

Council Response to Further Questions (November 28th 2011)

This schedule deals with any further proposed minor changes suggested by either the Inspector or representors during the public hearing sessions where the Council have determined that no change is considered appropriate together with a brief reasoned justification.

| Reference | Policy/ Paragraph | Suggested Change | Explanation |
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| 1. | Preface, Para 6 | The Inspector asks the council to check the reference as to why only 4 of the 5 Crossrail stations are planned to be refurbished | This is correct. All of the stations except Hanwell will be refurbished. |
| 2 | 1.1 (h) | To Council were asked to consider Bob Gurd's amendment (on behalf of Ealing Civic Society): "To care for the borough's historic character <u>heritage assets</u> , ensure excellence in urban design and design out crime to make Ealing's environment safe, accessible for all." It was later suggested that this be amended to: "To care for the borough's historic character <u>and heritage assets</u> , ensure excellence in urban design and design out crime to make Ealing's environment safe, accessible for all." | The proposed first alteration risks narrowing and therefore weakening the policy by reducing the scope of the protection offered from the historic environment as a whole to individual elements of that environment. As such, LBE cannot support this proposal. The latter amendment is considered superfluous in the light of FPMC13 which was inadvertently omitted by the Council and which now deals with this issue. |
| 3 | 1.1 (j) | The Council were asked to consider Nic Ferriday's amended wording as follows: "To reduce the environmental impact of activities within the borough, <u>making a requisite contribution</u> | Whilst reference to the UK, and EU limits/levels for air pollution and noise is helpful, perhaps this level of detail is better provided as part of the supporting text as follows: It is expected that the design of all development will achieve |

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| | | <u>(as relevant to a spatial strategy), to bringing air pollution within UK and EU limits, and bring ambient noise levels within WHO and EU recommended levels, achieving and maintaining a clean and healthy environment for all communities to enjoy.”</u> | high standards of sustainability and provide for climate change adaptation and mitigation. In addition new development will be expected to contribute to improving the quality of life in the borough through the reduction of noise pollution, protecting soundscape quality, reducing pollutant emissions and minimising public exposure to pollution, in line with UK, EU and international levels/limits. |
| 4. | 1.1 New Bullet Point (I) | The Council were asked to consider Nic Ferriday’s additional bullet point as follows: <u>To promote design (e.g. public space) and new facilities (e.g. community centres and cultural facilities) that will encourage and support community engagement and altruistic activity (e.g. volunteering, public events and democratic involvement.</u> | Addressing and encouraging community support and altruistic activity is a complex task and one with the current government has chosen to address through a package of measures of which planning is only a component part. It is difficult to write a planning policy which addresses this point directly particularly in a strategic level document such as the DS. LBE does not support the proposed wording as it seems wholly aspirational and does not therefore appear to be deliverable. |
| 5. | 1.2 Preamble | The Council were asked to consider Will French’s (of SEC) amendment to the first paragraph: “A range of other local development framework documents and procedures will aid the delivery of the Development Strategy 2026. In particular, Ealing’s Development Strategy must also have regard to the Sustainable Community Strategy, produced by local strategic partners in the borough – i.e. the local authority (with its range of service responsibilities) and other agencies involved in housing, health, education, employment, community safety etc. <u>and representatives of local individual, groups, businesses and organizations affected by, or having an interest in the development of the borough.”</u> | The Council have made an amendment (see FPMC21) that partially addresses this point. This makes reference to representatives of the local community and voluntary sector. This accurately reflects current membership of the Local strategic partnership (LSP) and how it consults on revisions to the Sustainable Communities Strategy. Wider involvement of the business and local community groups in the planning process is dealt with in the Statement of Community Involvement (SCI) that is covered in the very next sentence of this preamble. An additional reference is therefore not necessary. |
| 6. | 1.2 (a) | The Inspector asks whether or not the council have | Yes. The Proposed Early Minor Alterations to the London |

