

Written Statement

Ealing Council Statement 1: Overall Context LPA1

Tuesday 1st November 2011



1.1 This written statement relates to Matter 1 – Overall Context. It specifically covers matters raised in relation to the Preface, Chapter 1 and in general Appendix 3 (September 2010 version) or Appendix 2 (July 2011 version). The issues and questions to be addressed in this hearing statement are:

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

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

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

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

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?

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

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?

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

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

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

2. Effectiveness

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

2.2 PPS12 "Local Spatial Planning" requires every local planning authority to produce a core strategy which includes an overall vision which sets out how the area and the places within it should develop, strategic objectives for the area focusing on the key issues to be addressed and a delivery strategy for achieving these objectives (Para.4.1). The vision should be informed by an analysis of the characteristics of the area and its constituent parts and the key issues and challenges facing them. The vision should be in general conformity with the

- Regional Spatial Strategy (embodied in the London Plan) and it should closely relate to any Sustainable Community Strategy for the area (Para.4.2).
- 2.3 The Development Strategy can be demonstrated to be in line with the requirements set out by paragraph 4.1 of PPS12. Chapter 1 “A Vision for Ealing” sets out the council’s spatial vision and a number of overarching strategic objectives (Policy 1.1) and also shows how these will be delivered (Policy 1.2). These objectives reflect the key issues facing the borough, however, it is important to recognise that the extent to which the Development Strategy (through the planning system) can address these strategic objectives varies.
 - 2.4 The spatial approach of the plan forms a document that is wide-ranging and inclusive in its approach, addressing fundamental issues that affect the borough in a joined up approach. It is underpinned by an analysis of the each of the borough’s neighbourhoods and Appendix 2 provides a brief summary of some of their chief characteristics and how the plan will impact upon their future development.
 - 2.5 The spatial vision for Ealing is about the borough but set with the context of Ealing being part of Greater London and development corridors that extend beyond the borough boundaries. This vision is distinctive to Ealing, making reference to the borough and features within the borough. The plan must be in general conformity with the Regional Spatial Strategy and the draft NPPF will not change this requirement. The Mayor of London has issued a revised “Statement of General Conformity with the London Plan” (see ED78).
 - 2.6 The Development Strategy is the spatial expression of the council’s Sustainable Communities Strategy (SCS), the preparation and production of the plan has been closely aligned with the SCS including its recent update and revision that was undertaken and coordinated by the Local Strategic Partnership (see BS1 and BS2).
 - 2.7 Key strategic objectives in the Development Strategy set out clearly the development quantum for the borough (Policy 1.1a) and where the development of new homes, businesses and retail space will primarily be concentrated (Policy 1.1b). This pattern of growth corridors and residential hinterlands overlays a pattern of green spaces and green corridors in the borough and this provides the narrative structure for the spatial approach adopted in subsequent chapters of the plan.
 - 2.8 Chapters 2 and 3 seek to realise the potential opportunities in each of the two development corridors. Chapter 4 shows how the residential hinterlands outside of these corridors will be enhanced and how the council will seek to promote improved orbital links between the development corridors. Chapter 5 shows how the borough’s green and open spaces will be protected and enhanced. Finally, Chapter 6 is focused on delivery of the infrastructure necessary to support any new development.
 - 2.9 A timeline of 15 years is used as a reference throughout the Development Strategy and shows long term, strategic planning as well as meeting the requirements of PPS12 (Para. 4.13). Another key council objective has been to

