

Written Statement

Ealing Council Statement 2: Vision and Objectives LPA2

Tuesday 1st November 2011

EALING COUNCIL



1. Introduction

- 1.1 This written statement relates to Matter 2 – Vision and Objectives. The issues and questions to be addressed in this hearing statement are:
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?
 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?
 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?
 4. For the transport strategy to be justified should there be specific reference to the Mayor's London Transport Strategy.
 5. The introduction to policy 1.2 refers to including some agencies; to be effective all relevant agencies should be noted.
 6. Does policy 1.2(b) accord with emerging National Policy, if not, is the policy justified?
 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?
 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.
 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?
 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.

2. Soundness

- 2.1 **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?

- 2.2 This question is dealt with in the council's written statement to Matter 1 (See LPA 1, Sections 2 and 3, answers to Q.1 and 2).

3. Spatial Vision for Ealing 2026

- 3.1 **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?**

- 3.2 This question is dealt with in the council's written statement to Matter 1 (See LPA 1, Sections 2 and 3, answers to Q.1 and 2).

4. Relationship Between Deliverability and Transport Improvements

- 4.1 **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?**

- 4.2 The vision in the Development Strategy aims to steer development to the most accessible locations. The Uxbridge Road and the A40 corridors include some of the most accessible locations within LB Ealing.

- 4.3 The Uxbridge Road/Crossrail corridor is served by both high frequency bus services and the Great Western Mainline railway. It also contains the three largest town centres in the borough of Acton, Ealing Broadway (a Metropolitan town centre) and Southall (a major centre and opportunity area), London Plan 2011.

- 4.4 These locations offer a wide range of services within a short distance that minimises the need to travel and also have some of the highest Public Transport Accessibility Levels in the borough (based on current service provision).

- 4.5 The Uxbridge Road Corridor is designed as Corridor 1 in the Council's Local Implementation Plan and this corridor covers the whole of the Uxbridge Road in the Borough. The corridor will be delivered in four stages complemented by Major Scheme funding for Ealing Broadway Interchange and Southall Broadway. Full details of these are given in the LBE adopted LIP 2011-2014.

- 4.6 The A40 Corridor is served by the Central Line Underground, Chiltern rail services, bus services and the Piccadilly Line at Park Royal. It also contains Greenford town centre and the Park Royal Opportunity area.

5. Transport Strategy

- 5.1 **4. For the transport strategy to be justified should there be specific reference to the Mayor's London Transport Strategy.**
- 5.2 Reference is made to the Mayor of London's Transport Strategy in the supporting text to Policy 1.1 (see Page 18, last paragraph).
- 5.3 The LBE Adopted LIP 2011-2014 is compatible with and is extensively cross-referenced with the MTS 2010. The Mayor of London has acknowledged this by the formal approval of this document on October 12th 2011.

6. Delivery Agents

- 6.1 **5. The introduction to policy 1.2 refers to including some agencies; to be effective all relevant agencies should be noted.**
- 6.2 The council have striven to achieve a narrative structure that is short and concise and this list was never intended to be a full or exhaustive directory of all the agencies and partners that the council strives to work with. Therefore, the Council would welcome any further advice from the Inspector on this issue especially whether it is necessary to provide such a list and, if considered helpful, what additional agencies may usefully referred to.

7. New Office Development

- 7.1 **6. Does policy 1.2(b) accord with emerging National Policy, if not, is the policy justified?**
- 7.2 The draft NPPF proposes removing town centre uses from the existing sequential approach that favours town centre schemes over out of town ones (although it would keep this test for retail and leisure uses). In the absence of a regional spatial strategy this might be of particular concern to outer London boroughs like Ealing who are seeking to retain and attract office floorspace.
- 7.3 However, the London Plan 2011 seeks to consolidate and extend the strengths of diverse office markets outside Central London by focusing new office development on viable locations with good public transport locations and by enhancing the business environment including through mixed-use development (see REG29, Policy 4.2).
- 7.4 The most viable locations for the renewal and modernisation of the office stock in Outer London include town centre based office quarters. These findings are supported by both the London Office Panel Review (2009) and the Outer London Commission (2010).

- 7.5 In addition, the council has also undertaken a comprehensive Employment Land Review published in September 2010 (see EB20, especially the conclusions and recommendations at Para.10.29 to 10.45).