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| | | taken account of proposed alterations to the London Plan (2011) regarding affordable rents? | <p>Plan: Affordable housing, cycle parking standards and minor clarifications were published by the GLA on November 2nd 2011. The proposed alterations relate mainly to policies 3.8 - 3.13, which deal with affordable housing, and reflect the June 2011 revision to PPS3 which introduced the Government's new affordable rent product. The Council's proposed minor change to Development Strategy Policy 1.2(a), which sets separate targets for social/affordable rented and intermediate housing and clarifies the approach to negotiating level of provision from private residential/mixed use schemes, is fully in accord with the GLA's proposed early minor alterations. Policy 1.2(a) also signposts London Plan Policy 3.12 to ensure consistency.</p> <p>The Council also welcomes the proposed addition of 019.A which clarifies the legal status of the London Plan and NPPF in the GLA's proposed early minor alterations.</p> |
| 7. | 1.2 (b) | The Inspector acknowledges that the Council do not consider a change is necessary but wants suggestions for possible revised wording and numbering for possible policy additions in respect of allowing certain police services to be located on employment land. | The Council considers the alternative wording suggested in ED27 entirely inappropriate for inclusion in policy 1.2(b). Reference within this policy to 'community infrastructure' is excessively broad and would compromise the integrity of the policy and its ability to protect employment land. To agree to the alternative wording to govern for this potential development proposal would result in a dilution of the policy that must apply to the whole borough and not just individual sites. The London Plan (2011) is clear that, within London's unique land market, policies for the protection of industrial land must be clear and robust to ensure that London maintains a supply of industrial land. This need to provide high protection to industrial sites is confirmed in the borough's Employment Land Review, which at paragraph 10.66 reiterates that the |

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| | | | <p>stock of employment land is finite.</p> <p>As stated in paragraph 2.80 of the London Plan 2011, SILs are given protection because their scale and relatively homogenous character means they can accommodate activities which elsewhere might raise tensions with other land uses. The non-public facing police facilities referred to in ED27 would fall into a variety of use classes, and the Council concurs that the nature of the use generated by non-public facing police facilities is similar to that carried out on most industrial sites. Policy 2.84 of the London Plan 2011 already provides the needed flexibility to allow such uses within SILs, stating that “Policing and other community safety infrastructure may also be appropriate uses in these [SIL] locations”. The Council therefore does not consider it necessary to repeat higher-level policies.</p> <p>However, making specific reference to social and community infrastructure as an acceptable land use within SILs or LSISs, as suggested in ED27, within policy 1.2(b) would represent a significant revision to the policy, which would not be in conformity with the London Plan Policy 2.17 (Strategic Industrial Locations) or Policy 4.4 (Managing Industrial Land and Premises). In particular, Policy 4.4 requires LDFs to demonstrate how the borough stock of industrial land and premises will be managed in local circumstances in line with Policies 2.17 and 4.4.</p> <p>Moreover, while ED27 does make reference to other London boroughs that have included policy references to policing facilities in employment areas within their LDFs, both instances are within the Development Management DPD, where such detail is most appropriately located (it should be</p> |

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| | | | <p>noted that only one of the referenced DM DPDs has been adopted). Should wording be included within the LDF in respect of allowing certain police services to be located on employment land, this should be within the Development Management DPD as it relates to the consideration of individual planning applications, as opposed to policy 1.2(b) which relates to the strategic protection of employment land borough wide, with the specific intention of ensuring long-term protection of the borough's industrial land based. Future planning applications for this type of development on specific sites should include supporting information to justify exceptions to policy where considered appropriate and the Council would be obliged to consider each planning application and supporting documentation on its own individual merits.</p> <p>Therefore the Council cannot provide suggestions for possible revised wording in respect of allowing certain police services to be located on employment land as any relaxation of the policy would comprise the integrity of the policy, and moreover this level of detail is most appropriately included the Development Management DPD. To introduce such flexibility into the strategic policy would be counter to the evidence base.</p> <p>Should a change be necessary in the interests of soundness, the Council would suggest repeating paragraph 2.84 of the London Plan, with minor modification to reflect borough circumstances, as a final paragraph to the supporting text of Policy 1.2(b). Paragraph 2.84 of the London Plan states (with minor modifications as identified):</p> |