- create a plan with a narrative structure that is short, concise and is genuinely spatial and not thematic in approach. The plan therefore avoids repeating or reformulating national or regional policies (in line with PPS12, Para.4.30).
- 2.10 The interdependence and effectiveness of the various elements that make up the plan were tested by four separate rounds of public and stakeholder consultation. The council consulted on the key issues and options in 2006 and 2007. The council then carried out a review in Spring 2009 that took a fresh look at the content of the Ealing LDF to provide an overarching narrative for development, growth and improvement in Ealing and for policies contained within the LDF. This also took into account the council's wide-ranging work on regeneration projects in the borough's town centres and municipal estates. Further consultation on the council's initial proposals (preferred options) in 2009 and final proposals (draft submission proposals) in 2010 helped to further refine the Development Strategy.
- 2.11 The responses and feedback to these consultations were taken into account for the final submission version of the Development Strategy, delivering a document that has been subject to a wide range of critical thinking and review. Each stage has been also informed by a sustainability appraisal to evaluate the social, economic and environmental effects of the suggested options and the final preferred strategy.
- 2.12 The Council also took part in the PINS frontloading programme in January 2010, with the final report by the Inspector providing focused, detailed advice on what to aim for in the Development Strategy, including the importance of an overall vision and the role of the document in setting out strategic decisions and infrastructure provision.
- 2.13 A substantial evidence base has been established. National Planning Policy statements, regional plans and strategies, and plans and strategies of the Council and its partners have also informed the Development Strategy.
- 2.14 Finally, in relation to effectiveness (PPS 12, Para. 4.44, the Development Strategy can be shown to be effective through:
- Deliverability - as set out in the Infrastructure Delivery Plan and Schedule highlighted in Policy 1.2, Chapter 6 and Appendix 3.
 - Flexibility – the Development Strategy has been written to allow adaptation to changing circumstances; and,
 - Monitoring – is set out clearly in Policy 1.2 (m).

3. Relationship With Other Strategies

- 3.1 **2. Whether the overall spatial strategy has a sound basis, having regard to the Borough's context and needs, and the relationship with other strategies?**
- 3.2 The council considers that the Development (or Core) Strategy DPD has a sound basis that has satisfactorily taken into account the local context and needs of the

- borough as well as other plans and strategies that impact upon the borough. The Core Strategy will eventually be supported by other LDF documents such as the Development Management Policies DPD, Development Sites (or Sites Allocation) DPD, and Supplementary Planning Documents that, together with the London Plan, will provide a comprehensive planning framework for the future development of the borough.
- 3.3 The council considers that the Development Strategy has been prepared in accordance with the requirements of PPS12 Local Spatial Planning and guidance in the CLG Plan Making Manual, that it is founded on robust and credible evidence and that it is the most appropriate strategy for the borough. Where there are possible questions of conformity with the emerging draft National Planning Policy Framework (published in July 2011) the council considers that there are local circumstances that justify the approach taken and the evidence base supports our locally distinctive approach (for example see Matter 2, Q.6). The council also considers that the Development Strategy is deliverable.
- 3.4 The Development Strategy is, of course, expected to be in general conformity with the London Plan. In his representations on the Proposed Submission Development Strategy, the Mayor of London identified some areas of the document that he considered were not in general conformity and other areas where he had concerns. As a result of these comments, the council agreed to make some minor changes. It is understood that these changes has satisfied all of the Mayor's concerns and on September 28th 2011 he issued a revised "Statement of General Conformity with the London Plan" (see ED78).
- 3.5 The Development Strategy sets out in the Preface, Chapter 1 and Appendix 2 (July 2011 version) the local context and the challenges that the borough faces. This information is of necessity a summary of the circumstances affecting the borough and it is supported by a set of background documents and evidence that provides a more detailed picture of the borough, including its residents, businesses, built and natural environment and its position within West London and London as a whole.
- 3.6 Key documents that provide the local context are the various council strategies (particularly the Sustainable Communities Strategy (see BS1 and BS2) and these are informed by a wide range of sub-regional and regional studies. In addition, the council has commissioned or undertaken itself a number of evidence gathering exercises. These are based upon requirements of national policy guidance and/or issues considered to be appropriate and of relevance to the borough and provide an appropriate evidence base.
- 3.7 Hence we have undertaken and published, for example, an energy evidence base report (EB17), a heat mapping study (EB19), a Strategic Flood Risk Assessment (EB19), an Employment Land Review (EB20), a Strategic Housing Market Assessment (EB22), an Affordable Housing Viability Study (EB23), two iterations of an Infrastructure Delivery Plan and Schedule (EB24 and EB25), a green space audit (EB26) and various retail needs studies and town centre health checks (EB27-EB29).

- 3.8 The council has also collected data for monitoring purposes over a number of years. The council's Annual Monitoring Reports provide a time series of information for the past 5 years and in-house monitoring of some topics goes back much further, for example population and household change in the borough and the health of the retail hierarchy (see for example EB12).
- 3.9 The views of stakeholders, including residents and businesses and other organisations with an interest in the borough (such as the Local Strategic Partnership), have also been an important factor in developing the Development Strategy. Participation has been undertaken in accordance with the council's Statement of Community Involvement (EAL10) and the LDF Regulations (as amended). The council considers that participation was timely and effective and can confirm that it assisted in the generation and consideration of options for the borough.
- 3.10 The selection of Development Strategy options took place over a number of years, commencing in 2006, and included the consideration of policies and strategies of other bodies, including government planning policy statements, the London Plan and publications of bodies such as English Heritage and the Environment Agency.
- 3.11 In determining the spatial strategy for the borough, a key exercise has been the undertaking of a sustainability appraisal (see EB10 and EB11). The Submission Development Strategy was also subject to an SA (EAL6a and b) and the council undertook an Equality Impact Assessment (EB9).

