

# **LDF Core Strategy Independent Examination**

## **Matter 3 – Housing**

### **Statement by Ealing Friends of the Earth (105), Brent River & Canal Society (175) and Ealing Wildlife Network (172)**

#### **Representation 207: Housing targets**

This representation has been deemed Matter 2, but is highly relevant to Matter 3. We therefore reproduce the representation here.

Our 2010 response said: “The LDF notes that the housing targets have been set by the GLA. While many detailed questions have been posed and views sought in the various strands of the consultation, the council has refused to invite comment on the population forecasts and housing targets.

The LDF seems to regard the housing figures as ‘givens’ that cannot be challenged or significantly altered. We do not consider this satisfactory – comment and debate should be encouraged because housing targets underpin the entire LDF. It needs to be fully explained what would happen if Ealing rejects the targets. Only then can residents consider the options and reach an informed view. At present they are only being given one option – accept the housing target and therefore everything that flows from it.

When pressed, the head of planning strategy dismissed this issue by saying that if Ealing were to substitute its own figures, the LDF would be ‘taken over’ by central government. We have seen no evidence to this effect such as a precedent or legal advice.

We are aware that the Mayor of London/GLA has set housing targets for boroughs. However, the status of these targets is unclear. Now that national government has abolished regional housing targets, it is extremely unlikely it would attempt to take over the Ealing LDF because it inserted its own targets instead of GLA ones. It is noteworthy that not all London boroughs have accepted the GLA targets – this also indicates that a borough setting its own targets (or having none) is a valid and realistic option.

The upshot is that the LDF is unsound because the borough’s housing targets have not been subject to scrutiny, debate and consultation.”

The council’s response: “*Population forecasts and housing targets have indeed been set by the GLA.*” is inadequate. It needs to be fully explained what would happen if Ealing rejects the targets. Only then can residents consider the options and reach an informed view. At present they are only being given one option – accept the housing target and therefore everything that flows from it. Our comments in representation no. 206 on PPS12 are very relevant here.

The upshot is that the LDF is unsound because the borough’s housing targets have not been subject to scrutiny, debate and consultation. Our objection is maintained.

#### **Representation 206: Population**

This representation has been deemed appropriately Matter 2. However it is relevant to Matter 3 because our submissions emphasise the close linkage between the two. We therefore reproduce the representation here.

Our 2010 response said: “The LDF takes the population forecasts ‘as read’ or as ‘a given’. But it is obvious that Ealing’s population will only increase by this amount if housing and, to a lesser extent other facilities, are provided which encourage and support that population growth. The LDF therefore needs to be explicit in what assumptions it is making on infrastructure and why.

At present, the forecasts look like a self-fulfilling prophecy or ‘chicken and egg’:

- i population in Ealing is forecast to increase
- ii therefore we need more housing
- iii more housing is built
- iv this ensures the population will increase as people move in to occupy the new housing

The population forecasts are described in a background paper and they completely ignore the fact that population of a place depends on its housing and infrastructure.

Population forecasts and in particular the increases are key determinants in the LDF and the future of Ealing. The LDF is unsound because the effect of housing and infrastructure on population has been ignored.”

More clarity and openness is required on population statistics. Population projections underpin the LDF and determine the main policies, such as housing.

The council’s response is helpful in clarifying the process: “*The GLA set housing targets based on the Strategic Housing Land Availability Assessment which is supply driven e.g. dependent on the amount of land identified where housing can be developed. Based on those development quantum, the GLA reviewed its population projections to reflect the increase in population, which would result from people moving in these new homes.*” What is concerning is that the reader of the LDF and associated documents would not have realised this was the process, severely limiting their ability to comment in an informed manner.

An important point to note is that the housing target for Ealing was not simply imposed. As we understand it, it was negotiated between LBE and the Mayor/GLA and LBE agreed the figure. These negotiations were carried out behind closed doors and there was no consultation. The target is therefore, in a very real sense, LBE’s. They were not simply imposed by the Mayor; the Plan records what Ealing had already agreed to.

Given that the target is, to a considerable extent, self-imposed, and since there has been no consultation within Ealing, we consider it right and proper the issue should be debated at the Examination.

PPS12 says (para 4.5) “*Consultation on the core strategy during the preparation phase of the plan should be proportionate to the scale of issues involved in the plan.*” The housing target figures are by the most important component of the CS, yet there has been no consultation. Para 4.26 continues “*If it is proposed to produce a new or revised core strategy for an area .. it will in the government’s view be appropriate to involve the community in considering the options for the strategy before the final document is produced.*” The community was not involved in considering options for different levels of new housing in the CS.

Population and in particular the increases are key determinants in the LDF and the future of Ealing. The LDF is unsound because the effect of housing and infrastructure on population has not been explained and because the public has not been consulted on population forecasts or housing targets.

The council also notes “*Furthermore population is set to increase through natural growth and migration and this new population will also require new homes to live in.*” This may be so, but it entirely begs the question of Ealing’s population and housing. Natural growth, presumed births, within Ealing does not mean that when the children reach adulthood they should or would all want to live in Ealing. The implications on Ealing’s population are therefore unclear. Inwards migration clearly happens, but that does not mean the Ealing will house any particular number of people migrating from outside or that it has any particular responsibility to house them. The council response does therefore not justify any particular forecast of population or housing target. Only if Ealing were an island with limited migration would the council’s response be pertinent.

The proposed minor changes are reasonable as far as they go, but are inadequate. They fail to explain that the forecast population is a function of the plan for more housing – a crucial fact that should not be hidden from the public.

Our objection is maintained.