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| | | | <p><i>Development in SILs/<u>LSISs</u> for non-industrial or related uses <u>will</u> should be resisted other than as part of a strategically coordinated process of consolidation, or where it addresses a need for accommodation for SMEs or new emerging industries, or where it provides local, small scale ‘walk to’ services for industrial occupiers (workplace crèches for example), or office space ancillary to industrial use. Policing and other community safety infrastructure may also be appropriate uses in these locations.</i></p> <p>The underlined modifications are necessary to reflect that the evidence base clearly supports the protection of LSISs as well as SILs. However, the Council would caution that the above wording, as it relates to the determination of planning applications, is most appropriately located within the Development Management DPD.</p> |
| 8. | 1.2 New Policy to be inserted after 1.2 (e) | <p>The Council were asked to consider Robert Gurd's amendment (on behalf of Ealing Civic Society) as follows:</p> <p>Proposed revised Policy:</p> <p>“Heritage assets have traditionally had a key role in shaping the character of Ealing and should continue to do so. The Council will continue to update and revise its evidence base of designated and undesignated heritage assets. In particular, we will review our conservation area appraisals and management plans at five yearly intervals and review and update on an ongoing basis the list of heritage assets to ensure that they are identified and their</p> | <p>The proposed wording does not reflect the approach to heritage set out in PPS 5 and removes necessary mention of delivery elements detailed in the existing wording. As such, LBE cannot support this proposal.</p> <p>While the proposed wording makes reference to the concept of ‘significance’ this does not appear to be informed by a good understanding of the term as it is used in PPS 5 and the draft NPPF. The proposed reasoned justification could be construed to narrow the scope of the policy to ‘Victorian and interwar suburban architecture’, greatly weakening the broad understanding of a heritage asset that is set out in PPS 5. By seeking at this stage to include unnecessary context (which is already discussed at various points in the DS including the Neighbourhood Profiles) the proposed policy thereby greatly</p> |

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| | | <p>significance documented. We will strive during the planning process to protect, enhance and improve access to the historic environment and heritage assets and reduce the number at risk.”</p> <p>Proposed revised supporting text:</p> <p>“Development in Ealing has largely been determined by the coming of mainline and tube railways in the late 19th and early 20th centuries. As a consequence, Ealing contains important examples of Victorian and interwar suburban architecture. It has heritage assets important in their own right but which also influence the quality of design to the benefit of the wider area. This local character and these heritage assets need to be respected and protected in any new development. We expect new buildings to be of the highest urban design quality and respect their local character. It is also important to ensure high standards of sustainable construction are achieved but not at the expense of local character or heritage assets.”</p> | <p>weakens the plan’s approach to heritage.</p> <p>The proposed wording is undermined by the attempt to fit descriptive context into what needs to be a brief and focussed delivery policy. This effectively reduces the space available to address detailed delivery mechanisms and inhibits the understanding of those that remain.</p> <p>The addition of contextual wording does not serve to widen or better define the scope for refusal and is not therefore material to the policy.</p> <p>That which has now become Ealing’s Heritage was not heritage when it was built and it is therefore incorrect to state that ‘heritage assets have traditionally had a key role in shaping the character of Ealing’. If anything, the Victorian context of the Borough represents a radical departure from its previous character and this general lack of sensitivity to the past is strongly reflected in up until the origin of the modern conservation movement in the late 1970s. It does not help the understanding and protection of Ealing’s heritage to dwell on past attitudes to conservation.</p> <p>The specified 5 yearly interval for the review of CA appraisals and management plans is not supported as it is unnecessary and runs the risk of undermining these documents if they are not updated within this timeframe.</p> <p>The proposed reasoned justification is also largely contextual and provides limited support for the actual policy wording, or for its location at this point in the plan. It repeats many provisions relating to general design principles, which are covered extensively in the London Plan 2011, and says little that relates specifically to heritage as opposed to development</p> |

