

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

1. Whether the Key Issues, Vision and Objectives are sufficiently clear, locally distinctive and specific and thus effective.

The Vision is short on elements of sustainability, particularly community sustainability. Policy 1.1k refers to sustainable design and construction but not sustainable places or development. More is needed than homes, jobs, transport and retail development (a-d f &g) for balanced growth. There is also no mention of leisure or cultural facilities which are sadly lacking in parts of the borough. Schools and other community facilities are equally important. These facilities should feature at this stage in the Vision as they are clearly essential for building sustainable communities.

It is also short on heritage matters. These are mentioned in Policy 1h) [*‘caring for the borough’s historic character’*] but this reference is rather limited for a borough that has 27 conservation areas and a large number of listed and locally listed buildings. This care is lacking elsewhere in the plan where it proposed, for example, that Acton and Ealing Town centre conservation areas would be as suitable for tall buildings apparently without any regard to the historic context.

Policy 1.2 [Delivery of the Vision] provides a range of related policies (a-m) which would be simpler to understand if grouped with those in Policy 1.1 on a topic basis. Policies would also be more effective if cross references were made to UDP policies (DM & DSDPDs if they are progressed by the time of adoption of the CS). The arrangement of all the chapters makes for an unnecessarily complex plan that is not clear and is therefore not effective.

The Vision would be clearer if it were limited to Policy 1.1 with an introduction to the sub sections including: ‘The Vision for the borough in 2026 is to ensure a range of prosperous, cohesive and sustainable places of quality with diverse communities developed on the basis of balanced growth. To achieve this aim:’ [points a-k will need to be adapted accordingly].

We are concerned that these new generalised policies will be open to a wide range of interpretations whilst the detail of the UDP could be criticised for being out of date and therefore not applicable under the DNPPF. Achieving a core strategy that enables effective planning decisions to be made before the DM and DSDFDs are adopted would be assisted by **the inclusion of more detail especially in relation to community facilities, leisure, culture and protection of heritage assets in Chapter 1.**

2. Whether the overall strategy has a sound basis, having regard to the Borough’s context and needs, the relationship with other strategies.

The strategy is particularly unsound in relation to retail and housing. Retail is promoted on the basis of regeneration at a time when retail expenditure is declining and other competitive centres (e.g. Westfield) expanding. Housing is based on housing targets agreed in the London Plan where they were calculated for 10 years and then projected an extra 5 years to agree with local plan regulations.

The London Plan (paras 3.22 -3.26) explains that it is neither realistic or practicable to simply transfer national guidance on SHLAAs to London because of the distinct pressures and churn in its land market - on average 96% of capacity comes from formerly used sites often in existing use. An annual monitoring target based on the average capacity estimated to come forward over 10 years may not fully reflect the uncertainties in housing output arising from the current economic downturn.

Policy 3.4 on Optimising Housing Potential in the London Plan requires local context and character, the design principles in chapter 7 and public transport capacity to be taken into account and states that development proposals which compromise this policy should be resisted. This replaces former Policy 3A.3 in the RLP (Maximising the Potential of Sites) which paid no attention to the local character and rejected strategic referrals that did not maximise potential of a site. LB Ealing's Sites Development Schedule was drafted taking this approach into account. The basis has now changed at a time when the demand for retail sites is less and combined redevelopment is less attractive but above all local character must be taken into account.

We welcome the Mayor's new commitment in para. 3.27 *'to work with boroughs and stakeholders to develop and implement a new approach ... while also taking a bottom-up, participative and consensual approach.'* He promises that this will be the basis for early alterations to the plan. We hope that the Council will follow a similar approach in relation to housing and the exaggerated potential for accommodating new development. If the target figures imposed by the London Plan are to be achieved a new strategy will have to be adopted with less concentration on the Uxbridge Road Corridor as a source of housing combined with retail.

Therefore we consider that a reference to local character should be introduced into Policy 1.1 h).

3. Should there be clarity as to the official population statistics and the current population?

Official population statistics are out of date and were regarded as an undercount at the time of publication. Rapid rates of migration into and out of this borough increase demand for accommodation. Households expand to accommodate residents according to the number of rooms available so that planning for varied community uses and school places are particular problems. Because migrants both inward and outward do not have the same age range or birth rates as the existing population, significant change takes place between each census. Even the census does not give complete coverage where there are additional households in a house or flat who do not complete a form.

The Background Paper to Demography 2010 seeks for more realistic estimates and this leaves the reader with the impression that projections based on current birth rates and migration are not applicable to a borough with such high migration rates and that planning on a 15 year time scale based on these projections is likely to be guesswork.

Rating of households may be a better source of household information. The planning of 14,000 new homes will require a large number of school places as not all the small units are occupied by young city workers and the larger units by groups of adult workers who work locally. These new homes are not all a net increase and some will replace council housing by units for sale, so there will be a reduction in affordable housing. Some of these complexities should replace the very bland statement in para 1 on P 15(2010)

4. Are the policies sufficiently distinct from the supporting text?

The text should provide more justification for the policies and reference to sources not easily available makes the evidence seem to be lacking. There are examples of text that because of their importance should be in the policy rather than in the text. These will be identified under relevant matters below.

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?

The CS is dependent on the Development Sites and Development Management DPDs for decisions on

planning applications. Housing targets now relate to the Housing Trajectory thus increasing complexity. We are familiar with the DSDPD because it was subject to consultation at the same time as the Core Strategy. We are concerned about the adoption of the CS without these important documents. It leaves too much decision making to the DNPPF and the London Plan if the latter is regarded as in conformity with the DNPPF.

