location plan for extent of area/designation. An archaeological desk based assessment will be expected as part of any future planning applications for this site. The adjoining school building at Twyford High School immediately to the south of the site grade 2* Listed. Any proposals for development on the sports ground in close proximity to the school should seek to complement rather than detract from the setting of this listed building.'</p>
. 04	<p><i>English Heritage - London Region</i> SPD6</p> <p>It should be noted that the adjoining school contains a grade 2* listed building; proposals should not adversely affect its setting.</p>	<p>CHANGE - agree to amend section 6v) 'Archaeological/heritage value' as follows: 'The northern portion of this site is identified as forming part of an Area of Archaeological Interest. In particular the site is recognised as being of international importance for its prehistoric value, as one of the oldest inhabited sites in London, dating back over 100,000 years. See location plan for extent of area/designation. An archaeological desk based assessment will be expected as part of any future planning applications for this site. The adjoining school building at Twyford High School immediately to the south of the site grade 2* Listed. Any proposals for development on the sports ground in close proximity to the school should seek to complement rather than detract from the setting of this listed building.'</p>
. 05	<p><i>English Heritage - London Region</i> SPD6</p> <p>English Heritage strongly advises that the Council's own conservation staff is closely involved throughout the preparation and implementation of the SPD (and other SPDs).</p>	<p>NOTED - Planning Services, including the Conservation Officers have been involved in the drafting of this SPD. They will also be consulted on any further changes.</p>

Ref:	Summary	Response
101.25	<p><i>Ealing Civic Society</i> SPD6 This is full of interesting information about the history of the site. Policies should stand out more clearly. Vision for the Future - Policy should be quoted and public open space deficiency maps included. Concerns over too many facilities and not enough open space. Unused land could be POS with commuted payments from nearby developments. Is a TPO being prepared?</p>	<p>NO CHANGE - The sports ground is designated as Community Open Space. Its use or lack of use will not effect Public Open Space deficiency in this area, hence the the deficiency maps are not included or referenced in the document. The SPD lists a range of facilities which could potentially be accommodated at the site under its COS designation. This is not a comprehensive list nor is not suggested that all of these facilities should be accomodated, rather it gives an indication of the types of facilities which could be appropriate. Any new facilities must also be consistent with the existing uses operating from the site. The part of the site which is currently vacant is currently privately owned and so could not be identified as Public Open Space, it is therefore correctly identified as Community Open Space. A TPO is currently being prepared for the trees on the site.</p>
. 26	<p><i>Ealing Civic Society</i> SPD6                      2nd Para. If the Council does not understand the existing facilities on the site perhaps a land use survey should be carried out before the draft is approved. This para, need additional clarification.</p>	<p>NO CHANGE - The existing facilities at the site are outlined in Section 5 'Current</p>
. 27	<p><i>Ealing Civic Society</i> SPD6                      Page 85, Section 6(iii) 1st para. on community access need editing e.g line 5 'given that', line 7 'given that' and last sentence 'different operators' (no 's).</p>	<p>CHANGE - grammatical change - amend from 'different operator's' to 'different operators'</p>
013 . 01	<p><i>Wasps FC</i> SPD6                      Section 2, para 3 Suggest following amendments to section 2 'Site History', paragraph 3: Change 'The property was managed on behalf of the current..' to 'The property is managed on behalf of the current..'</p>	<p>CHANGE - Agree to amend as suggested, to correctly reflect how the site is currently managed.</p>
. 02	<p><i>Wasps FC</i> SPD6                      Section 2, para 3 Suggest following amendments to section 2 'Site History', paragraph 3, final sentence. Change from 'professional' training facility to 'elite' training facility.</p>	<p>NO CHANGE - suggested change is unnecessary.</p>
. 03	<p><i>Wasps FC</i> SPD6                      page 82, Section 2, Suggest following amendments to section 2 'Site History', paragraph 4, first sentence. Amend sentence to indicate that Wasps have now completed the purchase of the site.</p>	<p>CHANGE - agree change to reflect the most up to date position regarding the ownership of the site.</p>
. 04	<p><i>Wasps FC</i> SPD6                      page 82, Section 2, Suggest following amendments to section 2 'Site History', paragraph 4, final sentence. Amend from 'professional' players to 'elite' players</p>	<p>NO CHANGE - suggested change is unnecessary.</p>
. 05	<p><i>Wasps FC</i> SPD6                      page 82, Section 2, Suggest adding new paragraph at the end of section 2 'Site History': ;The relocation of QPR from the site and consolidation of rugby usage may present an opportunity to increase access by local schools during normal weekday hours'</p>	<p>CHANGE - agree to amend as follows 'In respect of the existing use, the relocation of QPR from the site and consolidation of rugby usage may present an opportunity to increase access by local schools</p>

during normal weekday hours.'