4. Demography

- 4.1 **3. Should there be clarity as to the official population statistics and the current population?**
- 4.2 The Council does not think it appropriate to quote the official ONS figures, which are out of date for planning purposes and seriously underestimate the borough's population and the number of households. The council has worked with the GLA to provide new demographic projections for Ealing that are more accurate. Full details and a reasoned justification for the council's approach are provided in a background paper on demography (see EB13).
- 4.3 If it would be helpful, to provide better clarity the second paragraph of the Preface could be amended to read:

"Local analysis shows that the official demographic statistics from the Office of National Statistics underestimate the borough's population and the number of households in Ealing. The GLA estimates Ealing's population at 322,000 in 2011 (with local estimates showing 127,000 households) and expects it to grow to 349,000 (142,500 households) by 2026."

5. Relationship Between Policies and Supporting Text

- 5.1 **4. Are the policies sufficiently distinct from the supporting text?**
- 5.2 Yes. Policies are set out in yellow boxes with a heading with a policy prefix whilst supporting text is set out below. To avoid any ambiguity it may make sense to check the font colour of the boxes used in Appendix 2: A Local Context – Neighbourhood Profiles and the council would welcome any further advice from the Inspector on this issue.

6. Relationship Between CS and Other DPDs

- 6.1 **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?**
- 6.2 Guidance on the preparation of Local Development Frameworks is provided by PPS12. As mentioned in this document, the Local Development Framework is a collection of local development documents produced by the local planning authority that collectively delivers the spatial planning strategy for its area (Paragraph 1.4). PPS12 also mentions that other DPDs must be prepared in accordance with the Local Development Scheme (Paragraph 5.2).
- 6.2 The Council's Local Development Scheme (LDS) (EB8) identifies all the development plan documents the Council intends to prepare. At Figure 2 in the LDS (on page 7) is a chart showing the relationship of the Development Strategy with other documents – including 4 other development plan documents.
- 6.3 In preparing the LDS, early thought was given to the content of and the relationship between the whole set of LDF documents, also noting the flexibility provided under the LDF system for different combinations of documents to be prepared. The Council's intentions regarding the relationship of the Development Strategy and the other development documents have been made clear throughout the LDS review process.
- 6.4 In preparing the Development Strategy, the Council has taken into consideration guidance set out in PPS12 and the CLG Making Plan Manual. Core Strategies are intended to provide the strategic framework for any other development plan documents that the Council produces. Paragraph 5.1 of PPS12 provides the criteria on which development plan documents to produce other than the Development Strategy. It states that other DPDs must be prepared in accordance with the Local Development Scheme.
- 6.5 The CLG Making Pan Manual also notes that it is important to develop the spatial strategy for the core strategy before moving on to policy details that will put the strategy into effect and that the strategy should drive the allocation of sites, not the other way round. Furthermore, the core strategy should provide a clear guide for the preparation of any subsequent development plan documents, or provide a base against which those development plan documents can be assessed.

