

Written Statement

Ealing Council Statement 11: Public Services, Retail and Employment Uses LPA11

Thursday 10th November 2011

EALING COUNCIL



1. Introduction

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

1. Does the Core Strategy provide an appropriate, effective and soundly based framework for the provision of a range of public facilities and services?

2. Is the proposed retail hierarchy soundly based, fully justified and consistent with national policy?

3. Is the strategy and policies for the economy and the provision of employment land soundly based, effective, deliverable and appropriate for this Borough, supported by a robust and credible evidence base, and consistent with national policy?

2. Public Facilities and Services

1. Does the Core Strategy provide an appropriate, effective and soundly based framework for the provision of a range of public facilities and services?

2.1 The Development (Core) Strategy, in Chapter 6, outlines the Council's infrastructure planning work. This work has resulted in production of an Infrastructure Delivery Plan (IDP) (EB 25 – part of the evidence base for the Strategy) and Infrastructure Delivery Schedule (IDS) (Appendix 3 of the Development Strategy) which summarises what, when, why, where and who will deliver the required infrastructure (including public facilities and services) to support the amount of growth identified in the Development Strategy. This includes a range of physical, social and green infrastructure. The Development Strategy confirms that a balance of each type of infrastructure is required to support the identified growth and create sustainable communities. Collation of the information has been through liaison with many and varied infrastructure/service providers and has sought to reflect as much detail as possible on their planned infrastructure provision over the plan period.

2.2 Chapter 6 of the Development (Core) Strategy confirms that whilst most detail is provided in the IDP for the first 5 years, it covers the same 15-year period as the Strategy. The IDP also includes sensitivity testing around high/low population projections, as well as identifying risks to delivery and contingencies.

- 2.3 The IDP and IDS identify planned infrastructure by type, and also by area. Infrastructure provision by area is summarised in area-based policies throughout the Development (Core) Strategy and in the Neighbourhood profiles (DS Appendix 2). The IDP also includes Section 3.4 'Linking Infrastructure to Growth' (see p25, Figure 9) which sets out infrastructure provision in relation to anticipated population growth, for periods 2010-15 and 2016-25.
- 2.4 As such, the Core Strategy sets the framework for the IDP. It is considered to provide an appropriate, effective and soundly based framework for the provision of a range of public services and facilities.

3. Retail Hierarchy

2. Is the proposed retail hierarchy soundly based, fully justified and consistent with national policy?

- 3.1 The borough's retail hierarchy is set out within the Development (Core) Strategy on Map 5 (see p.17).
- 3.2 In May 2009, Ealing and other London boroughs provided a wide range of town centre survey information to the GLA as part of their Town Centre 'Health Checks'. This included information on the scale, mix of uses, financial performance and accessibility of each centre, and has informed the town centre network identified within the adopted London Plan 2011 (see Policy 2.15 'Town Centres'). The retail hierarchy within Ealing's Development Strategy is consistent with the designations in the London Plan 2011. This relates to the designations of Metropolitan centre (Ealing), Major (Southall), District (Acton, Greenford and Hanwell) and (11) Neighbourhood centres. Ealing is designated in the London Plan 2011 as one of 12 Metropolitan centres across London.
- 3.3 In order to provide up-to-date evidence to inform the Development Strategy, Ealing jointly commissioned a Retail Needs Study with two adjacent boroughs, London borough of Hounslow and Hammersmith and Fulham. The studies were undertaken and reports produced in 2007 and then updated in 2010. These examined the health, function and potential floorspace requirements for each town centre over the plan period. The floorspace requirements are set out in Ealing's Development (Core) Strategy Policies 2.2b (Acton), 2.5a (Ealing), 2.7c (Hanwell), 2.8b (Southall) and 3.5a (Greenford). The potential retail floorspace quantum is considered to be consistent with the existing hierarchy of the centres.

- 3.4 Furthermore, the Council will commission further updates to the Retail Needs studies within the next 5 years in order to maintain an up-to date evidence base.
- 3.5 The proposed reconfiguration of Southall town centre is identified in Development Strategy Policy 2.8b. The proposed alterations have appropriately taken into account changes that will arise from new development. They include part extension of the town centre and part de-designation.
- 3.6 Ealing has also identified 'designated shopping frontages' across the borough within the UDP (2004) to protect and encourage retail uses in certain locations, in an attempt to consolidate the retail core of town centres and to provide convenient access to local shops from all residential areas. Development Strategy Policy 2.7c makes specific reference to this proposed consolidation in Hanwell. Furthermore, on the basis of current survey work of the designated frontages (commenced August 2011 and ongoing), the designated shopping frontages across the whole borough are being reviewed and will be revised/carried forward as appropriate to inform policies in the emerging Development Management (DM) DPD.
- 3.7 The council considers that the proposed retail hierarchy meets the requirements of PPS 4 policy EC3.1 which asks local authorities to "define a network and hierarchy of centres that is resilient to anticipated future economic changes to meet the needs of their catchments..."
- 3.8 Furthermore, the council considers that its lower tier hierarchy responds to the requirements of the London Plan 2011 that states that boroughs should "identify other smaller centres to provide convenient access, especially by foot, to goods and services needed on a day to day basis..." (London Plan 2011, Policy 2.15C b).
- 3.9 Clarification on the role of neighbourhood centres has already been addressed in response to rep 66 in EAL12b.
- 3.10 In light of the above, the Council considers the proposed retail hierarchy is soundly based, fully justified and consistent with national policy.

