

Name	Organisation	Policy Reference
Judy Breens	Kingsdown Residents Association	2.18
Nature of Comment: Object The policy should be to actively protect green spaces rather than just seek "enhancements" from any developments.		
Response: Policy 2.18 is not intended to provide protection for open space. RLP policies 7.16, 7.17, and 7.18 provide protection for different types of open space across London. It is not considered that the suggested revision is necessary in policy terms and it would seem to change the intention of the original London Plan policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Judy Breens	Kingsdown Residents Association	3.5
Nature of Comment: Object Developments should specifically provide safe and secure space for families, children and older people.		
Response: It is the intention of national, regional and local policy that all residential units should be safe and secure for all residents. The needs of different types of residents or family units for different types of accommodation are addressed through the Housing Strategy which specifies the different sizes of dwelling that will need to be delivered to meet identified need in the Borough. It is not clear what the proposed addition would add to the policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Judy Breens	Kingsdown Residents Association	3.17
Nature of Comment: Object All development proposals in excess of 100 homes must provide the provision of additional social infrastructure, rather than "should support"		
Response: The government's preferred method for development to contribute to common infrastructure requirements is through the Community Infrastructure Levy (CIL). Work on Ealing's CIL is proceeding in parallel to the DM DPD. This type of policy support is not necessary in order for the CIL to have force. The figure of 100 units seems arbitrary and is not supported.		

Outcome:
No change.

Name	Organisation	Policy Reference
Judy Breens	Kingsdown Residents Association	3.18
Nature of Comment: Object Sufficient parking for infirm and family users of healthcare facilities must be provided.		
Response: Representation noted. The London Plan includes disabled car parking standards for developments, including healthcare facilities. All developments must include provision for disabled people. These developments must also be accessible by public transport, which may also used by disabled people.		
Outcome: No change.		

Name	Organisation	Policy Reference
Judy Breens	Kingsdown Residents Association	4A
Nature of Comment: Object Six months is not long enough for a site to be deemed “not viable for re-occupation as an employment use” – this should be at least 2 years, to take a realistic time span across a short-term economic dip. Also consideration needs to be given to the preservation of parking provision on or around employment sites.		
Response: Agreed. 2 years is a more representative period to assess the viability of a site for reuse of employment purposes.		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Judy Breens	Kingsdown Residents Association	4.8
Nature of Comment: Object The policy needs to actively support diversity in the retail offer, rather than more “me too” comparison goods and convenience shopping.		
Response: It is not clear what type of variety in retail offer is promoted by the respondent. Plans for the retail mix of a given area will generally		

be located in area specific SPDs or AAPs. It is difficult to see how this could be adequately controlled or positively affected by a DM policy.

Outcome:

No change.

Name	Organisation	Policy Reference
Judy Breens	Kingsdown Residents Association	4.9
Nature of Comment: Object The policy should be to seek a binding obligation from developers to provide small shop units, at affordable rents, for large residential schemes.		
Response: It is not considered helpful to the realisation of this extra retail provision to be overly prescriptive as to how it should be met. The policy makes clear that this contribution should normally be made in the form of new units, but there may be circumstances in which financial contributions would provide a better solution. It is however agreed that the wording could make clearer the intention for these units to be affordable.		
Outcome: Add "affordable" to policy wording.		

Name	Organisation	Policy Reference
Judy Breens	Kingsdown Residents Association	5.10
Nature of Comment: Object Development proposals larger than 10 units must provide the provision of trees and planting to the same extent necessary to replace those which are lost in consequence of building or building works		
Response: The justification for this proposal is unclear. It seems of little advantage for the quantity of trees and planting to be equal to that which is lost if the space which these occupy does not offer the same level of amenity to that which it replaces. An amenity test is considered more useful and more workable.		
Outcome: No change.		

Name	Organisation	Policy Reference
Judy Breens	Kingsdown Residents Association	6.13
Nature of Comment: Object		

Developments must not result in a reduction in on-street parking capacity, especially for workers engaged in working at night or other times when public transport is impractical.

Response:
The stated strategic aim of RLP 6.13 is to strike a balance between "promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use". It is not therefore considered that a blanket ban on the loss of parking of any form would be compliant with regional policy.

Outcome:
No change.

Name	Organisation	Policy Reference
Judy Breens	Kingsdown Residents Association	7.3

Nature of Comment: Object
Developments in excess of 100 homes must provide a secure space for police officers to work, rest and meet the public – these premises must be open to residents outside of the development.

Response:
No request for such provision was made by the Metropolitan Police during our engagement with them and it is far from clear that it would be useful. To make such provision a requirement of policy could potentially make it a higher priority than charges levied in the CIL and thus endanger appropriate contributions for infrastructure from major schemes.

Outcome:
No change.

Name	Organisation	Policy Reference
Judy Breens	Kingsdown Residents Association	7.7

Nature of Comment: Object
Tall buildings should only be permitted in accordance with the safeguards provided by the Replacement London Plan – for form, proportion, scale and composition of surrounding building and no adverse impacts on local micro climate, wind turbulence, overshadowing or telecommunication interference.
A definition of tall buildings must be provided for valid and meaningful consultation. We assume a tall building is anything over 4 storeys

Response:
All Local Variations are in addition to RLP policies.
Tall buildings can be defined according to CABE / English Heritage Guidance as "buildings which are substantially taller than their neighbours and / or which significantly change the skyline".

Outcome:
Revise accordingly.

Name	Organisation	Policy Reference
Paul Keywood	Ealing Shopping Centre Limited Partnership	2.15

Nature of Comment: Object
LV should amend 'd' to : 'be in scale with the centre and the role of the centre within the hierarchy of centres in the Borough'. And 'e' to: 'promote access by public transport, walking and cycling and connectivity between the proposal and other parts of the centre.'

Response:
Policy 2.15 is part of the adopted Replacement London Plan. The purpose of a Local Variation is to add detail or adapt the policy to particular local circumstances, not to alter the intent of a regional policy which forms part of Ealing's development plan. Neither of the changes proposed is a response to particular local circumstances.

Outcome:
No change.

Name	Organisation	Policy Reference
Paul Keywood	Ealing Shopping Centre Limited Partnership	4.7

Nature of Comment: Object
Policy conflicts with DM policies in PPS4 with regard to interpretation of the sequential approach.

Response:
Policy 4.7 is part of the adopted Replacement London Plan.

Outcome:
No change.

Name	Organisation	Policy Reference
Paul Keywood	Ealing Shopping Centre Limited Partnership	5A

Nature of Comment: Object
Unclear and appears to apply to all development including minor proposals and changes of use.

Response:
Agreed. Policy wording to be clarified.

Outcome:
Policy wording to be clarified.

Name	Organisation	Policy Reference
Paul Keywood	Ealing Shopping Centre Limited Partnership	7C

Nature of Comment: Object
Has the potential to read as though local policy has the effect of extending statutory protections to locally listed buildings.

Response:
Agreed. Policy wording to be clarified.

Outcome:
Policy wording to be clarified.

Name	Organisation	Policy Reference
Paul Keywood	Ealing Shopping Centre Limited Partnership	LV 5.10

Nature of Comment: Object
TPOs do not place a permanent embargo on the removal of trees. Amend text to reflect relevant guidance relating to the purpose of TPOs and how these apply to works affecting trees subject to TPOs.

Response:
Works on trees protected by TPOs require the Council's permission and authorisation to fell these trees is contingent on the removal of the TPO. It should therefore follow that trees protected by TPOs should remain intact in the state set by the TPO, unless varied, and in situ for the lifetime of the TPO. However as this has clearly caused confusion, the policy wording will be revised to reduce misunderstanding.

Outcome:
Policy wording to be clarified.

Name	Organisation	Policy Reference
Valerie Scott	CgMs Ltd on behalf of Twyford Abbey Properties Ltd	LV 5.10

Nature of Comment: Object
This proposed amendment to Policy 5.10 is unnecessary. Policy 7.21 states that existing trees should be retained wherever possible and any loss as the result of development should be replaced following the principle of "right place, right tree. Wherever possible the

<p>planting of additional trees should be included in new development We see no reason to have any further policy relating to the protection of existing trees.</p> <p>Delete this local variation to RLP Policy 5.10. The proposal to retain all existing trees is unrealistic and far too prescriptive. Policy 7.21 which seeks to retain existing trees wherever possible is more appropriately worded. Trees subject to Tree Protection Order are protected under other legislation.</p>
<p>Response:</p> <p>The policy concerns more than trees and makes a link between the type of amenity offered by any new green space and its planting and that which it replaces. This concept is not present in RLP 7.21. The policy does not seek to protect all existing trees and it is difficult to see how this misunderstanding has arisen. The policy explicitly seeks to create a relationship between quality of green space before and after development which will allow flexibility in quantity and layout while preserving the quality of the space.</p>
<p>Outcome:</p> <p>No change.</p>

Name	Organisation	Policy Reference
Aoife Conacur	Squarestone Ealing Ltd	3.19
<p>Nature of Comment: Support Support.</p>		
<p>Response: Noted.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Aoife Conacur	Squarestone Ealing Ltd	4A
<p>Nature of Comment: Object</p> <p>This could result in the stifling of development by being overly prescriptive. The Council needs to be flexible in its approach to prevent buildings from standing vacant for long periods of time. It is important that reuse or redevelopment is encouraged particularly where there is a need for the proposed alternative use.</p> <p>Other town centre uses are likely to be appropriate within the Metropolitan Centre. The council should be realistic in their policy requirements. Marketing conditions should be taken into account. Non B Class uses can generate employment.</p> <p>Part A is unclear as points (a) and (b) appear to replicate the same requirement. We agree with point (c).</p> <p>Part B is also unclear. It provided two points but does not specific if (a) or (b) is to be complied with.</p>		
<p>Response:</p>		

It is clearly necessary that employment sites should be retained where there is demand for their reuse for employment purposes. The only way to determine interest in the reuse of a given site is through marketing it for a reasonable length of time. There are very few employment sites in the Metropolitan Centre and changes to a criteria policy are not an appropriate tool to deal with exceptional circumstances. If a change of use is preferred on a given site within the centre then this should be pursued through the Development Sites process. No form of pre-emptive loss of employment use such as that suggested by the respondent would be a responsible use of employment land. That existing occupants may not value a given site for employment use does not mean that that site is by definition unsuitable for employment uses. The policy is written in terms of a hierarchy of preference for the treatment of employment uses. Part A prefers (a) the reoccupation of the site, followed by (b) the redevelopment of the site in employment use. This can be clarified in the supporting wording. Part B follows a similar pattern where retention is not possible, preferring (a) mixed use development incorporating some employment use to (b) use of the site for an alternative employment use. This approach can be clarified in the reasoned justification.

Outcome:

Revise accordingly.

Name	Organisation	Policy Reference
Helen Greenhalgh	Commercial Estates Group	4A

Nature of Comment: Object

We consider that the policy might be more flexible and acknowledge that, in certain circumstances, it might be appropriate to consider alternative uses appropriate to a town centre on these sites.

CEG would also like the Council to recognise that it is not always appropriate for sites to be delivered as either mixed developments or for alternative economic land uses.

Response:

Ealing considers that the circumstances in which it is appropriate to consider alternative uses on employment sites are those in which there is no demonstrable interest in reusing these sites for their existing purposes.

The current wording is intended to indicate that we will require these options for redevelopment to be examined. This should be clarified.

Outcome:

Revise accordingly.

Name	Organisation	Policy Reference
Helen Greenhalgh	Commercial Estates Group	6.5

Nature of Comment: Object

Any future objectives to secure funding for CrossRail and other Strategic infrastructure need to take account of the fact that some

developments have viability issues.
Response: Policy 6.5 is part of the adopted Replacement London Plan.
Outcome: No change.

Name	Organisation	Policy Reference
Pauline Stocker	West London Mental Health NHS Trust	3.2
Nature of Comment: Support We support the recognition that new health developments should be designed in ways that improve health and reduce health inequalities. In association with major planning applications, the use of a Health Impact Assessment is one such way of considering this.		
Response: Noted.		
Outcome: No change.		

Name	Organisation	Policy Reference
Pauline Stocker	West London Mental Health NHS Trust	3.5
Nature of Comment: Object The objective should also be considered alongside other national policy objectives such as PPS5. The protection of heritage assets should not be at the expense of meeting various good practice design and space standards. The policy should reflect that special consideration will be given where listed buildings are concerned.		
Response: All national planning policies are material considerations in the determination of planning applications. Policy 3.5 is a part of the adopted London Plan 2011 and is not considered to conflict with national policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Pauline Stocker	West London Mental Health NHS Trust	3.6
Nature of Comment: Object		

The ability to meet these standards should be considered against other national policy objectives such as PPS5.
Response: All national planning policies are material considerations in the determination of planning applications. Policy 3.6 is a part of the adopted London Plan 2011 and is not considered to conflict with national policy.
Outcome: No change.

Name	Organisation	Policy Reference
Pauline Stocker	West London Mental Health NHS Trust	3.7
Nature of Comment: Object The proposed extension of the policy will need to be considered on a case by case basis or the policy will be unsound and not in accordance with the requirements of PPS12.		
Response: Necessary contributions from development will be secured through a combination of CIL, S106 and case-by-case negotiation backed by policy. The disposition of these requirements will be determined with reference to CIL viability work prior to the publication of the DM Final Proposals.		
Outcome: To be determined with reference to ongoing work on infrastructure.		

Name	Organisation	Policy Reference
Pauline Stocker	West London Mental Health NHS Trust	3.13
Nature of Comment: Support We support that negotiations in respect of affordable housing should take account of site specific circumstances including development viability, the availability of public subsidy, the implication of phased development including 'overage' provisions and other scheme specific considerations.		
Response: Noted.		
Outcome: No change.		

Name	Organisation	Policy Reference
Pauline Stocker	West London Mental Health NHS Trust	3.15
Nature of Comment: Support		

We support this policy in principle, however, it should be recognised that at St Bernard's hospital not all of the key worker housing is occupied.
Response: Noted.
Outcome: No change.

Name	Organisation	Policy Reference
Pauline Stocker	West London Mental Health NHS Trust	3.17
Nature of Comment: Object A net loss of social infrastructure should be accepted where that loss can be justified.		
Response: This policy forms part of the adopted London Plan 2011. None of the elements of the policy appear to contradict the aims set out the objection.		
Outcome: No change.		

Name	Organisation	Policy Reference
Pauline Stocker	West London Mental Health NHS Trust	3.18
Nature of Comment: Support We strongly support this policy and it is appropriate that proposals which provided high quality health care facilities should be supported.		
Response: Noted.		
Outcome: No change.		

Name	Organisation	Policy Reference
Pauline Stocker	West London Mental Health NHS Trust	5.2
Nature of Comment: Object A balance needs to be struck where listed buildings are concerned between the objectives of reducing carbon dioxide emissions and protecting heritage assets.		
Response:		

All national planning policies are material considerations in the determination of planning applications. Policy 5.2 is a part of the adopted London Plan 2011 and is not considered to conflict with national policy.

Outcome:

No change.

Name	Organisation	Policy Reference
Pauline Stocker	West London Mental Health NHS Trust	6.3
<p>Nature of Comment: Object Each project must be considered in relation to the contribution it makes to regeneration, meeting community needs, delivering housing and retaining significant employment.</p>		
<p>Response: All national planning policies are material considerations in the determination of planning applications. Policy 6.3 is a part of the adopted London Plan 2011 and is not considered to conflict with national policy.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Pauline Stocker	West London Mental Health NHS Trust	7B
<p>Nature of Comment: Object The objective of PPS5, which is to protect heritage assets, should not be compromised by the requirement to meet onerous design standards. It must be recognised that in urban and suburban locations existing site characteristics some compromise is to be expected. The acceptability of a proposal must be considered on its merits having regard to site specific considerations, including the constraints imposed by listed buildings.</p>		
<p>Response: The proposed design standards could hardly be regarded as onerous as they do not involve the use of generalised or empirical measures and are not therefore abstracted from the individual context of any given development. Development which is not capable of providing adequate daylight, privacy and legibility, or avoiding piecemeal development, overdevelopment or overbearing, is development which is either of insufficient quality or inventiveness of design or is in the wrong location. It is entirely legitimate for policy to expect all development to provide good amenity for its users whatever the individual circumstances of the site.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Pauline Stocker	West London Mental Health NHS Trust	7.17
Nature of Comment: Object Protection of MOL should not prejudice essential community facilities on adjacent land from being improved.		
Response: All national planning policies are material considerations in the determination of planning applications. Policy 7.17 is a part of the adopted London Plan 2011 and is not considered to conflict with national policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Alun Evans	Metropolitan Police Authority	3.1
Nature of Comment: Support The MPA/S supports this policy which seeks to protect the net loss of community facilities in the Borough, and therefore accord with the London Plan.		
Response: Noted.		
Outcome: No change.		

Name	Organisation	Policy Reference
Alun Evans	Metropolitan Police Authority/Service	3.7
Nature of Comment: support with comments It is essential that cross reference is made to the Core Strategy in order that policing is recognised as a key element in social infrastructure.		
Response: It is intended to adopt a common glossary for all technical terms used in LDF documents, the definition of social infrastructure is better included there.		
Outcome: Include an appropriate definition of social infrastructure in the LDF Glossary.		

Name	Organisation	Policy Reference
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Alun Evans	Metropolitan Police Authority/Service	3.17
Nature of Comment: support Support.		
Response: Noted.		
Outcome: No change.		

Name	Organisation	Policy Reference
Alun Evans	Metropolitan Police Authority/Service	3.18
Nature of Comment: support with comments There is no reference to support for social facilities within this policy. MPA/S seeks the inclusion of emergency services to include policing facilities within the definition of social facilities.		
Response: This shortcoming has been addressed in the policy as adopted in the London Plan 2011. It is intended to adopt a common glossary for all technical terms used in LDF documents, the definition of social infrastructure is better included there.		
Outcome: Include an appropriate definition of social infrastructure in the LDF Glossary.		

Name	Organisation	Policy Reference
Alun Evans	Metropolitan Police Authority/Service	4 A
Nature of Comment: object Whilst the criteria allows for some degree of flexibility for alternative uses to be located in these areas we recommend that a specific criterion be included which allows for alternative uses such as social infrastructure and housing.		
Response: Not accepted. The policy as drafted clearly sets out a basis for the release of sites which are surplus to demands for industrial land in the Borough. The suggested revision would undermine the ability of the policy to protect sites for which there is continued demand in employment uses.		
Outcome: No change.		

Name	Organisation	Policy Reference
Alun Evans	Metropolitan Police Authority/Service	5.12

Nature of Comment: support Support.
Response: Noted.
Outcome: No change.

Name	Organisation	Policy Reference
Alun Evans	Metropolitan Police Authority/Service	6.13
Nature of Comment: support with comments MPA/S recommend that flexibility is allowed for specialist uses.		
Response: The DM DPD will be guided by the approach adopted in the London Plan 2011 in order to ensure consistency across the region.		
Outcome: No change.		

Name	Organisation	Policy Reference
Alun Evans	Metropolitan Police Authority/Service	7.1
Nature of Comment: support Support		
Response: Noted.		
Outcome: No change.		

Name	Organisation	Policy Reference
Alun Evans	Metropolitan Police Authority/Service	7.3
Nature of Comment: support Support		
Response: Noted.		
Outcome: No change.		

Name	Organisation	Policy Reference
Alun Evans	Metropolitan Police Authority/Service	LV 7.3
<p>Nature of Comment: support with comments Recommend that the policy be amended as follows: Policing Needs and Secured by Design Development must not place unreasonable pressure on police resources. Development should make contributions through the use of Section 106 Agreements or the Community Infrastructure Levy, to policing where appropriate.</p>		
<p>Response: Policing' is likely to be too broad a word to be used in the adopted policy. The inference might be drawn that development should comprise a source of funding for normal policing activities and this is clearly inappropriate. Development should only be required to mitigate negative impacts which derive from the development itself. Necessary contributions from development will be secured through a combination of CIL, S106 and case-by-case negotiation backed by policy. The disposition of these requirements will be determined with reference to CIL viability work prior to the publication of the DM Final Proposals.</p>		
<p>Outcome: Remove second clause of policy. To be determined with reference to ongoing work on infrastructure.</p>		

Name	Organisation	Policy Reference
Andrew Ransome	Workspace Group	2.13
<p>Nature of Comment: Support Workspace supports the implementation of OAPFs to realise their growth potential. Workspace agrees that development proposals should be required to optimise residential and non-residential densities and where appropriate, contain a mix of uses.</p>		
<p>Response: Noted.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Andrew Ransome	Workspace Group	2.17

Nature of Comment: Object Workspace objects to the safeguarding of SILs in Ealing for Class B uses.
Response: Policy 2.17 is part of the adopted Replacement London Plan. The policy is actually phrased in terms of 'general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions, utilities, wholesale markets and other industrial related activities'.
Outcome: No change.

Name	Organisation	Policy Reference
Andrew Ransome	Workspace Group	3.5
Nature of Comment: Support with comments Workspace considers that design should be considered on site by site basis and that rigid requirements should not be imposed as this may stifle innovative design and result in the inefficient use of land.		
Response: Policy 3.5 is part of the adopted Replacement London Plan.		
Outcome: No change.		