6. Whether the CS properly indicates which UDP policies it supersedes.

No. If a large range of UDP policies are superseded by the DNPPF detailed development will be lost before an adequate strategy is established. Because the CS is so dependent upon the initial DPDs for which final versions have not been published, local objection to planning applications could be inadequately supported by policies.

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?

Ensuring the 'quality of places' is limited. It is promoted in conservation areas through appraisals in DPMD (7C -B) and open spaces in Chapter 5 but quality seems to be lost to regeneration in many policies in the CS. Policy 1.2 (f) refers to the '*quality of design solutions*' not 'place' and '*tall buildings being acceptable where they make a positive contribution to the urban environment*' when of the 3 places listed Acton and Ealing have town centre conservation areas. The negative impact of tall buildings on conservation areas was fully explored at the Arcadia Inquiry. Appendix 3 provides a summary of policies as they affect Acton, Ealing, Greenford, Hanwell, Northolt, Southall and Park Royal, with information on their future rather than specific policies for their centres.

This phrase 'quality of place' should be used in an introduction to Policy 1.1 a-k.

The design of new development is referred to in Policy 1.1 h) which *ensures excellence in urban design*. Policy 1.2 e) *ensures that future development achieves the highest standard of sustainable design and construction*. But sustainable development requires "the right use in the right place" and is more than just sustainable design and construction. **Please inset 'is sustainable and' after 'future development' in Policy 1.2 e)**

Protection of the built, cultural and natural heritage is lacking from the document. Policy 1.1 h) states it will 'care for the borough's historic character' and ensure excellence in urban design, then refers users to the Development Plan Management Document which is only at an initial consultation stage. Basic protection of heritage assets is provided by the London Plan but the proposed DMDPD policy 7C (A) states the "Development of any Heritage Asset or its setting must be made with reference to relevant Guidance..." which is being abolished by the DNPPF. The UDP provided a better policy but is too detailed for the Vision. Instead, this should be amended by dividing Policy 1.1 h. into two parts as follows:

- 1) To protect and enhance the borough's heritage assets which include Ancient Monuments, statutory and locally listed buildings, conservation areas and historic landscape, and their settings, ensuring new development cares for the local character of different parts of the borough.**
- 2) To ensure excellence in sustainable urban design, high quality architecture and ...' Reference to natural heritage could be included under i) after 'green space'.**

8. Are all references to the Development Sites DPD and Development Management DPD consistent in the CS?

No view.

9. Is the CS entirely consistent with The London Plan 2011 and is there any potential conflict with the Draft National Planning Policy Framework?

The DNPPF introduces difficulties for the Core Strategy. It makes clear the overriding importance of sustainable development and the importance of up-to date Local Plans. Other priorities will be changed by the Framework and the PPS/PPGs on which UDPs depend will be abolished. The Core Strategy relies on these documents as well, so that comments about national policy have to relate to both sources and to the London Plan. Local plans will need to qualify for a certificate of conformity with the DNPPF, but the draft at present leaves a wide range of concerns to local plans.

A further ambiguity in the DNPPF eliminates the highly prescriptive requirements for housing supply and does not mention London as an exception. The London Plan para 3.27 states the mayor 'will work with boroughs and other stakeholders to develop and implement a new approach' which would be 'more bottom up, participative and consensual.' This would be 'the basis for early alterations to the plan.' It is to be hoped that under this approach – which needs to be recognised in the CS -- local people will be able to influence the estimates of site capacity for housing to ensure space is safeguarded for other uses, particularly those benefiting local communities.

The DNPPF avoids prescriptive targets leaving detail to local plans and cooperation between adjoining Local Authorities. But the London Plan 2011 imposes housing targets. Unrealistic estimates of the capacity of sites selected for redevelopment were included in the DSDPD: unrealistic because they do not take into account the local character, historic assets and their setting, and the impact of tall buildings on the amenity of parts of the borough in estimating their capacity for development. Yet policy 7.4 in the London Plan emphasises the importance of local character and this should be reflected in the Core Strategy

The DNPPF emphasises sustainable development. Policy 7.6e (Architecture) in the London Plan mentions incorporating best practice in resource management and climate change mitigation and adaptation; but support for the 'right development in the right place', which is essential if development is to be sustainable, is limited in Policy 7.1 (Building London's Neighbourhoods and Communities). The text on climate change describes the effects of climate change in London but there is a lack of response in Ealing's core strategies to these issues. For example the DNPPF and loss of PPS3 on Housing could open up garden land to development. Private gardens are a major source of green space in London which helps mitigate the London heat island effect. The London Plan includes a presumption against back garden development. This is an important issue in this borough and should be dealt with strategically.

Office Floorspace in the London Plan has been reduced. Office floor space in the Core Strategy is concentrated in Ealing Town Centre and there is a related sequential test which is not in line with the DNPPF. The Outer London Commission recommended that 'clustered' office floorspace is more successful in its ability to attract leaseholders. This is reflected in the London Plan and is very relevant to local conditions in this borough.

10. Whether the Core Strategy gives sufficient guidance on the provision of the infrastructure that is required to support existing and future development.

Information on infrastructure provision is limited in the CS. For example, expansion of school places needed by the increase in birthrate and population is being achieved by the most economical rather than in the most sustainable way. Expansion is proposed by using available play space rather than providing school places on defined sites where the demand is greatest. This increases the journey to school and encourages car use. The CS Open Space chapter even proposes building a secondary

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school on playing fields in the green belt. The DNPPF encourages school building as an overriding policy which could make matters worse rather than better in this respect.