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| | | | <p>in general.</p> <p>The key objective for a Core Strategy heritage policy is that it sets out a clear strategic approach for the management of the Borough historic environment. The Council's preferred wording, set out in ED14, is structured as a delivery policy establishing its role in the plan and the reason for its location at this point in the document. The Borough's programme for the review and protection of its heritage is clearly set out as is the role intended for other LDF documents. The Council's proposed wording thus accords strongly with PPS 5 in providing a positive and proactive strategy for the conservation of the historic environment and reflecting the scale of the area covered by the plan and the significance of the heritage assets within it.</p> |
| 9. | 1.2 (g) | <p>The Council were asked to consider Robert Gurd's amendment (on behalf of Ealing Civic Society) as follows:</p> <p>Proposed revised policy as follows:</p> <p>"Tall buildings are defined as buildings taller than their surroundings or over 20m in height. Such buildings can have a significant detrimental impact upon local character.</p> <p>As a consequence tall buildings will only be considered if they do not cause harm to existing heritage assets. Therefore it is unlikely that they would be acceptable in conservation areas or close to open spaces or watercourses. The Council will work in conjunction with the Mayor and English</p> | <p>The proposed wording is fundamentally compromised by the attempt to structure the whole policy in terms of heritage considerations. Doing so does not achieve a rational approach toward tall buildings and compromises protections in all areas not adjacent to a conservation area, watercourse or open space.</p> <p>Overall the suggested approach confuses the role and functions of the Development Strategy and DM DPD, shears the policy of its delivery elements and context in the LDF, and unnecessarily repeats elements of Regional policy. It represents a substantial weakening of the preferred policy approach to tall buildings and as such the Council cannot support this proposal.</p> <p>The proposed wording does not identify the areas of the Borough in which tall buildings may be appropriate or</p> |

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| | | <p>Heritage to identify areas where tall buildings would or would not be appropriate as part of the [Development Sites DPD].</p> <p>Where they are considered appropriate, tall buildings should satisfy the criteria laid down in paragraphs 7.26 and 7.27 of the London Plan.”</p> <p>Proposed revised supporting text as follows:</p> <p>“As the London Plan identifies, tall buildings can play a part in regeneration plans but they can also have a significant detrimental impact upon local character. Therefore, they should be resisted in areas that would be particularly sensitive to their impacts such as close to open spaces, watercourses or in conservation areas and their settings. Tall buildings will only be considered if they are the most appropriate way to achieve optimum density in highly accessible locations, can enhance the qualities of their immediate and wider settings, or if they make a significant contribution to local regeneration. However, since areas of high transport accessibility coincide with key conservation areas in Acton and Ealing which could be damaged by tall buildings such buildings would not generally be permitted in these areas. The exercise to identify areas suitable for tall buildings will be carried out in collaboration with the Mayor and English Heritage as part of the [Development Sites DPD]. It will seek to direct such developments away from less appropriate or more sensitive locations (i.e. those considered vulnerable</p> | <p>inappropriate and so does not constitute an adequate plan-led spatial guide to the location of tall buildings as recommended by CABE/English Heritage best practice guidance.</p> <p>The policy is silent where identified search areas for tall buildings are not adjacent to conservation areas as at Gateways to Park Royal and Southall Town Centre.</p> <p>The proposed wording opens the entire Borough that is not adjacent to a conservation area, waterway or open space to the development of tall buildings.</p> <p>The Council does not support a definition of tall buildings which takes the form of a specified height. To do so would contradict CABE/English Heritage guidance on tall buildings and would also compromise the design and context-based approach set out in London Plan 2011 Policy 7.7. It would not in any case be appropriate to establish a specific height threshold in the Development Strategy as all other such criteria policies have been reserved to the DM DPD.</p> <p>The proposed blanket restriction on development of tall buildings ‘close to open spaces and watercourses or in conservation areas’ does not accord with CABE/English Heritage good practice guidance and appears to be without precedent in national policy. No evidence base has been assembled to support such a restriction and it is difficult to see how this could be effected.</p> <p>The Council does not support cross-referencing of specific policies particularly within the policy wording itself as this invites dispute over the applicability of policies that have not been specifically mentioned.</p> |

