

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

**Matters and Issues**

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**Inspector : Elizabeth Fieldhouse DipTP, DipUD, MRTPI.**

Programme Officer : Caroline Caldwell

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**Matters and Issues for the Hearing sessions of the Examination of Ealing Core Strategy**

The matters and issues identified here will be examined at the hearing sessions of the examination.

All those who made representations about the submitted Development (Core) Strategy (CS) were invited to submit statements (one for each matter which a person/organisation had made representations) addressing the questions set out. All the statements submitted are available for inspection in the Examination Library published on the Council's website under examination documents [http://www2.ealing.gov.uk/services/environment/planning/planning\\_policy/local\\_development\\_framework/development\\_strategy/examination\\_in\\_public/examination\\_library.html](http://www2.ealing.gov.uk/services/environment/planning/planning_policy/local_development_framework/development_strategy/examination_in_public/examination_library.html)

Paper copies are available in the Customer Service area in Perceval House.

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*Please note that in the lists of participants given below at the end of each matter, those representation numbers shown in bold are those who have requested to appear and be heard by the Inspector and those in italic whose position is unclear.*

*All other participant's representations will be considered from their written response to the consultation made on the Final Proposals Submission Document in September 2010. Both methods carry the same weight and the Inspector will have equal regard to views put orally or in writing.*

**Matter 1 – Overall Context (Preface, Chapter 1 and in general Appendix 3 (September 2010 version) or Appendix 2 (July 2011 version))**

Issues and questions

1. Whether the Key Issues, Spatial Vision and Spatial Objectives are sufficiently clear, locally distinctive and specific and thus effective.
2. Whether the overall spatial strategy has a sound basis, having regard to the Borough's context and needs, and the relationship with other strategies.
3. Should there be clarity as to the official population statistics and the current population?
4. Are the policies sufficiently distinct from the supporting text?

5. Is there adequate or too much reliance throughout the CS to the Development Sites and Development Management DPDs to provide an effective strategy for future development?
6. Whether the CS properly indicates which UDP policies it supersedes.
7. Does the Core Strategy provide an appropriate, effective, comprehensive and soundly based framework for ensuring the quality of places in the Borough, including the design of new development and protection of the built, cultural and natural heritage?
8. Are all references to the Development Sites DPD and Development Management DPD consistent in the CS?
9. Is the CS entirely consistent with The London Plan 2011 and is there any potential conflict with the Draft National Planning Policy Framework?
10. Whether the Core Strategy gives sufficient guidance on the provision of the infrastructure that is required to support existing and future development.

#### List of participants

**Ruth Cunningham on behalf of Transport for London (rep no 13)**

**Richard Chilton on behalf of The Park Community Group (rep no 110)**

*Carmelle Bell on behalf of Thames Water Utilities Ltd (rep no 136)*

**Will French on behalf of Save Ealing's Centre (rep no 174)**

**Judy Harris on behalf of Ealing Civic Society (rep no 185)**

**Susan New (rep no 212)**

**C/O Eric Leach on behalf of West Ealing Neighbours (rep no 214)**

**Metropolis on behalf of UK European Investment Ltd (in reference to NPFF & London Plan)**

#### **Matter 2 – Vision and Objectives (Chapter 1)**

##### Issues and questions

1. Are the Vision and Strategic Objectives soundly based and appropriate for this Borough, consistent with national policies, reflecting community views and locally distinctive, and do they provide a sound basis for the overall spatial strategy and strategic policies in the Core Strategy?
2. Is the Spatial Vision (policy 1.1) soundly based, effective and deliverable, appropriate for the Borough, supported by robust and credible evidence, and consistent with national policy?
3. Is a vision based on transport improvements proposed in the two corridors deliverable if the schemes do not materialise and are the proposed improvements to transport capacity and quality east-west and north-south deliverable?
4. For the transport strategy to be justified should there be specific reference to the Mayor's London Transport Strategy.
5. The introduction to policy 1.2 refers to including some agencies; to be effective all relevant agencies should be noted.
6. Does policy 1.2(b) accord with emerging National Policy, if not, is the policy justified?
7. Is the supporting paragraph to policy 1.2(b) 'short term protection' in the proposed changes implying that an alternative use is a sentence rather than an opportunity?
8. Policy 1.2(f) provides for tall buildings in specific town centres, what is the justification for such development and how will the area for such buildings effectively be controlled? There is no definition of what constitutes a tall building.
9. Is the Borough's heritage adequately provided for or is there a need for the CS to set out the overarching ethos for the Borough's Heritage?