Name	Organisation	Policy Reference
Andrew Ransome	Workspace Group	3.7
Nature of Comment: Object Workspace objects to the possibility of seeking contributions to the provisions of allotments and/or burial land. Workspace considered that a balanced approach should be taken when considering the value of the overall planning obligations package, thereby ensuring the viability and deliverability of the proposed development to meet strategic objectives. As such, Workspace considers that the any s106 contributions should be applied on a site-by-site basis and adheres to the requirements of Circular 05/2005. Planning obligations must only be imposed when it can be demonstrated that they are needed to mitigate against the impact of the development.		
Response: Not accepted. The provision of new allotments and burial space will have to be on sites which are large enough to support these uses. Any contribution which is made to this type of use would of course meet demand greater than that generated on site so a suitable reduction would be made in the development's liability for other infrastructure charges. Necessary contributions from development will be secured through a combination of CIL, S106 and case-by-case negotiation backed		

by policy. The disposition of these requirements will be determined with reference to CIL viability work prior to the publication of the DM Final Proposals.

Outcome:

No change.

Name	Organisation	Policy Reference
Andrew Ransome	Workspace Group	3.13
Nature of Comment: Support with comments Workspace considers that affordable housing tenure mix should be treated as guidelines and open to negotiation having regard to issues such as the need to encourage rather than restrain residential development. Therefore a scheme's viability and specific site feasibility is an important consideration in level of affordable housing provision, the availability of public subsidy, the implications of phased development including 'overage' provisions and other scheme requirements.		
Response: Policy 3.13 is part of the adopted Replacement London Plan (now renumbered 3.12).		
Outcome: No change.		

Name	Organisation	Policy Reference
Andrew Ransome	Workspace Group	5.12
Nature of Comment: Support with comments Workspace considers that the proposed approach needs to be revised to accord with the requirements of the Flood and Water Management Act 2010 in terms of SUDS provision and the changes to connectivity arrangements.		
Response: Not accepted. The Act introduces a requirement on developers of properties to construct sustainable drainage systems (SUDS), and to seek approval for these works from the 'approval body' - in most cases the Local Authority. Whilst it is envisaged that in many instances this approval will be sought alongside or in conjunction with the planning application process, both decision making mechanisms operate under a different legislative framework. Accordingly, it is neither appropriate or necessary to detail these provisions in the Development Plan. Moreover, Policy 5.13 'Sustainable Drainage' already seeks to maximise the utilisation of SUDS.		
Outcome: No change.		

Name	Organisation	Policy Reference
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Les West	St George	Proposed LV 3.5
<p>Nature of Comment: Comment Any proposed local variation should be mindful of emerging design standards being proposed by the Mayor of London in policy as well as SPG. Any local variations at Borough level need to be properly justified both in terms of evidence and the need to be in a DPD policy.</p>		
<p>Response: Noted.</p>		
<p>Outcome: No change. The proposed local variation may prove to be unnecessary as the definition of usable floorspace which is contained in Building Regulations 2010 seems to be sufficient.</p>		

Name	Organisation	Policy Reference
Les West	St George	3.7
<p>Nature of Comment: Object The suggested addition of a specific requirement for a contribution to allotment and burial space is not justified and this should not be added as a local variation to Policy 3.7. It is not appropriately related to the intentions of this policy and such needs should only be addressed on 'case by case' basis.</p>		
<p>Response: Not accepted. The provision of new allotments and burial space will have to be on sites which are large enough to support these uses. Any contribution which is made to this type of use would of course meet demand greater than that generated on site so a suitable reduction would be made in the development's liability for other infrastructure charges. Necessary contributions from development will be secured through a combination of CIL, S106 and case-by-case negotiation backed by policy. The disposition of these requirements will be determined with reference to CIL viability work prior to the publication of the DM Final Proposals.</p>		
<p>Outcome: To be determined with reference to ongoing work on infrastructure.</p>		

Name	Organisation	Policy Reference
Les West	St George	3.13
<p>Nature of Comment: Object The suggested addition of a specific requirement for a contribution to allotment and burial space is not justified and this should not be added as a local variation to Policy 3.7. It is not appropriately related to the intentions of this policy and such needs should only be addressed on 'case by case' basis.</p>		

<p>Response: This comment appears to have been addressed to the wrong policy, as the commentry suggests this is a comment on Policy 3.7. It is not accepted that the putative local variation is not appropriately related to the intentions of the policy and this would in any case result only in the policy being renumbered, not in the removal of the policy. Necessary contributions from development will be secured through a combination of CIL, S106 and case-by-case negotiation backed by policy. The disposition of these requirements will be determined with reference to CIL viability work prior to the publication of the DM Final Proposals.</p>
<p>Outcome: To be determined with reference to ongoing work on infrastructure.</p>

Name	Organisation	Policy Reference
Les West	St George	3.14
<p>Nature of Comment: Object The suggested introduction of additional guidance on the mix of units should not be added to the DPD policy as further prescription in a DPD policy will only serve to frustrate affordable housing delivery overall. Sufficient flexibility needs to be retained for the developer and the RSLs. Also there seems to be a comment here that should relate to Policy 3.4 in the DRLP as it refers to the Density Matrix table in the DRLP.</p>		
<p>Response: Not accepted. The commentry in the DM DPD specifically states that no local variation to this policy is proposed. The explanation that proposals will be assessed against the SHMA (and the Housing Strategy) is a description of normal current practice and no change from this is supported.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Les West	St George	4A
<p>Nature of Comment: Object As it appears that this proposed policy is intended to apply to all employment sites outside the SILs it seems unnecessarily restrictive and could undermine Ealing's ability to meet its minimum housing target in the DRLP.</p>		
<p>Response: Not accepted. The policy as drafted clearly sets out a basis for the release of sites which are surplus to demands for industrial land in the Borough. The suggested revision would undermine the ability of the policy to protect sites for which there is continued demand in employment uses.</p>		

Housing figures in London Boroughs are driven primarily by opportunity not by need as need is in practical terms inexhaustable. LBE does not accept that substantial release of industrial land is necessary to satisfy housing delivery over the plan period. Planned release will primarily satisfy strategic regeneration objectives

Outcome:

No change.

Name	Organisation	Policy Reference
Les West	St George	LV 5.2
Nature of Comment: Object The detail proposed for individual CO2 targets for different uses and housing types is too detailed for inclusion in the DPD.		
Response: Consideration will be given as to the best way to present this guidance in the final DPD. The detailed recommendations are based on highly rigorous and locally specific evidence of a broad range of development typologies and are considered very useful to applicants in the formulation of schemes.		
Outcome: No change.		

Name	Organisation	Policy Reference
Les West	St George	5A
Nature of Comment: Object It seems contradictory for all new development to have to demonstrate full consideration of CHP when the table in LV 5.2 acknowledges that for some housing types it is not feasible. Also the level of detail in the table attached to this policy is too detailed for the DPD.		
Response: The information contained in the table quoted in 5.2 is guidance, as such it acknowledges that CHP is not generally viable in some housing types, however the benefits of CHP are such that it should always be investigated. Clarity is the overriding consideration in this policy and all efforts will be made to avoid repetition between policies and documents, however, experience with applications in this area has indicated that many applicants would benefit from the type of guidance that is provided in this table.		
Outcome: No change		

Name	Organisation	Policy Reference
Les West	St George	5.10

<p>Nature of Comment: Object The requirement for no net loss is very restrictive, it seems unnecessarily inflexible. The supporting text introduces 'generally' into the wording, this should appear in the policy too.</p>
<p>Response: The policy wording is quite sufficiently flexible; it seeks to ensure a comparable quality before and after development has taken place. The use of the word 'generally' in the supporting wording does not qualify the requirement for an adequate quality of amenity but rather addresses the case that a site may offer enough green space that a reduction in its extent will not seriously compromise the quality or level of amenity of that portion which remains. This, however, will not always be the case and it is necessary to ensure that the policy can cope with circumstances in which the reduction of the extent of trees and planting requires a reconfiguration of the remaining green space. However the form of words used seems to have caused confusion so the policy will be revised to improve its clarity.</p>
<p>Outcome: Wording will be refined to avoid confusion.</p>

Name	Organisation	Policy Reference
Les West	St George	6.9
<p>Nature of Comment: Object The wording of this local variation seems too wide ranging and open ended in terms of developer contributions.</p>		
<p>Response: The import of the wording used is that developments should support the development of the Borough's cycle network. Necessary contributions from development will be secured through a combination of CIL, S106 and case-by-case negotiation backed by policy. The disposition of these requirements will be determined with reference to CIL viability work prior to the publication of the DM Final Proposals.</p>		
<p>Outcome: To be determined with reference to ongoing work on infrastructure.</p>		

Name	Organisation	Policy Reference
Les West	St George	7A
<p>Nature of Comment: Object We are concerned that part D of this policy might be used to resist housing development in what might be perceived to be 'noisy' locations. The wording of this policy needs careful consideration to avoid unnecessary constraints on potential brownfield development.</p>		
<p>Response:</p>		

The principle that development should avoid the co-location of contradictory uses is uncontroversial. This may constitute a better form of wording for this policy.

Outcome:

No change.

Name	Organisation	Policy Reference
Les West	St George	LV 7.3
Nature of Comment: Object The wording proposed seems a little excessive for a DPD policy. It should be more as advice rather than being mandatory.		
Response: The proposition that a DPD policy should as a matter of principle be advisory rather than binding seems curious and is not supported by precedent or guidance.		
Outcome: No change.		

Name	Organisation	Policy Reference
Les West	St George	7B
Nature of Comment: Object Whilst this local policy is written in relatively general terms and appears to reflect good practice, the proposed supporting text seeks to provide definitions for the criteria includes some prescriptive statements which go too far and conflict with the guidance in the London Housing Design guide i.e. that single aspect development is likely to be unacceptable. Further work is required on this.		
Response: This policy was written with reference to the London Housing Design Guide and with awareness that this is still in draft. The final text is likely to be available at the time of the DM DPD Final Proposals. Both the design guide and the wording to which the representor objects are issued as guidance, the supporting text acting as an amplification of policy rather than as policy itself. LBE remains unconvinced that single aspect development will generally prove acceptable and endorses local guidance to this effect, that it may be acceptable in some instances is also accounted for in this guidance. This alternate emphasis is wholly consonant with the need to be in general conformity with the London Plan.		
Outcome: No change.		

Name	Organisation	Policy Reference
Les West	St George	LV 7.7

<p>Nature of Comment: Object</p> <p>We are concerned by the proposal introduction of subjective judgements such as 'Making a positive contribution to the urban environment' in this local variation. Given the detail of the DRLP policy, any further guidance should be of spatial significance to Ealing i.e. through a High Buildings study. At the London plan EIP we supported a case by case approach which was not overly prescriptive.</p>
<p>Response:</p> <p>The construction of a tall building is of such significance to their surrounding area that it is considered essential for policy to consider the overall, composite effect of development rather than narrowly assessing its performance against criteria policies. The requirement of 'a positive contribution to the urban environment' is no more subjective than the requirements throughout national, regional and local policy for 'good design'. This wording also addresses the question of local character as a development may well be good design in an abstract context and yet unsuitable to the proposed site.</p>
<p>Outcome:</p> <p>No change.</p>

Name	Organisation	Policy Reference
Les West	St George	
<p>Nature of Comment: Object</p> <p>We do not think it is appropriate to apply all of the principles in policy 7.12 of the DRLP to Ealing's local protective views. They are not necessarily of equal status and importance. There needs to be a better evidence base and consideration of a policy for the local views.</p>		
<p>Response:</p> <p>The principles contained in the London Plan policy are considered to constitute a good framework for the management of views. This framework is stated chiefly in terms of principles, and is largely contextual in its wording and so is flexible in its application to views other than those designated through the London Plan. However, there is a logic to excluding elements of the policy which are geographically specific to an area that is wholly outwith Ealing's boundaries.</p>		
<p>Outcome:</p> <p>Revise accordingly.</p>		

Name	Organisation	Policy Reference
Les West	St George	LV 7.17
<p>Nature of Comment: Object</p> <p>It is not necessary to repeat national planning policy requirements for air quality here.</p>		
<p>Response:</p>		

Agreed.
Outcome: It should be possible to replace this policy with one describing necessary supporting evidence.

Name	Organisation	Policy Reference
Brian Cuthbertson		LV 5.2
Nature of Comment: Comment 5.2, Local Variation. Are these targets improvements over Bldg Regs, as are those in the Policy? I'm not sure how these figures would achieve those in 5.2, not being staged according to date; nor yield a zero carbon standard by 2026 which is well after that is required by 5.2. Are you eg making assumptions on decarbonisation of the grid?		
Response: This guidance does not represent improvements over those contained in policy and are intended to give applicants		
Outcome: No change.		

Name	Organisation	Policy Reference
Brian Cuthbertson		5A
Nature of Comment: Object This is very prescriptive as to technologies (compare 5.3 on Sustainable Design and Construction which is limited to general principles). Biomass heating is potentially highly suitable, but why ASHP not GSHP? My information suggests that ASHP may not be relatively viable where there is a gas supply, albeit energy saving not viability is the main aim. At any rate, the Energy-saving Trust has recently concluded that GSHP makes very good sense for housing (though our studies suggest it is not relatively viable for our churches). And why no solar heat, HW or PV? You've included wind turbines for schools, I doubt that is a worthwhile option in West London except on very tall buildings.		
Response: These are guidance only and do not restrict the technologies that are able to be used, but rather makes suggestions as possible ways in which the demands of policy can be accommodated in given schemes.		
Outcome: No change		

Name	Organisation	Policy Reference
Brian Cuthbertson		5.11
Nature of Comment: Support with comments I suggest avoidance of mono-cultures on green roofs. Perhaps item A-d covers that.		
Response: Noted. This will be taken into account when the policy is revised.		
Outcome: Consider opportunities to avoid mono-cultures in revised policy.		

Name	Organisation	Policy Reference
Brian Cuthbertson		5.14
Nature of Comment: Support Congratulations for supporting the Thames Tideway Tunnels - a courageous statement for the general good and against nimbyism.		
Response: Noted.		
Outcome: No change.		

Name	Organisation	Policy Reference
Graham Saunders	English Heritage	LV 7.7
Nature of Comment: Object In developing a local specific policy for the management of tall buildings in the borough we would advise that a criteria based approach is taken that reflects section 4 Criteria for Evaluation in English Heritage/CABE's Guidance on Tall Buildings (2007). As suggested above local specific issues which could be incorporated include elements of the borough that define its environmental characteristics, such as local views, skylines and notable heritage assets. In addition the policy should be developed within the context of the Core Strategy. As advised in our letter in response to the submission version of the Core Strategy (dated 30th November 2010) it is essential that a robust strategy for the management of tall buildings is provided at the strategic level. This includes the need to adopt a planned approach to tall buildings which identifies areas which may be appropriate and which are inappropriate for tall buildings, based upon robust evidence base. This should then be presented in the Core Strategy in textual and spatial form. The Development Management Policies could then help provide further clarity on local issues for those areas that may be appropriate for tall buildings. This could include matters such as scale, form, materials, treatment at ground level, and relationship within the skyline to existing tall buildings. Finally, it would be worth providing an appropriate definition of "tall buildings", which refines national and regional definitions in a local		

level, and which corresponds with that set out in the Development Strategy.
<p>Response: The criteria suggested seem already to be covered by RLP policy 7.7. The DM DPD will follow the spatial programme of the DS when that document is adopted. The proposed local variation is intended simply to make appropriate reference to the spatial objectives of the Development Strategy and to set the principle that as tall buildings have a disproportionate impact on the physical environment they should be held to higher a higher standard than other development. LBE agrees with the CABE / English Heritage definition of tall buildings as those "which are substantially taller than their neighbours and / or which significantly change the skyline".</p>
<p>Outcome: Insert CABE/EH definition of tall buildings.</p>

Name	Organisation	Policy Reference
Graham Saunders	English Heritage	LV 7.8
<p>Nature of Comment: Comment Policy 7.8 Heritage assets and archaeology: Ealing Policy 7C Heritage (page 61) We welcome the provision of locally-specific advice regarding the management of the historic environment in Ealing Policy 7C. For completeness we suggest that the Heritage policy is reworded to address all heritage assets (including listed buildings, conservation areas, scheduled monuments, registered parks and gardens, archaeological priority areas and any other local identified assets). For clarity, it would be worth setting out in the supporting text what the statutory protections are regarding listed buildings and conservation areas, as required by the Planning (Listed Buildings and Conservation Areas) Act 1990, and in terms of the need to conserve historic significance, as required by PPS5.</p>		
<p>Response: Noted. Comments will be taken into account in the revision of this policy.</p>		
<p>Outcome: Revise accordingly.</p>		

Name	Organisation	Policy Reference
Graham Saunders	English Heritage	LV 7.12
<p>Nature of Comment: Comment In general we advise that the DRLP policy wording could be further strengthened at a local level through a more aspirational approach to views. For example, paragraph B of the DRLP Policy 7.12 requires that development "should not be overly intrusive" in the view, implying that a degree of intrusiveness is acceptable. We suggest that this policy could be improved with a local requirement that proposals enhance designated views, in terms of their particular significance. In addition we would encourage the Council to consider identifying and designating local views and skylines that reflect the characteristics of the borough, including its</p>		

<p>historic context. To help English Heritage has published Seeing History in the View (2010) to provide guidance on the management of historic views and could be referenced in the supporting text to facilitate best practice. It would be useful if the text of policy 7.12 were accompanied by a plan to show where the designated views fall within the borough.</p>
<p>Response: Noted. Comments will be taken into account in the revision of this policy.</p>
<p>Outcome: Revise accordingly.</p>

Name	Organisation	Policy Reference
Katie Arthur	Environment Agency	5.3
<p>Nature of Comment: Support We fully support sustainable design and construction and are pleased to see the London Plan has been referenced, which includes high water efficiency targets. Additionally, it is encouraging to see that flooding is included as a consideration in the design process.</p>		
<p>Response: Noted.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Katie Arthur	Environment Agency	5.10
<p>Nature of Comment: Support We are pleased to see that green roofs are included in the policy on Urban greening.</p>		
<p>Response: Noted.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Katie Arthur	Environment Agency	5.11 + LV
<p>Nature of Comment: Support A policy entirely devoted to Green roofs is excellent to see. The list demonstrates a full grasp of the benefits a green roof can provide to a development.</p>		

It is especially encouraging that the local variation mentions 'smaller schemes'. In conjunction with the main green roof policy this should cover all new development and re-development.

Response:

Noted.

Outcome:

No change.

Name	Organisation	Policy Reference
Katie Arthur	Environment Agency	5.12
Nature of Comment: Support This forward thinking policy is a key to this document. It is essential it is retained. The local variation would be acceptable in conjunction with the original flood risk policy. The paragraphs in italics are especially useful as they outline to the developer what is considered to be acceptable and what they will be required to undertake as part of a planning application.		
Response: Noted. All Local Variations are supplementary to the original London Plan policies.		
Outcome: No change.		

Name	Organisation	Policy Reference
Katie Arthur	Environment Agency	5.13
Nature of Comment: Support As you mention in Policy 5.12, surface water is an issue within the London Borough of Ealing. This policy on Sustainable Urban Drainage (SUDS) will go some way to reduce this problem in the future. It is very useful to include the SUDS hierarchy demonstrated here. We can provide further guidance for developers on SUDS.		
Response: Noted. Offer of assistance for developers noted.		
Outcome: No change.		

Name	Organisation	Policy Reference
Katie Arthur	Environment Agency	5.15
Nature of Comment: Support Water use and supplies is an excellent policy which we fully support.		

Response: Noted.
Outcome: No change.

Name	Organisation	Policy Reference
Katie Arthur	Environment Agency	5.21 + LV
Nature of Comment: Support A Development Management policy on Contaminated land is essential. We fully support this policy. We especially support the Local Variation which will require applicants to submit information in relation to contaminated land as part of the planning application. This in theory will reduce the amount of Environment Agency objections on absent Preliminary Risk Assessment grounds.		
Response: Noted.		
Outcome: No change.		

Name	Organisation	Policy Reference
Katie Arthur	Environment Agency	7.19
Nature of Comment: Support We fully support this policy on the protection, promotion and management of biodiversity. Prioritising the targets in the Biodiversity Action Plan (BAPs) is essential. The policy fully considers the importance of biodiversity from the European to local level.		
Response: Noted.		
Outcome: No change.		

Name	Organisation	Policy Reference
Katie Arthur	Environment Agency	7.28
Nature of Comment: Support Restoring the Blue Ribbon Network is a priority for the Environment Agency and we are keen to see this policy retained and carried forward.		

Response: Noted.
Outcome: No change.

Name	Organisation	Policy Reference
John Adams	Drivers Jonas Deloitte on Behalf of Universities Superannuation Scheme	4A
Nature of Comment: Comment USS supports this policy in principle, however we urge the Council to build a degree of flexibility into the supporting text to allow a range of employment generating and supporting uses on employment land.		
Response: SIL and LSIS are suitable only for a defined range of activities as they are designated ensure a minimum industrial land supply. Non-designated employment sites are more flexible in their use.		
Outcome: No change.		

