

Matter 1 Representor 18/40
Ealing Civic Society
BRCS –Nic Ferriday- para 1.1e

ED4. 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?

1.1a DM18(17)The NPPF is concise and clearly written with the intention of simplifying planning guidance. Ealing DPDs. are complex and difficult to understand. eg the quotations from the London Plan in the DM. DPD are incomplete and variations to policy are confusing so that one has to use 4 documents to work out what the policy on any one topic is and then follow up with any adopted supplementary guidance. Design principles tend to be verbose in the DS DPD. This format is not a sound response to simplification envisaged by NPPF. The text should be rewritten to include enough LP policy with explanations and references to supplementary guidance incorporated.

1.1b DS40 (92 ,95) The DPDs. are not wholly consistent with the NPPF because they emphasise creating as much housing as possible with inadequate consideration of the jobs needed to employ the residents, the schools for their children and the community uses needed. Ealing’s housing emphasis is displayed in sites ACT 2, ACT 5 and others subject of our objections DS40 5-12 and 22. Furthermore sites with heritage assets are identified for redevelopment to provide the maximum built floor space rather than following the more sustainable/economic option of renovation. By contrast Para 7 in the NPPF identifies 3 of the functions that the planning system performs:

1 an economic role ;
2 a social role including providing the supply of housing, and
3 an environmental role protecting the natural, built and historic environment.
Para 8 states these roles should not be taken in isolation because they are mutually dependent.

1.1c DS40 (26) Sites where tall buildings are not encouraged by management policies 7A-D seem to be allowed in the Sites DPD. Acton Crossrail Station site ACT 6/7 is regarded as suitable for high density mixed use development with commercial and residential development (potential for student accommodation) The environment is unacceptable for any residential use including students. Council response to objection DS 40 26 is that it should be left to the comprehensive policies relating to residential amenity. But it is unsound to promote development that is not sustainable and cannot be made livable in through application of DM policy.

1.1d Landscape analysis is ignored despite LP policy 7.4 C. Natural England’s representations DS5 (4) about their Document ‘London Landscape Framework’ / January 2011 “aims to support but also go beyond existing green space policy.”
The Natural Landscape Areas and their Natural Signatures See Appendix 1.1
One of the London Sites identified is in Ealing Borough “11 Brent River Valley –

Meandering, shallow river bordered by diverse floodplain meadows and winding strips of damp woodland”.

1.1e In 1976 Local people represented to the Council the importance of the Brent Valley for planning and public access issues and the Brent River and Canal Society was formed BRCS seeks to protect the valley as a whole retaining its value for footpath and cycle access, informal recreation and nature conservation. Its omission from DM and DS DPD and Proposals Map would severely undermine the role of BRCS in protecting the area. BRCS launched a landscape plan with tree planting and an open space link that became FitzHerbert Walk and still comments on Planning Applications. The Major of London awarded Priority Parks Award of £400K for the BRP in 2009/10 based on the numbers of people supporting it throughout London. The importance of the valley is lost in the current Local Plan. Its significance in the DM DPD and any sites adjoining the BRP should be acknowledged in response to Natural England’s Representations, London Plan proposals and the enormous support from local people. A reference to further planning guidance on the BRP should be inserted under MOL policy.

In the Atlas of Map changes:

1) **PM20/7 ECS** supports their own representation about the boundary of the BRP and MOL ie Grove Avenue gardens should remain in MOL and the BRP; we also support that made by Grove Estate Residents (PM8/19).

2) **PM20/8 Tentelow Lane Depot.** Not every small section of MOL has to conform to the criteria of the London Plan. It is not logical to demote a central strip between similar strips of MOL. The site is shown as Blue Ribbon and is protected against built development in the permission for housing. It is unsound to extract small sites like this from MOL and the BRP.

3) **PM20/10 Billets Hart Close** The map is not clear as to redesignations of MOL but we assume that everything green is retained as MOL. If so the areas that are built upon should be excluded from both MOL and BRP. The COS is said to be outside the definition of MOL in the London Plan. This is not correct. It is a small part of a large Green Space It is part of the Brent River Park much of which is on the other side of the river, a Blue Ribbon site and the canal is a site of metropolitan importance for nature conservation.

The BRCS support this paragraph 1.1c

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?

1.2a The Development Management DPD and the Development Sites DPD do not take forward a significant number of the London Plan policies for LDFs and in trying to maximize housing do not adequately reflect local issues of concern especially those identified by residents.