<u>Ref:</u>	<u>Summary</u>	<u>Response</u>
13. 06	<i>Wasps FC</i> SPD6 Page 83, Section 5, Suggest amending paragraph to refer to players as 'elite'.	NO CHANGE - Suggested change is unnecessary
. 07	<i>Wasps FC</i> SPD6 Page 84, Section 6 Suggest adding additional paragraph to section 6ii) facilities: 'The Council will support, in principle, and subject to detailed consideration, proposals to improve and extend facilities which allow better use of the site by London Wasps and Wasps Football Club, such as appropriately located floodlighting, club house, administrative and related facilities.	NO CHANGE - Whilst the Council accepts that there may be scope for new facilities within the COS, it would not be appropriate to effectively agree such proposals without these proposals being fully tested through the normal application process.
. 08	<i>Wasps FC</i> SPD6 Page 84, Section 6 Suggest amending section 6, paragraph 2 as follows: 'In addition, the Council wishes to bring into beneficial use the existing 4.5 acres of land (Tennis Courts/Bowls area) to the north east corner of the site which has remained unused for sometime.	NO CHANGE - whilst it is acknowledge that this part of the site is outside the ownership of Wasps, reusing this part of the site is still a priority for the Council. The Community Open Space designation covers the entire site including the Tennis Court/Bowls area.
. 09	<i>Wasps FC</i> SPD6 Page 84, Section 6, Request that the following sentence be deleted from para 2: 'Over time should the existing use(s) cease to operate from this site a suitable mix of recreation facilities will be sought on the site.'	NO CHANGE - Whilst it is not envisaged that the existing uses will cease to operate from the site, since the SPD and any future iterations are a long term document it is not considered unreasonable to plan for any such eventualities. Whilst the SPD indicates a variety of possible uses which would be consistent with its COS status, the SPD acknowledges that any further uses must be compatible with the existing operations on the site.
. 10	<i>Wasps FC</i> SPD6 Page 84, Section 6, Amend para.3, section 6 so that text is only relevant to the tennis courts/bowls area of the site.	NO CHANGE - Whilst it is not envisaged that the existing uses will cease to operate from the site, since the SPD and any future iterations are a long term document it is not considered unreasonable to plan for any such eventualities, hence why this text should refer to all of the site and not just the tennis courts/bowls area. Whilst the SPD indicates a variety of possible uses which would be consistent with its COS status, the SPD acknowledges that any further uses must be compatible with the existing operations on the site.
. 11	<i>Wasps FC</i> SPD6 Page 84, Section 6, Correct para. 4 of section 6 as follows: 'Twyford High School currently makes use of the playing fields, and have expressed interest in increasing their usage of the site. St Vincent's Primary School, have also expressed interest in using the site'.	CHANGE - agree to amend wording as suggested.
. 12	<i>Wasps FC</i> SPD6 Page 84, Section 6, With reference to accommodating the local schools needs to secure sufficient school pitch provision at Twyford Avenue Sports Ground, para 4 should be amended to indicate that this need could be accommodated on the currently vacant tennis courts and bowls area.	NO CHANGE - Whilst it is agreed that the schools need for additional pitch provision could be accommodated on the vacant part of the site, and that the Council will prioritise the reuse of this part of the site, the Council does not wish to preclude the local schools from using other parts of the site. Any improved

access to the rest of the site will have to be compatible with the existing operations