10. Whether the lack of provision for sites for Gypsies, Travellers and Travelling Showpeople, in terms of the amount, distribution, location, phasing, size and tenure is fully justified and supported by an up-to-date, credible and robust evidence base and accords with national policy.

List of participants

**Valerie Scott of CgMs on behalf of Twyford Abbey (rep no 5)**

**Alun Evans of CgMs on behalf of Metropolitan Police (rep no 11)**

**Anthony Lewis on behalf of Ealing Cricket Ground Area Panel (rep no 22)**

**C/O Judy Breens on behalf of Kingsdown Residents Association (rep no 25)**

**James Guest (rep no 66)**

**Nic Ferriday on behalf of Ealing Friend of the Earth (rep no 105)**

**Richard Chilton on behalf of The Park Community Group (rep no 110)**

**Tony Miller on behalf of Ealing Borough Liberal Democrats (rep no 140)**

**Tom Berry on behalf of Ealing Wildlife Network (rep no 172)**

**Will French on behalf of Save Ealing's Centre (rep no 174)**

**Simon Bell on behalf of Brent River & Canal Society (rep no 175)**

**Judy Harris on behalf of Ealing Civic Society (rep no 185)**

**Ian Anderson of Icen Projects Limited on behalf of Stolkin Greenford Ltd (rep no 186)**

*Cllr Gary Malcolm on behalf of Ealing Borough Liberal Democrat (rep no 194)*

**B L Pankhurst (rep no 211)**

**Susan New (rep no 212)**

**Metropolis on behalf of UK European Investment Ltd (in reference to NPF & London Plan)**

**Matter 3 – Housing**

Issues and questions

1. Does the Core Strategy make appropriate provision for the effective delivery of new housing, including affordable housing, in terms of the amount, distribution, location, phasing, size and tenure of new housing development, having regard to national policy, and is it fully justified and supported by an up-to-date, credible and robust evidence base?
2. Are there sufficient identified sites to demonstrate that there is an identified 5 year supply plus an additional 20%? Large and small sites need to be identified; if they are to come from windfall sites the provisions of PPS3 would not be met. Is there any reliance on garden land to meet the housing provision?
3. Key policy 1.2(a) sets a 50% affordable housing target in accordance with the London Plan and while the supporting text sets out that is the level required, is this viable on all sites?
4. Would it be viable for affordable housing to be provided by means of a contribution on some sites where 10 units would not be developed and therefore is the supporting text too prescriptive?
5. What is the overall number of affordable houses to be sought on an annual basis, so that the effectiveness of the policy can be monitored in the annual monitoring report?
6. Key policy 1.2(l) the lack of additional provision for Gypsy and Traveller accommodation departs from the London Borough's Gypsy and Travellers Accommodation Assessment. Is the approach fully justified and consistent with national policy?
7. Should the CS refer to the provision of lifetime homes and properties to meet the needs of disabled people in line with The London Plan policy 3.8(c)?