8. Managed Release of Employment Sites

- 8.1 **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?**

- 8.2 Apologies. There is a simple typographical error that has resulted in some of the text of this paragraph being scrambled. The last sentence of the third bullet point "as the final sentence" should be deleted. The last paragraph of the supporting text: "Proactive management of these areas will involve the limited transfer of 14 hectares to mixed use development over the plan period, coordinated through the Development Sites DPD." should be the final sentence of the first bullet point.

- 8.3 To provide additional clarity it is also suggested that:

- The preamble before the three bullet points refers to "classifying employment land" rather than "categorising employment sites".
- In the second bullet point it is proposed that: "and to be lost over time" be deleted.
- In the third bullet point it is proposed that the first sentence be amended as follows: "Smaller sites that have either been lost to residential or ~~have been~~ so heavily diluted by other uses to no longer function effectively as employment land."
- A further footnote should also be added with a reference to the Employment Land Review 2010.

- 8.4 For the avoidance of doubt the full supporting text to Policy 1.2 (b) should now read as follows:

"A net increase in office floorspace of up to 90,000 sq metres will be encouraged in Ealing Town Centre to ensure the office market there maintains a sustainable critical mass. Park Royal and, to a lesser extent, Greenford will also see a net increase in office floorspace. Whilst office development can still be suitable in other areas, there will not be an overall net increase in other areas during the plan period. {Footnote 30}.

Managed release of employment land will involve classifying employment land in three broad categories:

- Long-term protection - Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs) comprise the borough's strategic employment land and are the primary focus for general industrial and warehousing uses. Where appropriate, these sites may also accommodate office development. Proactive management of these areas will involve the limited transfer of 14 hectares [insert new Footnote 31] to mixed-use

development over the plan period, coordinated through the Development Sites DPD.

- Medium-term protection – Smaller sites that may have conflicts with neighbouring uses. To achieve the efficient use of land these will be protected by criteria-based development management policies, allowing release to non-employment uses only if a lack of demand is demonstrated.
- Short-term protection – Sites that have either been lost to residential or so heavily diluted by other uses to no longer function effectively as employment land. Where appropriate, these will be allocated for alternative use through the Development Sites DPD.

Footnote 30 – See Employment Land Review 2010.

Footnote 31 – See Employment Land Review 2010.”

9. Tall Buildings

- 9.1 **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.**
- 9.2 The Development Strategy identifies the possibility for tall buildings in selected town centres to support the Strategy’s spatial and environmental objectives. The revised policy 1.2 (f) suggested in the Statement of Common Ground between Ealing Council and English Heritage (see ED14) emphasises that these areas may be suitable for tall buildings and any consent will be dependent on the development of satisfactory proposals particularly in relation to the site context. Development briefs for individual sites will be produced in the Development Sites DPD, and detailed criteria policies for the determination of planning applications (including the Planning Decisions criteria from the London Plan 2011) will appear in the Development Management DPD.
- 9.3 The Development Management DPD will also define a tall building according to CABE/EH guidance as "buildings which are substantially taller than their neighbours and / or which significantly change the skyline".

10. Heritage

- 10.1 **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?**
- 10.2 General principles for the treatment of heritage and conservation are thoroughly covered in national and regional policy and it is the Council’s view that there is little value in reformulating and restating policy that is already set out elsewhere. This reflects the spatial rather than thematic approach of the Strategy overall and also its treatment of other areas, such as design, and sustainability. Where notable opportunities exist for the enhancement of the historic environment or for heritage-led regeneration these are identified in the appropriate Development

Strategy policies, for example Ealing Town Hall and Pitzhanger Manor in Policy 2.5. The substance of our proposals for heritage-led regeneration will be more appropriately placed in area specific planning documents such as the Metropolitan Centre Spatial Development Framework and the Southall OAPF, which will allow sufficient detail for such strategies to be properly articulated.

- 10.3 Discussions with English Heritage highlighted the usefulness of a Development Strategy implementation policy that sets out this spatial approach more explicitly. The proposed text of this policy is set out in the Statement of Common Ground between Ealing Council and English Heritage (see ED14).

11. Gypsies, Travellers and Travelling Showpeople

- 11.1 **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.**
- 11.2 This question is dealt with in the council's written statement to Matter 3 (See LPA 3, Section 5, answer to Q.6).