Ref:	Summary	Response
. 13	<p><i>Wasps FC</i> SPD6 Page 85, Section 6, With reference to using part of the site as a leisure garden, or for cricket, hockey, football etc it is suggested that para. 4 and 5 are amended to indicate that such potential uses should be located on the tennis court/bowls area if proposed.</p>	<p>NO CHANGE - the amended wording as suggested would seem to preclude any potential proposed uses from operating anywhere on the site apart from the tennis court/bowls area. Whilst it is acknowledged that there is already an existing use operating from the site and that any proposed open space uses must be compatible with these operations, the SPD seeks only to highlight possible uses which would be consistent with the Community Open Space designation. The SPD is a long term document and therefore recognises that overtime operations from the site may change, and seeks to plan for any such eventualities.</p>
013. 14	<p><i>Wasps FC</i> SPD6 Page 85, Section 6, Suggest amending para. 5 as follows: 'The Council will also seek to ensure that any intensification of use arising from either new or improved facilities on the tennis courts and bowls area, would be compatible with the existing neighbouring uses. In this regard consideration will be given to any new development/change or intensification of use, which would have adverse impact on neighbouring uses.'</p>	<p>NO CHANGE - as worded the existing text seeks to safeguard the amenity of the neighbouring uses surrounding the sports ground. The impact of any new uses on the site in respect of the existing operations at the sports ground is already considered in paragraph 7 below. In this regard para 7 states that 'Given that there is already an established use on site at present, it will be essential to ensure that any change in access arrangements are compatible alongside existing uses'.</p>
. 15	<p><i>Wasps FC</i> SPD6 Page 85, section 6, In respect of securing S.106 monies suggest that additional text added to para. 6 as follows: 'In accordance with relevant government guidance, in appropriate circumstances the potential for securing S.106 monies..'</p>	<p>CHANGE - agree to amend text as suggested.</p>
. 16	<p><i>Wasps FC</i> SPD6 Page 85, Section 6, Delete and replace existing text under the heading 'Community Access'. The existing text identifies as a priority the need to improve community access to the site. The following replacement text should be added: 'The part of the site that is currently in use provides facilities for London Wasps Professional Rugby Club and Wasps Amateur Rugby Club. The two clubs have complementary requirements. However, given both clubs' needs, the Council recognise that the use of the ground by the community on an 'ad hoc' basis is unacceptable because of the insurance, health and safety and management issues this would raise.' Further text is also suggested re. the work of London Wasps Community Team and Wasps Football Club in promoting community access.</p>	<p>CHANGE (part) - The existing text should remain, however it is agreed that additional text could be added regarding the work of London Wasps Community Team and Wasps Football Club in promoting community access. It is not considered necessary to add additional text to resist the use of the ground by the community on an ad hoc basis. It is felt that the existing text already seeks to protect the existing operations on the site. In particular para 7 states that 'Given that there is already an established use on site at present, it will be essential to ensure that any change in access arrangements are compatible alongside existing uses.'</p>
. 17	<p><i>Wasps FC</i> SPD6 Page 85, Section 6, Suggest the addition of the following paragraph: 'As with the professional club, the Wasps Football Club require high quality rugby facilities, together with social facilities. The Council will work with Wasps FC and other partners to support the provision of such facilities.'</p>	<p>NO CHANGE - Whilst the Council accepts that there may be scope for new facilities within the COS, it would not be appropriate to effectively agree such proposals through the SPD without these proposals being fully tested through the normal application process.???</p>

Ref:

Summary

Response

034 . 01

*Sorbon Management Ltd*

SPD6

Consultation between the Council and stakeholders has been insufficient in terms of drafting this SPD. The Council should engage in meaningful consultation between the stakeholders (particularly the owners), and assurance should be given that the views expressed by the stakeholders will be taken on board by the Council. These failures undermine the credibility of the draft SPD, which should not be adopted until meaningful dialogue has taken place.

NO CHANGE - This SPD was drafted in consultation with all the key stakeholders.

In particular, with regard to the owner a meeting was held with the owner (and agents) to discuss the drafting of the brief. The owner has been invited to comment on various iterations of the brief during the drafting process. A number of the owners suggestions (in particular identifying residential development on the site) were contrary to UDP policy for the site and so could not be incorporated in a brief which supplements these policies.