List of participants

**Valerie Scott of CgMs on behalf of Twyford Abbey (rep no 5)**  
**Pauline Stocker of NLP on behalf of The West London Mental Health NHS Trust (rep no 12)**  
**Ruth Cunningham on behalf of Transport for London (rep no 13)**  
**Anthony Lewis on behalf of Ealing Cricket Ground Area Panel (rep no 22)**  
**C/O Judy Breens on behalf of Kingsdown Residents Association (rep no 25)**  
**Nic Ferriday on behalf of Ealing Friend of the Earth (rep no 105)**  
**Richard Chilton on behalf of The Park Community Group (rep no 110)**  
**Tony Miller on behalf of Ealing Borough Liberal Democrats (rep no 140)**  
**Tom Berry on behalf of Ealing Wildlife Network (rep no 172)**  
**Will French on behalf of Save Ealing's Centre (rep no 174)**  
**Simon Bell on behalf of Brent River & Canal Society (rep no 175)**  
*Cllr Gary Malcolm on behalf of Ealing Borough Liberal Democrat (rep no 194)*  
**Susan New (rep no 212)**  
**C/O Eric Leach on behalf of West Ealing Neighbours (rep no 214)**  
**Metropolis on behalf of UK European Investment Ltd (in reference to NPFF & London Plan)**

**Matter 4 – Climate Change and Sustainable Development**

Issues and questions

1. Does the Core Strategy provide an appropriate, effective and soundly based framework for providing access to jobs and services, including the provision of an efficient, safe and sustainable transport system to meet the needs of all transport users, which is fully justified and supported by robust, up-to-date and credible evidence and consistent with national policy?
2. Whether the policies on design, sustainable construction and renewable energy are appropriate and justified
3. Key policy 1.2(e) how would sustainable design and construction be effectively monitored, would there be a link to the Code for Sustainable Homes and BREEAM and the targets associated with those codes?
4. Reference to decentralised energy appears throughout the plan and underpins the majority of the policies. There is no indication of what is meant by decentralised energy
5. It is not clear in key policy 1.2(g) which is responsible for creating the specified tonnes of waste and whether the would accord with policy 5.16 of The London Plan.
6. Key policy 1.2(i) is this an aspiration or are there particular areas/routes that would be targeted or criteria that should be met for electric charging points
7. Is resistance to the extraction of land won aggregates in key policy 1.2(j) justified in the light of the requirement in The London Plan policy 5.20 and its supporting text?
8. Key policy 1.2(k) is prescriptive and should 'all sites to be subject to a sequential test...' From PPS25 it would appear that only development in areas of flood risk should be sequentially assessed. Is the policy justified and consistent with national policy?
9. The introduction to Chapter 6, reference to maps 9 and 10 being updated in the IDP report 2011. Do any of the changes go to the effectiveness of policies in Chapter 6?

List of participants

**C/O Judy Breens on behalf of Kingsdown Residents Association (rep no 25)**

**Nic Ferriday on behalf of Ealing Friend of the Earth (rep no 105)**

**Tom Berry on behalf of Ealing Wildlife Network (rep no 172)**

**Simon Bell on behalf of Brent River & Canal Society (rep no 175)**

**Judy Harris on behalf of Ealing Civic Society (rep no 185)**

**B L Pankhurst (rep no 211)**

**Metropolis on behalf of UK European Investment Ltd (in reference to NPF & London Plan)**

**Matter 5 – Special Opportunity Sites**

Issues and questions

1. Key policy 1.2(h) identifies Special Opportunity Sites – it is unclear what, if any, infrastructure will be required to facilitate the redevelopment of these sites and there is no indication of what type of development will be encouraged at these sites. This appears not to accord with the advice in PPS12 that states '*Infrastructure planning for core strategy should also include the specific infrastructure requirements of any strategic sites which are allocated in it.*'
2. Footnote 39 indicates that the sites were previously identified under the UDP, it is not clear why these sites did not come forward previously or what has been done to ensure that there is a realistic chance of them coming forward for development in the future.
3. The London Plan policy 2.13 provides for opportunity areas and intensification areas. It would appear from London Plan map 2.4 that both Southall and Park Royal/Willesden Junction lie, at least in part, within the Borough. Policy 2.13 (C) provides that LDFs should develop more detailed policies and proposals for opportunity areas. This is not evident in the Core Strategy, neither are any detailed policies.
4. Footnote 39 refers to further details in policies (proposals in text) but policy 2.9 refers to the Havelock Area not Glade Lane as in the identification of the special opportunity sites in the supporting text to policy 1.2(h). Is there a lack of consistency or are they different areas?

