

# Ealing Council Core Strategy Independent Examination

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

Submission by Tony Miller on behalf of Ealing Borough Liberal Democrats

### Issues and questions

- 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?**
- a. Crossrail now seems certain to proceed, even if some of the supporting station improvements are not now planned to be delivered as originally envisaged. The impact will be substantial; for example, passenger numbers on east-west routes on the main Great Western lines have already increased beyond original forecasts. Entrances and exits at Ealing Broadway station<sup>1</sup> in the morning peak have risen from 13,667 in 2006 to 14,889 in 2010, up 9%, despite a drop after the onset of slower economic activity nationally. Numbers are projected by Crossrail to increase further to 21,150 for a total rise of 55% by 2026. Managing the flow of passengers from surrounding areas to and from the Crossrail stations must be a key element of transport planning.
- b. While HS2 is less certain, the impact on the borough of a new interchange at Old Oak Common would be substantial. The Department of Transport says<sup>2</sup>

*The interchange at Old Oak Common would support regeneration and growth both immediately adjacent to the site and in the wider area. It would act as a catalyst to transform the existing industrial area and surrounding neighbourhoods, providing new housing and major employment opportunities. Current estimates suggest that HS2 has the potential to contribute to the creation of 20,000 jobs in the Old Oak Common area.*

Even if there remain many uncertainties on HS2, the core strategy should better anticipate such a development in line with the Mayor's Transport Strategy Policy 6.3 D, particularly with regard to the provision of substantially more new housing and associated community infrastructure in the north-east corner of the borough. Without this, investment and growth benefits would be accrued more to neighbouring areas.

- c. The strategic vision Greater consideration has to be given to the means whereby the projected improvements to transport capacity within the borough, particularly N – S and orbital routes (such as the North & West London light rail project, supported by

---

<sup>1</sup> Source: Transport for London station usage statistics - <http://www.tfl.gov.uk/tfl/corporate/modesoftransport/tube/performance/default.asp?onload=entryexit>

<sup>2</sup> *High Speed Rail: Investing in Britain's Future. Zone 4 effects* Department of Transport <http://highspeedrail.dft.gov.uk>

Council resolution in 2009<sup>3</sup>) can be achieved. (See also Q 4 below.)

- d. The loss of the through train service from Greenford to Ealing Broadway and Paddington under the present plans will reduce rather than improve connectivity for the north-west corner of the borough, which already suffers from poor communication links to the centre. This runs counter to the general policy and specifically to 4.4 (d)
- 4. For the transport strategy to be justified should there be specific reference to the Mayor's London Transport Strategy.**
- a. Past public transport planning in Ealing has been left almost entirely to the Mayor, with local contacts with TfL largely limited to minor issues such as location of bus stops. Realisation of the strategic objectives cannot be achieved except through the MTS/London Plan, which has a major impact on location of future development.
  - b. Other than Crossrail, Table 6.3 of the London Plan (based on the MTS) is entirely lacking in mention of projects concerning the borough, which should be key to future growth and which would attract central funding under policy 6.2 Ac. This appears to be due to the absence of proposals from within the draft Ealing Core Strategy.
  - c. There is no recognition in the Core Strategy of the need to safeguard land use for future expansion of the transport system, as required by the London Plan Policy 6.2C. A critical part of the transport corridor is the rail bottleneck between Ealing Broadway and West Ealing, which has been identified in the past<sup>4</sup> for potential widening to five tracks and could re-emerge as part of the proposed development of the main line to the west. Land between Ealing Broadway and West Ealing stations already provides scope for this, but the recent planning application by Glenkerrin UK Ltd for development of the Arcadia site, approved by the Council without reference to this possibility, would have impinged on this area.
  - d. There is also a logical inconsistency in the policy of encouraging residential development mainly in areas of existing high PTAL. Areas ripe for regeneration on potential sites with low PTALs (eg the Park Royal/Willesden segment) are not being given adequate consideration for infrastructure investment, particularly public transport, to prepare them to be more suitable for development.

This approach produces a mis-match between the policy of concentrating residential development in the two corridors (A40 and Uxbridge Road) with that of providing more affordable homes for local people (supporting commentary to Policy 1.1 and Policy 1.2(a)). Land available for development in the corridors will have a higher acquisition cost and developers will seek to recoup investment by applying for a significant variation in the designated proportion of affordable properties, as has already happened in the Dickens Yard and Arcadia developments (even though the latter will not now be built as originally approved by the Council).

---

<sup>3</sup> See Appendix 1

<sup>4</sup> Rail Utilisation study , Great Western Main Line (Route 13). Network Rail, Mar 2007

- e. There is no recognition in the CS to the concept in the MTS of a “hub and spoke” approach to local transport, which would emphasise the need for local networks based on the nodes represented by stations in town centres on the radial routes, particularly those which will be enhanced by Crossrail. Such an approach would restore the concept of local centres as clusters of communities with their own retail, employment and leisure facilities, linked to the nominal Metropolitan Centre represented by West Ealing and Ealing Broadway. Instead, the CS retains and further consolidates the radial nature of present ribbon development along the two main corridors, which will only serve to encourage travel out of the borough and weaken local offerings, in conflict with Policies 1.1 (d) and (f).

**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.**

- a. Experience of how Ealing has handled past planning applications reinforces the concern that the proposed policy is too vague and potentially excessively permissive, particularly in the context of town centres within conservation areas. Higher densities can be achieved without significant increases in height but the policy as now drafted would provide no incentive for developers to come up with imaginative solutions particularly to town centre problems.
- b. Both CABE/English Heritage and the London Plan have provided wording which is more explicit and acceptable, and would provide better protection for the character of Ealing’s several historic centres. We wish to repeat our preference for the alternative wording in our original submission to Policy 1.2(f), which should be contained in the CS and not left to the DPDs on Development Sites and Development Management.

**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?**

- a. As above, the CS should contain a clear statement of the priority to be given to protect and enhance the particular character of Ealing as a collection of historic communities. Policy 1.1 (h) is too weak and its place in the list of items comprising the spatial vision too low to give sufficient guidance to prevent future developments from creating a series of “clone towns”.
- b. The recent disturbances in the borough have underlined the need for a clear local identity with which all residents can associate and in which they can take pride. The built environment generally, and in particularly the historic continuity represented by conservation areas, is the visible expression of that identity and needs protection.

**Ealing Council Core Strategy  
Independent Examination**



**Ealing**

**1 Objectives**

Appendix 1 to Submission by Ealing Borough Liberal Democrats

***Extract from***

**London Borough of Ealing**

**NOTES OF COUNCIL MEETING - 21st APRIL 2009**

**3. North West London Light Railway**

The following motion was **agreed**:

"This Council notes:

1. The North West London Light Railway is a proposal for the construction of a light rail system providing direct links from Brent Cross to Park Royal, Ealing Broadway and Finchley Road via West Hampstead.
2. It would largely make use of existing freight lines or abandoned railway track beds.
3. It would provide an alternative to extra vehicle movements likely to be generated by the expanded Brent Cross, although it may also displace existing and potential freight traffic onto our roads and cause disruption to our tube network.

This Council calls on Transport for London to look into the advantages, disadvantages and feasibility of the North West London Light Railway and to engage in discussions with the London Boroughs of Barnet, Brent, Camden, Harrow and Ealing on its strategic potential for supporting new developments and orbital travel."