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| | | by virtue of the location, existing use or design) to those where any detrimental impacts can be minimised.” | <p>Repetition of the London Plan is unnecessary and inappropriate.</p> <p>The word ‘optimise’ in the context of London Plan 2011 Policy 3.4 is circumscribed by reference to the density matrix set out in table 3.2. The looseness of the phrase ‘optimum density’ used in the proposed policy makes it likely that there could be no objective mechanism to determine what this should be at a given location, or, that it would be read simply as ‘highest density’ and therefore introduce a presumption that tall buildings were the default response in all ‘highly accessible locations’.</p> <p>The Council’s preferred wording, set out in ED14, structures the tall buildings policy in relation to design and context and is anchored by a definition of tall buildings which originates in the CABE/English Heritage good practice guidance and which allows a clear and rational link to London Plan policies, particularly 7.7.</p> |
| 10. | 1.2 (k) | The Inspector asks where the reference to “all” new development is appropriate in light of PPS25. | Yes, the Council stands by its policy wording. This was dealt with in the Council’s Written Statement LPA4, Para 9.1- and discussed on the afternoon of Day 6 of the hearing sessions. Please let us know if any further clarity is required. |
| 11. | 2.2 c) | The Inspector asks should this also refer to preserving or enhancing and heritage assets (if there are any locally listed buildings that would be lost by the current wording)? | The term ‘public domain’ is intended to describe a broader context than just heritage and to clearly articulate the composite of adaption, refurbishment, and good new design that is needed in the town centre. The specific reference to preserving and/or enhancing heritage assets is superfluous at this point. This is more consistent with the Council and |

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| | | | <p>English Heritage's preferred wording for 1.2 (f) (see ED14) and with the spatial approach of the Development Strategy as a whole.</p> <p>Listed building designations (plural) are mentioned in the policy and are not capitalised so the term is generic to all such designations not specific to Statutory Listing. Locally listed buildings in any case are not dependent on mention in a plan document for their protection; English Heritage recommends that the list be maintained separately of the plan documents so that it can be more easily updated and revised.</p> |
| 12. | 2.2 c) | The Inspector wants to clarify why Policy 2.3 has no reference to heritage assets, but third explanatory paragraph refers to the Acton Town Hall complex that may be a heritage asset. | As the general principle of the treatment of heritage assets is well covered by national policy and also by 1.2 (f) it is not the Council's approach to repeat this principle in area specific policies. Rather, it is considered that policy can add value by mentioning specific heritage assets where this is recommended by the scale of the plan document and the significance of the heritage asset in question. |
| 13. | 2.5 (a) Footnote 54 | <p>The Council were asked to consider James Guest's amendment to add some additional text to Footnote 54 as follows:</p> <p>"The growth in retail floorspace is based on growth rates and projected market shares of consumer expenditure that will need to be regularly reviewed and updated over the life of the Development (Core) Strategy in order to reflect evolving/emerging commercial/economic circumstances."</p> | The Council do not consider that an additional signpost is necessary and that it would be repetitive. Acknowledgement for the need to conduct a retail needs update within five years of the adoption of the Development Strategy is made specifically in Policy 1.2 (m). This also acknowledges the difficulties of forecasting retail needs over a 15-year period. This commitment is not just confined to the Ealing Metropolitan Town Centre but to the whole of the borough. |

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| 14. | 2.5 (b) | The Inspector asks the council to check whether or not the reference to the office quarter might also include some flexibility with regard higher education facilities? | <p>The Council consider that flexibility with regard to education facilities should not be incorporated in this policy. See paragraphs 10.29 -10.45 of the Employment Land Review (2010) EB20. This confirms that the Council needs a strong policy promotion with regard to office floorspace to achieve the critical mass anticipated. It confirms the spatial priority for new large scale office development should firstly be Ealing Town Centre, especially the Business Quarter on Uxbridge Road. Whilst any planning application which came forward for alternative uses within the office quarter would be assessed on its own merits, to introduce such flexibility in the policy would be contrary to the recommendations in the evidence based report.</p> |
| 15. | 2.5 (e) | The Inspector asked whether or not the 1st bullet should include a specific reference to heritage assets. | <p>This policy is intended to seek enhancements to the street scene as a whole not just its individual elements. It is also designed to go into area specific detail as befits an area-based policy. This is more consistent with the Council and English Heritage's preferred wording for 1.2 (f), and with the spatial approach of the Development Strategy as a whole.</p> <p>The term 'heritage assets' as it is used in PPS 5 is not restrictive as assets do not have to be designated to have value and considerations of their significance can be introduced at any stage in the planning process as they come to light. The proposed wording adds nothing as LPAs are already bound to consider the significance of any given heritage asset in reaching their decisions. 'Historic character' is the Council's wording precisely because it expands this concept and adds value to the policy rather than repeating national policy.</p> |