List of participants

**Kevin Goodwin of CgMs on behalf of Goldcrest Land (rep no 4)**

**Judy Harris on behalf of Ealing Civic Society (rep no 185)**

**David Churchill of Icen Projects Limited on behalf of Stolkin Greenford Ltd (rep no 186)**

**Matter 6 – Uxbridge Road/Crossrail Corridor**

Issues and questions

1. Most of the proposals set out in this section refer to the Development Sites/Management DPDs in some form. The LDS shows that the aforementioned DPDs are not expected to be adopted until 2013. Are the Development Sites/Management DPDs sufficiently advanced to justify the proposed figures in the Housing Trajectory?
2. Policy 2.1(b) has no indication of what the improvements would entail (e.g. are there specific additional bus routes planned?), who will be responsible for funding/implementing them and when will they be implemented?
3. Development and conservation are not mutually exclusive (policy 3.1(b)). Should growth be inspired by an understanding of the historic context as best practice in regeneration to be consistent with national policy?

4. Policy 2.4 supporting text refers to the need for further studies, did these not inform the CS; when and in what format will the studies be undertaken?
5. Policy 2.5 (e) and (g) provide a wish list of changes/development to occur over the lifetime of the plan. There is no indication of how/when such features will be provided, and whether they will be justified and effective.
6. Policy 2.9 provides for the ongoing discussions regarding the Middlesex Business Centre (the Great Western Strategic Industrial location having been removed in the proposed change) which will inform the comprehensive regeneration of the Havelock area. It is not clear how this will be coordinated – a separate DPD or SPD – the timing and whether it would be effective in the lifetime of the CS.
7. What is the current situation at Green Man Lane (explanatory text to policy 2.6), is the text still justified.
8. Is footnote 63 comprehensive and effective? Why are maps 2 and 3 of the Atlas of Proposed Changes to the Adopted Proposals Map 2004 not relevant?

List of participants

**Pauline Stocker of NLP on behalf of The West London Mental Health NHS Trust (rep no 12)**  
**C/O Judy Breens on behalf of Kingsdown Residents Association (rep no 25)**  
**James Guest (rep no 66)**  
**Richard Chilton on behalf of The Park Community Group (rep no 110)**  
**Tony Miller on behalf of Ealing Borough Liberal Democrats (rep no 140)**  
**Will French on behalf of Save Ealing's Centre (rep no 174)**  
**Paul Keywood on behalf of Ealing Shopping Centre Limited Partnership (rep 183)**  
**Judy Harris on behalf of Ealing Civic Society (rep no 185)**  
*Cllr Gary Malcolm on behalf of Ealing Borough Liberal Democrat (rep no 194)*  
**Susan New (rep no 212)**  
**C/O Eric Leach on behalf of West Ealing Neighbours (rep no 214)**

**Matter 7 – A40 Corridor and Park Royal**

Issues and questions

1. Is it realistic to place reliance on HS2 when it is identified in The London Plan for anticipated completion post 2020 and is as yet is unfunded?
2. How would the cancellation of HS2 affect the implementation of policies in Chapter 3?
3. Policy 3.3 supporting text indicates that traffic movement through Park Royal is a key challenge and it is vital that public transport serving the area is improved. Nevertheless, there is only a commitment to 'further investigate options' for two rail interchange facilities. Are the relevant infrastructure providers supportive of such ideas and if not what are the contingency plans?
4. The Grand Union Canal runs through the area, should its use be promoted and increased use effectively managed to assist in the delivery of the CS vision and strategy.
5. Has the role of the canal been adequately recognised in the supporting text to policy 4.2?

