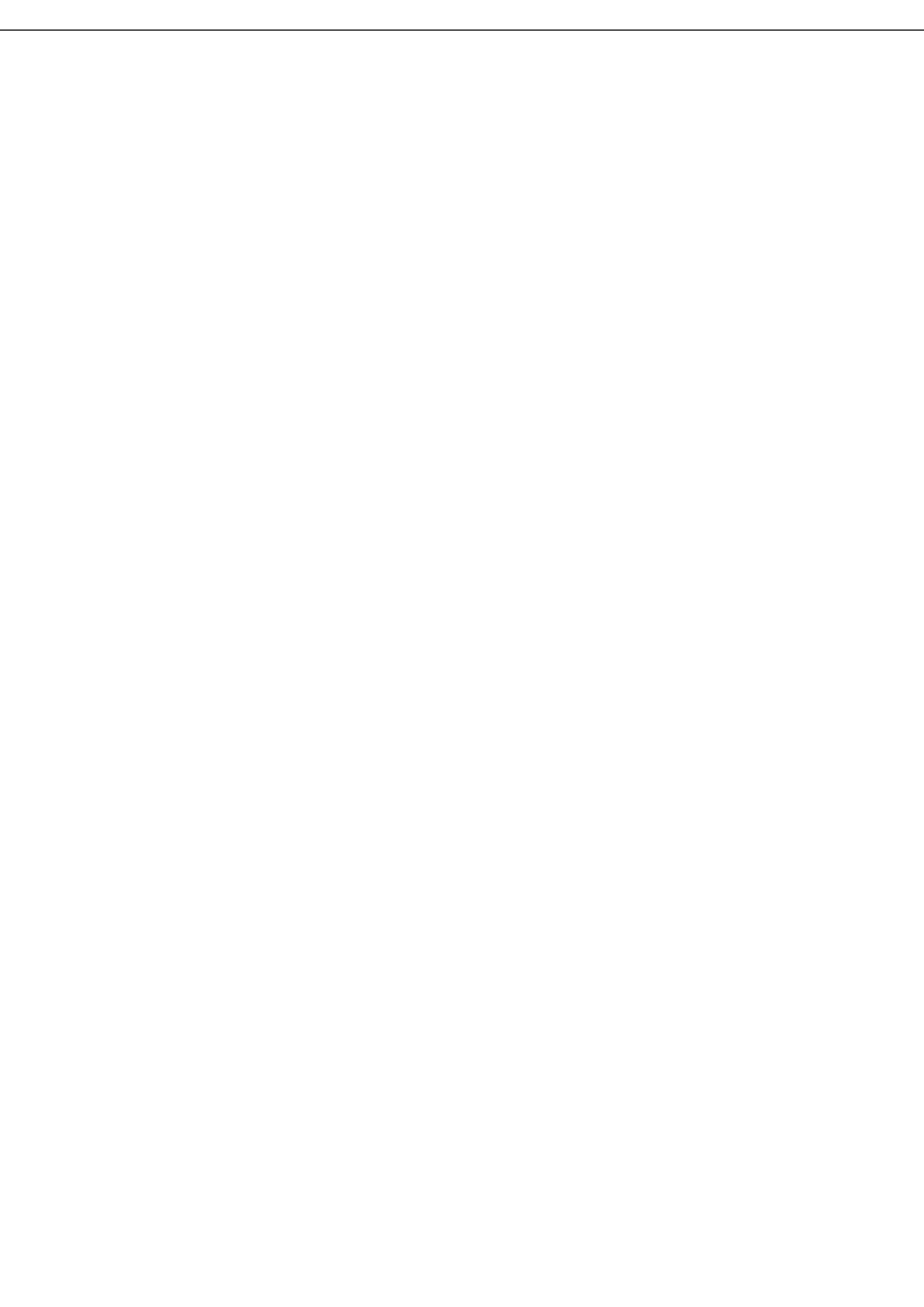


# Written Statement

## Ealing Council Statement 8: Residential Hinterlands LPA 8

Thursday 10<sup>th</sup> November 2011

EALING COUNCIL



## 1. Introduction

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

1. Is development of the Greenford Depot proposed in Policy 4.3 pre-empting the West London Waste plan and would this development compromise the ability of the Borough to deal with waste in the future?

2. The plan proposes to explore, investigate and further assess options, thereby providing little certainty that such options will be implemented. Is for example policy 4.4(b) (c) (d) and (e) akin to an issues and options paper rather than guiding development over the next 15 years.

