

# **Written Statement**

## **Ealing Council Statement 6: Uxbridge Road/Crossrail Corridor LPA6**

**Tuesday 8<sup>th</sup> November 2011**



## **1. Introduction**

1.1 The issues to be addressed in this hearing statement are:

**1. Most of the proposals set out in this section refer to the Development Sites/Management DPDs in some form. The LDS shows that the aforementioned DPDs are not expected to be adopted until 2013. Are the Development Sites/Management DPDs sufficiently advanced to justify the proposed figures in the Housing Trajectory?**

**2. Policy 1.2(b) has no indication of what the improvements would entail (e.g. are there specific additional bus routes planned?), who will be responsible for funding/implementing them and when will they be implemented?**

**3. Development and conservation are not mutually exclusive (Policy 3.1b). Should growth be inspired an understanding of the historic context as best practice in regeneration to be consistent with national policy?**

**4. Policy 2.4 supporting text refers to the need for further studies, did these not inform the CS; when and in what format will the studies be undertaken?**

**5. Policy 2.5(e) and (g) provide a wish list of changes/development to occur over the lifetime of the plan. There is no indication of how or when such features will be provided, and whether they will be justified and effective.**

**6. Key Policy 2.9 provides for the ongoing discussions regarding the Middlesex Business Centre (the Great Western Strategic Industrial location having been removed in the proposed changes) which will inform the comprehensive regeneration of the Havelock area. It is not clear how this will be coordinated – a separate DPD or SPD – the timing and whether it would be effective in the lifetime of the CS.**

**7. What is the current situation at Green Man Lane (explanatory text to policy 2.6), is the text still justified?**

**8. Is footnote 63 comprehensive and effective? Why are Maps 2 and 3 of the Atlas of Proposed Changes to the Adopted Proposals Map 2004 not relevant?**

## 2. Progress of Development Sites and Management DPDs

**1. Most of the proposals set out in this section refer to the Development Sites/Management DPDs in some form. The LDS shows that the aforementioned DPDs are not expected to be adopted until 2013. Are the Development Sites/Management DPDs sufficiently advanced to justify the proposed figures in the Housing Trajectory?**

- 2.1 Refer to Ealing Council Statement 1: Overall Context (LPA1) Issue 5 for an explanation of the relationship between the Development Strategy and Developments Sites and Management DPD; refer to Ealing Council Statement 3: Housing (LPA3) Issues 1, 2 and Appendix 1 for confirmation that the housing trajectory is supported by an up-to-date, credible and robust evidence base.
- 2.2 In particular, sites within the first five years of the housing trajectory have been assessed as deliverable (available, suitable and achievable) and sites from years 6 to 15 of the plan have been assessed as developable. The proposed figures are in the majority based on the London SHLAA constrained capacity for identified sites, which take as a starting point the mid-point of the density range for the applicable PTAL and setting to provide a realistic yield from individual housing sites.
- 2.3 However where further local level work on refining these figures has been carried out, for example through documents such as the Ealing Metropolitan Town Centre Development Framework, it is these figures that inform the housing trajectory. This approach is fully in accordance with national and regional policy and best practice guidance.
- 2.4 It should be pointed out that the London SHLAA at paragraph 8.7 suggests that boroughs may wish to draw on the SHLAA notional unconstrained capacities to estimate broad yields from the individual potential housing sites within the SHLAA. Through reliance on the SHLAA constrained capacities, unless further detailed work has confirmed that the identified constraints on a site can be overcome and produced revised figures, to inform the housing trajectory the Council considers that the figures presented are fully justified.

## 3. Bus Service Improvements

**2. Policy 2.1 (b) has no indication of what the improvements would entail (e.g. are there specific additional bus routes planned?), who will be responsible for funding/implementing them and when will they be implemented?**

- 3.1 Transport for London (TfL) is responsible for managing bus services across London. TfL Buses are responsible for the planning and scheduling and changing of services on the network as well as the provision and location of bus stands and flags. Nevertheless, LB Ealing will implement the following projects, which will improve bus services and servicing arrangements within the Uxbridge Road/Crossrail corridor:

- Corridor 1 Uxbridge Road (four stages);
  - Corridor 2 Ealing north-south;
  - Corridor 3 Acton north-south;
  - Corridor 4 West Ealing north-south;
  - Corridor 5 Southall north-south;
  - Ealing Broadway Interchange Major Scheme (funding allocated);
  - Southall Broadway Major Scheme (funding to be confirmed); and,
  - Borough-wide Bus Stop Accessibility Programme.
- 3.2 These schemes are referred to in the LBE Infrastructure Delivery Plan and further details are given in the LB Ealing adopted Local Implementation Plan 2011-2014. These schemes will be completed by 2014.
- 3.3 Transport for London will also implement the following projects in the Uxbridge Road/Crossrail Corridor, further details of which are given in the Mayor's Transport Strategy 2010:
- Bus network development (continuous review of service provision);
  - Countdown 2 bus passenger information system (to be completed in 2012); and,
  - New bus for London (implementation from 2012 onwards).
- 3.4 The Crossrail project is currently expected to be completed by 2019 and proposals for bus service improvements will be firmed up nearer this date when more accurate data (such as population details) to predict demand will be available.
- 3.5 Upon further reflection the council would like to suggest a minor change in the wording of Policy 2.1 (b) as to clarify that the council would not normally run and fund bus services as this is usually done by TfL. The suggested wording is as follows:

“To supplement the introduction of Crossrail, ~~make~~ ~~seek~~ improvements in bus services, capacity and servicing arrangements along the Uxbridge Road / Crossrail corridor.”

## 4. Conservation

### **3. Development and conservation are not mutually exclusive (Policy 3.1b). Should growth be inspired an understanding of the historic context as best practice in regeneration to be consistent with national policy?**

- 4.1 The spatial strategy for growth in Ealing is well informed by the Borough's historic context and strongly reflects its historic urban morphology. Heritage-led regeneration is a significant opportunity in the Borough and notable opportunities are identified where appropriate in DS policies, for example Ealing Town Hall and Pitzhanger Manor in Policy 2.5.
- 4.2 The substance of the proposals for heritage-led regeneration will be more appropriately placed in area specific planning documents such as the Ealing Metropolitan Town

Centre Spatial Development Framework and the Southall OAPF, which will allow sufficient detail for such strategies to be properly articulated.

## 5. Acton Main Line Station Area

**4. Policy 2.4 supporting text refers to the need for further studies, did these not inform the CS; when and in what format will the studies be undertaken?**

- 5.1 As stated in Policy 2.4(a), an upgrade to Acton Main Line station is planned as part of Crossrail; however Network Rail has yet to finalise design of the station. The supporting text refers to the need for further studies, as it would be premature to investigate improved bus routes/interchange facilities prior to the station design being finalized. Detailed transport modeling, public realm design, and negotiation with key stakeholders such as TfL around improved bus links can only be undertaken once the operational requirements of upgrading the station for Crossrail are confirmed.

## 6. Ealing Town Centre

**5. Policy 2.5(e) and (g) provide a wish list of changes/development to occur over the lifetime of the plan. There is no indication of how or when such features will be provided, and whether they will be justified and effective.**

- 6.1 The purpose of the Development Strategy is to articulate the intended spatial planning approach without going into matters of detail better dealt with in subsequent development planning documents. The justification for the changes/developments outlined in Policy 2.5(e) and (g) is provided through the ongoing public consultation undertaken as the Development Strategy progressed, and the extensive analysis of the town centre underpinning the Ealing Metropolitan Town Centre Development Framework. Therefore both 2.5(e) and (g) take account of the local context and needs of the town centre.
- 6.2 Policy 2.5(e) sets out the key ways in which the character of Ealing Town Centre will be preserved and enhanced, providing clear guidance to all parties bringing forward development in the town centre area about the Council's broad intentions for the area and therefore what proposals should provide and/or contribute towards.
- 6.3 Similarly, Policy 2.5(g) indicates the type of developments that are considered necessary to provide the range of cultural, heritage, social, sport and leisure facilities to support Ealing as the borough's main town centre. The list of key developments sought in the town centre has arisen as a result of public consultation (for example, the youth consultation emphasized the importance of a cinema) and the results of the Ealing Metropolitan Town Centre Development Framework.
- 6.4 Certain developments, such as the creation of a new health centre and the refurbishment of Ealing Town Hall and Pitzhanger Manor, will be led by the relevant statutory authorities. Otherwise, Policy 2.5(g) provides a clear indication to all parties

bringing forward development about particular gaps in provision that the Council is seeking to address; the developments sought by Policy 2.5(g) are congruent with other Council strategies which focus specifically on the delivery of key improvements.