Name	Organisation	Policy Reference
Iceni Projects	Stolkin Properties LTD (SPL) (Formally GSK)	4A
Nature of Comment: Comment While not seeking to challenge the overall thrust of this policy we are concerned that it may be seen to override other policies i.e. Final Proposal 4.2 which do actively promote non employment uses on non-employment sites and which are coming forward having regard to the Replacement London policy in relation to SILs.		
Response: Policy 4A should not in fact be applicable to SILs which are protected by RLP policy 2.17. Any release from strict employment uses on a SIL should be part of a strategic planning framework of the sort being undertaken at Greenford Green, and should not be subject to criteria policies such as 4A which are designed for smaller local sites. This distinction will be made clear in the revised draft by bringing Ealing's employment site terminology into line with that of the RLP.		
Outcome: Revise employment site terminology.		

Name	Organisation	Policy Reference
Robin Harper		2.13
<p>Nature of Comment: My client supports policy objectives to optimize residential output and densities within Opportunity Areas including contributing towards meeting (or where appropriate exceeding) minimum guidelines for housing. In order to comply with this policy, it is essential for the Development Strategy to identify 'minimum' guidelines for housing on each proposals site within the Opportunity Area.</p>		
<p>Response: This representation will be dealt with in the Sites document.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Robin Harper		3.5
<p>Nature of Comment: Policy 3.5 takes onboard the residential space standards recommended in the preconsultation draft of the London Housing Design Guide. The proposed residential space standards should be amended to reflect revised minimum unit sizes recommended in the Interim London Housing Design Guide (August 2010). The Development Management DPD should endorse other residential design standards recommended in the Interim London Housing Design Guide, including minimum private amenity space standards, which are integral to achieving housing densities and design quality required by the London Plan.</p>		
<p>Response: The next draft of the policy will use the wording of the adopted London Plan.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Robin Harper		3.6
<p>Nature of Comment: This policy must recognize that - subject to proposals in the Green Infrastructure Strategy - it may not be possible to meet the Mayor's Playspace Supplementary Planning Guidance within the Southern Gateway Opportunity Area. Policy 3.6 should include exceptions for areas identified as appropriate for high density/tall buildings. Alternatively, the policy must acknowledge that residential development on the Southern Gateway sites should provide fewer family sized homes than elsewhere in the borough. At present, the policy requirement is inconsistent with other policy objectives for the Southern Gateway and therefore unsound.</p>		
<p>Response:</p>		

Applications will be assessed on their merits at the time of application. It is not appropriate to apply exceptions pre-emptively and in advance of any viability testing. To apply general exceptions to RLP policies would risk non-conformity with with RSS.

Outcome:

No change.

Name	Organisation	Policy Reference
Robin Harper		3.7
Nature of Comment:		
My client supports Part A which seeks to encourage large residential developments in areas of high public transport accessibility. However, proposals to extend the boundaries of the Southern Gateway Opportunity Area should be reviewed against this policy objective to ensure that the additional areas proposed also have high public transport accessibility.		
Response:		
This representation is outwith the scope of a generic development management document.		
Outcome:		
No change.		

Name	Organisation	Policy Reference
Robin Harper		7.4
Nature of Comment:		
This policy should be amended to acknowledge that in Opportunity Areas and other regeneration areas identified in the Development Strategy DPD, the objective will be to create a new character and 'sense of place', and new development should not necessarily have regard to the pattern of existing spaces and streets in terms of orientation, scale, proportion and mass.		
Response:		
This representation is outwith the scope of a generic development management document.		
Outcome:		
No change.		

Name	Organisation	Policy Reference
Robin Harper		7.7
Nature of Comment:		
Policy 7.7 should support the principle that tall buildings are appropriate in Opportunity Areas, Areas of Intensification or Town Centres that have good access to public transport. While the criteria based urban design analysis for assessing proposals for tall buildings is supported, Policy 7.7 should be supplemented by a Tall Building Study to identify areas that are particularly appropriate		

for taller buildings and facilitate proposals on specific sites, such as the Southern Gateway sites.
Response: LV 7.7 states that tall buildings will be permitted where, among other things, they accord with the spatial objectives of the Development Strategy.
Outcome: No change.

Name	Organisation	Policy Reference
Robin Harper		7D
Nature of Comment: Policy 7D is incomplete. The section relating to open space provision standards states that the Council is awaiting further details on the open space strategy which will follow in the next draft. The provision of new open space in areas of deficiency – particularly in town centres, opportunity area and other areas of residential intensification – underpins the policy objectives in the Development Strategy and Development Management DPDs. These documents are unsound in the absence of the Open Space Strategy and Green Infrastructure Strategy. The Council must review and re-consult on both DPDs, once these documents have been completed.		
Response: The commentary notes that the policy 'will be defined in light of the findings of the open space strategy which is currently underway'.		
Outcome: No change.		

Name	Organisation	Policy Reference
Patrick Blake		
Nature of Comment: The HA has no further comments on this document.		
Response: Noted.		
Outcome: No change.		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	2.13
Nature of Comment: object ECS object to the consultation suggestion that the RLP policy should apply to the opportunity sites in the Development Sites DPD		

because each site should be considered on the basis of appropriate policies. Large areas defined in the DRLP such as Southall Gas Works can create their own character. Smaller ones should provide for local need and respect local character. Park Royal is defined in the DRLP as the other area to which this policy applies. An Opportunity Area Planning Framework would help the regeneration of this MEL with its excellent transport opportunities and road congestion problem; its lack of open space and its outmoded street patterns. Policy 2.13Cb) promotes residential development which is unsuitable for sites in Park Royal because they would expose more residents to the existing industrial environment, lack of social infrastructure and proposed waste disposal sites. Flats in the Southern Gateway have not proved popular with key workers. An Ealing variant is needed to avoid optimising floorspace on logistic depots requiring adequate space for HGVs. This will reduce industrial/warehousing floorspace without vacating land. A range of non-residential uses may include Waste Disposal Sites. We would like to see a mix of offices, industry and warehousing with improvements to public transport, cycle tracks, open space provision but above all landscaping that improves the environment.

Response:
Noted. The OAPF for Park Royal has now been adopted. All industrial space in Park Royal that is of strategic importance is protected by the SIL designation.

Outcome:
No change.

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	2.15
<p>Nature of Comment: support with comments ECS propose a local variant that “ Conservation Areas, Local Character and design principles as well as social infrastructure requirements need to be taken into account”. It is difficult to propose other variants until we know the Town Centre boundaries. Presumably West Ealing will be removed from the Metropolitan Centre as it is being turned into a major housing area with local convenience shops by the proposals made in the Sites Development DPD, its difficult access from the north of Ealing and its very limited or unattractive parking.</p>		
<p>Response: These various elements of policy are dealt with in their respective policies. Conservation areas in Policy 7.8 and 7C, local character in 7.1, design mainly in 7B and social infrastructure in 3.17, 3.18 and 3.19.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	2.18
<p>Nature of Comment: object ECS object to any alteration in the width of Green Corridors of 25m as laid down in SPG where it relates to residential development along the A40. West of site PAR 01 developed non- residential areas variations of width could be accepted but footpaths and cyclepaths in a landscape setting are essential. On MOL and Green Belt it could be wider as at Northala fields. The movement of species along green corridors is promoted by adequate space for plants, animals and humans.</p>		
<p>Response: The policy does not discuss the width of green corridors.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	3.5
<p>Nature of Comment: support with comments ECS support much in the RLP policy but the following should be included in a local variant: *It should apply to extended and renovated dwellings *C “arrival at the building” needs policy explanation and “home as a place of retreat” need support from Ealing’s variants. Privacy from overlooking is needed both inside and outside the dwelling, as well as protection from noise and nuisance but we also object to the growing tendency for gated development. *D We do not see how exemplary design and achieving other objectives is an adequate reason for designs that ignore B & C ie regeneration is not enough to justify inappropriate development. Ealing should expand what this borough means by D. * E promises the Mayor’s help over housing design but our current concern is the design of flats with one of its habitable rooms combined with the Kitchen. These provide advantages for some households but are unsuitable for others including most families. This concern should be reflected in a local variant which restrains this proliferation. * new F requirement for private amenity space in new development according to number of habitable rooms and retaining adequate garden size in existing housing</p>		
<p>Response: Extensions and renovations are not necessarily subject to planning approval and it is difficult to see that works of this nature could materially affect factors such as density, tenure and land use mix. It is considered that such elements relating to these concerns, of applications for extensions and renovations that are subject to planning approval, are better dealt with through more generic design policies such as 7B. It is unclear why arrival at the building and home as a place of retreat need support from Ealing Local Variations as they are already</p>		

part of the RLP. Privacy and noise are discussed in Policies 7A and 7B.
 Clause D is part of the adopted London Plan 2011
 Suggestions E and F will be considered in light of the adopted LP 2011 space standards and London Housing Design Guidance.

Outcome:
 Consider suggestions for E and F

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	3.5
<p>Nature of Comment: object The RLP policy confines requirements for informal recreation to children. This may be appropriate for inner London with its wide ranging public transport and leisure facilities but in a suburban environment private amenity space is essential for adults as well. The SPG is inadequate for an Outer London borough and an Ealing Variant is needed to confirm its own standards of private amenity space to provide somewhere to sit in the sun, grow plants or play games. Such spaces at ground level provides areas for trees which are so important to Ealing's character</p>		
<p>Response: It is intended that amenity space will be dealt with in policy 7D and by reference to the London Housing Design Guide.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	3.7
<p>Nature of Comment: object This policy applies to very few sites in the borough and the largest is the Southall gas works site which already has planning permission. The other is also in Southall with only a small dwelling increase. There seems little point in having an Ealing local variant to this policy as the Gas Works site is polluted and unsuitable for burials despite the pollution some allotments are proposed. We propose that any new flats allowed by the Council that have no garden space should be required to contribute to development of a new allotment site not just large residential developments. Perhaps under the variation to policies 2.5 or 2.6 above</p>		
<p>Response: Noted. Necessary contributions from development will be secured through a combination of CIL, S106 and case-by-case negotiation backed by policy. The disposition of these requirements will be determined with reference to CIL viability work prior to the publication of the DM Final Proposals.</p>		
<p>Outcome: To be determined with reference to ongoing work on infrastructure.</p>		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	3.14
<p>Nature of Comment: ECS objects to the lack of local variants explaining the part of policies quoted from the RLP and consolidated London Plan. The text seems deliberately selected to make it difficult to understand how affordable housing requirements are assessed and therefore to make sensible variant proposals. Ealing needs affordable housing but promoting corridors of redevelopment to achieve low %s of affordable housing is inflating the price of flats.</p>		
<p>Response: No policies are quoted from the Consolidated London Plan and it has now been superseded. The parts of the RLP quoted reflect those sections identified as Development Decisions criteria.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	3.15
<p>Nature of Comment: object</p> <p>B. This clause encourages the retention of housing in unsuitable locations where pollution, noise, traffic congestion and visual amenity are unacceptable. This should be avoided by adding “unless the immediate environment is unsuitable for residential use.”</p> <p>C. ECS queries how the length of let can be treated as a planning matter. Holiday lets up to 28 days may influence the residential stock available in the borough but surely a short let of 2 months is better than a premises standing empty waiting for a long let. We are puzzled also about how enforcement can be achieved.</p> <p>Proposed E - Gardens—ECS is concerned about proposed built development on gardens recently reclassified as greenfield sites. Garden land is lost in the majority of planning applications for extensions and it is difficult to protect it from permitted development without Article 4 directions which would increase the costs of planning the borough. The reasons we consider there should be some policy protection is the impact that infill housing can have on the street scene and propose: ‘Existing gardens should be protected where they need to provide enough amenity space for the units served and reflect the local character of the area. Infill houses should respect the character of the street scene and ancillary buildings and hard surfaces should leave space for rain to percolate to the water table to ensure the survival of shrubs and trees in the gardens or street.’</p>		
<p>Response: This policy is part of the adopted London Plan 2011. Loss of housing use may sometimes be desirable in certain locations, however this type of development would normally be treated as a departure from the plan, this allows its use to be tightly controlled by the LPA where it would be, as is mostly the case,</p>		

undesirable at a strategic level.

The proposed additional clause E as a local variation to policy 3.14 is not considered necessary. Ealing Policy 7B seeks resist any overdevelopment of a site. The supporting text to this policy defines those circumstances which may constitute an overdevelopment. It may be helpful to include reference to the loss of amenity land below the accepted provision standards in this text. Garden/amenity provision standards for new development will be established in Ealing Policy 7D.

Outcome:

No change.

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	3.17-3.19
Nature of Comment: object Policies are supported but we object because they are inadequate. Funding Social infrastructure is the main problem in preserving it when it needs renovation and providing it when it is lacking for local residents. Education and Health seem to have priority for public funding but arts leisure and culture are just as important in regeneration and creating a lively town centre.		
Response: Providing funding for social infrastructure is not the role of planning except in so far as it relates to CIL and s106. Necessary contributions from development will be secured through a combination of CIL, S106 and case-by-case negotiation backed by policy. The disposition of these requirements will be determined with reference to CIL viability work prior to the publication of the DM Final Proposals.		
Outcome: No change.		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	3.20
Nature of Comment: object ECS propose a local variant which allows protection of the indoor sports facilities; but the type of open space use should be adjusted according to local demand for playing fields taking into account the need for floodplain in this borough, the importance of biodiversity on sites where some playing fields are located and the provision of adequate changing facilities. Open Space policy7D seems to add little.		
Response: This will be dealt with in policy 7D		
Outcome: No change.		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	4A
<p>Nature of Comment: object ECS object to this policy because it would result in loss of important office locations in the Ealing Broadway office corridor because A b) &c) are too permissive. It would enable housing in the Major Employment Locations where land is needed for a range of employment uses. Land owners are likely to wish to benefit from higher residential land values of mixed use development in a poor residential environment. This would create a demand for social infrastructure which would require significant public investment. More notice should be taken of the Outer London Commission Report and the ELR. Release of employment land should be based on retaining the most suitable sites not the vagaries of the property market during recession.</p>		
<p>Response: This policy does not apply to SIL (MEL in UDP terminology) only local employment sites. Terminology will be brought into line with RLP to avoid confusion.</p>		
<p>Outcome: Update terminology.</p>		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	4.5
<p>Nature of Comment: object It is not sustainable to allow hotels at major transport hubs. They should be in town centres and public transport interchanges, a more sustainable option, as proposed in the RLP- Policy 4.5 A c). Supporting the visitor economy is part of the RLP strategy but Ealing's Strategy ignores this despite the large number of visitors from Eastern Europe and the Indian sub-continent who visit relatives in the borough. There should be a more positive approach than it is only relevant to inner London boroughs</p>		
<p>Response: It is not clear what distinction is being drawn between public transport interchanges and major transport hubs, unless it is the assumption that a transport hub can be other than a hub of public transport.</p>		
<p>Outcome: Insert 'public'.</p>		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	5.10
<p>Nature of Comment: object The variant seem totally inadequate compared with UDP policy 4.5 Landscaping, tree protection and planting. In the 2009 consultation all community groups and individual residents supported this policy with a % proposing the BAP was taken into account.</p>		

The GLA opted for reference to implementing Ealing's tree strategy.
Response: The Local Variation is to be read in conjunction with the RLP policy itself and elements of UDP are also covered by RLP 5.9, 5.11 and 7.21. These are considered quite adequate.
Outcome: No change.

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	5.18
Nature of Comment: object Safeguarding wharves or promoting new ones along the canal is not just a matter of waste disposal but an issue for promoting use of the canal in line with DRLP policies 7.26 and 7.30A. Cross references would help users who need every bit of help they can get because of the complex structure imposed on the arrangement of policies and proposals.		
Response: LBE 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. All policies must be read together.		
Outcome: No change.		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	6.2
Nature of Comment: object The list in table 6.3 does not provide for adequate orbital transport for West London. Local schemes especially for orbital transport should be safeguarded in a local variant.		
Response: Routes for safeguarding are identified in the DS not the DM DPD.		
Outcome: No change.		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	6.5
Nature of Comment: object ECS assume that as Crossrail is funded by parliamentary legislation and TfL has cut back funding to be spent on stations. We		

propose a local variant for new development through Section 106 funding improving access to the stations, in addition to linking shopping across main traffic routes. Any associated development should make the most of development opportunities linked to the station rebuilding to compensate for TfL cuts.

Response:
Improvements to access will be sought where they are needed through the design process.

Outcome:
No change.

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	6.6
Nature of Comment: object Much of Ealing's development will be influenced by aircraft operations and the LDF should support the Mayor in opposing a third runway.		
Response: The policy is not relevant to a putative third runway, and the DM DPD is not the place to determine the Council's corporate position on any future proposals for the expansion of Heathrow.		
Outcome: No change.		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	6.9
Nature of Comment: object Ealing variant should extend the superhighway along the A40 from Park Royal		
Response: Representation noted. Ealing Council officers are currently in negotiations with TfL to secure maximum benefits for the borough from the proposed Cycle Superhighway. As this is a TfL project and the scope is not confirmed yet, it is not appropriate to include details in the Development Management DPD at this time.		
Outcome: No change.		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	6.10
Nature of Comment: object		

B is totally inadequate in helping the improvement of the walking network. There should be an Ealing variant which requires new development to contribute to routes to town centres and stations.

Response:

Improvements to the walking network will be sought where they are needed through the design process. Necessary contributions from development will be secured through a combination of CIL, S106 and case-by-case negotiation backed by policy. The disposition of these requirements will be determined with reference to CIL viability work prior to the publication of the DM Final Proposals.

Outcome:

No change.

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	6.13
<p>Nature of Comment: object</p>		
<p>There should be an Ealing variant to enable offices to have more generous parking provision under controlled conditions where this is appropriate to enable them to compete in the office market.</p>		
<p>Response:</p>		
<p>Representation noted. The London Plan specifies maximum levels of car parking for certain types of uses, but the system allows a level of flexibility when deciding appropriate parking provision. However, public transport, pedestrian and cycle accessibility, plus the impact on the highway network vehicle flows are key material considerations when assessing levels of proposed car parking for developments. Officers do not have any evidence of developers not locating in LB Ealing due to the levels of parking provision being too restrictive and are not aware of any in west London. Developers appear willing to come to west London under the current parking policies and levels.</p>		
<p>Outcome:</p>		
<p>No change</p>		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	7A
<p>Nature of Comment: object</p>		
<p>The policy should include the paragraphs “ sensitive uses will not be permitted...from their surrounding” and “Any development ...should be refused”. Separating these two important points, one with below some definitions, the other as part of the context is misleading</p>		
<p>Response:</p>		
<p>Both sentences are clarificatory, the sentence 'Sensitive uses...' will be inserted in the policy, the other is unnecessary and will be</p>		

deleted.
Outcome: No change.

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	7B
<p>Nature of Comment: object These points are supported but we wish to raise the meaning of “negative visual impact”. In the context of a conservation area it is explained in PPS 5 and relates to Conservation area assessments but elsewhere is open to a much wider interpretation. Any building disliked for its appearance is negative. We request “in relation to local character” is inserted in the definition. B Backland is defined in the UDP where access is restricted and the definition should not be changed. This should be part of the policy and not explanatory text. The policy should require low rise compared with its surrounding development. Similarly reference should be made to the need for private amenity space and the importance of garden land.</p>		
<p>Response: It is hard to see that the addition of the phrase 'in relation to local character' adds anything when the whole basis of the policy is to judge development in relation to its context. The reference to back land will be deleted.</p>		
<p>Outcome: Delete reference to back land.</p>		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	7.7 + LV
<p>Nature of Comment: object The RLP version quoted has been amended by the Mayor in a suggested change. We regard D c) as particularly important in relation to Tall and Large Buildings and consider that the list of sensitive sites quoted in the RLP should be specified as unsuitable in the local plan. The existing UDP does not use 20m alone as guidance to the height of tall buildings. It includes those proposals which are significantly higher than their surroundings so that in the UDP Table 4B together with “policy 4.1 (ii) Appropriate height and design” provide very good control for development when used by planning officers to assess applications. The statement in para 2 on P60 is therefore incorrect. We object to the Local Variation as proposed because it encourages tall and large buildings : a) in the Uxbridge RD Corridor with its large number of conservation areas, and b) it is inconsistent with English Heritage guidelines and the RLP suggestions in relation to heritage assets.</p>		

Ealing Local variant to policy 7.7a-b should be deleted and replaced by Tall buildings will not be encouraged in areas sensitive to their impact including conservation areas, the setting of listed buildings, historic parks and gardens, the edge of Green Belt or MOL. They are inappropriate for residential development unless adequate on-site play and amenity spaces can be provided for all residents.

Response:

As the introduction to the DM DPD consultation document explains the final version will have access to the adopted London Plan policies.

Tall buildings can be defined according to CABE / English Heritage Guidance as "buildings which are substantially taller than their neighbours and / or which significantly change the skyline".

The DM DPD policy will accord with the spatial objectives of the DS as it is required to. Any development with inadequate amenity space as defined in policy is entirely unacceptable.

Outcome:

No change.

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	7C

Nature of Comment: object

ECS object to the delegation of this important policy on the character of conservation areas to assessments that were not subject to the same rigorous process of objection. The conservation area assessments contain omissions that at the best are misleading, at the worst allow any development proposed. Locally listed buildings and local character are not protected by any other legislation so this policy needs to cover both. We propose that locally listed buildings should be covered by 7C new c) Locally listed buildings and groups of buildings of façade value will be protected and their character enhanced unless alternative use of the building is not viable. Article 4 directions will be used to protect locally listed buildings from damaging permitted development.

Response:

The CAAs and Management Plans are the supplementary guidance informing decisions in conservation areas this cannot be altered by a DM policy. The protection of LLBs and local character areas will be clarified.