3. Is there a commitment from service providers to undertake any of the proposed north-south routes or is it only initial feasibility work that is emerging. Will the proposal offer support for investment in the Borough over the lifetime of the CS?

1.2 Issues 2 and 3 will be addressed jointly as both are concerned with the deliverability of the proposals in policy 4.4.

## 2. Regenerate Greenford Depot

**1. Is development of the Greenford Depot proposed in Policy 4.3 pre-empting the West London Waste plan and would this development compromise the ability of the Borough to deal with waste in the future?**

2.1 Whilst the depot at present is Ealing's main base of operations for its waste services including its household waste and recycling centre, the site accommodates a range of other Council services and uses, including an archiving centre, vehicle depot and maintenance area, refuse collection base, salt barns, warehousing and ancillary offices etc. The current configuration of uses on site is not ideal. The redevelopment of this site presents an opportunity to reconfigure uses in the interests of optimising the available space. This policy therefore seeks to optimise the capacity of these services without compromising their ability to operate from this site.

2.2 With regard to the existing waste functions (which are already safeguarded through the London Plan), the Council through its waste plan is seeking to ensure that any such proposals maximise the management throughput/capacity on this site. Policy 4.3 therefore seeks to ensure that this position is not prejudiced, whilst also recognising the important wider functions of this site. At present the waste operations on the site function as a transfer facility, and do not contribute towards meeting the apportionment target in the London Plan.

2.3 In relation to any future proposals on this site the policy recognises the need for sensitive design and consideration in relation to neighbouring uses and land. In

this regard the waste plan and Development Management DPD will also comprise policies to guide the determination of planning applications.

### **3. Promote North-South Links**

**2. The plan proposes to explore, investigate and further assess options, thereby providing little certainty that such options will be implemented. Is for example policy 4.4(b) (c) (d) and (e) akin to an issues and options paper rather than guiding development over the next 15-years.**

**3. Is there a commitment from service providers to undertake any of the proposed north-south routes or is it only initial feasibility work that is emerging. Will the proposal offer support for investment in the Borough over the lifetime of the CS?**

#### **Assessing the deliverability of objectives**

3.1 PPS12 sets out that development strategies should demonstrate that its objectives have a realistic prospect of being delivered by stating when, where and by whom they will be delivered as far as practicable, explaining which partners were involved in its preparation and how resources were given consideration, and through sound infrastructure planning. The relevant evidence should also support them. They should also be consistent with other plans and strategies relating to adjoining areas. PPS12 however recognises that deliverability cannot sometimes fully be ensured due to the lack of budgeting of delivery agencies and that policies should not put undue reliance on funding where it has not been identified. However they should be flexible and show how they handle contingency. The following sections demonstrate that proper consideration is being given to the deliverability of key objectives under policy 4.4 and that a proper monitoring framework is in place.

#### **Consistency with Existing Policy Frameworks and Evidence**

3.2 Policies 4.4 (a), (b), (c), (d), (e) and (h) are referred to both in the LB Ealing Local Implementation Plan (LIP) 2007 (transport policies and projects followed until 2011) and the adopted Local Implementation Plan 2011-2014. The LIP 2007 is consistent with the Mayor's Transport Strategy 2001 and the London Plan 2004. The adopted LIP 2011-2014 is consistent with the revised Mayor's Transport Strategy (MTS) 2010 and the London Plan: Spatial Development Strategy for Greater London, 2011.

3.3 Policies are designed to allow flexibility, and in particular, allow the borough to take advantage of situations when additional funding becomes available, for instance the recent Biking Borough and Outer London funding awards.

3.4 Both the LBE 2007 LIP and LBE adopted LIP 2011-2014 were subject to full public and stakeholder consultations. The public, neighbouring boroughs and over 100 local community organisations were formally invited to comment on each plan, including the Metropolitan Police and Ealing Passenger Transport User Group. The 2007 LBE LIP was approved by Council's Cabinet and

