

## **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?**

See response to Matter 1 question 1. The Vision and Strategic Objectives do not reflect community views which unfortunately had little impact when objecting to the London Plan or at the time of the initial consultation on the LDF.

**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?**

d) Town Centre classification in the London Plan does use retail floorspace as a guide but para A2.3 identifies Metropolitan centres as having significant employment, service and leisure function. National policy in PPS6, one of the Statements not listed for cancellation, includes in para 1.8 town centre uses that apply in addition to retail. These include leisure, entertainment, arts, culture, more specifically theatres, cinemas, galleries, indoor bowling, bingo etc, all uses that are under-represented in Ealing Metropolitan Centre where restaurant, gambling, pubs and clubs are the main ‘leisure’ provision.

**Reference should be made under d) to ‘with provision for leisure, entertainment, arts and culture.’**

e) We fail to see how Ealing can be a healthy place to live given the high pollution levels generated by congested roads and overhead aircraft. While appreciating that this is a London wide issue, concentrating development in the Uxbridge Road corridor is locating more residents where pollution levels are likely to increase their risk of heart attacks. The most polluted areas such as Acton, Ealing and Southall town centres should not be redeveloped for housing in the next 5 years until concerted action is taken to reduce vehicle pollution. Green space should be used to protect residents, cyclists and pedestrians along major roads and development adjacent to railways with diesel trains.

**This issue must not be ignored in the Vision which concentrates development in the Uxbridge Rd Corridor, especially town centres.**

f) Healthy travel behaviour, if equated with bicycle use, could result in increased heart attack risk from vehicle pollution. Action is needed to provide for separate cycle and footpaths protected from vehicle pollution. This policy should also specify that cycle routes are needed in the transport corridors to places of employment.

i) This supports the protection of the pattern of green space, but policies in chapter 5 are devoted to enhancing it. **Enhancement should be included in the Spatial vision.**

**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?**

The E-W transport links already exist and are very congested. Public expenditure cuts have already delayed Crossrail so that the improved transport links are likely to

impinge in the next review of this plan rather than during this 5 year cycle. The housing targets assume accessibility by public transport that does not reflect this congestion. High density development around a station should be restricted until increased transport capacity is available at that station.

The improvement of N-S and orbital transport could be assisted by incremental improvements at junctions and reducing street parking, enabling bus priority measures to provide more reliable services.

**See also our comments on Matter 1.7.**

**4. For the transport strategy to be justified should there be specific reference to the Mayor's London Transport Strategy.**

Yes.

**5. The introduction to policy 1.2 refers to including some agencies; to be effective all relevant agencies should be noted.**

These paragraphs do not mention either property developers with whom the Council has had discussions or residents who may or may not have been consulted. We feel strongly that community involvement is often ignored in the development process or only engaged at a late stage at formal consultation on a planning application.

**6. Does policy 1.2(b) accord with emerging National Policy, if not, is the policy justified?**

The sequential approach to offices does not accord with the DNPPF; but the alternative of building offices on any underused employment site in the borough to provide cheap office space could create unsustainable development dependent on car travel.

Significant amounts of office space in Ealing Town Centre is vacant or under used and some of the office corridor is being converted or redeveloped for residential use, a land use with more reliable return on investment. The Outer London Commission appointed by the Mayor expressed concerns about loss of Outer London offices in town centres. Those centres with most floorspace and a specialised function have suffered least from the growth of the CPZ which has access to a wide work force and services. Growth of centres outside London which offer office car parking and a wider range of housing, some in villages with a rural setting, have also suffered less.

If the borough is to provide a range of employment opportunities for local people then the sequential approach for offices is fully justified. Commuting is congested, time consuming and expensive. Crossrail will reduce travel time but add to the cost.

Because Crossrail will become congested in time, encouraging local employment is an effective strategy justified by the need to build up a stock of flexible office space that proves attractive on the basis that local workers have relevant skills and can save travelling time and fares. The office corridor in Ealing Town Centre should therefore be developed to provide this stock supported by much needed attractive facilities for culture, leisure and recreation and good orbital as well as radial transport facilities.

**We consider that the text supporting 1.2b) sequential approach should be expanded to justify using the sequential approach to offices.**

The long-term protection of employment land will enable adequate public transport links to be provided between homes and work place and land protected for logistics and the warehousing needed to support London. Allowing housing to extend into these areas will create further problems for home owners of pollution, noise and lack of

visual amenity. A major change in land use patterns will create a new demand for schools and community facilities in these locations.

**We consider that Strategic Industrial sites and locally significant and other employment land should be given long-term protection.**

In the UDP, employment areas were designated as Special Opportunity Sites. The Southern Gateway to Park Royal was given this designation and a redundant factory and ex-BBC accommodation has been redeveloped for student accommodation located on a traffic gyratory giving access to Park Royal Employment Area. The change in land use has created an area of housing without open space in a noisy and polluted environment. Two public parks are proposed but there is scarcely enough space for one. Any transfer of land away from employment use should ensure that sites are available for open space, schools and community facilities. The supporting text does not refer to these difficulties which could be replicated at Greenford Green or any other new sites released.

