

Ealing Borough Council

**Examination of
Development Sites and Development Management
Development Plan Documents**

**Draft Schedule of
Matters and Issues**

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INSPECTOR'S DRAFT MATTERS AND ISSUES

Please note:

1. As set out in the accompanying Guidance Notes, the starting point for the examination will be the Development Sites and Development Management Development Plan Documents February 2013 version. Nevertheless, the Inspector will also consider the changes suggested by the Council (documents EDS2 and EDM2).
2. Representors may wish to refer to the Inspector's initial queries: these are available on the examination website.

http://www.ealing.gov.uk/downloads/download/2334/examination_documents

1. MATTER ONE – OVERALL APPROACH

- 1.1 Overall, have the two DPDs been prepared in accordance with relevant legal requirements, and the procedural requirements of the National Planning Policy Framework (NPPF)? Are they consistent with the NPPF and do they reflect the presumption in favour of sustainable development?
- 1.2 Generally, do the two DPDs take forward the policies of the London Plan, reflecting local issues and objectives? How do they relate to those of neighbouring authorities within London?
- 1.3 Is there a local justification for the sites and policies in both documents supported by a robust, credible and up to date evidence base?
- 1.4 Has the Plan emerged following consideration of all reasonable alternatives? Is there a clear audit trail to support the chosen/selected approach? Does the sustainability appraisal satisfactorily support the chosen/selected strategy?

2. MATTER TWO – GENERAL ISSUES FOR DEVELOPMENT SITES DPD

- 2.1 Would the scale, type and distribution of the allocated sites conform to London Plan policies and be consistent with the Development/Core Strategies (CS)? Should the potential number and type of development be specified for each development site?

- 2.2 Having regard to the scope of adopted and programmed CS, are there any obvious omissions, in terms of provision for particular needs, from the submitted Plan?
- 2.3 Is the amount of land allocated for housing sufficient to meet the needs of the borough over the short, medium and long term? If not, how will the plan ensure that an appropriate housing land supply will be maintained? Will they provide for an appropriate housing mix, including affordable housing, in the right locations? How and when will the need for Gypsy and Traveller sites be addressed?
- 2.4 Are the location and scale of the retail, employment, mixed use allocations clearly justified? Is 'mixed use' a clear enough term to guide development? Is there a reasonable prospect of the safeguarded land being used for that purpose within the life of the Plan?
- 2.5 Are the allocations deliverable and viable, when considering expected sources of funding, an assessment of infrastructure requirements and the requirements of the development management policies? Are the sites deliverable where comprehensive development is expected and sites are occupied and /or in multiple ownership? Will the Plan be effective?
- 2.6 Does the Plan deal adequately with uncertainty? What provisions have been made to ensure flexibility given the current economic climate? Is sufficient consideration given to monitoring and triggers for review?

3. MATTER 3 – SITE SPECIFIC ISSUES FOR DEVELOPMENT SITES DPD

- 3.1 ACT1, ACT3, ACT5, ACT6, EAL2, EAL3, SOU1, SOU5, SOU6, SOU8, and OIS1 – will the sites be deliverable in the light of concerns from Thames Water about water supply and waste water services?
- 3.2 What is the effect on the development sites of safeguarding land for HS2?

Area 1 - Acton

- 3.3 An overarching issue for Acton is whether the development sites contribute to revitalising Acton Town Centre and the regeneration of Acton Main line Station, as envisaged by the CS.
- 3.4 Additional site specific matters include:
 - ACT4, ACT5 – Are the allocated uses justified/too restrictive/viable?
 - ACT2 ACT3, ACT4 - Are the design principles clear, justified and flexible enough to be effective?
 - ACT2 - Is the development site boundary appropriate. Should it include other buildings?

- ACT6 (Acton Crossrail Station, formerly ACT7) - How will the allocation reduce the environment impact of the industrial activities on the surrounding residential areas? Is it compatible with Ealing's Sustainable Communities Strategy?

Area 2 - Ealing

- 3.5 An overarching issue for Ealing is whether the development sites would revitalise Ealing Metropolitan Centre, including defining and reinforcing its character, as envisaged by the CS.
- 3.6 An overarching issue for West Ealing is whether the sites form part of a wider strategy for West Ealing? Should there be a more holistic approach? Can the infrastructure cope with the new development?
- 3.7 Additional site specific matters include:
- EAL7, EAL13, EAL18 - Are the design principles clear, justified and flexible enough to be effective? Will there be sufficient parking provision for the town centre?
 - EAL1, EAL3, EAL4, EAL11, EAL14, EAL15 and EAL17 - Do the design principles take sufficient account of non designated heritage assets? Is it necessary to specify demolition /refurbishment /modification?
 - EAL8, EAL10 - Are the allocated uses justified/too restrictive/viable?
 - EAL12 – Is residential use unsuitable because of the railway?
 - EAL17 – Would low rental accommodation of value to the community be lost?

