London Borough of Ealing
Development (or Core) Strategy
Submission Development Plan Document – Independent
Examination

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Inspector further initial questions – PART 2
16th August 2011

• Where will I find sites identified to meet at least the first 5 years supply of housing land plus 20%. I have so far not found sufficient sites identified having been through EB12, EB21, EB22, EB23, REG6 and other documents. Some of the larger sites are identified but it is necessary to know if the sites referred to as in the Development Management DPD are likely to be available, realistic and that the smaller site provision is not relying on windfall site. In other words, I need to know that the suggested supply of housing land is available and not just an aspiration. This will come through in the hearings but I would be grateful to be pointed towards any particular document to which I have access and is included in the Examination Library.

• Could the Council indicate which of their proposed changes it considers go towards soundness.

• Minor points on a more detailed read of the EAL2
  ➢ Footnote 1 and 15 - one refers to the Background Paper being No.1 and the other does not. Lack of consistency
  ➢ Map 1 - not sure why two different colours of diamonds on map but only one colour shown in legend.
  ➢ p8 final paragraph reference to the wrong appendix number
  ➢ Do footnotes 19, 25, 28, 35, 37, 41, 92, 95 need updating?
  ➢ 1st supporting paragraph to 1.2(g) needs updating
  ➢ Map 7 'G' and 'I' have no titles
  ➢ Footnote 45 should refer to Appendix 1
  ➢ Footnotes 71 and 72 inconsistency with 71 referring to it being draft and 72 not indicating that it is draft.
  ➢ Do policy 6.4 and footnote 90 need updating?
  ➢ Footnote 93 is out of date
  ➢ 1st line p73 and footnote 94 do not reflect the current situation
  ➢ Not all the footnotes relating to the Housing Trajectory were included in EAL3 but should be changed in line with the others
Where will I find sites identified to meet at least the first 5 years supply of housing land plus 20%. I have so far not found sufficient sites identified having been through EB12, EB21, EB22, EB23, REG6 and other documents. Some of the larger sites are identified but it is necessary to know if the sites referred to as in the Development Management DPD are likely to be available, realistic and that the smaller site provision is not relying on windfall site. In other words, I need to know that the suggested supply of housing land is available and not just an aspiration. This will come through in the hearings but I would be grateful to be pointed towards any particular document to which I have access and is included in the Examination Library.

a) It must be borne in mind that the 20% contingency arises from the draft NPPF which was published for consultation after submission of Ealing's Development (or Core) Strategy DPD. However, we understand that this is now a material consideration and therefore must be given active consideration.

b) The housing trajectory in the most recent 2009-10 AMR (EB12) sets out the borough's five year supply of housing land as well as broad locations for future growth. The housing trajectory includes sites currently under construction, with planning permission, and those identified via the emerging Development Sites DPD (predominantly via the SHLAA process) expected to be delivered within the plan period.

c) The constrained assessments from the London SHLAA (REG6) informed the site-by-site capacity figures included in the housing trajectory and Development Sites DPD Initial Proposals (EB6).

d) The Development Sites DPD Initial Proposals included a limited number of sites additional to the SHLAA, and where appropriate capacities were also updated from the SHLAA, to reflect the most up-to-date information available at borough level.

e) The relationship of housing supply targets and provision was summarized in Background Paper 2: Housing (EB21) published alongside the Development Strategy DPD Final Proposals (EAL5).

f) Since this data was collated, further work on refining the figures in the housing trajectory has been carried out in preparation for submission of the Core Strategy. The identified capacity of approximately 12,400 units from large sites remained relatively unchanged from the AMR/Development Sites DPD Initial Proposals so an update to Background Paper 2: Housing was not deemed necessary.

g) With provision for approximately 12,400 units demonstrated in the housing trajectory and 3,255 units from small sites in the SHLAA, a total of 15,655 units is reached, exceeding the Development Strategy target of 14,000 units.
over the plan period by 12 percent. This equates to an annual provision of 1043 units against the London Plan target of 890 units per annum. This 12 percent represents a significant contingency over and above London Plan requirements.