## Sustainability Appraisal of SPDs

009 . 06	<p><i>English Heritage - London Region</i></p> <p>SA</p> <p>We welcome the opportunity to inform the assessment and preparation of the SA, given the role of the historic environment, and impacts on it. SPDs should not adversely affect the historic environment; design issues should be considered in baseline documents, and indicators formulated. Refer to our national policy statements and recommended objectives, and involve Council's own Conservation staff.</p>	<p>NOTED - the baseline data will be updated in light of information/data published by English Heritage.</p>
040 . 07	<p><i>Environment Agency</i></p> <p>SA</p> <p>Objective 17 should be split into 3 separate objectives to consider water quality, water conservation and flood risk separately. Combining more than one environmental issue within one SA objective will reduce the effectiveness of the appraisal process. This is because the LDF policies may effect the issues differently, but being together in one objective the effect can only be</p>	<p>NO CHANGE - Whilst it is acknowledged that water quality, water conservation and flood risk are distinct issues, they all fall under the heading of water environment, and have therefore been consolidated into a single objective. It was useful to limit the number of objectives to a manageable number to aid an already complicated appraisal process. The concern about cumulatively considering these issues is noted however. Any differences between the three separate components of this objective will be drawn out in the text in the matrices.</p>
. 08	<p><i>Environment Agency</i></p> <p>SA                      SPD5</p> <p>SA of SPD5 'West London Tram' - concern that flood risk issues have not been given due consideration.</p>	<p>CHANGE - agreed to add further reference to minimising the impact of flood risk in paragraph 5.2</p>
. 09	<p><i>Environment Agency</i></p> <p>SA</p> <p>Section 6 'Options' - Although the process of Option Identification and Option Appraisal for the SPDs covered by the SA is not ideal, we acknowledge that it is difficult for you to consider alternative policy options due to the use of policies which supplement fixed UDP policies and you are constrained by this.</p>	<p>NOTED</p>
. 10	<p><i>Environment Agency</i></p> <p>SA                      Appendix 1</p> <p>Appendix 1 'SPD Objective Appraisals' - The shortened format of the SA objective 17 means that flood risk is effectively given very limited consideration in the</p>	<p>NO CHANGE - Whilst it is acknowledged that water quality, water conservation and flood risk are distinct issues, they all fall under the heading of water environment, and have therefore been consolidated into a single objective. It was useful to limit the number of objectives to a manageable number to aid an already complicated appraisal process. The concern about cumulatively considering these issues is noted however. Any differences between the three separate components of this objective will be drawn out in the text in the matrices.</p>
040 . 11	<p><i>Environment Agency</i></p> <p>SA                      Appendix 1</p> <p>Appendix 1 'SPD Objective Appraisals' - Where the matrices which assess the plan objectives against the SA objectives give a 'neutral' or 'no impact' score, further explanation should be given to justify this case.</p>	

043 . 01	<p><i>The Countryside Agency</i></p> <p>SA</p> <p>The following documents published by the Countryside Agency may be of use when undertaking the sustainability appraisal: Countryside Character Series, Landscape Character Assessment, Countryside Quality Counts Project. The potential impacts on access land, public open land and rights of way should be fully considered as part of the appraisal process. Further baseline information may be obtainable from the Annual State of the Countryside Reports and the Countryside</p>	<p>NOTED - these documents will be reviewed during the process of updating the baseline data.</p>
. 02	<p><i>The Countryside Agency</i></p> <p>SA</p> <p>The Countryside Agency supports the following new/revised Sustainability Appraisal Objectives as listed in the final report: Objectives 6, 7, 10, 11, 12, 13, 14 and</p>	<p>NOTED - support noted</p>
044 . 01	<p><i>English Nature</i></p> <p>SA</p> <p>SA of SPD5 'West London Tram' - particularly concerned about the potential negative impact of the West London Tram Project on the Hayes Pastures at Yeading Brook Site of Borough Importance for Nature Conservation. Concern that the comments in table 15 'SPD Options Appraisal Matrix' give insufficient weight to the possible impacts of the project. Moreover the commentary in relation to SA objective 22 states that the tram route adjoins sites of nature conservation value at various points. In fact the current proposals include the routing of a test track through the site. This is likely to result in the loss of a significant habitat. Given the above, the comment, POSITIVE COMPATIBLE, against SA objective ? in respect of objective C in table 9b is misleading. The impacts would in fact be negative</p>	<p>The SA appraises the SPD and not the West London Tram project itself, hence why it was determined that the SA objectives and SPD objectives are 'positive compatible'.</p>