- 6.6. Mindful of the role of a core strategy as referenced above, the Development Strategy is essentially about the overarching strategy and key principles as core policies. This approach is in accordance with that indicated in 'Policies for Spatial Plans: A Guide to Writing the Policy Content of Local Development Documents' produced by the Planning Officers' Society in July 2005. Section 1.7 of the Guide describes the types of policies that may be included in a spatial plan.
- 6.7 PINS guidance as set out in the document "Local Development Documents - Lessons Learnt Examining Local Development Documents" (June 2007) advises Local Planning Authorities to consider the chain of conformity in preparing development plan documents (Paragraphs 1.22-1.23). At the time work started on the Development Strategy, there was clear advice from PINS that "until it was clear that there were no fundamental issues of soundness with the Core Strategy the examination of lower level DPDs was neither sensible nor practical as it could lead to wasted effort and cost by all involved". On this basis, the Council's approach has been to ensure that the Development Strategy was substantially in place before other documents could be progressed to the publication stage.
- 6.8 The Development Strategy articulates the intended spatial planning approach without going into matters of detail better dealt with in subsequent development planning documents. There will always be parties, particularly representing specific interests, who would wish the policies to go further, such as in providing greater protection. Equally there will be other parties who may prefer greater flexibility. The Council considers that the right balance in terms of the level of detail required has been made. In the Council's view, it is therefore important to avoid over-complicated policies in a single document.
- 6.9 The Council considers that there is an effective relationship between the Development Strategy and the emerging Development Management Policies DPD. The latter will take its lead from the Development Strategy and is intended to provide more detailed policies to implement the Development Strategy. Several references are made in the Development Strategy to the way in which Development Management DPD policies will add further detail to the principles established, for example 1.1 (d), 1.2 (e), 1.2 (f) and 1.2 (l). The Development Management Policies DPD will be used in conjunction with the strategic policies in the Development Strategy in determining planning applications.
- 6.10 The Council considers that there is an effective relationship between the Development Strategy and the emerging Development Sites (or Sites Allocation) DPD. The key role of the Development Sites DPD is to identify specific sites for future development (e.g. land for new homes or employment). The purpose of the Development Sites DPD is to support the delivery of the Development Strategy. The Council is using this mechanism to bring forward the redevelopment of a number of sites through joined up working with private and public landowners and developers. Again, there are several references are made in the Development Strategy to the way in which the Development Sites DPD will add further detail to the principles established, for example 1.2 (b), 1.2 (f), 1.2 (f) and 1.2 (k).

- 6.11 Finally, the Council also considers that there is an effective relationship between the Development Strategy and the emerging Joint West London Waste Plan DPD. Six West London boroughs have joined together to plan for the management of future waste. Policy 1.2 (g) in the Development Strategy sets out the council's overarching strategic objectives and the WLWP will identify and safeguard sufficient sites for waste management facilities over the plan period.

7. Relationship Between CS and UDP

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

7.2 No, not yet. This is because the Council has been tracking the preparation and production of the Replacement London Plan that was finally adopted on July 2011 and this will also have significant implications for the Council's Adopted UDP.

7.3 We are currently completing a thorough audit and consulting internally on a draft document that shall be finalised in time for commencement of the public hearings on November 1st 2011.

8. Quality of Places, Design and Heritage

8.1 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?

8.2 The Development Strategy provides all necessary protection for built, cultural and natural heritage and support for the design of new development that is relevant to the overall spatial strategy and is not repetitious of national or regional policy. Notable local assets or opportunities are mentioned where appropriate to provide support for relevant SPDs/AAPs. Detailed development management policies will appear in the Development Management DPD.

9. Cross References to Other DPDs

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

9.2 Yes. We have striven to achieve a narrative structure that is short and concise and we accept that suitable cross-referencing between DPDs and the judicious use of footnotes aids navigation and accessibility of the documents. Therefore, the Council would welcome any further advice from the Inspector on this issue especially where this would help improve the clarity and legibility of the plan.

10. Relationship with the London Plan 2011 and Draft NPPF

- 10.1 **9. Is the CS entirely consistent with The London Plan 2011 and is there any potential conflict with the Draft National Planning Policy Framework?**
- 10.2 Regarding the London Plan 2011, yes. On September 28th 2011 the mayor of London issued a revised “Statement of General Conformity with the London Plan” (see ED78). However, in respect of any implications for policies superseded in the Adopted UDP, see Paras. 7.2-7.3 above. The Council has also previously indicated that it would suggest some revised text for “Appendix One: A Regional Context – The London Plan” that would reflect the fact that the London Plan 2011 has now been adopted. The suggested text together with updated Maps 11 and 12 are attached at Appendix 1 and the GLA has indicated that they are content with the proposed amendments.
- 10.3 Regarding the draft National Planning Policy Framework (NPPF), the council provided an initial response on 5th August 2011 in response to a question from the Inspector (see ED1). The comments made in relation to status of the document are still valid i.e. that is a draft subject to the outcome of a lengthy consultation process but that, in the meantime, it should be regarded as capable of being a material consideration, although the weight to be given to it will be a matter for the decision maker in each particular case.
- 10.4 The consultation on the draft NPPF closed on October 17th 2011 and the council submitted formal comments in time (see ED79). It should be borne in mind that it is not the purpose of the examination in public to debate the merits or otherwise of the emerging NPPF. However, the council believes that there are no issues of general non-conformity between the Development Strategy and the emerging NPPF.
- 10.5 The council is also aware of the revised advice note prepared by the Planning Inspectorate issued on September 8th 2011. Annex B of this advice note now takes account of revised guidance on trajectory of LPA 5 year housing requirements and the proposed incorporation of planning policy on traveller sites into the final National Planning Policy Framework.
- 10.6 In particular, the council would wish to highlight the following:
- 1. Presumption in favour of sustainable development** – The council believes its approach to plan making and development management is highly proactive and that the Development Strategy positively plans for appropriate and sustainable new development. The council has assembled a substantial evidence base that provides a basis for objectively assessing future development needs.
- 2. Neighbourhood Plans** – The council believes that neighbourhood plans will provide a useful mechanism for helping to shape future development and for engaging communities and businesses in the planning process. The council intends to apply for a grant under the final tranche of it's the CLG Neighbourhood Planning Frontrunners scheme, Communities and Local Government (CLG) to

