London Borough of Ealing  
Development (or Core) Strategy Submission Development Plan  
Document – Independent Examination

Matters 6 & 7 – Uxbridge Road/Crossrail Corridor and A40/Park Royal Corridor

Additional submission by Tony Miller on behalf of Ealing Borough Liberal Democrats

Outer London spatial structure: Ealing’s Core Strategy (CS) and the “star and cluster” approach.

In reply to some of the discussion at the public hearing on Thursday 3 November about whether the CS observed the “star and cluster” concept of the finally adopted London Plan (LP), it was stated on behalf of the Council that the two corridor approach as set out in Policy 1.1(b) and the Key Diagram was derived from and consistent with the LP. This note comments on that claim.

One of the most significant changes in the LP published in July 2011 from the 2008 Consolidated London Plan is the emphasis on the development of local centres in Outer London, largely as a result of the work of the Outer London Commission. In a joint presentation between the GLA, DEMOS and the LSE on 30 June 2011 (The Regional Picture: Planning for Outer London)¹, attention was drawn to the move to a concentric pattern with polycentric development, rather than the previous linear and radial approach. The changes to reflect this approach are explained in LP paragraphs 2.25 to 2.28 and are contained in the Key Diagram (page 73) as well as Policy 2.6, the following explanatory paragraphs 2.29 & 2.30, and Policies 2.7, 2.8 and 2.16.

The Mayor had established the outer London Commission with the remit to examine the potential for economic growth in outer London, and its recommendations included:

1- Spatial Structures:  
a) We recommend that outer London’s existing spatial structure should be developed as necessary to support its future development and regeneration. The development of outer London should be modelled on a “star and cluster” structure focused on the existing town centre network. [My emphasis.] We support the concept of strategic outer London development centres where these will accommodate sufficiently the scale and nature of growth likely to occur.  
b) We endorse the opportunity/intensification area designations in the London Plan, and recommend that the process of preparing planning frameworks for them should be accelerated and that opportunities for designation of new areas should be considered.

¹ [Link or reference to presentation]

http://www2.lse.ac.uk/geographyAndEnvironment/research/london/events/londonDevWorkshops/newlon
donenvironment/outerLondon/BPurssell.ppt#14
The OLC’s interim report was published in July 2009, and the final one in June 2010. Ealing’s draft consultation *Development Strategy 2026 - Initial Proposals* was released on 1 September 2009, before the OLC’s final report was published. The opening paragraph of Appendix Two (The London Plan: A Context for Ealing’s Development Strategy) (repeated in the corresponding Appendix One, page 71 of the CS) makes it clear that this context was the 2008 Consolidated London Plan, and that it was too early for the OLC’s work to be considered. The approach to the corridors in its Key Diagram (Map 1 – page 8) is clearly based on a development and extension of the corresponding Key Diagram in the 2008 London Plan (page 59).

The OLC’s recommendation was quoted in detail in Ealing’s Employment Land Review (Roger Tym & Partners with LSH Sept 2010, p.12), which is one of the documents used as Ealing’s evidence base. Nevertheless no changes have been reflected in the Key Diagram in the CS, which remains unaltered except that development is even more concentrated in the two corridors than previously.

It appears that the Council did not re-examine the policy basis for its approach in the light of the important change in emphasis in the LP, with which I submit it is no longer in conformity.