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| Other comments | *Response* |
| Para 1.14 |  |
| LBE’s understanding is that the portion of CIL assigned to the NP is fixed at 25%. Delete at least | PPG Para 072 says: “In areas where there is a neighbourhood plan or neighbourhood development order in place, charging authorities can choose to pass on more than 25% of the levy.” Reference ID: 25-072-20140612 |
| Policy E1 |  |
| This policy is repetitive of the existing approach set out in DM DPD 4B, and the draft wording replicates much of the existing policy. With a view to implementation it would be useful if it were expressed in terms of the changes that it makes to the existing planning framework for retail uses. | This has now been modified to clarify that its application is solely to new frontages and supplements the existing Local Plan policies, where there is no provision for designation. (Map 7 refers) |
| Policy E2 |  |
| The term ‘money lenders’ is not a clear description of these use types. Suggest the term ‘easy credit’ establishments is used instead. | Adopt the term ‘pay day loan shops’, as used in the GPDO. |
| Para 5.1.9 |  |
| The term ‘money lenders’ is not a clear description of these use types. Suggest the term ‘easy credit’ establishments is used instead. | As above |
| Para 5.1.11 |  |
| There is little evidence of successful centres ‘moving away’ from retail uses and this is not in fact what is proposed by the policy or the rest of the paragraph. This should be revised as follows: |  |
| ‘…Successful towns will move away from a reliance upon retail to the provision of include a broader mix of commercial and employment uses, community services, leisure and residential.’ | Suggest substitute ‘diversify’ for ‘move away’ |
| Para 5.1.14 |  |
| The suggestion is not that the value of these functions lies in their being ‘alternative’ but rather that they are appropriate and necessary to the town centre. This should be revised as follows; |  |
| ‘The town centre needs to be rebalanced to provide a broader range of alternative functions, including employment, commercial, leisure, community, residential, healthcare and education.’ | Delete ‘alternative functions’ and substitute ‘town centre uses’ |
| Policy E4 |  |
| This policy is supported and reflects a growing demand in Ealing for workspace of this kind. | Noted |
| HBE1 i) |  |
| The current wording comes too close to suggesting a stylistic requirement for development. This in incompatible with NPPF para 60. This can be remedied by deleting ‘historic architecture’, making clear that it is the character and design interest of the area that is to be complemented, as follows: |  |
| ‘complement the special character and design interest of the area’s historic architecture and achieve the highest standard of sustainable urban design and construction;’ | Suggest substitute ‘enhances’ for ‘complements’ |
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| HBE2 |  |
| Suggest that the wording ‘Development should’ is adopted for reasons of clarity and consistency. | P~~refer to retain the stronger obligation of the present wording?~~ Agreed |
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| HBE2 iv) |  |
| It is not clear what the concept of ‘zone of influence’ adds to the assessment of impact. Impact is assessed wherever it is present according to the merits of the scheme and its surroundings. This clause seems likely only to cause confusion without adding to the quality or coverage of policy. | See definition in 5.2.13 and in HE publication referenced |
| Para 5.2.8 |  |
| This paragraph shoud be revised in line with the revisons to the policy set out above. In addition it is not accepted that the town centre is characterised by consistent building heights. This may be the case in individual parades but outside these the centre has a varied scale and skyline as one would expect from a centre that oped organically from the Victorian period onwards. | Disagree with this assessment; a variety of scale and skyline is not inconsistent with the general range of frontage heights as found across the town centre and as illustrated in Map 7 |
| “Outside the Office Corridor (see Glossary), the character of Ealing’s historic centre is marked by its largely consistent building heights and scale, particularly within the retail core (Map 7). Thise character of Ealing Town Centre is reinforced further through the legacy of many Victorian and Edwardian buildings and which, although not displaying a specific style, imbue Central Ealing with a more ‘traditional’ townscape stronger character than is evident in some of the other important London town centres. This rich history and its architectural heritage mean it has many special places and buildings, ie ‘heritage assets’, which this Plan aims to conserve and enhance. | Note words ‘largely consistent’ |
| Para 5.2.9 |  |
| This paragraph shoud be revised or deleted in line with the revisons to the policy set out above. In particular, it is impossible to apply the LVMF criteria to views which are undefined. | This para has been rewritten (see Responses to meet LBE suggested strategic conflicts Feb 2016 part 2 v2) |
| Para 5.2.10 |  |
| This paragraph should distinguish between designated and undesignated heritage assets in line with the NPPF. | Not necessary in the context of this para |
| Para 5.2.12 |  |
| This paragraph shoud be revised in line with the revisons to the policy set out above; | Not accepted - no change required |
| ‘Buildings higher than 4 – 6 storeys may be acceptable away from street frontages, but it will be essential for Development proposals for all such developments to should preserve or enhance the prevailing character and appearance of the Conervation Area.' |  |
| HBE 4 |  |
| The term ‘Public Open Space’ refers to only one form of green infrastructure in Ealing’s Local Plan and would therefore be confusing even if not capitalised. If this is intended to refer to all open spaces then it is suggested that the form ‘green and open spaces’ is used. | This has been changed in Responses to meet LBE Feb 2016 part 2 v2 |
