

LDF Core Strategy Independent Examination

Matter 11 – Public services, retail and employment

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

As advised, the 3 organisations named have decided to combine their representations in order to save time and avoid duplication.

Ealing Friends of the Earth has been invited to appear on Matter 11. We are not clear which representations the Inspector had in mind as being pertinent to Matter 11, but assume it is representation 204. We have included it in our statement for Matter 2 and reproduce it here.

Representation 204: Growth and infrastructure

Our 2010 response said: “The central feature of the LDF is a ‘requirement’ to add some 14,000 housing units and accommodate about 24,000 extra people by 2026. This will add huge pressures to the borough, will make it more crowded and, unless commensurate improvements to all forms of infrastructure are made, lead to a reduction in quality of life for existing residents.

There is no evidence in the strategy that commensurate infrastructure will be provided. There are qualitative statements about infrastructure but a lack of quantification – the latter being needed to give confidence there will not be a reduction in quality of life for existing residents.

We recognise that the detail of infrastructure and environmental impacts are not a matter for the strategy document and that they are covered, to some extent, in other documents. However, those documents are only draft or ‘initial proposals’. Furthermore, only some of these are being consulted upon at this stage.

For the strategy to be sound, it needs to have a provision such that if requisite infrastructure is not provided – that is sufficient to prevent a deterioration in quality of life for residents – then the population and housing plans will be revised forthwith.

The upshot is that the LDF is unsound because there can be no confidence that quality of life will not be reduced as a result of LDF policies.”

Where we say “We recognise that the detail of infrastructure ..2 and the council response says more or less this (in a more formal way): “*It is the purpose of the Infrastructure Delivery Plan to support development quantum in the development strategy by making sure that the right infrastructure is provided. ..*”

Where we say “For the strategy to be sound, it needs to have a provision such that if requisite infrastructure is not provided ..” The council seems to agree in its response: “*The Council acknowledges that development quantum may need to be reviewed if supporting infrastructure cannot be provided.*” We assume ‘development quantum’ in this context means the housing building programme. If indeed, the council does intend to review its housing if commensurate infrastructure is not forthcoming, this very important policy needs to be stated clearly in the CS.

Our objection is maintained.