

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

Inspector: Elizabeth Fieldhouse DIPTP DIPUD MRTPI
Programme Officer: Caroline Caldwell
Email: ldfprogrammeofficer@gmail.com
Tel: 020 8825 7944

**Mr Guest email
14th November 2011**

In addition to my request to speak at the examination of Matter 12 “UDP Policies Saved/Superseded” I would be grateful if you could forward this email and attachment to the Inspector and the LDF Team at Ealing Council as it sets out some of the concerns I hope to raise at the session.

I fully accept that policies will need to be deleted as they become replaced by successor policies or, exceptionally, if it is considered that they are no longer applicable.

My concern is to avoid the premature deletion of the detailed provisions of the current policies where these detailed provisions are not incorporated in immediately operable successor policies. Were this to occur there could be the risk that planning applications could be brought forward in the “interregnum” after the deletion of the UDP policies and before successor detailed Development Management policies have passed through their examination and been adopted.

The risk seems to lie in the differing nature of the London Plan, Ealing’s Development (Core) Strategy and Ealing’s UDP and its associated SPG’s and SPD’s.

While the London Plan and the Development (Core) Strategy are strategic in nature, the UDP is a combination of both strategic and detailed guidance.

When considering the possible deletion of UDP policies we need to test the soundness of deleting the constituent detailed provisions of each policy and not just the deletion of its headline introductory paragraph.

To facilitate this testing I’ve attempted to list every provision of the policies that forms part of Chapters 4 Urban Design and Chapter 5 Housing in the UDP, along with a key policy from Chapter 8 Community Facilities.

Ideally the Council would complete the Comments section against each policy sub-paragraph with a reasoned justification as to why it should be retained or deleted, along with guidance as to the period for which it should be retained if that was proposed. This would demonstrate the soundness of proposed retentions and deletions.

I’ve inserted a few notes in the comments column which may help the start of this detailed review.

An additional complication is the forthcoming London SPG on Housing. At present we are waiting for a consultation draft of this document along with a successor to the interim edition of the Mayor's London Housing Design Guide.

I am also concerned at the proposed deletion of certain of Ealing's SPG's and SPD's.

I note that the March 2010 edition of Ealing's Local Development Scheme states: "When UDP policies cease to be saved in the Local Development Framework, the SPG relating to these policies can no longer be retained within the local development framework." (Page 9, Paragraph 2.7)

There seems to be the possibility that the detailed provisions in certain of Ealing's SPG's and SPD's could be lost if their "parent" UDP policies were deleted.

I have noted my concerns over the proposed deletion of SPG's 14 and 16 in my emails copied below and wish to comment on this at the hearing.

‘