1.2bDM18(47,48) For example 1) the London Plan policy 7.7E & F encourages control of tall buildings in areas of sensitive locations such as” Conservation Areas, listed buildings and their settings, registered historic parks and gardens, scheduled monuments, battlefields, the edge of Green Belts or MOL....**or other areas designated by boroughs as being insensitive or inappropriate for tall buildings**” .(our emphasise) But the CS & DM Docs. gives very little guidance on sensitive sites and plenty of scope for defining additional sites through documents that do not go

through examination and may be inadequately publicized or local representations not taken into account. Sensitive sites should be defined as proposed in the London Plan and those sites that are suitable identified as proposed in the CS.

1.2c (DM Example 2) LP Policy 7.4 Local Character “Boroughs should consider the different characters of their areas to identify landscapes, buildings and places including on the blue network where that character should be sustained, protected and enhanced through managed change....” Ignoring heritage assets such as local listed buildings in most of the DS DPD is unsound because the sites give a false picture of development opportunities due to the lack of information on undesignated heritage assets. Local Listed Buildings are not identified in the plan. (see para 1.3a below) There has been no landscape study also recognised by Natural England in their representation (See Appendix 1.1) and the Brent River Park (BRP) has been omitted.

1.2d DS40(90) Hillingdon has objected to the impact of the former gas work redevelopment Southall West (SOU5). The statement of common ground does not seem to be available. If their concerns are overridden by the planning application approved by the GLA the problems of access and impact on Hillingdon will be resolved through section 106 agreements. There is no guarantee that the application will be implemented and the Development Sites brief should be extended to cover this eventuality. ECS registered their letter of objection to the planning application but it was not made available by the Council.

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?

The evidence base is very uneven. Two examples where policy is not based on up to date survey include local listing and nature conservation:

1.3a Ealing Civic Society organized a survey by local community groups of additions to the local list of buildings. Additions to the UDP VOL 2 2004 were published on line as Local Gems. The survey work covered much of the borough where local people enjoyed their heritage and was given to the Council in Nov 2012 Councilors have considered officer recommendations. This information is not publicly available but we understand the existing list is greatly reduced. Because they are not included in the plan they will not be open to examination which is regretted because weeks of work carried out by different groups may be wasted.

1.3b We are very concerned that the existence of a local list is not recorded in the Local Plan or the presence of Locally listed buildings in the Development Sites doc. Where ECS has objected to its omission the Council response is that it will be included in the record of Heritage Assets. This would be yet another document to be consulted and omission of local listing from the DS.doc means the environmental strand identified in para 8 NPPF is likely to be ignored. A record of local listing should be included in the plan and in each site brief.

1.3c The Biodiversity Action Plan is out of date, the last review of nature conservation sites being in 2007 and the input on nature conservation in the Green Space Strategy is limited to a deficiency map. Tables are needed with up-to-date classifications if policy on nature conservation is to be implemented.

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?

There have been a series of versions but very little discussion or feedback and we have very little understanding of:

- 1) Why the number of sites has been so drastically reduced in the latest DS DPD,
- 2) Why the Sites DPD mainly covers large employment, residential, mixed use and town centre sites while ignoring regeneration through heritage development and promotion of green space.

The documents have been published over a long period with public meetings kept to a minimum, so that residents get the impression they have already contributed. Many important changes seem to have occurred on the grounds of flexibility since the consultation. There is no audit trail that has been made available to us.

Word Count 1739 including the Inspectors total?

Appendix 1.1 'London Landscape Framework' / January 2011

“aims to support but also go beyond existing green space policy. This is not to suggest that London’s landscapes have been neglected. The protection of London’s green spaces goes back as far as the late nineteenth century, with the formation of the Commons Preservation Society in 1865, and over the twentieth century and into the twenty-first steps have continued to be taken to assess, protect and manage London’s green spaces. These measures range from the designation of London’s Green Belt in 1947 to the proliferation of strategies and frameworks in recent years, which include the London Plan, the East London Green Grid and the Green Arc as well as focused strategies such as the Thames Landscape Strategy and those for the Wandle and Lea River Valleys. Local borough policies also incorporate green space and biodiversity plans. Nevertheless, none of these strategies aim specifically to reconnect Londoners with the underlying nature of the city. Largely perceived as amenities, London’s green spaces are not always recognised for what they tell us about the land upon which London is built, nor does current policy aim to redress the skewed perception of London as an intensely built up city. Currently London’s natural landscapes, whilst well-known, well-loved and well-used, are not always perceived as integral to London’s character, and are often enjoyed without any real knowledge of their specific relationship to the city in which they sit. This focus on use value also inadvertently neglects those remnants of the natural landscape which are not so obviously amenable to leisure uses. This study aims to set straight these imbalances.”