Outcome:

Update policy re LLBs and local character areas.

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	7.12

Nature of Comment: comment

The views mapped in the current UDP do not show viewing corridors as required by the GLA policy and there are also omissions of

views and landmarks. As the RLP policy refers to landmarks so should the Ealing variant.
Response: The policy will be updated.
Outcome: Update policy.

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	7.14
Nature of Comment: comment The local variant of 7.14 and Policy 7A Operational Amenity should be combined to make more sense of the issues. Lack of any paras. of explanations from the DRLP make the policies lack context.		
Response: LV 7.14 is unnecessary, it will be deleted.		
Outcome: Delete LV 7.14		

Name	Organisation	Policy Reference
Judy Harris	Ealing Civic Society	Appendix I
Nature of Comment: comment Proposals Map is included as a change but there is no proposal map available.		
Response: It is not necessary for the Proposals Map to be available for the DM DPD consultation, it will be subject to its own examination process.		
Outcome: No change.		

Name	Organisation	Policy Reference
Nicholas Taylor	London Fire and Emergency Planning Authority	3.5
Nature of Comment: comment Request inclusion of further guidance on fire safety and emergency services access. LFB seek the inclusion of hardwired smoke alarms in social housing and sprinkler systems where appropriate.		
Response:		

Fire safety needs are generally better met through Building Regulations and there would seem to be little that is locally specific in this representation to justify the inclusion of a provision that has been left out of the London Plan 2011. This level of detail would probably be better contained in supplementary guidance.

Outcome:

No change.

Name	Organisation	Policy Reference
Nicholas Taylor	London Fire and Emergency Planning Authority	6.3 & 6.13
Nature of Comment: support with comments		
Access requirements for emergency vehicles are paramount. Request Table 6.1 is made more prominent in the final document.		
Response:		
Noted. We accept the suggestion that table 6.1 is made more prominent in the final document.		
Outcome:		
Improve layout of document in regard to LP 2011 tables.		

Name	Organisation	Policy Reference
Nicholas Taylor	London Fire and Emergency Planning Authority	7.13
Nature of Comment: support with comments		
Fully support policy. It will allow LFB to maintain the highest level of service.		
Response:		
Noted.		
Outcome:		
No change.		

Name	Organisation	Policy Reference
Ben Rogers	Express Park Investments	LV 7.7
Nature of Comment: object		
The policy is objected to on the grounds that it does not provide adequate detail regarding the Council's preferred locations for tall buildings. It is considered that policies contained within the Development Management DPD should contain a greater level of detail than those within the Development Strategy, and it is clear that this policy does not do this. Criteria (a) of Policy 7.7 should be expanded to state where suitable locations for tall buildings within the borough exist. It is acknowledged that the spatial objectives of		

the Development Strategy define Acton as a town centre location that is suitable for tall buildings, and this should be identified in the wording of the policy. Accordingly, it is considered that the wording of criteria (a) of Policy 7.7 should be amended to the following: “(a) accord with the spatial objectives of the Development Strategy in that they should be located within the Borough’s town centres, including Acton”.

Response:
It is accepted that the final wording of the policy could usefully specify the areas which the Development Strategy identifies as suitable for tall buildings in order that the need for cross-checking between documents is minimised. The recommended wording, however, does not fulfil this objective as it mentions only Acton. A revised wording will be incorporated following the adoption of the Development Strategy.

Outcome:
Update policy to include full list of areas in which Tall Buildings may be appropriate.

Name	Organisation	Policy Reference
Isabel Assaly	Natural England	2.15
Nature of Comment: support		
Support		
Response:		
Noted.		
Outcome:		
No change.		

Name	Organisation	Policy Reference
Isabel Assaly	Natural England	2.18
Nature of Comment: support		
Support		
Response:		
Noted.		
Outcome:		
No change.		

Name	Organisation	Policy Reference
Isabel Assaly	Natural England	3.2
Nature of Comment: support with comments		

As per our comments of 26 March 2010 with regards to social infrastructure (with particular reference to Policies 3.2 and 3.8), we reiterate our recommendation that, where possible, heath facilities are located in close proximity to new or existing areas of greenspace. This will increase opportunities for those using heath facilities to access the natural environment which can help to improve both physical and mental health.

Response:
Noted. The extent to which this can be effected by a DM policy is limited.

Outcome:
No change.

Name	Organisation	Policy Reference
Isabel Assaly	Natural England	3.5
Nature of Comment: support with comments Green infrastructures can contribute to the delivery of high quality housing developments and we recommend that this be referenced within the policy.		
Response: Agreed. We consider that this aspect of development is well covered in ELV 5.10 and in EP 7D which will contain open space standards.		
Outcome: No change.		

Name	Organisation	Policy Reference
Isabel Assaly	Natural England	3.6
Nature of Comment: support with comments We would encourage the council to ensure that recreational facilities within developments, where applicable, should make provision for natural greenspace for outdoor play. This is also applicable to policy 3.19 (Educational Facilities) and important with regards to addressing Areas of Deficiency in Access to Natural Greenspace within the borough.		
Response: Agreed. We consider that this aspect of development is well covered EP 7D which will contain open space standards.		
Outcome: No change.		

Name	Organisation	Policy Reference
Isabel Assaly	Natural England	5.9

<p>Nature of Comment: support with comments As per our comments of 26 March, we would expect any policy in the Development Management DPD on climate change adaptation to refer to the need to incorporate the natural environment into development. With regards to this policy, the provision of living roofs and walls, SUDS, tree planting and landscaping can contribute to the mitigation of both climatic risks, especially with regards to the Urban Heat Island. This is also applicable to Policy 5.3 (Sustainable Design and Construction).</p>
<p>Response: Agreed. We consider that this aspect of development is well covered in ELV 5.10.</p>
<p>Outcome: No change.</p>

Name	Organisation	Policy Reference
Isabel Assaly	Natural England	5.10
<p>Nature of Comment: support Support</p>		
<p>Response: Noted.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Isabel Assaly	Natural England	5.11
<p>Nature of Comment: support Support</p>		
<p>Response: Noted.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Isabel Assaly	Natural England	5.12
<p>Nature of Comment: support with comments We are encouraged to note the proposed amendments to this policy and recommend that the policy also makes reference to ensuring that Green Infrastructure is considered as a suitable flood risk management strategy. This also applies to policy 5.13</p>		

(Sustainable Drainage).
Response: Agreed, this form of flood prevention measure applies chiefly at a strategic level and is already part of the SFRA and DS approach to flood risk management.
Outcome: No change.

Name	Organisation	Policy Reference
Isabel Assaly	Natural England	7 D
Nature of Comment: support with comments I am aware that with regards to open space provision standards, further details are to be provided in the next draft DPD. However, I would like to take this opportunity to draw your attention to Natural England's Accessible Natural Greenspace Standards: http://naturalengland.etraderstores.com/NaturalEnglandShop/product.aspx?ProductID=887a3e18-5296-4f1f-ae0c-15e02debf0e5 These standards can assist the council with increasing the provision of open space in areas of deficiency within the borough.		
Response: This guidance will be used to help refine Ealing's provision standards.		
Outcome: Incorporate as far as possible in emerging Ealing open space standards.		

Name	Organisation	Policy Reference
Isabel Assaly	Natural England	7.19
Nature of Comment: We recommend that point A. under section C. should be reworded to state: 'Wherever possible, make a positive contribution to the protection, promotion, enhancement and management of biodiversity'. In addition, we are of the opinion that all SINCs are important and that the council should consider that in some instances, for example in Areas of Deficiency in Access to Nature, Borough and Local grade SINCs represent the only accessible area of greenspace. An additional point to section E. should be that ecological enhancements are proposed within development schemes.		
Response: This policy is now a part of the adopted London Plan 2011. The revision to section C has been incorporated into the adopted plan. The wording 'promotion' has been replaced by 'enhancement' in the adopted policy. In the context of Development Management, and given the usage of the word 'enhancement, the wording 'promotion' is neither considered necessary or appropriate. Accordingly,		

the Council would not support a local variation to this policy clause.
 Part D of policy 7.19 provides for the protection of all Sites of Importance for Nature, including sites of local importance. The Council recognises the value of sites of local importance in addressing deficiency in access, and in initially identifying sites, sought to identify sites in areas of deficiency. The London Plan policy allows for adequate consideration of this value. Accordingly, the Council would not support a local variation to this policy clause.
 The point at E was not incorporated in the adopted plan, we consider that this is well covered by section C part a.

Outcome:
 No change.

Name	Organisation	Policy Reference
Isabel Assaly	Natural England	7.20
Nature of Comment: We recommend that this policy makes reference to the London Geodiversity Action Plan 2009-2013, available for consultation at: http://www.naturalengland.org.uk/regions/london/ourwork/wildlondon/landscape-geodiversity.aspx		
Response: Noted, it is not considered that this signposting is by itself enough to justify an additional local variation from the London Plan, but this advice will be given by officers and in any relevant supplementary guidance.		
Outcome: No change.		

Name	Organisation	Policy Reference
Lisa Bowden	Royal Mail	3.6
Nature of Comment: support with comments Policy 3.6 states that the Council will expect development proposals that include housing to make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Royal Mail acknowledges the need for children and young people's play and informal recreational facilities. However, we request that the Council amend the Policy to state that the provision of such space should be appropriate to the form, scale and type of development proposed. Further we request that any financial contribution towards the provision of open space is only sought in areas where there is an identified deficiency and at a level that ensures that the overall delivery of appropriate development is not compromised. Any Section 106 contributions from development sites must be fair, reasonable and proportionate and must comply with government guidance Circular 05/05. This request accords with the Mayor's adopted Supplementary Planning Guidance (SPG) 'Providing for Children and Young People's Play and Informal Recreation', which acknowledges that there may be scope for innovative solutions for the provision of play and		

recreation space outside of the SPG guidelines if they meet the criteria for quantity, quality and access.
Response: This policy forms part of the adopted London Plan 2011 and is therefore part of Ealing's development plan. The Mayor's SPG and relevant government guidance are also material to planning applications. There does not seem to be any reason for a specific local variation to the London Plan policy.
Outcome: No change.

Name	Organisation	Policy Reference
Lisa Bowden	Royal Mail	3.13
Nature of Comment: support Part B of Policy 3.13 states that "negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy, the implications of phased development including 'overage' provisions and other scheme requirements". Royal Mail support and welcome the Council's approach to take into consideration the individual circumstances including development viability when negotiating affordable housing as part of residential and mixed use schemes. This accords with London Plan (October 2009) Part (b) of Policy 3.13 which states that "negotiations on sites should take account of their individual circumstances including development viability". Further, the supporting text to this Policy states that "the Mayor wishes to encourage, not restrain, overall residential development. Boroughs should take a reasonable and flexible approach to securing affordable housing on a site by site basis".		
Response: Support welcomed.		
Outcome: No change.		

Name	Organisation	Policy Reference
	Royal Mail	4 A
Nature of Comment: object Part (b) of this Policy states that "where it is proposed to retain a building or site in employment use is not viable the council will seek: a mixed use development which maximises the amount of employment space retained. b use of the building or site for an alternative economic land use". Royal Mail support part (a) of this Policy which permits the change of employment uses where it can be demonstrated to the Council that the change of use from employment uses, or the redevelopment of the site for a non-employment use, meets the criteria set out in part (a), (b) and (c) of the Policy.		

However, we request that Part (b) of the Policy is amended to enable sites that may have reached the end of their economic life, be unfit for modern occupation and yet uneconomic to redevelop for employment use. The Policy as drafted would prevent such sites coming forward for development. We therefore request more flexibility is incorporated into the Policy and supporting text, providing for the circumstances described above.

This Policy should enable sites that are surplus to requirements to come forward for mixed use or residential developments where it is demonstrated it is no longer commercially suitable for employment use. On such basis we would support the principle of this Policy.

Planning Policy Statement 1 (PPS1): Delivering Sustainable Development, states that “policies should promote mixed use developments for locations that allow the creation of linkages between different uses and can thereby create more vibrant places”. PPS4, which details that LPAs should plan positively and proactively to encourage economic development, in line with the principles of sustainable development. In particular, PPS4 states that LPAs should develop flexible policies which are able to respond to economic change and notes the need for co-ordination with infrastructure;

Policy EC.2 (d) of PPS4, which states that LPAs should “seeks to make the most efficient and effective use of land, prioritising previously developed land which is suitable for re-use”;

and

Policy EC.2 (h) of PPS4, which states that “at the local level, where necessary to safeguard land from other uses ... a range of sites [should be identified] to facilitate a broad range of economic development, including mixed use”.

Response:

The policy provides quite sufficient flexibility for non economic uses on these sites however, it states that alternative economic uses remain the preference for these sites. None of the sources quoted conflict with this approach and it is entirely consistent with national policy.

Outcome:

No change.

Name	Organisation	Policy Reference
Carmelle Bell	Thames Water	5.13
<p>Nature of Comment: support</p> <p>We support the approach of multi-agency collaboration to achieve sustainable drainage and the hierarchical approach to managing London's surface water and combined foul and surface water drainage.</p> <p>There are limitations of SUDs, particularly in the Greater London conurbation where the drainage systems are complex and the potential for flooding very great. Clay and saturated gravel subsoil across much of the London area add to the constraints on their effectiveness. SUDs are only part of a range of solutions and cannot be a substitute for mainstream flood defence measures.</p> <p>Therefore we welcome the acknowledgement within the draft policy that incorporating SUDs into a development may not always be</p>		

practical.
Response: Noted.
Outcome: No change.

Name	Organisation	Policy Reference
Carmelle Bell	Thames Water	5.14
<p>Nature of Comment: object As set out below we are keen for the Borough to change key elements of proposed Policy 5.14. Part C - sewage infrastructure In developing our proposals to upgrade London's water and sewage infrastructure we appraise best available technology against the regulated economic framework we work within. Therefore the reference to best available technology within the policy needs to include reference to not entailing excessive cost. As Policy 5.3 covers minimising carbon emissions it is not considered necessary for Section C of Policy 5.14 to also make reference to energy capture. This is a duplication of policy. Therefore we consider Part C of the policy should be re-worded as follows: 'Development proposals to upgrade London's wastewater infrastructure (including London's sludge treatment capacity) should be supported provided they utilise best available technology not entailing excessive costs.' Part D - Thames Tunnel Thames Water has provided representation to Ealing regarding the Development Strategy Final Proposals, dated September 2010, advising that a specific policy endorsing the Thames Tunnel project is required for the DPD to be found sound. If you decide to implement this policy recommendation within the Development Strategy, then we consider a corresponding policy within the Development Management DPD unnecessary and this representation can subsequently be disregarded to avoid repetition.</p>		
Response: Part C of this policy is part of the adopted London Plan 2011		
Outcome: No change.		

Name	Organisation	Policy Reference
Carmelle Bell	Thames Water	5.15
Nature of Comment: Support		

Response: Noted.
Outcome: No change.

Name	Organisation	Policy Reference
A H J ("Tony") Miller	Ealing Liberal Democrats	6.2
<p>Nature of Comment: object</p> <p>Specific potential developments in Ealing are missing from the RLP Table 6.3, and the opportunity should be taken to correct this. Areas where land should be safeguarded should allow for the possibility of one or more of the following developments:</p> <ul style="list-style-type: none"> - railway embankments between Ealing Broadway station and land up to West Ealing, including the former BBC car park south of Haven Green, for a 5th track on the Great Western relief line - land alongside the main Great Western and London underground lines, for the possibility of a light rail link between Ealing Broadway (North and West London light rail proposal) - land at and around Ealing Broadway station for the possibility of the proposed West London orbital tube link - land at and around Ealing Broadway station for the possibility of an integrated bus/rail/tube/taxi interchange alongside and/or over the rail tracks 		
<p>Response: Strategic safeguarding in Ealing is accomplished through the Development Strategy.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
A H J ("Tony") Miller	Ealing Liberal Democrats	LV 7.7
<p>Nature of Comment: object</p> <p>1. The supporting commentary in Ealing's Final proposal Development Strategy Policy 1.2 (f) says that "more detailed policies on density and tall buildings will be contained within both the Development Sites and Development Management policy documents". However neither document defines "tall buildings". We propose that a definition should be included consistent with national guidance issued by CABE/English Heritage, such as: "Tall buildings are those which are substantially taller than their neighbours and/or which significantly change the skyline."</p> <p>2. Specific note should also be made in the local variation to enlarge on the guidance in DLP 7.7, and say that "Tall or large buildings will only be considered in areas whose character would not be adversely affected by their scale, mass or bulk. They will not be</p>		

permitted in areas that are inappropriate or sensitive to their impact, especially conservation areas, the setting of listed buildings, historic parks and gardens, the edge of the green belt or metropolitan open land.”

Response:

The wording of the DS policy has been revised to incorporate a definition of tall buildings in accord with CABE/EH good practice guidance. The blanket restrictions on the development of tall buildings in conservation areas, the setting of listed buildings, historic parks and gardens, and sites adjacent green belt and MOL do not accord with CABE/EH guidance and are not supported. The first suggested sentence is incorporated in policy 7.7 of the London Plan 2011.

Outcome:

No change.

Name	Organisation	Policy Reference
Harry Alvarez	Harry Alvarez	2.18
Nature of Comment: Object The policy should be to actively protect green spaces rather than just seek "enhancements" from any developments.		
Response: Policy 2.18 is not intended to provide protection for open space. RLP policies 7.16, 7.17, and 7.18 provide protection for different types of open space across London. It is not considered that the suggested revision is necessary in policy terms and it would seem to change the intention of the original London Plan policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Harry Alvarez	Harry Alvarez	3.5
Nature of Comment: Object Developments should specifically provide safe and secure space for families, children and older people.		
Response: It is the intention of national, regional and local policy that all residential units should be safe and secure for all residents. The needs of different types of residents or family units for different types of accommodation are addressed through the Housing Strategy which specifies the different sizes of dwelling that will need to be delivered to meet identified need in the Borough. It is not clear what the proposed addition would add to the policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Harry Alvarez	Harry Alvarez	3.17
Nature of Comment: Object All development proposals in excess of 100 homes must provide the provision of additional social infrastructure, rather than "should support"		
Response: The government's preferred method for development to contribute to strategic infrastructure requirements is through the Community Infrastructure Levy (CIL). Work on Ealing's CIL is proceeding in parallel to the DM DPD. This type of policy support is not necessary in order for the CIL to have force. The figure of 100 units seems arbitrary and is not supported.		
Outcome: No change.		

Name	Organisation	Policy Reference
Harry Alvarez	Harry Alvarez	3.18
Nature of Comment: Object Sufficient parking for infirm and family users of healthcare facilities must be provided.		
Response: Representation noted. The London Plan includes disabled car parking standards for developments, including healthcare facilities. All developments must include provision for disabled people. These developments must also be accessible by public transport, which may also be used by disabled people.		
Outcome: No change.		

Name	Organisation	Policy Reference
Harry Alvarez	Harry Alvarez	4A
Nature of Comment: Object Six months is not long enough for a site to be deemed "not viable for re-occupation as an employment use" – this should be at least 2 years, to take a realistic time span across a short-term economic dip. Also consideration needs to be given to the preservation of parking provision on or around employment sites.		
Response: Agreed. 2 years is a more representative period to assess the viability of a site for reuse of employment purposes.		

Outcome:
Revise accordingly.

Name	Organisation	Policy Reference
Harry Alvarez	Harry Alvarez	4.8
Nature of Comment: Object The policy needs to actively support diversity in the retail offer, rather than more “me too” comparison goods and convenience shopping.		
Response: It is not clear what type of variety in retail offer is promoted by the respondent. Plans for the retail mix of a given area will generally be located in area specific SPDs or AAPs. It is difficult to see how this could be adequately controlled or positively affected by a DM policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Harry Alvarez	Harry Alvarez	4.9
Nature of Comment: Object The policy should be to seek a binding obligation from developers to provide small shop units, at affordable rents, for large residential schemes.		
Response: It is not considered helpful to the realisation of this extra retail provision to be overly prescriptive as to how it should be met. The policy makes clear that this contribution should normally be made in the form of new units, but there may be circumstances in which financial contributions would provide a better solution. It is however agreed that the wording could make clearer the intention for these units to be affordable.		
Outcome: Add "affordable" to policy wording.		