undertake a project in collaboration with a local community group and a business organisation. This will examine the potential for one or two neighbourhood plans covering the Ealing Metropolitan Town Centre. The closing date for receipt of applications is November 4th 2011.

3. Tests of Soundness – The draft NPPF introduces a new test of soundness in that plans should be positively prepared based on a strategy that seeks to meet objectively assessed development and infrastructure requirements. The council believes that its Development Strategy fully accords with this test and that a considerable body of evidence supports this.

4. Removing office development from ‘Town Centre First’ policy – The draft NPPF seeks to free office development from the need to follow the requirements of the ‘Town Centre First’ policy and for proposals to be judged on their individual merits. However, local and regional circumstances justify a more locally distinctive approach. See LPA2, Para.7.1-7.4 for brief explanation.

5. Removing the brownfield target for housing development - Whilst the draft proposes that the specific target housing development on brownfield land should be removed, it also says: “where practical and consistent with other objectives, allocations of land for development should prefer land of lesser environmental value” (Para.19). The decision as to what are the most suitable locations for housing growth will depend on local circumstances and the council has set out a clear framework for meeting housing supply targets and will intends to bring forward its Development Sites DPD in due course.

6. Requiring local councils to identify an additional 20% of deliverable sites against their five-year housing requirement – See LPA3, Q.2, Paras. 3.7-3.9.

7. Remove the national minimum site size threshold for requiring affordable housing to be delivered – See LPA3, Q.4, Paras. 4.7-4.9.

8. Protecting community facilities - The proposed policy strengthens the current policy by asking local councils to consider the availability and viability of community facilities as part of the plan making process and to develop policies to safeguard against their unnecessary loss. The London Plan 2011 Policy 3.16 relates to community facilities. It now includes advice that "The suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered." Whilst this requirement to demonstrate need (or absence of need) may place additional costs on developers, it is necessary to ensure the Council continues to protect community facilities in the right locations to support growth and achieve sustainable communities.

9. Green Belt – The draft NPPF says that core Green Belt protection will remain in place and the test to preserve the openness and purposes of including land in the Green Belt will be maintained. The council’s approach is discussed at LPA9, Q.2, Paras. 3.1-3.2.

10. Green infrastructure – The draft NPPF encourages local planning authorities to take a more strategic approach to green infrastructure to give them a better understanding of the existing green infrastructure network and its functions in their area. Areas of green space of metropolitan significance, including for example Sites of Metropolitan Importance for Nature Conservation, Regionally Important Geological Sites, and the Blue Ribbon Network were identified jointly with the GLA. With regard to the creation of a strategic network of green infrastructure, the Council have recently commenced work with Design for London and neighbouring boroughs to develop a green infrastructure plan (All London Green Grid). The Council's approach is discussed in LPA9, Q.5, Para. 6.3.

11. Green Space designation – The draft NPPF introduces a new protection for locally important green space that is not currently protected by any national designation called “local green space”. The council's approach is discussed at LP9, Q.5, Paras. 6.1-6.3.

12. Clarification on which wildlife sites should be given the same protection as European sites - The council have prepared a Habitats Regulations Assessment Screening Report that was finalized and published in February 2011. Whilst there are no sites of European importance in the borough the screening report has considered the wider impact of the plan on sites in neighbouring boroughs. The findings of this report are there are no likely significant effects of the plan against the conservation objectives of a European designated site. Natural England has confirmed that they are happy with the council's approach.