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| 16. | 2.5 (e) | The Council were asked if an additional reference to conservation areas should also be made. | This policy is intended to seek enhancements to historic buildings and frontages (both with and without statutory protection), as these constitute an important feature of the streetscene. It is also designed to go into area specific detail as befits an area-based policy. To make generic statements about conservation areas will dilute the policy and do nothing extra to enhance these. This is more consistent with LBE and English Heritage's preferred wording for 1.2 (f), and with the spatial approach of the Development Strategy as a whole. |
| 17. | 2.8 | The Inspector asks whether or not the first paragraph of the supporting text should refer to the redevelopment or refurbishment of the station? | Redevelopment is a better description of the scale of change that is envisaged for Southall Station and the surrounding area. It has already been identified by TfL and the GLA as the CrossRail station with the greatest opportunity for redevelopment and is the subject of an emerging Opportunity Area Planning Framework (OAPF) for Southall. |
| 18. | Policy 3.7 (b) | The Inspector asks the Council to consider changing reference in policy to 'ASDA' supermarket | Although this is a commercial name and is liable to change, it is considered that it is sufficiently well known to justify retention. This would also accord with the practice adopted in the Park Royal OAPF (see Chapter 10.7). However, the council have suggested a footnote be added in the Development Strategy that would signpost this reference. |
| 19. | Chapter 5, Preamble | The Inspector has asked the Council to consider signposts to policies in the London Plan and Development Management DPD dealing with pollution etc. | This is considered unnecessary, and is not the appropriate place in the document to deal comprehensively with matters relating to pollution. Policy 1.1(j) provides further detail in this regard. An appropriate cross-reference to the Development Management DPD and London Plan policies is proposed in relation to this policy. The preamble to chapter 5 is intended to provide a general statement detailing the Council's approach to protecting and enhancing the boroughs network |

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| | | | of green and open spaces. Sign posting these other documents would detract from the general message being told here. The appropriate 'signposting'/cross-referencing has been added to the individual policies in that chapter where relevant. |
| 20. | Chapter 5 | The Inspector asks whether or not any additional wording might be required in relation to the protection of open/green spaces with heritage value | <p>This is considered unnecessary. Open space of heritage value at a strategic level are identified on map 8 of the Development Strategy as Heritage Land, and in reference to individual sites in policy 5.2. Heritage Land is defined in the LDF glossary. Policies relating to the safeguarding of such land will be detailed in the Development Management DPD. Other heritage assets, including listed buildings, ancient monuments and archaeological interest areas will be detailed on the Proposals Map DPD, with appropriate policies in the Development Management DPD.</p> <p>Specifically, London Plan Policy 7.4 makes the 'pattern and grain of existing spaces and streets' a material consideration in planning applications. The Council also proposes to include the existing urban morphology as a material consideration in the relevant DM DPD policy. Taken together, these considerations arguably encourage the promotion of green space in conservation areas rather than just their preservation. It is therefore considered that little of value could be added by a strategic policy.</p> |
| 21. | Chapter 6 | The Inspector acknowledges that the Council do not consider a change is necessary but wants suggestions for possible revised wording and numbering for possible policy additions in respect of Thames Tunnel. | The Council supports the principle of the Thames Tideway Tunnel. The project is already included in the IDS (see Appendix 3) and its entry has now been amended in line with representations from TWA Utilities to reflect the current status of the project (see LPA 12, Appendix 1 – ED91). The Council is also concerned that the inclusion of a specific policy is not |