| HBE4 i) |  |
| This clause conflates encroachment on Public Open Space with visual intrusion from tall buildings and further implies that only tall buildings are capable of causing such encroachment. This is ambiguous but potentially implies a reduction of the protection from that of DM DPD Policy 2.18 which protects all views to, from and within all green and open spaces in the borough. | It is not accepted that the policy wording has these implications: note the words ‘in particular’.  Potential confusion in meaning and application has been removed by other proposed changes to Policy HBE4. |
| HBE 4 iii) |  |
| DM DPD policy 2.18 is quite clear that its protections relate to both openness and heritage value so it is unclear why the heritage value of Walpole Park should require additional policy protection. Why the lack of a Common Land designation, which primarily relates to forms of public use access should necessitate additional management and development restrictions also remains unclear. This is unduly restrictive and it is difficult to see what it adds to the management of this space or understanding of its urban or architectural significance. | LBE has consistently argued that common land designation has no relevance to planning decisions. The restrictions now imported are already present in other legislation, but adding theme here brings clarity and removes any potential gap in application. |
| Para 5.2.8 |  |
| This para advises that Haven Green was previously designated as MOL, which is not the understanding of the Council. This should be deleted. | This has been corrected. |
| Para 5.2.26 |  |
| The considerations attributed to Haven Green are not a function of its common land designation as implied. This paragraph is misleading and should be deleted. | Response as above to HBE 4 iii. |
| Para 5.2.27-5.2.32 |  |
| These paragraphs amplify policy clauses that should be deleted for the reasons given above. These supporting paragraphs should also therefore be deleted. | Changes to para 5.2.28 have been suggested. Otherwise the response is again as above. |
| Recommended Action 6 b) |  |
| The actions listed in this RA are incompatible with the adopted, funded and currently implemented scheme for transport interchange at Haven Green. This clause should be deleted. | Not accepted; see the rider contained in the SDG report on option 1A. |
| Recommended Action 7 |  |
| The actions listed in this RA are incompatible with the adopted, funded and currently implemented scheme for transport interchange at Haven Green. This RA should be deleted. | Note changes to clarify options. Otherwise response as above. |
| Recommended Action 9 |  |
| Providing EV points at a ratio of 1:50 is excessive at this time. The Council is considering a strategy for the effective implementation of EV points that would sustain growth of EVs into the future without significant negative impact on other vehicles. The Council has no powers to require other existing car parks to implement EV points. | This is a 10 year development plan, not just for 2017. |
| T2 |  |
| Car parks on the edges of town centres are historically underused placing this policy approach in doubt. The NP evidence base needs to justify any changes to Ealing and London parking standards. | Vehicle *access* from the edges of the town centre, to enable motorists to park without driving through the centre, is what is proposed. |
| The reference to the CA is unclear in the context of a parking policy. |  |
| Recommended Action 10 |  |
| Stop and shop bays encourage car use and are very difficult to enforce since recent enforcement laws came into place. They should be avoided where possible, and other modes promoted for quick trips. | US study suggests that because of ‘substitution effects’, stop and stop does not add significantly to trip generation and therefore total traffic movements, but it can facilitate the number of short shopping trips and therefore add to retail volume |
| In local/regional town centres such as Ealing, most visitors are regulars who have their preferred car parks (usually the one with the shortest walk). Real time signs have a low impact on queues. | This contradicts the MTC designation. The centre should be a regional base and be competitive within it, serving occasional as well as regular visitors (eg Uxbridge). |
| T3 |  |
| This approach is overly prescriptive and will not be possible in all circumstances. | The wording is clearly *not* prescriptive, eg ‘should aim to’ and ‘ where practical’ |
| PR3 |  |
| The Uxbridge Road will never be traffic free. This policy should focus on reducing the impact of traffic and enhancing the pedestrian experience. | Noted. |
| CC2 |  |
| Several reports have been produced regarding the demand for a performance space and the inclusion of an arts centre in the CIL. The proposal acknowledges that this would not be reliant on public subsidy from the local authority. The aspiration for the physical space is acknowledged, however this will need to be supported by a sound business plan in addition to any capital cost implications. | Noted. We assume this comment is *not* suggesting that viability is an appropriate test in considering a planning application. |
| CC3 |  |
| Consolidation of the Ealing Cultural Quarter is supported. Anchor organisations such as Pitzhanger Manor, Cinema, Questors, Ealing Studios etc. afford the opportunity to create a hub for creative and cultural businesses, practitioners and audiences and the positive wider impact on the area. | Support noted; assume ‘consolidation’ in this context means ‘strengthen’ |
| Recommended Action 16 |  |
| This could be broadened to refer to art in the public realm including the development of site specific art and participative activities such as festivals and animators in the public space adding to the vibrancy of the arts and culture in Central Ealing. This also includes infrastructure necessary to support art and cultural activity and popup opportunities within the public realm (cabling, water supply etc.). |  |