- 6.5 Furthermore, the Council is using the Development Sites DPD as a mechanism to bring forward the redevelopment of a number of sites through joined up working with private and public landowners and developers, which have the potential to contribute significantly to the achievement of the objectives of Policy 2.5(e) and (g).

## 7. Havelock Area

**6. Key Policy 2.9 provides for the ongoing discussions regarding the Middlesex Business Centre (the Great Western Strategic Industrial location having been removed in the proposed changes) which will inform the comprehensive regeneration of the Havelock area. It is not clear how this will be coordinated – a separate DPD or SPD – the timing and whether it would be effective in the lifetime of the CS.**

- 7.1 As mentioned in the supporting paragraph to Policy 2.8, Southall is designated as an Opportunity Area in the London Plan 2011. The Council is currently working with the GLA on an Opportunity Area Planning Framework/SPD for Southall, through which the comprehensive regeneration of the Havelock area will be coordinated. The anticipated timescale for adoption of the OAPF is early 2013; delivery is fully within the lifetime of the Development Strategy.

## 8. Green Man Lane

**7. What is the current situation at Green Man Lane (explanatory test to policy 2.6), is the text still justified?**

- 8.1 As of September 2011, demolition of Green Man Lane and the construction of new homes are underway. The first occupants are expected to move in Spring 2012, with full completion of the estate regeneration programme within five to seven years. The Council has secured the required compulsory purchase orders, and a delivery partnership and legal agreement is in place.
- 8.2 Green Man Lane falls within Ealing Metropolitan Centre, which has the highest potential for developing decentralised energy networks within the borough. Condition 36 of the planning permission ties the developer to demonstrate that the energy centre at Green Man Lane be designed to allow for future connection to any decentralised energy network. Policy 2.6 covers the Green Man Lane Estate and the wider area, so that any developments that come forward in close proximity to Green Man Lane will have to future proof their energy centres to be ready to connect into a decentralised energy network should one become available off-site.

- 8.3 In light of the current situation at Green Man Lane, the explanatory text is no longer justified and is therefore proposed to be updated as follows:

*Green Man Lane was identified as in need of regeneration in 2005. Work with residents identified that they felt unsafe on the estate, many people were overcrowded, crime and security were key issues, and the majority of residents were dissatisfied with the quality, condition and management of the homes and the estate generally as a place to live. In addition, there were fundamental design and construction issues with Green Man Lane.*

*Comprehensive redevelopment was confirmed as the most appropriate solution in January 2008, to address the issues identified above and increase the supply of private and affordable housing, while contributing to the regeneration of West Ealing Broadway. A Master Plan for the redevelopment was approved in 2010, and in 2011 the Council secured the required Compulsory Purchase Orders and put in place a legal agreement and delivery partnership. The first occupants are expected to move in Spring 2012, with full completion of the redevelopment programme completed within five to seven years.*

*Together with Ealing Town Centre, Green Man Lane is considered to have the second highest potential for developing a district energy network. The energy centre at the Green Man Lane redevelopment has been designed to allow for future connection to any decentralised energy network, and any developments that come forward in close proximity to Green Man Lane will also have to demonstrate the same. Further information on how a potential network could be established can be found in the borough's Heat Map study.<sup>59</sup> (footnote remains unchanged)*

## **9. Southall Town Centre**

### **8. Is footnote 63 comprehensive and effective? Why are Maps 2 and 3 of the Atlas of Proposed Changes to the Adopted Proposals Map 2004 not relevant?**

- 9.1 Map 1 shows the existing Southall Town Centre boundary, Map 2 shows the proposed amendments to the Southall Town Centre boundary, and Map 3 shows the proposed Southall Town Centre boundary and the proposed King Street Neighbourhood Centre boundary. On further consideration Maps 2 and 3 are relevant, therefore to ensure footnote 63 is comprehensive and effective Maps 2 and 3 should be referenced in addition to Map 1 of the Atlas of Proposed Changes to the Adopted Proposals Map 2004. It is proposed that footnote 63 be revised as follows:

<sup>63</sup> *See Maps 1, 2 and 3 in Atlas of Proposed Changes to the Adopted Proposals Maps 2004 which illustrates in map form and proposed changes that arise from this Development Strategy and other draft Development Plan Documents.*