13. Decentralised energy targets - The draft NPPF gives councils discretion to set their own targets to reduce carbon emissions from new development. The council's approach is discussed in LPA4, Q.3, Paras. 3.1-3.11.

14. Traveller sites - The new Planning Policy Statement for traveller sites will be reviewed and incorporated into the final National Planning Policy Framework. The council's approach is discussed in LPA3, Q.6, Paras. 5.1-5.5.

11. Relationship between Infrastructure Provision and Existing and Future Development

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

11.2 See LPA11, Q.2, Paras. 2.1-2.4.

Appendix 1: Suggested Amended Text and Maps for Appendix One

Appendix One: A Regional Context - The London Plan 2011

The London Plan 2011 sets out the overall spatial framework for development across London up until 2031 and is illustrated diagrammatically at Map 11. It indicates the amounts and types of development required over the next 20 years across London as a whole, and for West London, and in some cases, borough by borough. On this basis, the role of Ealing's Development Strategy is to relate the amounts and types of development (indicated in the London Plan) to Ealing's needs, and to indicate where and when development should be provided.

The London Plan requires that the local development framework supports economic development – taking advantage of Ealing's location between Central London and Heathrow, and promoting Park Royal, in the north east of the borough, which is the biggest industrial estate in Western Europe. The council must plan for a strong portfolio of industrial land, providing for a range of business needs – including the need to accommodate additional waste management facilities.

The Mayor of London supports proposals by Ealing Council to enhance the attractiveness of town centres – Acton, Ealing, Hanwell, Greenford and Southall - and manage their restructuring where necessary. It is also important to facilitate delivery of strategic transport priorities including Crossrail, improved bus services and more sustainable access to Heathrow Airport.¹

The London Plan indicates public transport accessibility levels (PTALs) across London and seeks to improve public transport accessibility. Subject to public transport capacity, areas with high PTALs can expect relatively high-density development. Low PTALs and limited public transport capacity can constrain development potential. Development can of course fund improvements. These factors are important in establishing the approach to development in Ealing's Development Strategy. Map 12 shows PTALs in Ealing.

¹ The effect of the Mayor's projected improvements in public transport are summarised in the London Plan at Chapter 6. See: <http://www.london.gov.uk/sites/default/files/LP2011%20Chapter%206.pdf>

The Mayor's plan requires that Ealing's expanding population be accommodated in sustainable communities, taking into account needs for social and community infrastructure. The London Plan highlights the environment, particularly improving air quality along the A40 and the North Circular Road, and providing open space – not only major green spaces such as Horsenden Hill and the Brent River Park, but the many small sites which add value to Ealing's environment.