Area 3 – Greenford

- 3.8 An overarching issue for Greenford is whether the development sites will enhance and consolidate Greenford Town Centre.
- 3.9 Additional site specific matters include:
- GRE1 is there a conflict with the existing uses? Will the character be harmed by the allocation?

Area 4 - Hanwell

- 3.10 An overarching issue for Hanwell is whether the development sites would enhance and consolidate Hanwell Town Centre as envisaged by the CS. What happens to the existing uses that are occupying the development sites?

Area 5 – Southall

- 3.11 Overarching issues for Southall are whether the development sites will revitalise Southall Town Centre and whether sufficient land been identified for additional community buildings to meet local need, as envisaged by the CS. Should there be a greater provision of open space?

3.12 Additional site specific matters include:

- SOU5 - How will the development be integrated into the town? What will the effect of the proposed retail be on the town centre? Are the design principles clear, justified and flexible enough to be effective? What measures have been considered to ensure that traffic can be accommodated in the area? Has the funding for the additional infrastructure been taken into account and how does this affect the viability of the site? Should reference be made to the character of the Grand Union Canal? What is the position with Hillingdon Council about cross boundary issues?
- SOU6 – Are the allocated uses justified/too restrictive/viable? Are the design principles clear, justified and flexible enough to be effective? What is the status of the Southall Opportunity Area Planning Framework? How has it/will it influence the design principles?

Area 6 - Other important sites

3.13 Will the other important sites contribute to the CS delivery strategy? Should there be an introduction to this section explaining the role and contribution of these sites to the development strategy?

3.14 Additional site specific matters include:

- OIS1 - Are the allocated uses justified/too restrictive/viable?
- OIS2/3/4 – Is the wording sufficiently clear to ensure a balance between development and landscaping? Are the design principles clear, justified and flexible enough to be effective?
- OIS5 – How long will Acton Storm Tanks be required by Thames Water? Will this site be viable/deliverable by 2021? How will cross boundary issues with Hammersmith and Fulham Council be dealt with? What are the implications of the Thames Tunnel?
- OIS7 – (Greenford Green formerly OIS8) - Are the allocated uses justified/too restrictive/viable?
- OIS8 (St Bernard's Hospital formerly OIS9) - When is this scheduled by West London Mental Health NHS to become available for development? Are the allocated uses justified/too restrictive/viable?

4. MATTER 4 – DO THE ALLOCATIONS IN THE DEVELOPMENT SITES DPD REPRESENT THE MOST APPROPRIATE STRATEGY IN THE CIRCUMSTANCES?

- 4.1 Are the alternative proposals that have been put forward in representations appropriate and deliverable? Have they been subject to sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?
- 4.2 Representations about other sites will be heard in this session.

5. MATTER 5 – DEVELOPMENT MANAGEMENT DPD

Inspector's Note: The Development Management DPD has changed considerably between the February 2013 version and the modified version, which is document reference EDM2. Further comments received by representors in their hearing statements, taking into account the changes, will form the basis of detailed discussions on many of the policies at the hearing sessions.

- 5.1 Are the policies clearly worded? Will they be a succinct and easily understood guide to development? Do they need more explanatory text? Do they need to refer to other directly relevant policies in the CS? Do they unnecessarily repeat policies from the London Plan or requirements from other legislation?
- 5.2 Are they justified by an up-to-date, credible and robust evidence base?
- 5.3 Do they rely on standards or requirements set out in untested documents?
- 5.4 Are the policies relating to employment (4A), retail (4B), density (3.4), living conditions (7A C, 7B), open space (7D) too prescriptive, failing to take into account individual site and development circumstances. Will these policies be effective in encouraging development in Ealing?
- 5.5 Do the policies relating to affordable housing (3A), carbon dioxide emissions (5.2), green roofs (5.11) and open space (7D) place an unreasonable burden on development, affecting their viability in the current economic climate. Will these policies be effective in encouraging development in Ealing over the next five years and throughout the plan period?

Christine Thorby INSPECTOR