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| | | | <p>good policy making and the objections do not relate to the tests of soundness. Furthermore, the Council has and continues to work with TWA and supports the timely implementation of the Thames Tideway Sewer Tunnel project, including connection of the combined sewer outflows in the borough.</p> <p>Should the Inspector be minded to recommend the inclusion of a specific policy then it is suggested that the following wording be used: "To work with Thames Water and other stakeholders to support the timely implementation of the Thames Tideway Sewer Tunnel project, including connection of the combined sewer outflows in the borough." This should be inserted in Chapter 2 in Policy 2.1 as a new clause (f).</p> <p>The supporting text would read as follows and be inserted after the second paragraph of the existing supporting text for Policy 2.1 as follows: "The Thames Tunnel project will help to reduce and limit pollution from the sewerage system for the whole of London. The Council will work with Thames Water and other stakeholders to identify any work site needs within the borough and resolve local matters, for example design, construction, traffic management, remediation and mitigation {add new footnote}."</p> <p>The footnote will read: "See also Policy 6.1 and Appendix 3 (the Infrastructure Delivery Schedule.)"</p> |
| 22. | Chapter 6 | The Inspector asks whether or not there needs to be some additional reference made to town centre service facilities that are not provided elsewhere? | Policy 1.1 (e) makes reference to the provision and enhancement of infrastructure 'and services' as one of the aims within the Spatial Vision for Ealing 2026. The Council therefore consider appropriate reference has been made to services in this overarching policy. If the Inspector considers |

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| | | | additional or alternative reference to services is still required in Chapter 6, please provide additional clarification of 'services' and/or citing other borough policy examples. |
| 23. | Chapter 6 | The Inspector asks should there be any specific reference to St Bernard's Hospital in the CS? | The Council do not consider that any specific references to St Bernard's Hospital in the Development Strategy are necessary. Policy 6.2 already refers to healthcare, which includes mental health services. Specific references are already made to both existing and future provision in Section 5.9 of the IDP Version 2 (July 2011). |
| 24. | Appendix 3 | The Inspector would like to know the reasons for the minor changes to the Infrastructure Delivery Schedule. | The October 2011 version of the Infrastructure Delivery Schedule is appended to the Council's Written Statement on Matter 12 (ED91) and includes minor changes which update the costing of transport projects and the phasing, location and cost of the Thames Tunnel sewer project. Refer also to Paras. 2.6, 2.7 and 6.6 of the Council's Written Statement for a further explanation. Refer also to FPMC137 in the Schedule of Further Proposed Minor Changes (Version 3) that outlines some further amendments to improve the clarity of the IDS. |
| 25. | Maps 2 and 13 | The Inspector asks that the Council to check that these both accurately include all relevant sites in the Acton area. | Yes, the Council can confirm that there is no discrepancy between the potential housing sites, SIL or LSIS sites between Maps 2 and 13. Special Opportunity Sites will be deleted from both maps in line with the removal of the policy on Special Opportunity Sites (Policy 1.2 (h)). |
| 26. | Map 89, Volume 2 of the Atlas of Proposed Changes to the | The Inspector asks that the Council check the status of Walmer Gardens and whether the map should be retained in its current form? | The Council proposes to retain this map and confirms that the boundary shown is correct. The area outlined in blue on this map is not owned by the Council, and is in private ownership with no right of public access. It is acknowledged that the boundaries are blurred on the ground given that this area is not fenced off from the main gardens to the south. It is also |

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| | UDP Adopted Proposals Map | | possible that park rangers have managed this part of the site, but on an informal basis only. There is no duty however for them to maintain this part of the site given that it is in private ownership. Accordingly the revised Public Open Space (POS) boundaries as detailed in Map 89 are an accurate reflection of the area which is publicly accessible and 'formally' managed by the Council's Parks team. |
| 27. | General | The Inspector asks the council to check that it is satisfied that all references to the concept of "development corridors" are appropriate and clear? | Yes, the concept of development corridors is clear throughout the document. |
| 28. | General | The Inspector asks that the changes suggested in emails prior to the hearings (that were not published in the suggested changes or the errata) also be incorporated, this would include the typo in the errata in relation to the housing potential on page 11. | This has now been done and where appropriate references included in the Draft Schedule of Further Proposed Minor Changes. |