4 Economy and Employment land

3. Is the strategy and policies for the economy and the provision of employment land soundly based, effective, deliverable and appropriate for this Borough, supported by a robust and credible evidence base, and consistent with national policy?

- 4.1 The evidence base for the economy and provision of employment land is provided by the Employment Land Review (September 2010)(see EB20).
- 4.2 The study assessed the future demand for employment land, compared it with the land supply under UDP policies, and made policy recommendations accordingly. The study dealt with two broad land uses: industry/warehousing and offices. The study analysed how far existing employment sites should be safeguarded from redevelopment for other uses, whether more land should be identified for employment uses, or whether land should be released from employment use. Overall, the ELR recommended few sites for immediate release from employment use.
- 4.3 The ELR also made recommendations about the type of employment land that will be need for the future. Industrial employment in Ealing and London generally has been decline for many years as the structure of the economy has changed, so the study assessed whether what had been considered previously good sites may be optimal for modern office type activities, or indeed even if there is a demand for office type activities.
- 4.4 The ELR found that the industrial sector is key to the economy of the borough, and correspondingly Policy 1.2(b) gives long-term protection to Strategic Industrial Locations (SILs, as designated by the London Plan 2011) and Locally Significant Industrial Sites (LSISs, as defined by the London Plan 2011 Policy 4.4); LSISs replace the UDP designation of Major Employment Location.
- 4.5 Policy 1.2(b) affords medium-term protection to sites currently in employment use and designated as Employment Sites in the UDP; however the Employment Sites designation has not been carried forward in favour of a more flexible approach to smaller sites through criteria based policy in the emerging Development Management DPD.
- 4.6 Other than at Ealing and in the Southern Gateway of Park Royal, the ELR did not identify a significant demand for office space, and policies reflect the need to direct office development to Ealing Town Centre to maintain a critical mass; the local market in other centres will be adequately served by development of small offices in town centres as demand requires. This approach is supported by the London Office Policy Review (GLA, 2009) and in line with Policy 4.2 of the London Plan 2011, which directs boroughs to focus office capacity where there is strategic as well as local evidence of demand.
- 4.7 The study extended beyond the usual ELR in that it had a clear focus on planning for economic growth and regeneration, in seeking to answer whether, and how, Ealing can continue to accommodate Use Class B1, B2 and B8 employment, and how this objective should be taken forward in the

LDF so that strategic and local economic development is achieved within the borough.

- 4.8 A particular need identified was for low-cost, smaller spaces for light industrial businesses and start-ups, particularly in the food-manufacturing sector in Southall. The Southall OAPF will investigate this potential and promote smaller spaces if appropriate. The ELR also looked at the potential impact that Crossrail may have on Ealing's economy.
- 4.9 The strategy and policies for the economy and provision of employment land are based on an in-depth analysis of the borough's local and wider economic circumstances and future needs. In particular, the Development Strategy clearly directs office development to Ealing Town Centre, the most appropriate location, and provides strong protection of the industrial land base that is a key driver of the borough's economy. The Council is confident that this is a justified, effective and deliverable approach, and satisfied that the approach is in accord with national and regional policy.

5 Other issues arising from representor's further statements on Matter 11 not already addressed above or in the Council's other responses

- 5.1 In response to the Representations from Judy Harris and Tony Miller, DS Policy 6.2 'Social Infrastructure' provides an indicative (but not exhaustive) list of infrastructure proposals/requirements. The IDP appropriately contains more of the detail on a wider range of planned infrastructure, including arts and culture. IDP Section 8.10 confirms the Council's commitment to refreshing the cultural strategy and includes examples of proposals including arts and cultural uses at Ealing Town Hall.
- 5.2 The IDP confirms in section 1.6 that options for delivering infrastructure include using existing assets better and more efficiently, through investing in current sites. Whilst new infrastructure will in some instances be provided as part of new developments, not all new infrastructure will therefore require new sites.

6 Conclusions

For the reasons outlined above, the Council considers:

- The Development Strategy provides an appropriate, effective and soundly based framework for the provision of a range of public services and facilities.
- The proposed retail hierarchy is soundly based, fully justified and consistent with national policy, and

- The strategy and policies for the economy and the provision of employment land soundly based, effective, deliverable and appropriate for this Borough, is supported by a robust and credible evidence base, and is consistent with national policy.

No minor changes are suggested.