Name	Organisation	Policy Reference
Harry Alvarez	Harry Alvarez	5.10
Nature of Comment: Object Development proposals larger than 10 units must provide the provision of trees and planting to the same extent necessary to replace those which are lost in consequence of building or building works		

<p>Response: The justification for this proposal is unclear. It seems of little advantage for the quantity of trees and planting to be equal to that which is lost if the space which these occupy does not offer the same level of amenity to that which it replaces. An amenity test is considered more useful and more workable.</p>
<p>Outcome: No change.</p>

Name	Organisation	Policy Reference
Harry Alvarez	Harry Alvarez	6.13
<p>Nature of Comment: Object Developments must not result in a reduction in on-street parking capacity, especially for workers engaged in working at night or other times when public transport is impractical.</p>		
<p>Response: The stated strategic aim of RLP 6.13 is to strike a balance between "promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use". It is not therefore considered that a blanket ban on the loss of parking of any form would be compliant with regional policy.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Harry Alvarez	Harry Alvarez	7.3
<p>Nature of Comment: Object Developments in excess of 100 homes must provide a secure space for police officers to work, rest and meet the public – these premises must be open to residents outside of the development.</p>		
<p>Response: No request for such provision was made by the Metropolitan Police during our engagement with them and it is far from clear that it would be useful. To make such provision a requirement of policy could potentially make it a higher priority than charges levied in the CIL and thus endanger appropriate contributions for infrastructure from major schemes.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Harry Alvarez	Harry Alvarez	7.7

<p>Nature of Comment: Object</p> <p>Tall buildings should only be permitted in accordance with the safeguards provided by the Replacement London Plan – for form, proportion, scale and composition of surrounding building and no adverse impacts on local micro climate, wind turbulence, overshadowing or telecommunication interference.</p> <p>A definition of tall buildings must be provided for valid and meaningful consultation. We assume a tall building is anything over 4 storeys</p>
<p>Response:</p> <p>All Local Variations are in addition to RLP policies.</p> <p>Tall buildings can be defined according to CABE / English Heritage Guidance as "buildings which are substantially taller than their neighbours and / or which significantly change the skyline".</p>
<p>Outcome:</p> <p>Revise accordingly.</p>

Name	Organisation	Policy Reference
Mary-Jean Bartlett	Mary-Jean Bartlett	2.18
<p>Nature of Comment: Object</p> <p>The policy should be to actively protect green spaces rather than just seek "enhancements" from any developments.</p>		
<p>Response:</p> <p>Policy 2.18 is not intended to provide protection for open space. RLP policies 7.16, 7.17, and 7.18 provide protection for different types of open space across London. It is not considered that the suggested revision is necessary in policy terms and it would seem to change the intention of the original London Plan policy.</p>		
<p>Outcome:</p> <p>No change.</p>		

Name	Organisation	Policy Reference
Mary-Jean Bartlett	Mary-Jean Bartlett	3.5
<p>Nature of Comment: Object</p> <p>Developments should specifically provide safe and secure space for families, children and older people.</p>		
<p>Response:</p> <p>It is the intention of national, regional and local policy that all residential units should be safe and secure for all residents. The needs of different types of residents or family units for different types of accommodation are addressed through the Housing Strategy which specifies the different sizes of dwelling that will need to be delivered to meet identified need in the Borough. It is not clear what the proposed addition would add to the policy.</p>		

Outcome:
No change.

Name	Organisation	Policy Reference
Mary-Jean Bartlett	Mary-Jean Bartlett	3.17
<p>Nature of Comment: Object All development proposals in excess of 100 homes must provide the provision of additional social infrastructure, rather than "should support"</p>		
<p>Response: The government's preferred method for development to contribute to common infrastructure requirements is through the Community Infrastructure Levy (CIL). Work on Ealing's CIL is proceeding in parallel to the DM DPD. This type of policy support is not necessary in order for the CIL to have force. The figure of 100 units seems arbitrary and is not supported.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Mary-Jean Bartlett	Mary-Jean Bartlett	3.18
<p>Nature of Comment: Object Sufficient parking for infirm and family users of healthcare facilities must be provided.</p>		
<p>Response: Representation noted. The London Plan includes disabled car parking standards for developments, including healthcare facilities. All developments must include provision for disabled people. These developments must also be accessible by public transport, which may also used by disabled people.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Mary-Jean Bartlett	Mary-Jean Bartlett	4A
<p>Nature of Comment: Object Six months is not long enough for a site to be deemed "not viable for re-occupation as an employment use" – this should be at least 2 years, to take a realistic time span across a short-term economic dip. Also consideration needs to be given to the preservation of parking provision on or around employment sites.</p>		

Response: Agreed. 2 years is a more representative period to assess the viability of a site for reuse of employment purposes.
Outcome: Revise accordingly.

Name	Organisation	Policy Reference
Mary-Jean Bartlett	Mary-Jean Bartlett	4.8
Nature of Comment: Object The policy needs to actively support diversity in the retail offer, rather than more “me too” comparison goods and convenience shopping.		
Response: It is not clear what type of variety in retail offer is promoted by the respondent. Plans for the retail mix of a given area will generally be located in area specific SPDs or AAPs. It is difficult to see how this could be adequately controlled or positively affected by a DM policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Mary-Jean Bartlett	Mary-Jean Bartlett	4.9
Nature of Comment: Object The policy should be to seek a binding obligation from developers to provide small shop units, at affordable rents, for large residential schemes.		
Response: It is not considered helpful to the realisation of this extra retail provision to be overly prescriptive as to how it should be met. The policy makes clear that this contribution should normally be made in the form of new units, but there may be circumstances in which financial contributions would provide a better solution. It is however agreed that the wording could make clearer the intention for these units to be affordable.		
Outcome: Add "affordable" to policy wording.		

Name	Organisation	Policy Reference
Mary-Jean Bartlett	Mary-Jean Bartlett	5.10
Nature of Comment: Object		

Development proposals larger than 10 units must provide the provision of trees and planting to the same extent necessary to replace those which are lost in consequence of building or building works

Response:

The justification for this proposal is unclear. It seems of little advantage for the quantity of trees and planting to be equal to that which is lost if the space which these occupy does not offer the same level of amenity to that which it replaces. An amenity test is considered more useful and more workable.

Outcome:

No change.

Name	Organisation	Policy Reference
Mary-Jean Bartlett	Mary-Jean Bartlett	6.13

Nature of Comment: Object

Developments must not result in a reduction in on-street parking capacity, especially for workers engaged in working at night or other times when public transport is impractical.

Response:

The stated strategic aim of RLP 6.13 is to strike a balance between "promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use". It is not therefore considered that a blanket ban on the loss of parking of any form would be compliant with regional policy.

Outcome:

No change.

Name	Organisation	Policy Reference
Mary-Jean Bartlett	Mary-Jean Bartlett	7.3

Nature of Comment: Object

Developments in excess of 100 homes must provide a secure space for police officers to work, rest and meet the public – these premises must be open to residents outside of the development.

Response:

No request for such provision was made by the Metropolitan Police during our engagement with them and it is far from clear that it would be useful. To make such provision a requirement of policy could potentially make it a higher priority than charges levied in the CIL and thus endanger appropriate contributions for infrastructure from major schemes.

Outcome:

No change.

Name	Organisation	Policy Reference
Mary-Jean Bartlett	Mary-Jean Bartlett	7.7
<p>Nature of Comment: Object Tall buildings should only be permitted in accordance with the safeguards provided by the Replacement London Plan – for form, proportion, scale and composition of surrounding building and no adverse impacts on local micro climate, wind turbulence, overshadowing or telecommunication interference. A definition of tall buildings must be provided for valid and meaningful consultation. We assume a tall building is anything over 4 storeys</p>		
<p>Response: All Local Variations are in addition to RLP policies. Tall buildings can be defined according to CABE / English Heritage Guidance as "buildings which are substantially taller than their neighbours and / or which significantly change the skyline".</p>		
<p>Outcome: Revise accordingly.</p>		

Name	Organisation	Policy Reference
Arthur Breens	Arthur Breens	2.18
<p>Nature of Comment: Object The policy should be to actively protect green spaces rather than just seek "enhancements" from any developments.</p>		
<p>Response: Policy 2.18 is not intended to provide protection for open space. RLP policies 7.16, 7.17, and 7.18 provide protection for different types of open space across London. It is not considered that the suggested revision is necessary in policy terms and it would seem to change the intention of the original London Plan policy.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Arthur Breens	Arthur Breens	3.5
<p>Nature of Comment: Object Developments should specifically provide safe and secure space for families, children and older people.</p>		
<p>Response: It is the intention of national, regional and local policy that all residential units should be safe and secure for all residents. The needs of different types of residents or family units for different types of accommodation are addressed through the Housing Strategy which</p>		

specifies the different sizes of dwelling that will need to be delivered to meet identified need in the Borough. It is not clear what the proposed addition would add to the policy.

Outcome:

No change.

Name	Organisation	Policy Reference
Arthur Breens	Arthur Breens	3.17
<p>Nature of Comment: Object All development proposals in excess of 100 homes must provide the provision of additional social infrastructure, rather than "should support"</p>		
<p>Response: The government's preferred method for development to contribute to strategic infrastructure requirements is through the Community Infrastructure Levy (CIL). Work on Ealing's CIL is proceeding in parallel to the DM DPD. This type of policy support is not necessary in order for the CIL to have force. The figure of 100 units seems arbitrary and is not supported.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Arthur Breens	Arthur Breens	3.18
<p>Nature of Comment: Object Sufficient parking for infirm and family users of healthcare facilities must be provided.</p>		
<p>Response: Representation noted. The London Plan includes disabled car parking standards for developments, including healthcare facilities. All developments must include provision for disabled people. These developments must also be accessible by public transport, which may also used by disabled people.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Arthur Breens	Arthur Breens	4A
<p>Nature of Comment: Object Six months is not long enough for a site to be deemed "not viable for re-occupation as an employment use" – this should be at least 2</p>		

years, to take a realistic time span across a short-term economic dip. Also consideration needs to be given to the preservation of parking provision on or around employment sites.
Response: Agreed. 2 years is a more representative period to assess the viability of a site for reuse of employment purposes.
Outcome: Revise accordingly.

Name	Organisation	Policy Reference
Arthur Breens	Arthur Breens	4.8
Nature of Comment: Object The policy needs to actively support diversity in the retail offer, rather than more “me too” comparison goods and convenience shopping.		
Response: It is not clear what type of variety in retail offer is promoted by the respondent. Plans for the retail mix of a given area will generally be located in area specific SPDs or AAPs. It is difficult to see how this could be adequately controlled or positively affected by a DM policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Arthur Breens	Arthur Breens	4.9
Nature of Comment: Object The policy should be to seek a binding obligation from developers to provide small shop units, at affordable rents, for large residential schemes.		
Response: It is not considered helpful to the realisation of this extra retail provision to be overly prescriptive as to how it should be met. The policy makes clear that this contribution should normally be made in the form of new units, but there may be circumstances in which financial contributions would provide a better solution. It is however agreed that the wording could make clearer the intention for these units to be affordable.		
Outcome: Add "affordable" to policy wording.		

Name	Organisation	Policy Reference
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Arthur Breens	Arthur Breens	5.10
Nature of Comment: Object Development proposals larger than 10 units must provide the provision of trees and planting to the same extent necessary to replace those which are lost in consequence of building or building works		
Response: The justification for this proposal is unclear. It seems of little advantage for the quantity of trees and planting to be equal to that which is lost if the space which these occupy does not offer the same level of amenity to that which it replaces. An amenity test is considered more useful and more workable.		
Outcome: No change.		

Name	Organisation	Policy Reference
Arthur Breens	Arthur Breens	6.13
Nature of Comment: Object Developments must not result in a reduction in on-street parking capacity, especially for workers engaged in working at night or other times when public transport is impractical.		
Response: The stated strategic aim of RLP 6.13 is to strike a balance between "promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use". It is not therefore considered that a blanket ban on the loss of parking of any form would be compliant with regional policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Arthur Breens	Arthur Breens	7.3
Nature of Comment: Object Developments in excess of 100 homes must provide a secure space for police officers to work, rest and meet the public – these premises must be open to residents outside of the development.		
Response: No request for such provision was made by the Metropolitan Police during our engagement with them and it is far from clear that it would be useful. To make such provision a requirement of policy could potentially make it a higher priority than charges levied in the CIL and thus endanger appropriate contributions for infrastructure from major schemes.		
Outcome:		

No change.

Name	Organisation	Policy Reference
Arthur Breens	Arthur Breens	7.7
Nature of Comment: Object Tall buildings should only be permitted in accordance with the safeguards provided by the Replacement London Plan – for form, proportion, scale and composition of surrounding building and no adverse impacts on local micro climate, wind turbulence, overshadowing or telecommunication interference. A definition of tall buildings must be provided for valid and meaningful consultation. We assume a tall building is anything over 4 storeys		
Response: All Local Variations are in addition to RLP policies. Tall buildings can be defined according to CABE / English Heritage Guidance as "buildings which are substantially taller than their neighbours and / or which significantly change the skyline".		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Charlotte Bubb	Charlotte Bubb	2.18
Nature of Comment: Object The policy should be to actively protect green spaces rather than just seek "enhancements" from any developments.		
Response: Policy 2.18 is not intended to provide protection for open space. RLP policies 7.16, 7.17, and 7.18 provide protection for different types of open space across London. It is not considered that the suggested revision is necessary in policy terms and it would seem to change the intention of the original London Plan policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Charlotte Bubb	Charlotte Bubb	3.5
Nature of Comment: Object Developments should specifically provide safe and secure space for families, children and older people.		
Response:		

It is the intention of national, regional and local policy that all residential units should be safe and secure for all residents. The needs of different types of residents or family units for different types of accommodation are addressed through the Housing Strategy which specifies the different sizes of dwelling that will need to be delivered to meet identified need in the Borough. It is not clear what the proposed addition would add to the policy.

Outcome:

No change.

Name	Organisation	Policy Reference
Charlotte Bubb	Charlotte Bubb	3.17
Nature of Comment: Object		
All development proposals in excess of 100 homes must provide the provision of additional social infrastructure, rather than "should support"		
Response:		
The government's preferred method for development to contribute to strategic infrastructure requirements is through the Community Infrastructure Levy (CIL). Work on Ealing's CIL is proceeding in parallel to the DM DPD. This type of policy support is not necessary in order for the CIL to have force.		
The figure of 100 units seems arbitrary and is not supported.		
Outcome:		
No change.		

Name	Organisation	Policy Reference
Charlotte Bubb	Charlotte Bubb	3.18
Nature of Comment: Object		
Sufficient parking for infirm and family users of healthcare facilities must be provided.		
Response:		
Representation noted. The London Plan includes disabled car parking standards for developments, including healthcare facilities. All developments must include provision for disabled people. These developments must also be accessible by public transport, which may also used by disabled people.		
Outcome:		
No change.		

Name	Organisation	Policy Reference
Charlotte Bubb	Charlotte Bubb	4A

<p>Nature of Comment: Object Six months is not long enough for a site to be deemed “not viable for re-occupation as an employment use” – this should be at least 2 years, to take a realistic time span across a short-term economic dip. Also consideration needs to be given to the preservation of parking provision on or around employment sites.</p>
<p>Response: Agreed. 2 years is a more representative period to assess the viability of a site for reuse of employment purposes.</p>
<p>Outcome: Revise accordingly.</p>

Name	Organisation	Policy Reference
Charlotte Bubb	Charlotte Bubb	4.8
<p>Nature of Comment: Object The policy needs to actively support diversity in the retail offer, rather than more “me too” comparison goods and convenience shopping.</p>		
<p>Response: It is not clear what type of variety in retail offer is promoted by the respondent. Plans for the retail mix of a given area will generally be located in area specific SPDs or AAPs. It is difficult to see how this could be adequately controlled or positively affected by a DM policy.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Charlotte Bubb	Charlotte Bubb	4.9
<p>Nature of Comment: Object The policy should be to seek a binding obligation from developers to provide small shop units, at affordable rents, for large residential schemes.</p>		
<p>Response: It is not considered helpful to the realisation of this extra retail provision to be overly prescriptive as to how it should be met. The policy makes clear that this contribution should normally be made in the form of new units, but there may be circumstances in which financial contributions would provide a better solution. It is however agreed that the wording could make clearer the intention for these units to be affordable.</p>		
<p>Outcome: Add "affordable" to policy wording.</p>		

Name	Organisation	Policy Reference
Charlotte Bubb	Charlotte Bubb	5.10
Nature of Comment: Object Development proposals larger than 10 units must provide the provision of trees and planting to the same extent necessary to replace those which are lost in consequence of building or building works		
Response: The justification for this proposal is unclear. It seems of little advantage for the quantity of trees and planting to be equal to that which is lost if the space which these occupy does not offer the same level of amenity to that which it replaces. An amenity test is considered more useful and more workable.		
Outcome: No change.		

Name	Organisation	Policy Reference
Charlotte Bubb	Charlotte Bubb	6.13
Nature of Comment: Object Developments must not result in a reduction in on-street parking capacity, especially for workers engaged in working at night or other times when public transport is impractical.		
Response: The stated strategic aim of RLP 6.13 is to strike a balance between "promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use". It is not therefore considered that a blanket ban on the loss of parking of any form would be compliant with regional policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Charlotte Bubb	Charlotte Bubb	7.3
Nature of Comment: Object Developments in excess of 100 homes must provide a secure space for police officers to work, rest and meet the public – these premises must be open to residents outside of the development.		
Response: No request for such provision was made by the Metropolitan Police during our engagement with them and it is far from clear that it would be useful. To make such provision a requirement of policy could potentially make it a higher priority than charges levied in the		

CIL and thus endanger appropriate contributions for infrastructure from major schemes.
Outcome: No change.

Name	Organisation	Policy Reference
Charlotte Bubb	Charlotte Bubb	7.7
Nature of Comment: Object Tall buildings should only be permitted in accordance with the safeguards provided by the Replacement London Plan – for form, proportion, scale and composition of surrounding building and no adverse impacts on local micro climate, wind turbulence, overshadowing or telecommunication interference. A definition of tall buildings must be provided for valid and meaningful consultation. We assume a tall building is anything over 4 storeys		
Response: All Local Variations are in addition to RLP policies. Tall buildings can be defined according to CABA / English Heritage Guidance as "buildings which are substantially taller than their neighbours and / or which significantly change the skyline".		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Philip Bubb	Philip Bubb	2.18
Nature of Comment: Object The policy should be to actively protect green spaces rather than just seek "enhancements" from any developments.		
Response: Policy 2.18 is not intended to provide protection for open space. RLP policies 7.16, 7.17, and 7.18 provide protection for different types of open space across London. It is not considered that the suggested revision is necessary in policy terms and it would seem to change the intention of the original London Plan policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Philip Bubb	Philip Bubb	3.5
Nature of Comment: Object		

Developments should specifically provide safe and secure space for families, children and older people.
<p>Response: It is the intention of national, regional and local policy that all residential units should be safe and secure for all residents. The needs of different types of residents or family units for different types of accommodation are addressed through the Housing Strategy which specifies the different sizes of dwelling that will need to be delivered to meet identified need in the Borough. It is not clear what the proposed addition would add to the policy.</p>
<p>Outcome: No change.</p>

Name	Organisation	Policy Reference
Philip Bubb	Philip Bubb	3.17
<p>Nature of Comment: Object All development proposals in excess of 100 homes must provide the provision of additional social infrastructure, rather than "should support"</p>		
<p>Response: The government's preferred method for development to contribute to strategic infrastructure requirements is through the Community Infrastructure Levy (CIL). Work on Ealing's CIL is proceeding in parallel the DM DPD. This type of policy support is not necessary in order for the CIL to have force. The figure of 100 units seems arbitrary and is not supported.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Philip Bubb	Philip Bubb	3.18
<p>Nature of Comment: Object Sufficient parking for infirm and family users of healthcare facilities must be provided.</p>		
<p>Response: Representation noted. The London Plan includes disabled car parking standards for developments, including healthcare facilities. All developments must include provision for disabled people. These developments must also be accessible by public transport, which may also used by disabled people.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Philip Bubb	Philip Bubb	4A
<p>Nature of Comment: Object Six months is not long enough for a site to be deemed “not viable for re-occupation as an employment use” – this should be at least 2 years, to take a realistic time span across a short-term economic dip. Also consideration needs to be given to the preservation of parking provision on or around employment sites.</p>		
<p>Response: Agreed. 2 years is a more representative period to assess the viability of a site for reuse of employment purposes.</p>		
<p>Outcome: Revise accordingly.</p>		

Name	Organisation	Policy Reference
Philip Bubb	Philip Bubb	4.8
<p>Nature of Comment: Object The policy needs to actively support diversity in the retail offer, rather than more “me too” comparison goods and convenience shopping.</p>		
<p>Response: It is not clear what type of variety in retail offer is promoted by the respondent. Plans for the retail mix of a given area will generally be located in area specific SPDs or AAPs. It is difficult to see how this could be adequately controlled or positively affected by a DM policy.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Philip Bubb	Philip Bubb	4.9
<p>Nature of Comment: Object The policy should be to seek a binding obligation from developers to provide small shop units, at affordable rents, for large residential schemes.</p>		
<p>Response: It is not considered helpful to the realisation of this extra retail provision to be overly prescriptive as to how it should be met. The policy makes clear that this contribution should normally be made in the form of new units, but there may be circumstances in which financial contributions would provide a better solution. It is however agreed that the wording could make clearer the intention for</p>		

these units to be affordable.

Outcome:
Add "affordable" to policy wording.