h) Additionally, the borough is currently progressing an Opportunity Area Planning Framework for Southall in partnership with the GLA with the purpose of unlocking the development potential of further sites.

i) We will be constantly keeping this under review and believe that the plan is flexible enough to accommodate any changes. Should the Inspector wish to view the calculations underlying the housing trajectory including the relationship with the SHLAA, these are readily available.

j) Finally it must be borne in mind that the housing and property industry must have the sufficient capacity to deliver any new development and this is not within the sole control of a local planning authority. We are committed to facilitating development in the right circumstances, in the right places and the council will endeavour to ensure that any barriers to future development, where it is deemed appropriate, are removed or ameliorated.

Could the Council indicate which of their proposed changes it considers go towards soundness.

- We would welcome further clarification from the inspector as to the basis of this question.

- On a separate but related matter we would also welcome your advice on how or whether we also need to demonstrate compliance with the new test of soundness on 'positive planning' introduced under the draft NPPF.

Minor points on a more detailed read of the EAL2

- **Footnote 1 and 15 - one refers to the Background Paper being No.1 and the other does not. Lack of consistency**
- Noted. This is an omission. Footnote 1 and 15 should read: "According to the Ealing 2010 Preferred Ward projections. See Background Paper 1 on Demography (July 2011)"
- **Map 1 - not sure why two different colours of diamonds on map but only one colour shown in legend.**
- Further clarification may be needed. Only one style of diamond is illustrated on the map (in light blue to denote Strategic Industrial locations). A dark blue square is used to denote Town Centres.
- **P8 final paragraph reference to the wrong appendix number**
- Noted. This is an error. Text should be updated to read 'Appendix 1'.
- **Do footnotes 19, 25, 28, 35, 37, 41, 92, 95 need updating?**
• Noted. It is agreed that all referencing to the London Plan should be updated to refer to the London Plan 2011, and its respective policies.

• **1st supporting paragraph to 1.2(g) needs updating**

• Noted. As above, any referencing to the London Plan will be updated to refer to the London Plan 2011.

• **Map 7 ‘G’ and ‘I’ have no titles**

• Noted. The legend to map 7 will be reformatted. For clarification the key is intended to read as follows:
  
  C - North London Line Improvements  
  D - Greenford Rd Bus Service Improvements  
  E - Greenford A40 Freight Link  
  F - High Frequency Bus Route between Ealing & Wembley Park via Park Royal  
  G - West London Orbital Improvements  
  H - Improved bus links between South Acton & Park Royal  
  I - Extension of Overground Line Greenford-Ruislip  
  J - Greenford Branch Line Improvements

• **Footnote 45 should refer to Appendix 1**

• Noted. Footnote 45 will be updated to correctly reference Appendix 1.

• **Footnotes 71 and 72 inconsistency with 71 referring to it being draft and 72 not indicating that it is draft.**

• Noted. The Park Royal Opportunity Area Planning Framework is approved, and accordingly any reference to ‘draft’ should be removed.

• **Do policy 6.4 and footnote 90 need updating?**

• Noted. Any cross-referencing to the London Plan will be updated to refer to the London Plan 2011.

• **Footnote 93 is out of date**

• Noted. Footnote 93 will be deleted.

• **1st line p73 and footnote 94 do not reflect the current situation**

• Noted. Appendix 1 will be re-written to reflect the London Plan 2011 which was published after Ealing’s Development (or Core) Strategy was formally submitted for examination. This is largely a factual summary and it is intended that revised text can be agreed as part of a statement of common grounds with the GLA.

*Not all the footnotes relating to the Housing Trajectory were included in EAL3 but should be changed in line with the others*

Noted. EAL3 will be reviewed and updated as necessary.