- Transport for London (TfL). The adopted LIP 2011-2014 has been approved by Council Cabinet and is currently awaiting approval from the Mayor of London.
- 3.5 Policy 4.4 (a) will be implemented in a first phase by 2012 (train and signaling improvements) with a possible second phase likely around 2020 (source MTS 2010). Policies 4.4 (b) and (c) are not fully funded currently, but can be implemented in part using alternative means.
  - 3.6 Policies 4.4 (d) and (e) are not currently funded and but are included in the Core Strategy so that they can be pursued should funding become available in the future.
  - 3.7 Policies 4.4 (f) and (g) are proposals from the Greenford Green Land Use and Transport Strategy 2006. Policy 4.4 (g) is not currently funded and but is included in the Core Strategy so that it can be pursued should funding become available in the future.
  - 3.8 The adopted LIP 2011-2014 identifies specific north-south corridor projects across the borough, including Acton-Park Royal, Ealing Broadway, Greenford and Northolt, in order to implement policies 4.4 (b), (c), (f) and (h). LBE has already completed feasibility work for these corridors and will implement in full by 2014. These are multi-modal corridors to be implemented on the public highway (including improvements for walking, cycling, buses and general traffic).
  - 3.9 London Buses will provide service enhancements (including north-south routes), with new vehicles from 2012 and regular reviews of the bus network (policies 4.4 (b), (c), (f) and (h) and MTS 2010).
  - 3.10 In addition, the West London Sub-Regional Transport Plan 2010 (TfL) identifies the following north-south corridors for improvements:
    - Wembley - Ealing (relevant to policy 4.4 (b))
    - Ealing - Brent Cross (relevant to policy 4.4 (c))
    - Heathrow - Harrow (relevant to policy 4.4 (h))
  - 3.11 Furthermore, the draft Network Operating Strategy (TfL, May 2011) proposes a corridor management approach to be taken on the TfL Road Network (TLRN) to facilitate more effective movement across all transport modes. This is relevant to both the A406 and A312 north-south corridors in LB Ealing for policies 4.4 (b) and 4.4 (h) respectively.
  - 3.12 The North and West London light rail link and an extension to the Greenford service linking with London Overground services east of Acton have been investigated further in the last twelve months. Given they are not currently funded or included in the Mayor's Transport Strategy 2010 or in the West London Sub-Regional Transport Plan 2010 nor the LB Ealing adopted Local Implementation Plan (LIP) 2011-2014, these schemes will not realistically be built during the Core Strategy period and are therefore not being progressed at this point in time.
  - 3.13 Growth in population in the residential hinterlands is one of a series of factors that is included in the selection of Corridors and Neighbourhoods. Information is

gathered on elements such as planned new developments, demographic changes and future forecasts to help inform the identification of future transport investment. Additionally, TfL LIP funding is allocated to the borough on needs-based criteria that includes population and deprivation levels. General infrastructure needs for areas included in residential hinterlands are factored in as part of the Infrastructure Delivery Plan which assesses infrastructure needs in different parts of the borough in relation to population projections which integrate not only planned housing data but birth-rates and migration levels.

### **Monitoring Arrangements/ Contingency Planning**

- 3.14 The Core Strategy makes the necessary monitoring arrangements to handle contingency, through sound infrastructure planning. Policy 6.1 of the Development Strategy sets out that the IDP will identify and promote improvements needed to and from development hubs, which will include enhancing North/South links within the borough as well as orbital journeys.
- 3.15 The IDP in its transport section ascertains that the list of priorities, interventions and challenges needs to be refined, and clarify the projects and interventions upon which the Council will focus through the LDF and the accompanying transport plan as well as determining the level of funding and transport available.
- 3.16 The MTS 2010 includes a monitoring framework. This encompasses the TfL Annual Report (covering policies 4.4 (a), (b) and (c)), plus the Annual Travel in London Report (covering policy 4.4 (c)).
- 3.17 The adopted LIP 2011-2014 contains a performance-monitoring plan, which includes a target on bus journey time (monitoring policies 4.4 (f) and (h)).
- 3.18 TfL continuously monitor the borough's progress for the implementation of projects through the live Programme of Investment on the Borough's Portal system. Also a three-year impact report on the policy and project outcomes of the LIP 2011-2014 will be required for submission to TfL in April 2014. These are relevant to the corridors programme for policies 4.4 (b), (c), (f) and (h).
- 3.19 Should policies 4.4 (d), (e) and (g) be implemented, appropriate monitoring arrangements will be established for each of these.

### **Conclusions**

- 3.20 We suggest the following revised wording in policy 4.4 (a) & (c):
  - 4.4 Promote North-South Links:
    - (a) To seek improvements to the North London Line and services in the borough.
    - (c) To further explore opportunities for improving orbital journeys from southwest London through Ealing Broadway to north London.
- 3.21 The justification for these changes are:

#### 4.4

(a) Improvements to the North Line London come under the jurisdiction of TfL which is outside the control of LB Ealing.

(c) WestTrans, the sub-regional transport partnership led by LB Ealing, is currently undertaking feasibility work on a series of identified corridors from the West London Transport Plan including a number of orbital routes through Ealing Broadway