Name	Organisation	Policy Reference
Philip Bubb	Philip Bubb	5.10
<p>Nature of Comment: Object Development proposals larger than 10 units must provide the provision of trees and planting to the same extent necessary to replace those which are lost in consequence of building or building works</p>		
<p>Response: The justification for this proposal is unclear. It seems of little advantage for the quantity of trees and planting to be equal to that which is lost if the space which these occupy does not offer the same level of amenity to that which it replaces. An amenity test is considered more useful and more workable.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Philip Bubb	Philip Bubb	6.13
<p>Nature of Comment: Object Developments must not result in a reduction in on-street parking capacity, especially for workers engaged in working at night or other times when public transport is impractical.</p>		
<p>Response: The stated strategic aim of RLP 6.13 is to strike a balance between "promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use". It is not therefore considered that a blanket ban on the loss of parking of any form would be compliant with regional policy.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Philip Bubb	Philip Bubb	7.3
<p>Nature of Comment: Object Developments in excess of 100 homes must provide a secure space for police officers to work, rest and meet the public – these premises must be open to residents outside of the development.</p>		

<p>Response: No request for such provision was made by the Metropolitan Police during our engagement with them and it is far from clear that it would be useful. To make such provision a requirement of policy could potentially make it a higher priority than charges levied in the CIL and thus endanger appropriate contributions for infrastructure from major schemes.</p>
<p>Outcome: No change.</p>

Name	Organisation	Policy Reference
Philip Bubb	Philip Bubb	7.7
<p>Nature of Comment: Object Tall buildings should only be permitted in accordance with the safeguards provided by the Replacement London Plan – for form, proportion, scale and composition of surrounding building and no adverse impacts on local micro climate, wind turbulence, overshadowing or telecommunication interference. A definition of tall buildings must be provided for valid and meaningful consultation. We assume a tall building is anything over 4 storeys</p>		
<p>Response: All Local Variations are in addition to RLP policies. Tall buildings can be defined according to CABE / English Heritage Guidance as "buildings which are substantially taller than their neighbours and / or which significantly change the skyline".</p>		
<p>Outcome: Revise accordingly.</p>		

Name	Organisation	Policy Reference
Maggie Wilson	Maggie Wilson	2.18
<p>Nature of Comment: Object The policy should be to actively protect green spaces rather than just seek "enhancements" from any developments.</p>		
<p>Response: Policy 2.18 is not intended to provide protection for open space. RLP policies 7.16, 7.17, and 7.18 provide protection for different types of open space across London. It is not considered that the suggested revision is necessary in policy terms and it would seem to change the intention of the original London Plan policy.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Maggie Wilson	Maggie Wilson	3.5
Nature of Comment: Object Developments should specifically provide safe and secure space for families, children and older people.		
Response: It is the intention of national, regional and local policy that all residential units should be safe and secure for all residents. The needs of different types of residents or family units for different types of accommodation are addressed through the Housing Strategy which specifies the different sizes of dwelling that will need to be delivered to meet identified need in the Borough. It is not clear what the proposed addition would add to the policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Maggie Wilson	Maggie Wilson	3.17
Nature of Comment: Object All development proposals in excess of 100 homes must provide the provision of additional social infrastructure, rather than "should support"		
Response: The government's preferred method for development to contribute to strategic infrastructure requirements is through the Community Infrastructure Levy (CIL). Work on Ealing's CIL is proceeding in parallel to the DM DPD. This type of policy support is not necessary in order for the CIL to have force. The figure of 100 units seems arbitrary and is not supported.		
Outcome: No change.		

Name	Organisation	Policy Reference
Maggie Wilson	Maggie Wilson	3.18
Nature of Comment: Object Sufficient parking for infirm and family users of healthcare facilities must be provided.		
Response: Representation noted. The London Plan includes disabled car parking standards for developments, including healthcare facilities. All developments must include provision for disabled people. These developments must also be accessible by public transport,		

which may also used by disabled people.
Outcome: No change.

Name	Organisation	Policy Reference
Maggie Wilson	Maggie Wilson	4A
Nature of Comment: Object Six months is not long enough for a site to be deemed “not viable for re-occupation as an employment use” – this should be at least 2 years, to take a realistic time span across a short-term economic dip. Also consideration needs to be given to the preservation of parking provision on or around employment sites.		
Response: Agreed. 2 years is a more representative period to assess the viability of a site for reuse of employment purposes.		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Maggie Wilson	Maggie Wilson	4.8
Nature of Comment: Object The policy needs to actively support diversity in the retail offer, rather than more “me too” comparison goods and convenience shopping.		
Response: It is not clear what type of variety in retail offer is promoted by the respondent. Plans for the retail mix of a given area will generally be located in area specific SPDs or AAPs. It is difficult to see how this could be adequately controlled or positively affected by a DM policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Maggie Wilson	Maggie Wilson	4.9
Nature of Comment: Object The policy should be to seek a binding obligation from developers to provide small shop units, at affordable rents, for large residential schemes.		
Response:		

It is not considered helpful to the realisation of this extra retail provision to be overly prescriptive as to how it should be met. The policy makes clear that this contribution should normally be made in the form of new units, but there may be circumstances in which financial contributions would provide a better solution. It is however agreed that the wording could make clearer the intention for these units to be affordable.

Outcome:

Add "affordable" to policy wording.

Name	Organisation	Policy Reference
Maggie Wilson	Maggie Wilson	5.10
Nature of Comment: Object		
Development proposals larger than 10 units must provide the provision of trees and planting to the same extent necessary to replace those which are lost in consequence of building or building works		
Response:		
The justification for this proposal is unclear. It seems of little advantage for the quantity of trees and planting to be equal to that which is lost if the space which these occupy does not offer the same level of amenity to that which it replaces. An amenity test is considered more useful and more workable.		
Outcome:		
No change.		

Name	Organisation	Policy Reference
Maggie Wilson	Maggie Wilson	6.13
Nature of Comment: Object		
Developments must not result in a reduction in on-street parking capacity, especially for workers engaged in working at night or other times when public transport is impractical.		
Response:		
The stated strategic aim of RLP 6.13 is to strike a balance between "promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use". It is not therefore considered that a blanket ban on the loss of parking of any form would be compliant with regional policy.		
Outcome:		
No change.		

Name	Organisation	Policy Reference
Maggie Wilson	Maggie Wilson	7.3

<p>Nature of Comment: Object Developments in excess of 100 homes must provide a secure space for police officers to work, rest and meet the public – these premises must be open to residents outside of the development.</p>
<p>Response: No request for such provision was made by the Metropolitan Police during our engagement with them and it is far from clear that it would be useful. To make such provision a requirement of policy could potentially make it a higher priority than charges levied in the CIL and thus endanger appropriate contributions for infrastructure from major schemes.</p>
<p>Outcome: No change.</p>

Name	Organisation	Policy Reference
Maggie Wilson	Maggie Wilson	7.7
<p>Nature of Comment: Object Tall buildings should only be permitted in accordance with the safeguards provided by the Replacement London Plan – for form, proportion, scale and composition of surrounding building and no adverse impacts on local micro climate, wind turbulence, overshadowing or telecommunication interference. A definition of tall buildings must be provided for valid and meaningful consultation. We assume a tall building is anything over 4 storeys</p>		
<p>Response: All Local Variations are in addition to RLP policies. Tall buildings can be defined according to CABI / English Heritage Guidance as "buildings which are substantially taller than their neighbours and / or which significantly change the skyline".</p>		
<p>Outcome: Revise accordingly.</p>		

Name	Organisation	Policy Reference
Melvyn Green	Melvyn Green	2.18
<p>Nature of Comment: Object The policy should be to actively protect green spaces rather than just seek "enhancements" from any developments.</p>		
<p>Response: Policy 2.18 is not intended to provide protection for open space. RLP policies 7.16, 7.17, and 7.18 provide protection for different types of open space across London. It is not considered that the suggested revision is necessary in policy terms and it would seem to change the intention of the original London Plan policy.</p>		

Outcome:
No change.

Name	Organisation	Policy Reference
Melvyn Green	Melvyn Green	3.5
Nature of Comment: Object Developments should specifically provide safe and secure space for families, children and older people.		
Response: It is the intention of national, regional and local policy that all residential units should be safe and secure for all residents. The needs of different types of residents or family units for different types of accommodation are addressed through the Housing Strategy which specifies the different sizes of dwelling that will need to be delivered to meet identified need in the Borough. It is not clear what the proposed addition would add to the policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Melvyn Green	Melvyn Green	3.17
Nature of Comment: Object All development proposals in excess of 100 homes must provide the provision of additional social infrastructure, rather than "should support"		
Response: The government's preferred method for development to contribute to strategic infrastructure requirements is through the Community Infrastructure Levy (CIL). Work on Ealing's CIL is proceeding in parallel to the DM DPD. This type of policy support is not necessary in order for the CIL to have force. The figure of 100 units seems arbitrary and is not supported.		
Outcome: No change.		

Name	Organisation	Policy Reference
Melvyn Green	Melvyn Green	3.18
Nature of Comment: Object Sufficient parking for infirm and family users of healthcare facilities must be provided.		
Response:		

Representation noted. The London Plan includes disabled car parking standards for developments, including healthcare facilities. All developments must include provision for disabled people. These developments must also be accessible by public transport, which may also be used by disabled people.
Outcome: No change.

Name	Organisation	Policy Reference
Melvyn Green	Melvyn Green	4A
Nature of Comment: Object Six months is not long enough for a site to be deemed “not viable for re-occupation as an employment use” – this should be at least 2 years, to take a realistic time span across a short-term economic dip. Also consideration needs to be given to the preservation of parking provision on or around employment sites.		
Response: Agreed. 2 years is a more representative period to assess the viability of a site for reuse of employment purposes.		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Melvyn Green	Melvyn Green	4.8
Nature of Comment: Object The policy needs to actively support diversity in the retail offer, rather than more “me too” comparison goods and convenience shopping.		
Response: It is not clear what type of variety in retail offer is promoted by the respondent. Plans for the retail mix of a given area will generally be located in area specific SPDs or AAPs. It is difficult to see how this could be adequately controlled or positively affected by a DM policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Melvyn Green	Melvyn Green	4.9
Nature of Comment: Object The policy should be to seek a binding obligation from developers to provide small shop units, at affordable rents, for large residential		

schemes.
<p>Response: It is not considered helpful to the realisation of this extra retail provision to be overly prescriptive as to how it should be met. The policy makes clear that this contribution should normally be made in the form of new units, but there may be circumstances in which financial contributions would provide a better solution. It is however agreed that the wording could make clearer the intention for these units to be affordable.</p>
<p>Outcome: Add "affordable" to policy wording.</p>

Name	Organisation	Policy Reference
Melvyn Green	Melvyn Green	5.10
<p>Nature of Comment: Object Development proposals larger than 10 units must provide the provision of trees and planting to the same extent necessary to replace those which are lost in consequence of building or building works</p>		
<p>Response: The justification for this proposal is unclear. It seems of little advantage for the quantity of trees and planting to be equal to that which is lost if the space which these occupy does not offer the same level of amenity to that which it replaces. An amenity test is considered more useful and more workable.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Melvyn Green	Melvyn Green	6.13
<p>Nature of Comment: Object Developments must not result in a reduction in on-street parking capacity, especially for workers engaged in working at night or other times when public transport is impractical.</p>		
<p>Response: The stated strategic aim of RLP 6.13 is to strike a balance between "promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use". It is not therefore considered that a blanket ban on the loss of parking of any form would be compliant with regional policy.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Melvyn Green	Melvyn Green	7.3
<p>Nature of Comment: Object Developments in excess of 100 homes must provide a secure space for police officers to work, rest and meet the public – these premises must be open to residents outside of the development.</p>		
<p>Response: No request for such provision was made by the Metropolitan Police during our engagement with them and it is far from clear that it would be useful. To make such provision a requirement of policy could potentially make it a higher priority than charges levied in the CIL and thus endanger appropriate contributions for infrastructure from major schemes.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Melvyn Green	Melvyn Green	7.7
<p>Nature of Comment: Object Tall buildings should only be permitted in accordance with the safeguards provided by the Replacement London Plan – for form, proportion, scale and composition of surrounding building and no adverse impacts on local micro climate, wind turbulence, overshadowing or telecommunication interference. A definition of tall buildings must be provided for valid and meaningful consultation. We assume a tall building is anything over 4 storeys</p>		
<p>Response: All Local Variations are in addition to RLP policies. Tall buildings can be defined according to CABA / English Heritage Guidance as "buildings which are substantially taller than their neighbours and / or which significantly change the skyline".</p>		
<p>Outcome: Revise accordingly.</p>		

Name	Organisation	Policy Reference
Judith Paris	Judith Paris	2.18
Nature of Comment: Object The policy should be to actively protect green spaces rather than just seek "enhancements" from any developments.		
Response: Policy 2.18 is not intended to provide protection for open space. RLP policies 7.16, 7.17, and 7.18 provide protection for different types of open space across London. It is not considered that the suggested revision is necessary in policy terms and it would seem to change the intention of the original London Plan policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Judith Paris	Judith Paris	3.5
Nature of Comment: Object Developments should specifically provide safe and secure space for families, children and older people.		
Response: It is the intention of national, regional and local policy that all residential units should be safe and secure for all residents. The needs of different types of residents or family units for different types of accommodation are addressed through the Housing Strategy which specifies the different sizes of dwelling that will need to be delivered to meet identified need in the Borough. It is not clear what the proposed addition would add to the policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Judith Paris	Judith Paris	3.17
Nature of Comment: Object All development proposals in excess of 100 homes must provide the provision of additional social infrastructure, rather than "should support"		
Response: The government's preferred method for development to contribute to strategic infrastructure requirements is through the Community Infrastructure Levy (CIL). Work on Ealing's CIL is proceeding in parallel to the DM DPD and CIL. This type of policy support is not necessary in order for the CIL to have force.		

The figure of 100 units seems arbitrary and is not supported.
Outcome: No change.

Name	Organisation	Policy Reference
Judith Paris	Judith Paris	3.18
Nature of Comment: Object Sufficient parking for infirm and family users of healthcare facilities must be provided.		
Response: Representation noted. The London Plan includes disabled car parking standards for developments, including healthcare facilities. All developments must include provision for disabled people. These developments must also be accessible by public transport, which may also used by disabled people.		
Outcome: No change.		

Name	Organisation	Policy Reference
Judith Paris	Judith Paris	4A
Nature of Comment: Object Six months is not long enough for a site to be deemed “not viable for re-occupation as an employment use” – this should be at least 2 years, to take a realistic time span across a short-term economic dip. Also consideration needs to be given to the preservation of parking provision on or around employment sites.		
Response: Agreed. 2 years is a more representative period to assess the viability of a site for reuse of employment purposes.		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Judith Paris	Judith Paris	4.8
Nature of Comment: Object The policy needs to actively support diversity in the retail offer, rather than more “me too” comparison goods and convenience shopping.		
Response: It is not clear what type of variety in retail offer is promoted by the respondent. Plans for the retail mix of a given area will generally		

be located in area specific SPDs or AAPs. It is difficult to see how this could be adequately controlled or positively affected by a DM policy.

Outcome:

No change.

Name	Organisation	Policy Reference
Judith Paris	Judith Paris	4.9
Nature of Comment: Object		
The policy should be to seek a binding obligation from developers to provide small shop units, at affordable rents, for large residential schemes.		
Response:		
It is not considered helpful to the realisation of this extra retail provision to be overly prescriptive as to how it should be met. The policy makes clear that this contribution should normally be made in the form of new units, but there may be circumstances in which financial contributions would provide a better solution. It is however agreed that the wording could make clearer the intention for these units to be affordable.		
Outcome:		
Add "affordable" to policy wording.		

Name	Organisation	Policy Reference
Judith Paris	Judith Paris	5.10
Nature of Comment: Object		
Development proposals larger than 10 units must provide the provision of trees and planting to the same extent necessary to replace those which are lost in consequence of building or building works		
Response:		
The justification for this proposal is unclear. It seems of little advantage for the quantity of trees and planting to be equal to that which is lost if the space which these occupy does not offer the same level of amenity to that which it replaces. An amenity test is considered more useful and more workable.		
Outcome:		
No change.		

Name	Organisation	Policy Reference
Judith Paris	Judith Paris	6.13
Nature of Comment: Object		

Developments must not result in a reduction in on-street parking capacity, especially for workers engaged in working at night or other times when public transport is impractical.

Response:

The stated strategic aim of RLP 6.13 is to strike a balance between "promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use". It is not therefore considered that a blanket ban on the loss of parking of any form would be compliant with regional policy.

Outcome:

No change.

Name	Organisation	Policy Reference
Judith Paris	Judith Paris	7.3

Nature of Comment: Object

Developments in excess of 100 homes must provide a secure space for police officers to work, rest and meet the public – these premises must be open to residents outside of the development.

Response:

No request for such provision was made by the Metropolitan Police during our engagement with them and it is far from clear that it would be useful. To make such provision a requirement of policy could potentially make it a higher priority than charges levied in the CIL and thus endanger appropriate contributions for infrastructure from major schemes.

Outcome:

No change.

Name	Organisation	Policy Reference
Judith Paris	Judith Paris	7.7

Nature of Comment: Object

Tall buildings should only be permitted in accordance with the safeguards provided by the Replacement London Plan – for form, proportion, scale and composition of surrounding building and no adverse impacts on local micro climate, wind turbulence, overshadowing or telecommunication interference.

A definition of tall buildings must be provided for valid and meaningful consultation. We assume a tall building is anything over 4 storeys

Response:

All Local Variations are in addition to RLP policies.

Tall buildings can be defined according to CABE / English Heritage Guidance as "buildings which are substantially taller than their neighbours and / or which significantly change the skyline".

Outcome:
Revise accordingly.

Name	Organisation	Policy Reference
Kate Woolven	Kate Woolven	2.18
Nature of Comment: Object The policy should be to actively protect green spaces rather than just seek "enhancements" from any developments.		
Response: Policy 2.18 is not intended to provide protection for open space. RLP policies 7.16, 7.17, and 7.18 provide protection for different types of open space across London. It is not considered that the suggested revision is necessary in policy terms and it would seem to change the intention of the original London Plan policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Kate Woolven	Kate Woolven	3.5
Nature of Comment: Object Developments should specifically provide safe and secure space for families, children and older people.		
Response: It is the intention of national, regional and local policy that all residential units should be safe and secure for all residents. The needs of different types of residents or family units for different types of accommodation are addressed through the Housing Strategy which specifies the different sizes of dwelling that will need to be delivered to meet identified need in the Borough. It is not clear what the proposed addition would add to the policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Kate Woolven	Kate Woolven	3.17
Nature of Comment: Object All development proposals in excess of 100 homes must provide the provision of additional social infrastructure, rather than "should support"		
Response: The government's preferred method for development to contribute to strategic infrastructure requirements is through the Community		

Infrastructure Levy (CIL). Work on Ealing's CIL is proceeding in parallel to the DM DPD. This type of policy support is not necessary in order for the CIL to have force.
The figure of 100 units seems arbitrary and is not supported.

Outcome:
No change.

Name	Organisation	Policy Reference
Kate Woolven	Kate Woolven	3.18
Nature of Comment: Object Sufficient parking for infirm and family users of healthcare facilities must be provided.		
Response: Representation noted. The London Plan includes disabled car parking standards for developments, including healthcare facilities. All developments must include provision for disabled people. These developments must also be accessible by public transport, which may also used by disabled people.		
Outcome: No change.		

Name	Organisation	Policy Reference
Kate Woolven	Kate Woolven	4A
Nature of Comment: Object Six months is not long enough for a site to be deemed “not viable for re-occupation as an employment use” – this should be at least 2 years, to take a realistic time span across a short-term economic dip. Also consideration needs to be given to the preservation of parking provision on or around employment sites.		
Response: Agreed. 2 years is a more representative period to assess the viability of a site for reuse of employment purposes.		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Kate Woolven	Kate Woolven	4.8
Nature of Comment: Object The policy needs to actively support diversity in the retail offer, rather than more “me too” comparison goods and convenience shopping.		

<p>Response: It is not clear what type of variety in retail offer is promoted by the respondent. Plans for the retail mix of a given area will generally be located in area specific SPDs or AAPs. It is difficult to see how this could be adequately controlled or positively affected by a DM policy.</p>
<p>Outcome: No change.</p>

Name	Organisation	Policy Reference
Kate Woolven	Kate Woolven	4.9
<p>Nature of Comment: Object The policy should be to seek a binding obligation from developers to provide small shop units, at affordable rents, for large residential schemes.</p>		
<p>Response: It is not considered helpful to the realisation of this extra retail provision to be overly prescriptive as to how it should be met. The policy makes clear that this contribution should normally be made in the form of new units, but there may be circumstances in which financial contributions would provide a better solution. It is however agreed that the wording could make clearer the intention for these units to be affordable.</p>		
<p>Outcome: Add "affordable" to policy wording.</p>		

Name	Organisation	Policy Reference
Kate Woolven	Kate Woolven	5.10
<p>Nature of Comment: Object Development proposals larger than 10 units must provide the provision of trees and planting to the same extent necessary to replace those which are lost in consequence of building or building works</p>		
<p>Response: The justification for this proposal is unclear. It seems of little advantage for the quantity of trees and planting to be equal to that which is lost if the space which these occupy does not offer the same level of amenity to that which it replaces. An amenity test is considered more useful and more workable.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Kate Woolven	Kate Woolven	6.13
Nature of Comment: Object Developments must not result in a reduction in on-street parking capacity, especially for workers engaged in working at night or other times when public transport is impractical.		
Response: The stated strategic aim of RLP 6.13 is to strike a balance between "promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use". It is not therefore considered that a blanket ban on the loss of parking of any form would be compliant with regional policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Kate Woolven	Kate Woolven	7.3
Nature of Comment: Object Developments in excess of 100 homes must provide a secure space for police officers to work, rest and meet the public – these premises must be open to residents outside of the development.		
Response: No request for such provision was made by the Metropolitan Police during our engagement with them and it is far from clear that it would be useful. To make such provision a requirement of policy could potentially make it a higher priority than charges levied in the CIL and thus endanger appropriate contributions for infrastructure from major schemes.		
Outcome: No change.		