**We consider that Policy 1.2 b) should include ‘any transfer of land from employment to housing uses should reserve sites for open space or community facilities needed’.**

**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?**

This is following the London Plan in allowing for the release of industrial land as a contribution towards sector targets. The terms used seem guaranteed to result in appeals if the policy is applied. Small sites may be important to a neighbourhood such as at Cambridge Yard in Hanwell. Large sites provide scope for industry, warehousing and logistics - essential uses if London’s financial growth is restricted by recession. The London Plan identifies the need to reduce industrial land but we have concerns that this may leave less scope for economic development which is essential to the recovery of the economy. Sites that could nurture innovation, new technology and employment opportunities if given only short term protection will be lost forever. Strategic and the best sites including those with local significance should be given long term protection. The remainder should be related to a set of criteria for release. Problems arise at the borough boundary, especially in Park Royal, so there should be coordination with adjoining local authorities.

It would be clearer if the CS identified the criteria on which industrial land/employment land could be transferred to other uses. The London Plan advises that this should relate to demand but with a downturn in the economy this may not be very useful in protecting locally significant industrial or employment sites.

**Of the other London Plan criteria we consider the CS should include the words: ‘Any release should be related to the quality and fitness for purpose of the site, accessibility, its impact on adjacent uses and its significance to the locality.’ The text should be modified to refer to long term release only and then list the criteria for the remaining sites.**

**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.** This policy is confusing combining high densities with high rise. It refers to a suitable

housing mix ignoring the fact that offices, schools, community uses are important in areas of good public transport accessibility as well, and that offices particularly tend to be tall. A whole range of building types may be large

The London Plan defines tall and large buildings as ‘significantly taller than their surroundings cause a significant change in the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor’. Height is not the only dimension that makes a building too dominant in the landscape. A reference to large buildings could therefore usefully be included. A tall and large buildings policy should be separated from a high density housing policy 1.2f).

**EH/CABE advice on tall buildings suggests defining inappropriate locations. We therefore also wish to see included the following text: ‘tall/large buildings are inappropriate in Conservation areas, their settings and the setting of listed buildings’ as encouraged by the London Plan.**

The protection of conservation areas was recently endorsed by the Secretary of State in the relation to the proposed Arcadia Development in Ealing Town Centre. The settings of Sites of Importance for Nature Conservation and local parks are also inappropriate. Buildings with a large mass can have a strong impact on any important habitat or overshadow public open spaces. It is also very important that tall or large buildings do not harm adjoining land uses especially heritage assets, housing, open space and streets. (This harm to heritage assets is demonstrated in the Dickens Yard development under construction at the rear of the Town Hall (Grade II listed) which is a building of community importance and is visually overwhelmed by 9 storey flats.)

Overshadowing, wind, noise and microclimate are problems to be taken into account for all buildings but so are privacy, the effects of air pollution and any overbearing character. Tall and large buildings aggravate these problems and, where the environment is already poor, subject more residents or workers to them. Noise can be excluded from buildings but not associated open space. Pollution is difficult to exclude and requires expensive air conditioning which combined with the energy used makes affordable housing less affordable and perhaps unsustainable. The council should limit its support for high densities in areas of good public transport accessibility to those with acceptable environmental conditions. Sites should be adequate in size with any tall buildings located to avoid harm to adjoining land use.

**We therefore propose dividing Policy 1.2f and adding local character and reference to heritage assets:**

**1.2 (fa) To support higher densities in areas of good public transport accessibility. Whilst proper regard shall be made to relevant London Plan policies, the Council will take into account primarily the quality of the design, local character, location of the site, available infrastructure and the need to provide a suitable housing mix.**

**1.2(fb) Tall and large buildings should be located where they contribute positively to the urban environment. The quality of the design in relation to its surroundings, and the accessibility of its location are important considerations. Tall buildings should generally be limited to identify development sites in town centres near stations outside conservation areas and their settings.**

**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?**

The CS scarcely mentions the Borough's heritage: Policy 1.1 h) states 'it will care for the borough's historic character' then refers users to the Development Plan Management Document which is only at an initial consultation stage and where Policy 7C depends entirely on other documents. Under the DNNPF supporting guidance (in particular that provided in the recently issued PPS5) is due to be cancelled and conservation area appraisals on which Conservation Area decisions depend could be changed without much public input.

Some basic protection of Heritage Assets is provided by the London Plan which requires in Policy 7.8:

*\*A the identification of types of heritage asset;*

*\*B how this should be done;*

*\*C-E what development should take into account;*

*\*F in LDF preparation boroughs should seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration*

*\*G Boroughs should include appropriate policies for identifying, protecting, enhancing and improving access to the historic environment.*

**We ask for clear overarching policies in the CS which follow London Plan advice given in F and G above and from Policy 7.7 E on tall/large buildings. In particular, we press for conservation areas, listed buildings and their settings, registered historic parks and gardens, scheduled ancient monuments to be designated as inappropriate locations for tall buildings.**

The DNPPF (para 21) proposes 'additional development plan documents should only be used when clearly justifiable' and 'Supplementary planning documents should only be necessary where their production can help to bring forward sustainable development at an accelerated rate and must not be used to add financial burdens on development'. Assuming that this approach is not overturned as a result of the current consultation, adequate policies to support the Historic Environment must therefore be included in the CS.

**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.**

No Views.