List of participants

**Ruth Cunningham on behalf of Transport for London (rep no 13)**  
**Tony Miller on behalf of Ealing Borough Liberal Democrats (rep no 140)**  
**Judy Harris on behalf of Ealing Civic Society (rep no 185)**  
**David Churchill of Icen Projects Limited on behalf of Stolkin Greenford Ltd (rep no 186)**

*Cllr Gary Malcolm on behalf of Ealing Liberal Democrat (rep no 194*

**Metropolis on behalf of UK European Investment Ltd (in reference to NPFF & London Plan)**

**Matter 8 – Residential hinterlands**

Issues and questions

1. Is development of the Greenford Depot proposed in Policy 4.3 pre-empting the West London Waste Plan and would this development compromise the ability of the Borough to deal with waste in the future?
2. The plan proposes to explore, investigate and further assess options, thereby providing little certainty that such options will be implemented. Is for example policy 4.4(b) (c) (d) and (e) akin to an issues and options paper rather than guiding development over the next 15 years.
3. Is there a commitment from service providers to undertake any of the proposed north-south routes or is it only initial feasibility work that is emerging. Will the proposal offer support for investment in the Borough over the lifetime of the CS?

List of participants

**James Guest (rep no 66)**

**Tony Miller on behalf of Ealing Borough Liberal Democrats (rep no 140)**

**Judy Harris on behalf of Ealing Civic Society (rep no 185)**

**David Churchill of Icen Projects Limited on behalf of Stolkin Greenford Ltd (rep no 186)**

*Cllr Gary Malcolm on behalf of Ealing Borough Liberal Democrat (rep no 194)*

**Matter 9 – Protecting and Enhancing Ealing’s Green and Open Spaces**

Issues and questions

1. Whether the policy framework for Green Infrastructure (GI) and Open Space is an appropriate reflection of local needs and opportunities and is sufficiently clear, detailed, and conforms to national policy requirements
2. Will the Green Belt boundary endure for the lifetime of the plan?
3. Are all the proposed developments within the Green Belt (policy 5.1) justified and appropriate development within the advice in PPG2?
4. A definition of Metropolitan Open Land (MOL) is necessary. Are the proposed uses compatible within MOL to ensure its protection?
5. Is adequate provision made for the establishing of local green spaces for uses such as allotments?
6. To make policies 5.1, 5.2 and 5.3 effective, is there no need for further supporting paragraphs? At least an explanation of green corridors and their benefits would be necessary to justify policy 5.3, but MOL and Green Belt may also require supporting text.
7. If additional land is to be identified to meet policy 5.7 requirements, to be effective this should be identified in the Development Sites DPD, but there is no reference to this document.
8. Is reference to the Blue Ribbon network necessary when reference is made to the Grand Union Canal and the River Brent in policy 5.3 and do they provide an opportunity for north-south routes and freight transport? Should reference to the network also be included within the appropriate local area in Appendix 2 to be effective?
9. Has the heritage value of parks and green spaces been fully recognised?
10. Can the greening of Warwick Road where it crosses Ealing Common (policy 5.2(c)) be effectively provided for without reference in the CS?

11. Whether a spatial policy for the safeguarding of outdoor, community sports facilities is necessary and, if so whether or not this is adequately provided for in the policies in chapter 5?

List of participants

**Valerie Scott of CgMs on behalf of Twyford Abbey (rep no 5)**  
**Ruth Cunningham on behalf of Transport for London (rep no 13)**  
**Anthony Lewis on behalf of Ealing Cricket Ground Area Panel (rep no 22)**  
**C/O Judy Breens on behalf of Kingsdown Residents Association (rep no 25)**  
**Geoff Smith of DMH Stallard on behalf of Monopoli Trust (rep no 48)**  
**Eric Leach (rep no 54)**  
**Nic Ferriday on behalf of Ealing Friend of the Earth (rep no 105)**  
**Richard Chilton on behalf of The Park Community Group (rep no 110)**  
**Tony Miller on behalf of Ealing Borough Liberal Democrats (rep no 140)**  
**Peter Gallagher (rep no 158)**  
**Tom Parkinson on behalf of Creffield Road Residents Association (rep no 165)**  
**Tom Berry on behalf of Ealing Wildlife Network (rep no 172)**  
**Simon Bell on behalf of Brent River & Canal Society (rep no 175)**  
**Giuseppina Ortu on behalf of Save Trees in Gunnersbury (rep no 176)**  
**Judy Harris on behalf of Ealing Civic Society (rep no 185)**  
*Cllr Gary Malcolm on behalf of Ealing Borough Liberal Democrat (rep no 194)*  
**B L Pankhurst (rep no 211)**