Name	Organisation	Policy Reference
Kate Woolven	Kate Woolven	7.7
Nature of Comment: Object Tall buildings should only be permitted in accordance with the safeguards provided by the Replacement London Plan – for form, proportion, scale and composition of surrounding building and no adverse impacts on local micro climate, wind turbulence, overshadowing or telecommunication interference. A definition of tall buildings must be provided for valid and meaningful consultation. We assume a tall building is anything over 4 storeys		
Response:		

All Local Variations are in addition to RLP policies.
 Tall buildings can be defined according to CABE / English Heritage Guidance as "buildings which are substantially taller than their neighbours and / or which significantly change the skyline".

Outcome:
 Revise accordingly.

Name	Organisation	Policy Reference
Nick Woolven	Nick Woolven	2.18
<p>Nature of Comment: Object The policy should be to actively protect green spaces rather than just seek "enhancements" from any developments.</p>		
<p>Response: Policy 2.18 is not intended to provide protection for open space. RLP policies 7.16, 7.17, and 7.18 provide protection for different types of open space across London. It is not considered that the suggested revision is necessary in policy terms and it would seem to change the intention of the original London Plan policy.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Nick Woolven	Nick Woolven	3.5
<p>Nature of Comment: Object Developments should specifically provide safe and secure space for families, children and older people.</p>		
<p>Response: It is the intention of national, regional and local policy that all residential units should be safe and secure for all residents. The needs of different types of residents or family units for different types of accommodation are addressed through the Housing Strategy which specifies the different sizes of dwelling that will need to be delivered to meet identified need in the Borough. It is not clear what the proposed addition would add to the policy.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Nick Woolven	Nick Woolven	3.17
Nature of Comment: Object All development proposals in excess of 100 homes must provide the provision of additional social infrastructure, rather than "should support"		
Response: The government's preferred method for development to contribute to strategic infrastructure requirements is through the Community Infrastructure Levy (CIL). Work on Ealing's CIL is proceeding in parallel to the DM DPD. This type of policy support is not necessary in order for the CIL to have force. The figure of 100 units seems arbitrary and is not supported.		
Outcome: No change.		

Name	Organisation	Policy Reference
Nick Woolven	Nick Woolven	3.18
Nature of Comment: Object Sufficient parking for infirm and family users of healthcare facilities must be provided.		
Response: Representation noted. The London Plan includes disabled car parking standards for developments, including healthcare facilities. All developments must include provision for disabled people. These developments must also be accessible by public transport, which may also be used by disabled people.		
Outcome: No change.		

Name	Organisation	Policy Reference
Nick Woolven	Nick Woolven	4A
Nature of Comment: Object Six months is not long enough for a site to be deemed "not viable for re-occupation as an employment use" – this should be at least 2 years, to take a realistic time span across a short-term economic dip. Also consideration needs to be given to the preservation of parking provision on or around employment sites.		
Response: Agreed. 2 years is a more representative period to assess the viability of a site for reuse of employment purposes.		

Outcome:
Revise accordingly.

Name	Organisation	Policy Reference
Nick Woolven	Nick Woolven	4.8
Nature of Comment: Object The policy needs to actively support diversity in the retail offer, rather than more “me too” comparison goods and convenience shopping.		
Response: It is not clear what type of variety in retail offer is promoted by the respondent. Plans for the retail mix of a given area will generally be located in area specific SPDs or AAPs. It is difficult to see how this could be adequately controlled or positively affected by a DM policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Nick Woolven	Nick Woolven	4.9
Nature of Comment: Object The policy should be to seek a binding obligation from developers to provide small shop units, at affordable rents, for large residential schemes.		
Response: It is not considered helpful to the realisation of this extra retail provision to be overly prescriptive as to how it should be met. The policy makes clear that this contribution should normally be made in the form of new units, but there may be circumstances in which financial contributions would provide a better solution. It is however agreed that the wording could make clearer the intention for these units to be affordable.		
Outcome: Add "affordable" to policy wording.		

Name	Organisation	Policy Reference
Nick Woolven	Nick Woolven	5.10
Nature of Comment: Object Development proposals larger than 10 units must provide the provision of trees and planting to the same extent necessary to replace those which are lost in consequence of building or building works		
Response: The justification for this proposal is unclear. It seems of little advantage for the quantity of trees and planting to be equal to that which is lost if the space which these occupy does not offer the same level of amenity to that which it replaces. An amenity test is considered more useful and more workable.		
Outcome: No change.		

Name	Organisation	Policy Reference
Nick Woolven	Nick Woolven	6.13
Nature of Comment: Object Developments must not result in a reduction in on-street parking capacity, especially for workers engaged in working at night or other times when public transport is impractical.		
Response: The stated strategic aim of RLP 6.13 is to strike a balance between "promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use". It is not therefore considered that a blanket ban on the loss of parking of any form would be compliant with regional policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Nick Woolven	Nick Woolven	7.3
Nature of Comment: Object Developments in excess of 100 homes must provide a secure space for police officers to work, rest and meet the public – these premises must be open to residents outside of the development.		
Response: No request for such provision was made by the Metropolitan Police during our engagement with them and it is far from clear that it would be useful. To make such provision a requirement of policy could potentially make it a higher priority than charges levied in the CIL and thus endanger appropriate contributions for infrastructure from major schemes.		

<p>Outcome: No change.</p>

Name	Organisation	Policy Reference
Nick Woolven	Nick Woolven	7.7
<p>Nature of Comment: Object Tall buildings should only be permitted in accordance with the safeguards provided by the Replacement London Plan – for form, proportion, scale and composition of surrounding building and no adverse impacts on local micro climate, wind turbulence, overshadowing or telecommunication interference. A definition of tall buildings must be provided for valid and meaningful consultation. We assume a tall building is anything over 4 storeys</p>		
<p>Response: All Local Variations are in addition to RLP policies. Tall buildings can be defined according to CABE / English Heritage Guidance as "buildings which are substantially taller than their neighbours and / or which significantly change the skyline".</p>		
<p>Outcome: Revise accordingly.</p>		

Name	Organisation	Policy Reference
Bill Wolmoth	Bill Wolmoth	2.18
<p>Nature of Comment: Object The policy should be to actively protect green spaces rather than just seek "enhancements" from any developments.</p>		
<p>Response: Policy 2.18 is not intended to provide protection for open space. RLP policies 7.16, 7.17, and 7.18 provide protection for different types of open space across London. It is not considered that the suggested revision is necessary in policy terms and it would seem to change the intention of the original London Plan policy.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Bill Wolmoth	Bill Wolmoth	3.5
<p>Nature of Comment: Object Developments should specifically provide safe and secure space for families, children and older people.</p>		

<p>Response: It is the intention of national, regional and local policy that all residential units should be safe and secure for all residents. The needs of different types of residents or family units for different types of accommodation are addressed through the Housing Strategy which specifies the different sizes of dwelling that will need to be delivered to meet identified need in the Borough. It is not clear what the proposed addition would add to the policy.</p>
<p>Outcome: No change.</p>

Name	Organisation	Policy Reference
Bill Wolmoth	Bill Wolmoth	3.17
<p>Nature of Comment: Object All development proposals in excess of 100 homes must provide the provision of additional social infrastructure, rather than "should support"</p>		
<p>Response: The government's preferred method for development to contribute to strategic infrastructure requirements is through the Community Infrastructure Levy (CIL). Work on Ealing's CIL is proceeding in parallel to the DM DPD. This type of policy support is not necessary in order for the CIL to have force. The figure of 100 units seems arbitrary and is not supported.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Bill Wolmoth	Bill Wolmoth	3.18
<p>Nature of Comment: Object Sufficient parking for infirm and family users of healthcare facilities must be provided.</p>		
<p>Response: Representation noted. The London Plan includes disabled car parking standards for developments, including healthcare facilities. All developments must include provision for disabled people. These developments must also be accessible by public transport, which may also be used by disabled people.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
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Bill Wolmoth	Bill Wolmoth	4A
<p>Nature of Comment: Object Six months is not long enough for a site to be deemed “not viable for re-occupation as an employment use” – this should be at least 2 years, to take a realistic time span across a short-term economic dip. Also consideration needs to be given to the preservation of parking provision on or around employment sites.</p>		
<p>Response: Agreed. 2 years is a more representative period to assess the viability of a site for reuse of employment purposes.</p>		
<p>Outcome: Revise accordingly.</p>		

Name	Organisation	Policy Reference
Bill Wolmoth	Bill Wolmoth	4.8
<p>Nature of Comment: Object The policy needs to actively support diversity in the retail offer, rather than more “me too” comparison goods and convenience shopping.</p>		
<p>Response: It is not clear what type of variety in retail offer is promoted by the respondent. Plans for the retail mix of a given area will generally be located in area specific SPDs or AAPs. It is difficult to see how this could be adequately controlled or positively affected by a DM policy.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Bill Wolmoth	Bill Wolmoth	4.9
<p>Nature of Comment: Object The policy should be to seek a binding obligation from developers to provide small shop units, at affordable rents, for large residential schemes.</p>		
<p>Response: It is not considered helpful to the realisation of this extra retail provision to be overly prescriptive as to how it should be met. The policy makes clear that this contribution should normally be made in the form of new units, but there may be circumstances in which financial contributions would provide a better solution. It is however agreed that the wording could make clearer the intention for these units to be affordable.</p>		

Outcome:
Add "affordable" to policy wording.

Name	Organisation	Policy Reference
Bill Wolmoth	Bill Wolmoth	5.10
Nature of Comment: Object Development proposals larger than 10 units must provide the provision of trees and planting to the same extent necessary to replace those which are lost in consequence of building or building works		
Response: The justification for this proposal is unclear. It seems of little advantage for the quantity of trees and planting to be equal to that which is lost if the space which these occupy does not offer the same level of amenity to that which it replaces. An amenity test is considered more useful and more workable.		
Outcome: No change.		

Name	Organisation	Policy Reference
Bill Wolmoth	Bill Wolmoth	6.13
Nature of Comment: Object Developments must not result in a reduction in on-street parking capacity, especially for workers engaged in working at night or other times when public transport is impractical.		
Response: The stated strategic aim of RLP 6.13 is to strike a balance between "promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use". It is not therefore considered that a blanket ban on the loss of parking of any form would be compliant with regional policy.		
Outcome: No change.		

Name	Organisation	Policy Reference
Bill Wolmoth	Bill Wolmoth	7.3
Nature of Comment: Object Developments in excess of 100 homes must provide a secure space for police officers to work, rest and meet the public – these premises must be open to residents outside of the development.		
Response:		

No request for such provision was made by the Metropolitan Police during our engagement with them and it is far from clear that it would be useful. To make such provision a requirement of policy could potentially make it a higher priority than charges levied in the CIL and thus endanger appropriate contributions for infrastructure from major schemes.

Outcome:

No change.

Name	Organisation	Policy Reference
Bill Wolmoth	Bill Wolmoth	7.7
<p>Nature of Comment: Object Tall buildings should only be permitted in accordance with the safeguards provided by the Replacement London Plan – for form, proportion, scale and composition of surrounding building and no adverse impacts on local micro climate, wind turbulence, overshadowing or telecommunication interference. A definition of tall buildings must be provided for valid and meaningful consultation. We assume a tall building is anything over 4 storeys</p>		
<p>Response: All Local Variations are in addition to RLP policies. Tall buildings can be defined according to CABE / English Heritage Guidance as "buildings which are substantially taller than their neighbours and / or which significantly change the skyline".</p>		
<p>Outcome: Revise accordingly.</p>		

Name	Organisation	Policy Reference
Rachael Bust	The Coal Authority	
<p>Nature of Comment: no observations</p>		
<p>Response: Noted.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Richard Oakley	Heathrow Airport Ltd	7.7
Nature of Comment: Amend policy to include aerodrome safeguarding		
Response: Policy 7.7 is part of the adopted London Plan 2011. There is no locally specific reason to justify the variation of this policy and no aerodromes are located within the borough boundary.		
Outcome: No change.		

Name	Organisation	Policy Reference
Richard Oakley	Heathrow Airport Ltd	
Nature of Comment: New policy regarding Aerodrome Safeguarding		
Response: Development management policy coverage is not required in order for the LPA to consult HAL in appropriate circumstances. LP 2011 Policy 6.6 already contains sufficient scope for the refusal of inappropriate development that would compromise airport operations. It is inappropriate for HAL to attempt to have included on a piecemeal basis and at this late stage in the London planning process advice of regional rather than local significance that was not considered necessary to the London Plan.		
Outcome: Ensure that HAL is on list of consultees where appropriate.		

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	2.17
Nature of Comment: British waterways feel that where industrial sites do not utilise their waterfront location for freight along the canal, the site should be better utilised for mixed use development, to include residential and leisure uses on the waterside.		
Response: Ealing is sympathetic to the desire to improve canalsides, however the policy is a part of the adopted London Plan 2011 and it does not allow the sort of flexibility suggested. SIL sites provide London's strategic reserve of employment land and the introduction of uses which are sensitive to noise would compromise this supply and the policy as a whole as well as providing residential and leisure uses of poor environmental quality.		

Outcome:
No change.

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	2.18
<p>Nature of Comment: If this policy is intended to refer to the Grand Union Canal, we support D and E, but we have concerns about the proposed local variation that will require a soft edge or minimum plot boundaries and would like to clarify what this includes. We have had experience of 'buffer zones' being applied to waterside developments, which have been intended to enhance biodiversity but instead are left unintended and become unsightly areas, supporting antisocial behaviour and preventing the development from integrating with the canalside.</p>		
<p>Response: Noted. The proposed LV is intended, as the consultation document says, to set minimum widths for plot boundaries "where these are to serve a green corridor function, or where a soft edge is required on sites adjacent to existing natural open space". It is intended to include a policy which allows buffers to be secured where these would be of benefit, not a blanket requirement for all instances. It should be noted also that unintended land may in fact serve a valuable biodiversity function specifically by virtue of this lack of maintenance. This method, however, should be reconciled with the overall design of any given project.</p>		
<p>Outcome: Note in developing policy.</p>		

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	3.2
<p>Nature of Comment: BE Active, Be Healthy' (2009) DoH specifically refers to waterways and towing paths as 'blue gyms'. We consider that C should include improved towpath links and enhancements.</p>		
<p>Response: This sentiment would appear already to be covered in the existing wording of section C.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	3.5
<p>Nature of Comment:</p>		

Waterside housing development should be designed to address and enhance surrounding features, such as the Grand Union Canal.
Response: This sentiment would appear already to be covered in the existing wording of section B.
Outcome: No change.

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	4A
Nature of Comment: We feel that the following should be added "...will only be granted where all of the following can be demonstrated; d) the surrounding landscape and environment would significantly benefit from an alternative use that would better support other social, environmental and economic aims and objectives...." Under B we would suggest the addition of the following to b: "use of the building or site for an alternative economic land use that can provide a wider social benefit".		
Response: The propose of policy 4A is to ensure that a minimum area of land is preserved in the Borough for industrial purposes. The proposed addition would compromise this objective.		
Outcome: No change.		

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	5.2
Nature of Comment: The Grand Union Canal can be used to limit our impact on climate change in a number of ways: -Use of canal water for heating and cooling of waterside buildings; -Use of SUDS; -Use of waterborne freight for moving waste and materials for waterside sites; -Use of towpaths for walking and cycling. The DM DPD should promote the Grand Union Canal's potential for delivering sustainability and sustainable growth, and should ensure that developers are required to consider feasibility of these sustainable options for development withing reasonable proximity of the waterways.		
Response: Other than the use of canal water for heathing and cooling these are all addressed in other policies; SUDS in 5.13; freight in 7.26;		

walking and cycling in 7.27.
 It is not considered that specific policy mention is needed in order to encourage the use of canal water for heating and cooling, although we will consider the its inclusion in the supporting wording of policy 5.9.

Outcome:
 No change.

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	5A
Nature of Comment:		
We would suggest that the design of new waterside development must consider the use of canal water for heating and cooling.		
Response:		
It is not considered that specific policy mention is needed in order to encourage the use of canal water for heating and cooling, although we will consider the its inclusion in the supporting wording of policy 5.9.		
Outcome:		
No change.		

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	5.9
Nature of Comment:		
As above the GUC should be promoted for heating and cooling.		
Response:		
It is not considered that specific policy mention is needed in order to encourage the use of canal water for heating and cooling, although we will consider the its inclusion in the supporting wording of policy 5.9.		
Outcome:		
Consider inclusion in supporting wording.		

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	5.12
Nature of Comment:		
The GUC can act as a flood defence structure, having a managed waterlevel under constant monitoring, particularly during times of high water. We consider that a blanket refusal of any development within 5m of the waterway will adversely affect the effective design of waterside sites and limit appropriate integration with the waterside.		
Response:		

As a structure with a controlled waterlevel, canalside development may not need to be covered to the same extent by a buffer strip. British waterways will need to demonstrate their ability to maintain flooding effects to within a similar tolerance as a 5m buffer strip.

Outcome:

Engage with BW to assess capacity to revise this policy.

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	5.17
Nature of Comment: This policy should make reference to the potential for waste to be transported by water.		
Response: Section f of the policy already does this.		
Outcome: No change.		

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	5.18
Nature of Comment: Transportation of construction waste by water should be promoted through planning policies.		
Response: This is what the policy does.		
Outcome: No change.		

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	6.14
Nature of Comment: We support c and the increased use of the Blue Ribbon Network for freight transport, but would suggest that this should go further to ensure that use of the network is made wherever possible.		
Response: It is difficult to see how this could be achieved through a policy which only controls development.		
Outcome: No change.		

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	7.3
Nature of Comment: We would also refer to 'Under Lock and Quay' for waterside sites.		
Response: Noted.		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	7.26
Nature of Comment: Suggested changes for this policy were submitted to the RLP examination by BW.		
Response: Noted. The Final Proposals version of the DM DPD will have access to the adopted text of the LP 2011.		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	7.27
Nature of Comment: Suggested changes for this policy were submitted to the RLP examination by BW.		
Response: Noted. The Final Proposals version of the DM DPD will have access to the adopted text of the LP 2011.		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	7.28
Nature of Comment: Suggested changes for this policy were submitted to the RLP examination by BW.		
Response: Noted. The Final Proposals version of the DM DPD will have access to the adopted text of the LP 2011.		

Outcome:
Revise accordingly.

Name	Organisation	Policy Reference
Claire McAlister	British Waterways London	7.30
Nature of Comment: Suggested changes for this policy were submitted to the RLP examination by BW.		
Response: Noted. The Final Proposals version of the DM DPD will have access to the adopted text of the LP 2011.		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Len Cardwell	Quattro UK Ltd Park Royal	4A
Nature of Comment: The policy deals employment sites and uses definitions in PPS4. It does not take account of the potential for employment sites to be used for waste and recycling sites as recommended in PPS10.		
Response: LBE accepts the potential for employment sites to be used for waste and recycling purposes where this use is identified through the sub-regional waste plan. The direct quoting of PPSs will soon become anachronistic with the introduction of the NPPF. An alternative wording with be sought.		
Outcome: Rephrase definition of employment uses in terms of principles rather than direct reference to PPSs.		

Name	Organisation	Policy Reference
Len Cardwell	Quattro UK Ltd Park Royal	5.17
Nature of Comment: The policy is confusingly worded. Under locational suitability it refers to criteria F and G below. F and G do not exist. As is dealing with all waste capacity it should refer also to policy 5.18 which provide locational criteria for Construction and demolition waste.		
Response: The policy may have been unhelpfully truncated by the reference in the Planning Decisions criteria to the LDF Preparation section of the policy. LBE is working with the GLA to address these problems. LBE 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. All policies must be read together.

Outcome:
Revise policy

Name	Organisation	Policy Reference
Len Cardwell	Quattro UK Ltd Park Royal	6.15
Nature of Comment: To comply with MPS1 the policy should refer to safeguarding as well as provision of strategic rail interchanges.		
Response: This element of policy would seem to be addressed by LP policy 6.2 and Table 6.1.		
Outcome: No change.		

Name	Organisation	Policy Reference
David Payne	Mineral Products Association	6.15
Nature of Comment: It is important to provide policy support for the development of strategic rail freight interchanges. It is also critical to provide for safeguarding and expansion of existing operations, particularly in areas where regeneration is being proposed, so as to avoid loss of capacity or increased constraints on their operation.		
Response: This element of policy would seem to be addressed by LP policy 6.2 and Table 6.1.		
Outcome: No change.		

Name	Organisation	Policy Reference
Mark Reen	Conservatives	2.15
Nature of Comment: Town centre streetscapes should be protected as far as possible from development that degrades the essential character of the centre. For example the Edwardian tenement above the Oaks is not designated frontage and is not protected by local listing but contributes significantly to the "feeling" of Acton as a character neighbourhood. The council should ensure that Policy 2.15 should "protect and enhances the vitality..."		
Response:		

The proposed variation does not appear to be locally specific to Ealing so it is difficult to accommodate it as a variation to the London Plan policy. Nor would the proposed wording achieve the form of provision envisaged as the protection of the vitality of the centre might require the loss of buildings of streetscape value. Protections of streetscape are generally effected by conservation area designations which allow the LPA to resist the demolition of buildings even where they are not statutorily or locally listed. Acton Town Centre conservation area would allow considerations such as these to be properly weighted through the planning process.

Outcome:

No change.