The London Plan – Complementing Ealing's Development Strategy 2026

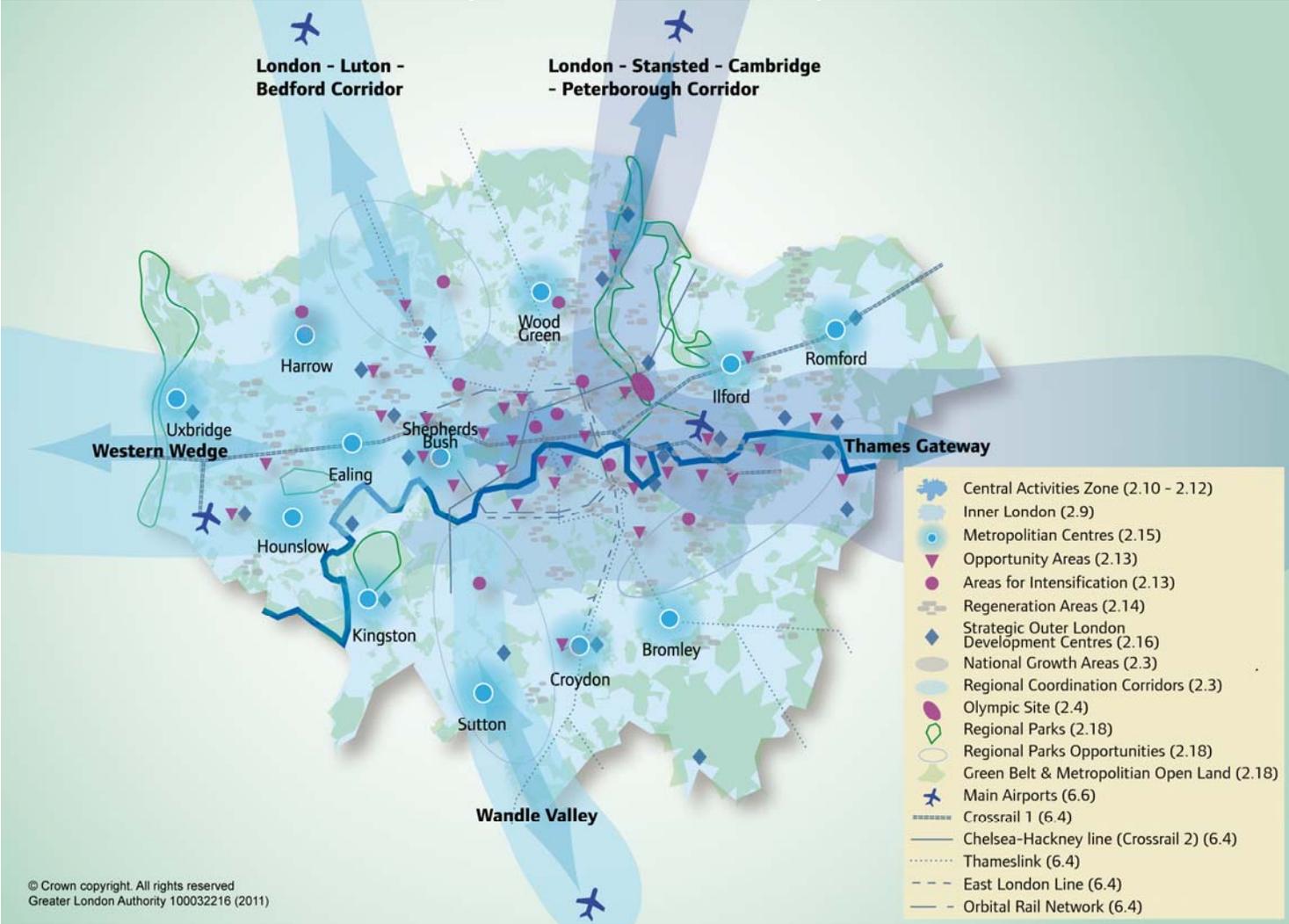
The London Plan is more than a context for local planning. Together with Ealing's development plan, it is the statutory basis for decisions on planning applications in the borough. As indicated above, the Ealing's Development Strategy will have policies on where and when development should be accommodated. The London Plan will complement these with a range of thematic policies setting standards for the quality of development and the environment (i.e. for all types of development in suburban, urban and central London). The proposals in Ealing's Development Strategy take account of these thematic 'quality' policies in the London Plan, and there is no need for them to be restated in the Ealing Development Strategy.

Strategic policies, whether in the London Plan or in Ealing's Development Strategy, deal with general principles. There is no local reason for the general principles set out in the London Plan not to apply in Ealing. However, the application of strategic 'quality' policies to individual sites and to on-going development management (i.e. the process of dealing with planning applications) does require careful consideration in the light of local circumstances. On this basis, Ealing's forthcoming Development Sites and Development Management documents together with the Ealing Proposals Map (and on waste matters, the West London Waste Plan) will establish specific development policies tailored to Ealing's local requirements.

The matters covered by the thematic policies in the existing London Plan are summarised below:

<p style="text-align: center;">London Plan 2011 – Thematic Policies</p> <p>London's Places: Sub-regions, Inner London, Outer London, Opportunity Areas, Town Centres, Strategic Industrial Locations</p> <p>London's People: Equal Life Chances, Health, Housing, Social Infrastructure</p> <p>London's Economy: Sectors and workplaces, Emerging sectors, Improving opportunities for all</p> <p>London's Response to Climate Change: Mitigation, Adaptation, Waste, Aggregates and contamination</p> <p>London's Transport: Integrating Transport and Development, Connecting London</p> <p>London's Living Spaces and Places: Place shaping, Heritage, Safety and Resilience, Pollution, Open and Natural Environment, Blue Ribbon Network</p> <p>Visit - http://www.london.gov.uk/publication/londonplan</p>

Map 11: Strategic Diagram for London
 (Source: London Plan 2011)



**Map 12: Public Transport Accessibility Levels in Ealing (from London Plan)
(Source: Transport for London 2010)**