## Appendix D : 09/02/06 Representation from Metropolitan Police Authority



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Planning Policy Team  
Environment Group  
London Borough of Ealing  
Percival House  
14/16 Uxbridge Road  
London  
W5 2HL

9<sup>th</sup> February 2006

**Dear Sir**

### REPRESENTATION ON BEHALF OF METROPOLITAN POLICE AUTHORITY DRAFT SPD2 COMMUNITY FACILITIES

I write on behalf of our client the Metropolitan Police Authority (MPA) with regard to the above draft document.

#### Context to Representations

The MPA are mindful that Planning Policy Statement 1 (PPS1) states that Council's should prepare development plans which promote inclusive, healthy, safe and crime free communities. At the local level adopted UDP policies encourage development to create a safe and secure environment. The MPA have a key role to play in delivering safe communities.

Significant levels of new development are proposed in Ealing over the next ten years. The Mayor's draft Proposed Alterations to the London Plan specifies an annual target of 845 dwellings over this period. This scale of development will increase demands on police resources in seeking to deliver safe communities.

The MPA are mindful that saved UDP Policy 8.2 states that where intensive urban development is proposed an assessment should be made of the likely social impacts and demands on community facilities and services. The definition of community facilities in the UDP does not include police facilities, although it includes similar "service providers", such as healthcare facilities. Having regard to the guidance in PPS1, we believe it is reasonable for the scope of the SPD to be widened to include the need for developers to assess the impact of development schemes on policing. Indeed, where schemes have a direct impact on policing we believe it is reasonable to seek contributions through Section 106 agreements, as has become established practice with health providers.

As outlined in CgMs' representations to the Council's draft SCI (as were submitted on behalf of the MPA by means of Matthew Roe's letter of 22<sup>nd</sup> September 2005), the MPA are interested in development schemes which breach the following thresholds:

**Directors**  
P Chadwick BA, MIFA, FSA  
K Goodwin BTP, MRTPI  
E Mortimer BA, FRTP, FISA  
J Stockdale BSc, MRICS  
R Bourm BA, MFA  
J Brooks BSc, MTR, MRTPI  
T Collins MRICS, DipTR, MRTPI, MCIT, MILT, MHEW  
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M Honour BSc, MRICS, MRTPI  
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J Lowe BA  
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S Stevens BA, BTP, Dip Surv, MRTPI, AEMA

CgMs Limited  
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No 3303376  
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100 residential units;  
5000 m<sup>2</sup> floorspace; and,  
100 car parking spaces.

As with the SCI, the MPA should be informed of the Council's determination of development schemes which breach these thresholds by forwarding details to:

Metropolitan Police Service  
Director of Asset Management  
Property Services  
12th Floor, Empress State Building  
Empress Approach  
Lillie Road  
London SW6 1TR

### **Proposed Changes to Draft SPD**

Having regard to the above observations the MPA suggest the following changes to the text:

- i) *General Comment* - The scope of SPD2 should be extended to include reference to policing needs:
- ii) *Section 3 (i)* – the scope of social impact assessment should be extended to include policing needs. When a proposed development is likely to have significant social impacts, the range of bodies the developer should consult should be extended to include the MPA (contacted through the Metropolitan Police Service's Property Services Department);
- iii) *Section 5* – A short section could be added on policing which recognises that:
  - a) the Council will assist in the delivery of police facilities to address community's needs; b) a major new housing, commercial or mixed use development is likely to generate additional demands for police resources; and c) where planning applications are made which breach the development thresholds, the MPA should be consulted.
- iv) *Table 3* - Assessment of the Impact of Proposed Development – relevant amendments should be made to this table to reflect the above representations.

I hope these comments will be incorporated into the adopted version of the SPD. If you disagree with these comments please contact either Alun Evans or myself to discuss them further prior to reporting the SPD to any Committee for ratification.

Yours faithfully



**Matthew Roe**  
**Senior Associate Director**

c.c. Metropolitan Police Authority