Name	Organisation	Policy Reference
Mark Reen	Conservatives	2.18
<p>Nature of Comment: With regard to green corridors (for example the A40 at Acton) the policy should aim to ensure that developments meet the needs of residents not the maximum site density available. The 5m buffer may be insufficient to provide proper distance between major routes and proposed development. This is also applicable to development along canals, blue ribbon or MOL.</p>		
<p>Response: The policy does not propose a specific boundary 5m or otherwise. LBE considers that a green corridor policy may be necessary to address matters of this type.</p>		
<p>Outcome: Consider green corridor policy.</p>		

Name	Organisation	Policy Reference
Mark Reen	Conservatives	3.15
<p>Nature of Comment: Policy should resist the subdivision of existing housing (esp 3/4 bedroom housing). It makes no sense to struggle to build houses in the borough if we are also at the same time allowing existing properties to be divided into flats.</p>		
<p>Response: The principle is accepted that it is counterproductive to lose existing units of a type which is in demand. Policy will need to be able to justify restriction of this loss in terms of necessary housing mix.</p>		
<p>Outcome: Explore possibility for local variation or new policy.</p>		

Name	Organisation	Policy Reference
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Mark Reen	Conservatives	3.17
Nature of Comment: Services within walking distance should be preserved.		
Response: Policy already requires that new facilities should be accessible on foot or bicycle, or by public transport.		
Outcome: No change.		

Name	Organisation	Policy Reference
Mark Reen	Conservatives	4A
Nature of Comment: The re-occupation limit before consideration of alternative use should be 2 years.		
Response: Agreed.		
Outcome: Revise policy accordingly.		

Name	Organisation	Policy Reference
Mark Reen	Conservatives	LV 4.8
Nature of Comment: The proposal to limited non A1 use classes is welcomed. The challenge is determining the frontage affected. Could the local variation proposed also allow the council to consider the overall impact within neighbourhood centre as a whole where concentrations of non A1 use may cause significant harm to the overall presentation of the centre? The concept of what constitutes a relevant frontage within a shopping neighbourhood (particularly neighbourhood or local districts) should be developed. UDP definition of relevant frontage is a concept that could be strengthened.		
Response: This may be difficult to access objectively but will be considered when the policy is revised. Relevant frontage is either that within the defined area or that of continuous or nearly continuous units.		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Mark Reen	Conservatives	4B
Nature of Comment: Use A3/A4/A5 and in particular A3 should be carefully drawn to protect retail frontages from becoming concentrated in these uses. For example 3 estate agents next door to each other as on Northfield Avenue could be argued to create a weakening of the retail offer in the same way as with fast food restaurants. The requirement to limit fast food outlets to outside a 400m radius of schools is to be welcomed. The advertising hoardings should also be the subject of strengthened policy to avoid the degrading of the frontage. Does policy intend to ensure that A3 use classes as a whole are limited to an area outside the 400m buffer? Enforcement is key.		
Response: The presence of advertising at a given location is something that can be controlled by planning, but the content of advertisements is not. Similarly, existing premises cannot be removed by planning policies; their continued presence does not constitute development.		
Outcome: No change.		

Name	Organisation	Policy Reference
Mark Reen	Conservatives	LV 4.9
Nature of Comment: I am uncertain that outlining minimum provision will encourage developers of large schemes to provide a market level of shopping units.		
Response: The policy is intended to satisfy all realistic convenience demand from schemes. In practice, large schemes on sites not covered by a site brief or in the Site Allocations DPD will be rare and will be subject to detailed design negotiations which this policy is intended to support..		
Outcome: No change.		

Name	Organisation	Policy Reference
Mark Reen	Conservatives	6.5
Nature of Comment: CrossRail stations/TfL should be obliged to develop drop-off parking proposals as part of the station development. Planning policy toward CrossRail station development should be clear about the modal change including cars/trains and not just public transport exchanges. Kiss and drop parking should form a significant part of the overall plan for Crossrail station development.		

<p>Response: Representation noted. Ealing Council officers are currently awaiting more detailed designs of Crossrail stations. The new station designs will have to take into account passengers using pedestrian, cycle, bus and taxi modes as well as any car drop-off facilities within the available constraints of each site. The new stations will also have to fully take into account the needs of disabled passengers. The impact on the highway network will also be a key consideration of the designs.</p>
<p>Outcome: No change.</p>

Name	Organisation	Policy Reference
Mark Reen	Conservatives	6.13
<p>Nature of Comment: Disabled parking provision within the RLP is sufficient.</p>		
<p>Response: The adopted London Plan 2011 accomodates Ealing's preferred approach to this matter so the indicated Local Variation is not now necessary.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Mark Reen	Conservatives	7A
<p>Nature of Comment: I would like the amenity provisions to make clear (and tacit) the inclusion of odour and noise from food establishments including fast food establishments.</p>		
<p>Response: The policy clearly concerns all emissions that are caused by uses on site. The supporting clarifies that these emissions include odour.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Mark Reen	Conservatives	7.4
<p>Nature of Comment: Should be strengthened to be "informed by and protect the surrounding historic environment."</p>		

<p>Response: Protection of the historic environment is governed by the provisions and approach of PPS5 (and the similar provisions in the draft NPPF) and this will be reflected in the DM DPD heritage policy. New development itself cannot specifically protect the surrounding historic environment as this is not part of the development site.</p>
<p>Outcome: No change.</p>

Name	Organisation	Policy Reference
Mark Reen	Conservatives	7.6
<p>Nature of Comment: Backland development should not be of a type simply to comply with policies. Development should be considered for refusal if the scheme has obviously been created to specifically overcome the amenity provisions on constrained sites including backland development. I would not want the existing site line and overlooking protections within the UDP to be lost as a gauge to overdevelopment acceptability.</p>		
<p>Response: The failure of development control policies in respect of these considerations is a clear illustration of the need to refashion policies in development management form. Applicants cannot be criticised for satisfying the requirements of policy and the planning system allows no recourse for the refusal of schemes where they do.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Mark Reen	Conservatives	LV 7.7
<p>Nature of Comment: Should be a and b and c; and the "and" should be clear. It should also be held that tall buildings on existing housing estates should be held to the same high standard as those in more sensitive locations. The policy should not presume that a tall building in South Acton or Park Royal should be held to a different standard than elsewhere in the borough.</p>		
<p>Response: All policies are inclusive except where indicated otherwise. The requirements of the policy relate to tall buildings solely as a function of their height or prominence. There is no actual or implied disparity in the treatment of buildings based on their location in the Borough; the only provisions relating to location are those which prevent tall buildings outside defined areas.</p>		

Outcome:
No change.

Name	Organisation	Policy Reference
Graham Clements	GLA	2.13
Nature of Comment: The Council should have regard to the Park Royal Opportunity Area Planning Framework when preparing detailed local variations for this policy. Sign posting to Park Royal OAPF is also recommended within the supporting text to this policy.		
Response: Agreed, there is value in highlighting Ealing's OAPFs to enhance usability.		
Outcome: Add reference to Ealing's OAPFs.		

Name	Organisation	Policy Reference
Graham Clements	GLA	3.1
Nature of Comment: The GLA notes that no local variation is proposed to this policy. The Council is reminded the development management policies in this DPD should have regard for the whole DRLP policy.		
Response: LBE will seek further engagement with the GLA to see how this issue can be addressed where it arises throughout the DM DPD.		
Outcome: To discuss with the GLA.		

Name	Organisation	Policy Reference
Graham Clements	GLA	3.5
Nature of Comment: For clarity at the local level the Council should reference 'Mayor of London' under Part E, rather than directly quoting the DRLP text which simply states 'The Mayor'.		
Response: Noted. LBE will seek further engagement with the GLA to address this and similar matters where it arises through the DM DPD.		
Outcome: To discuss with the GLA.		

Name	Organisation	Policy Reference
Graham Clements	GLA	3.7
Nature of Comment: TfL supports the principle of encouraging large scale developments within areas of high public transport accessibility.		
Response: Noted.		
Outcome: No change.		

Name	Organisation	Policy Reference
Graham Clements	GLA	3.12
Nature of Comment: This DPD requires an affordable housing policy clearly setting out affordable housing targets, and tenure split. The Council should refer to DRLP 3.12 in this regard.		
Response: Noted. LBE will be able to include such a policy in the final proposals draft, Ealing's Development Strategy having by then been adopted.		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Graham Clements	GLA	3.14
Nature of Comment: This policy makes reference to "density guidance set out in Policy 3.4 of the Plan and Table 3.2". However, this signpost refers to the DRLP and this detail does not appear to have been provided with this DPD. The Council should included the density matrix and/or update the signposting as necessary.		
Response: Agreed.		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Graham Clements	GLA	4A

Nature of Comment:

As expressed through previous representations to the Council's Core Strategy, the GLA seeks clarification that the operation of Policy 4A (alongside DRLP policy 2.17), will ensure release of industrial land remains around the specified 14 ha benchmark over the plan period.

The GLA notes that the marketing clause in this policy (6 months) is looser than that in the Industrial Capacity SPG (normally at least 2 years). The GLA would, therefore, welcome further discussion on this, along with clarification as to whether there are to be locally significant industrial or employment sites designated. The Council is advised to give further consideration to how non-SILs will be safeguarded, for example the waste site at GRE05.

Response:

LBE does plan to designate LSIS to protect Ealing's limited supply of industrial land, largely based on the Employment Sites designation in the UDP and these are intended to conserve employment land release to serve strategic purposes. The marketing figure of six months was suggested by the ELR evidence base prepared for the Development Strategy and it was felt that this should be tested as part of the consultation, given the generally negative view of this proposal and the constrained nature of Ealing's supply of industrial land it is proposed to bring this in line with regional figures.

Outcome:

Revise accordingly.

Name	Organisation	Policy Reference
Graham Clements	GLA	LV 4.9

Nature of Comment:

The inclusion of local detail with relation to this DRLP policy is welcomed. The Council are, however, asked to carefully consider whether the 50 unit threshold is optimal in terms of balancing other necessary planning obligations.

Response:

Noted.

Outcome:

Revise accordingly.

Name	Organisation	Policy Reference
Graham Clements	GLA	5.2

Nature of Comment:

Supported. The proposed inclusion of detailed targets with the local variation is welcomed. The Council is, however, asked to review these carefully to ensure that they are not overly prescriptive and, as a consequence, difficult for the Council to implement and monitor.

Response: Noted. Policy in this area will continue to evolve with the updating of national policy and buildign regs with the aim of reducing repetition and complexity.
Outcome: Revise accordingly.

Name	Organisation	Policy Reference
Graham Clements	GLA	5A
Nature of Comment: The insertion of this locally specific policy is welcomed, as is the detail designed to address proposals below the major development threshold. With particular regard to point 'C', and associated table, the Council is again asked to ensure targets are not overly prescriptive		
Response: Noted. Policy in this area will continue to evolve with the updating of national policy and buildign regs with the aim of reducing repetition and complexity.		
Outcome: No change.		

Name	Organisation	Policy Reference
Graham Clements	GLA	5.3
Nature of Comment: TfL seek reference within point h) to securing sustainable procurement and transport (e.g. via use of water/rail transport and construction consolidation centres) of materials, using local supplies where feasible.		
Response: It is difficult to see what in this proposed local variation would be locally specific and it appears more to be an omission from the London Plan than local policy. However, if the approach of minor alterations to LP policies is agreed by the GLA then there is no objection to incorporating this change.		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Graham Clements	GLA	5.15
Nature of Comment:		

Supported. However, the Council should address the whole of DRLP policy 5.15 and provide greater detail through supporting text fully addressing elements within the 'Strategic' policy component, and how these will be encouraged and secured locally.

Response:

It is understood that strategic objectives of policy are generally addressed through the Development Strategy. However it is agreed that the strategic elements of this policy relate more closely to DM consideration.

Outcome:

Revise accordingly.

Name	Organisation	Policy Reference
Graham Clements	GLA	5.16
Nature of Comment: The document does not seem to address DRLP policy 5.15. The Council should include this policy, addressing relevant elements of the 'Strategic' approach as local variations.		
Response: It is assumed that the reference is intended to be to policy 5.16. Many of the strategic elements of this policy will be addressed through the Waste DPD, however, LBE is receptive to the proposal to address other elements through a local variation.		
Outcome: Consider wording that avoids repetition as far as possible.		

Name	Organisation	Policy Reference
Graham Clements	GLA	5.17
Nature of Comment: Supported. This policy reflects London Plan development framework guidelines for waste, however, the Council should give more detail as to how this policy will be achieved locally.		
Response: Noted.		
Outcome: Consider wording that avoids repetition as far as possible.		

Name	Organisation	Policy Reference
Graham Clements	GLA	5.17
Nature of Comment: TfL supports the principle of evaluating the full transport and environmental impact of all collection, transfer and disposal movements,		

in particular the focus on maximising the potential use of rail and water transport using the Blue Ribbon Network.
Response: No change.
Outcome: No change.

Name	Organisation	Policy Reference
Graham Clements	GLA	5.18
Nature of Comment: Supported. Sign posting to the emerging West London Waste DPD is welcomed, however, the Council should also cross reference DRLP policy 5.16 in the supporting text.		
Response: LBE 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. All policies must be read together.		
Outcome: No change.		

Name	Organisation	Policy Reference
Graham Clements	GLA	6.3
Nature of Comment: TfL recommends that Table 6.3 includes a reference to safeguarding existing public transport infrastructure such as bus stands, bus garages, bus stations and public transport interchanges, as well as making sufficient provision for future need. TfL would also welcome a reference that the Council will refuse proposals that conflict with London Plan policy for safeguarding transport land.		
Response: LBE supports the principle of safeguarding the transport infrastructure mentioned, and refusing proposals that conflict with LP policy. Support for future provision is also endorsed, but in practice this may be difficult to achieve.		
Outcome: Review policy		

Name	Organisation	Policy Reference
Graham Clements	GLA	6.7
Nature of Comment: TfL notes that there is no bus related policy in the draft DM DPD, The introduction of an appropriate policy will be necessary to		

ensure that consideration is given to the implications for bus services as a result of site specific developments.
<p>Response: It is difficult to see what in this proposed local variation would be locally specific and it appears more to be an omission from the London Plan than local policy. Necessary contributions from development will be secured through a combination of CIL, S106 and case-by-case negotiation backed by policy. The disposition of these requirements will be determined with reference to CIL viability work prior to the publication of the DM Final Proposals.</p>
<p>Outcome: No change.</p>

Name	Organisation	Policy Reference
Graham Clements	GLA	6.10
<p>Nature of Comment: TfL recommends that this policy is expanded to include the following:</p> <ul style="list-style-type: none"> - Enable new developments to link into adjacent pedestrian network and provide new and improved links where necessary - For larger sites, contribute to wider walking network improvements and links/improvements to Strategic Walking Network (Capital Ring) and other strategic walking programmes/approaches e.g. Legible London way-finding system - Contribute to creation of an inclusive walking environment that encourages walking by all sections of society - Ensure pedestrian facilities are provided in line with walking best practice and guidelines prepared by TfL and other similar bodies - Work with highway authorities to ensure pedestrian facilities contribute to road safety. 		
<p>Response: It is difficult to see what in this proposed local variation would be locally specific and it appears more to be an omission from the London Plan than local policy. Necessary contributions from development will be secured through a combination of CIL, S106 and case-by-case negotiation backed by policy. The disposition of these requirements will be determined with reference to CIL viability work prior to the publication of the DM Final Proposals.</p>		
<p>Outcome: No change.</p>		

Name	Organisation	Policy Reference
Graham Clements	GLA	6.7, 6.8
<p>Nature of Comment: TfL has noted that no policy has been included relating to buses and coaches. These are an essential element of the transport</p>		

network, and TfL strongly recommends that the Council included relevant policy on buses to include the potential for requesting funding from developers to enable enhancements to routes and for improvements to bus stops.
<p>Response: It is difficult to see what in this proposed local variation would be locally specific and it appears more to be an omission from the London Plan than local policy. Necessary contributions from development will be secured through a combination of CIL, S106 and case-by-case negotiation backed by policy. The disposition of these requirements will be determined with reference to CIL viability work prior to the publication of the DM Final Proposals.</p>
<p>Outcome: No change.</p>

Name	Organisation	Policy Reference
Graham Clements	GLA	7.1
<p>Nature of Comment: This policy references a link to para 7.5 of the DRLP, however, the associated text has not been provided. The Council should give greater consideration to providing detail with regard to how new development will help to meet lifetime neighbourhood principles. It may be useful for the Council to set out within a local variation to provide the 'hook' for Ealing to develop these principles further within a local context.</p>		
<p>Response: Most of the strategic elements of this policy are considered to have been covered at the strategic level of plan-making, with the Development Strategy and Sites building on the generally strong character of Ealing's neighbourhoods. However, we will consider the need for any additional elements of this policy to be adopted locally.</p>		
<p>Outcome: Review policy</p>		

Name	Organisation	Policy Reference
Graham Clements	GLA	7A
<p>Nature of Comment: The LDF Preparation section of Policy 7.1 in the DRLP refers to Boroughs needing to undertake infrastructure plans to ensure that the new development will be able to meet the needs of future residents. It may therefore be useful to have reference in the policy to the proposals in the Core Strategy (Proposal 6.1, 6.2 and 6.3) to ensure the link between development and infrastructure planning is explicit.</p>		
<p>Response:</p>		

It is considered that on balance the local policy is focussed on a rather different area of policy than is proposed by this amendment.

Outcome:

No change.

Name	Organisation	Policy Reference
Graham Clements	GLA	7.3

Nature of Comment:

The inclusion of a local variation to this DRLP policy is welcomed. However, the GLA would urge the Council to reconsider the inclusion of the reference to 'gating' in the definitions of security measures. A key principle of the London Plan is to ensure good permeability of places, and to employ high quality urban design to reduce the need for security equipment. Whilst the GLA accepts that gating may be a 'tool' for very specific circumstances, it is not something that should be used as an example as it could give the impression that this approach may be appropriate for wider use.

The Council should also note that there have been further changes proposed to DRLP Policy 7.3, the GLA would expect any changes of DRLP content to be reflected in this DPD.

Response:

In the context of Ealing, gating is nearly always the enclosing of alleyways which constitute poor quality and unsafe spaces with little overlooking and inappropriate shared car and pedestrian access. However, we accept fully the point that gating is inappropriate where it leads to the fracturing or de facto privatisation of high quality public space. We will therefore remove reference to gating.

Outcome:

Remove reference to gating.

Name	Organisation	Policy Reference
Graham Clements	GLA	7B

Nature of Comment:

The list of criteria in this local variation appear to be phrased in negative terms. The Council should consider whether it may be more appropriate to phrase the criteria more positively to reflect development management principles rather than development control.

Response:

Agreed, the policy can be strengthened by adopting a development management approach.

Outcome:

Revise accordingly.

Name	Organisation	Policy Reference
Graham Clements	GLA	LV 7.7

<p>Nature of Comment: The inclusion of a local variation to this DRLP policy is welcomed. However, the Council should make clear that the additional criteria set out under the local variation will be read in conjunction with DRLP 7.7, rather than in place of it.</p>
<p>Response: This is the intention in all local variations. A reference to this effect will be included in the introduction of the final proposals document.</p>
<p>Outcome: Revise accordingly.</p>

Name	Organisation	Policy Reference
Graham Clements	GLA	7C
<p>Nature of Comment: The inclusion of this local variation is welcomed. However, the Council should consider whether part A, as written adds much value in terms of a local variation. With regard to local designations, the Council may wish to consider setting out other types of designations in addition to buildings.</p>		
<p>Response: Noted. This policy will need to be revised following the adoption of the DS and LP 2011, and with a view to the replacement of PPS5.</p>		
<p>Outcome: Revise accordingly.</p>		

Name	Organisation	Policy Reference
Graham Clements	GLA	7.9
Nature of Comment: Although referenced in the contents page, this policy seems to be missing from the initial proposals DM DPD. The Council should include this policy with local variations as appropriate.		
Response: Noted.		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Graham Clements	GLA	7.12
Nature of Comment: It is understood the Council wishes to apply the principles of DRLP to local protected views. The GLA would be supportive of this approach, however, the Council should consider whether parts D, F and H are relevant to local views in Ealing. If they are not, the Council should reflect that clearly through this policy.		
Response: Agreed. The principles contained in the London Plan policy are considered to constitute a good framework for the management of views. This framework is stated chiefly in terms of principles, and is largely contextual in its wording and so is flexible in its application to views other than those designated through the London Plan. However, there is a logic to excluding elements of the policy which are geographically specific to an area that is wholly outwith Ealing's boundaries.		
Outcome: Revise accordingly.		

Name	Organisation	Policy Reference
Graham Clements	GLA	7.26
Nature of Comment: TfL supports the protection of existing water facilities for waterborne freight traffic, the increase in the use of safeguarded wharves for waterborne freight transport, and the principle that development proposals close to navigable waterways should maximise water transport for bulk materials.		
Response: Noted.		
Outcome:		

No change.

Name	Organisation	Policy Reference
Graham Clements	GLA	7.30
Nature of Comment: TfL supports the principle of requiring development proposals along London's canal network and other rivers and waterbodies to contribute towards waterspace accessibility and encourage active water related uses, in particular transport uses. TfL also supports the principle of requiring development within or alongside London's docks to promote their use for transport.		
Response: Noted.		
Outcome: No change.		