**Matter 10 – Maps**

Issues and questions

1. Are all the changes in the Atlas of Proposed Changes to the Adopted UDP Proposals Map 2004 referred to in the CS and is the remainder of the Proposals still relevant in the light of the CS?
2. Map 1 - there are two different colours of diamonds but only one is identified in the Legend.
3. Map 1 – the route of Crossrail 1 has been identified and is anticipated for completion between 2013 and 2020 and funded. Surely therefore the proposed route should be included in Map 1.
4. Is the Grand Union Canal and associated mooring/access identified on the CS maps so that improved usage can be effectively directed?
5. Whether the Proposals Maps and Inset Maps are correct and effective in implementing the CS development proposals and policies.

List of participants

**Valerie Scott of CgMs on behalf of Twyford Abbey (rep no 5)**  
**Geoff Smith of DMH Stallard on behalf of Monopoli Trust (rep no 48)**  
**James Guest (rep no 66)**  
**Will French on behalf of Save Ealing's Centre (rep no 174)**  
**Judy Harris on behalf of Ealing Civic Society (rep no 185)**  
**Metropolis on behalf of UK European Investment Ltd (in reference to NPFF & London Plan)**

**Matter 11 - Public Services, Retail and Employment uses**

Issues and questions

1. Does the Core Strategy provide an appropriate, effective and soundly based framework for the provision of a range of public facilities and services?
2. Is the proposed retail hierarchy soundly based, fully justified and consistent with national policy?



3. Is the strategy and policies for the economy and the provision of employment land soundly based, effective, deliverable and appropriate for this Borough, supported by a robust and credible evidence base, and consistent with national policy?

List of participants

**James Guest (rep no 66)**

**Nic Ferriday on behalf of Ealing Friend of the Earth (rep no 105)**

**Tony Miller on behalf of Ealing Borough Liberal Democrats (rep no 140)**

**Tom Berry on behalf of Ealing Wildlife Network (rep no 172)**

**Will French on behalf of Save Ealing's Centre (rep no 174)**

**Simon Bell on behalf of Brent River & Canal Society (rep no 175)**

**Judy Harris on behalf of Ealing Civic Society (rep no 185)**

**David Churchill of Icen Projects Limited on behalf of Stolkin Greenford Ltd (rep no 186)**

*Cllr Gary Malcolm on behalf of Ealing Borough Liberal Democrat (rep no 194)*

**Matter 12 – Phasing, Delivery and Monitoring**

Issues and questions

1. It is of concern that most of the transport proposals are grouped in three categories: Mayor's Transport Strategy/Sub-Regional Transport Plan proposals, LDF/LBE Transport Schemes and the LIP corridors and neighbourhood programmes. This makes it difficult to assess the delivery timeframe of individual proposals. Priority proposals are not identified. In addition all schemes are only deliverable with additional funding which could have repercussions for growth in the Borough. What is the certainty of the identified projects being feasible and effective?
2. Generalised policies with minimal reliance on quantitative targets may cause issues for implementation.
3. Should the canal and water environment be included in the Infrastructure Delivery Schedule in Appendix 3?
4. Whether the mechanisms in the CS for implementation and monitoring are sufficiently clear, detailed, and meet national policy requirements.

List of participants

**Nic Ferriday on behalf of Ealing Friend of the Earth (rep no 105)**

**Andrew Bennett on behalf of Jehovah's Witnesses (rep no 116)**

**Tony Miller on behalf of Ealing Borough Liberal Democrats (rep no 140)**

**Tom Berry on behalf of Ealing Wildlife Network (rep no 172)**

**Will French on behalf of Save Ealing's Centre (rep no 174)**

**Simon Bell on behalf of Brent River & Canal Society (rep no 175)**

**Judy Harris on behalf of Ealing Civic Society (rep no 185)**

*Cllr Gary Malcolm on behalf of Ealing Borough Liberal Democrat (rep no 194)*