

Consultation on the [New London Plan](#)

Response by Ealing Matters

Introduction and explanation

Ealing Matters is a newly established borough-wide alliance of residents' associations and community groups (including local conservation panels and neighbourhood forums). We formed in response to changes sweeping through the London Borough of Ealing that are trashing our heritage, disposing of our public assets and generally ruining the fabric of our communities in a way that residents find themselves unable to influence.

The New London Plan threatens to accelerate this process, and we object to it, both overall, and to many of its specific policies for reasons we set out briefly below. Individual policies about which we are concerned can be viewed in full by clicking on the [link in the policy heading](#). Most are quite long, so below we have extracted what we think are the key words that express the gist of the policy that concern us. These are bordered to aid comprehension and in **Times New Roman font** with, in some cases, their *justificatory text italicised*. Ealing Matters's comments on the policy are in Calibri.

[New London Plan: Overall](#)

Unlike previous revisions which were incremental in their approach, the New Plan introduces some quite radical changes to its predecessor. Many of these changes, and most particularly the deletion of FALP's Table 3.2, have not been widely discussed or justified and no effort has been made to explain what their impact will be on the ground if they are accepted. Their full significance will only be revealed once the policies are introduced, but by then any public concerns will be brushed aside as the plan will have been adopted.

Furthermore, the New Plan's approach is overly full of aspirational policies. While many may sound impressive, too few have any prospect of being implemented. This is the case across the Plan, except in Chapters 4 (Housing) and 10 (Transport) where policies have specific targets that mean they will be the policies that are most rigidly implemented irrespective of the fine words elsewhere.

This will exacerbate a growing trend over recent years for the Mayor's comments on major planning applications referred to him to concentrate on an ever-narrower set of concerns, with additional housing units dominating all other interests of good planning. Far too often conflicts with individual policies – not least Policy 3.4 of the current plan – have been ignored or dismissed inappropriately.

If, which we do think it should, the plan proceeds to implementation in its present form, it needs a much stronger explanation about the weight that its aspirational policies will be given when they are assessed against the policies which carry detailed targets.

A further problem is that the Plan is starting to encroach on non-strategic matters that should be for Boroughs rather than the Mayor. This is particularly the case for Policy D8 and its requirement that Boroughs must identify locations for tall buildings in their Plans. It is also evident in Policy H2's requirement that there be a presumption in favour of development on small sites. By interfering in non-strategic areas like this the Plan is removing democratic accountability from too many areas of decision making. Inclusion in the London Plan will remove the requirement for locally elected representatives to justify their decisions to the people who elect them.

These criticisms of the Plan's approach are of truly fundamental importance. They reflect a growing concern in Ealing that the planning system has become subverted to satisfying the needs of property speculators, big businesses with deep pockets and the kind of remote bodies that Greg Clark's NPPF's foreword warns about, irrespective of the views of a general public growing increasingly sidelined. This is creating a serious democratic deficit and the harm it will do to public confidence in the planning system could be very serious.

Policy GG1 Building strong and inclusive communities.

To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities those involved in planning and development must ... blah blah ... provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration ... blah blah ... support the creation of a London where all Londoners ... blah blah ... enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently ...

1.1.5 Early engagement with local people leads to better planning proposals, with neighbourhood Plans providing a particularly good opportunity for communities to shape growth in their areas. Taking advantage of the knowledge and experience of local people will help to shape London's growth, creating a thriving city that works better for the full diversity of its inhabitants.

In practice the New Plan appears to set its back on the value of engaging with communities. While local engagement may never have been high on their list of priorities, previous versions of the plan did at least carry numerous references in their policies to the need to engage locally over development proposals. The only references to local engagement in the New Plan appear to be those quoted above and the Glossary's definition of the term, 'community engagement'. The scale of the changes proposed in this plan are huge but there is no public endorsement of them. The serious risk is that this omission will create an upsurge of criticism against development proposals that communities find unacceptable. The consequences would be unpredictable but potentially very difficult to manage.

More specifically, in line with the National Planning Policy Framework, greater clarity is required on the role that Neighbourhood Plans can play and their value in making distinctive places. As so many of the policies in the New Plan are of an aspirational nature, it needs to be made clear which policies are 'strategic' policies to the extent that Neighbourhood Plans should be in general conformity with them and which areas may be left open to Neighbourhood Plans to shape.

Policy SD7 Town centre network

The changing roles of town centres should be proactively managed in relation to the town centre network as a whole ... The classification of International, Metropolitan and Major town centres (can only be changed through the London Plan.

The town centre network is dynamic, and allows the role and function of centres to change over time. The role of individual centres within the network will need to be proactively managed in order to ensure that the network as a whole continues to serve the needs of Londoners and London's economy. In some instances, ... it may be appropriate to re-classify some existing centres, in order to respond to shifts in demand.

Very extensive evidence was submitted in previous rounds of the Plan that when assessed against the criteria the Plan sets out, Ealing no longer merits its classification as a Metropolitan Centre. Metropolitan centres are supposed to serve wide catchments extending over several boroughs, contain 100,000 m² retail, leisure and service floorspace and have a significant proportion of high-order comparison goods relative to convenience goods. Ealing has only been able to hold on to its metropolitan centre designation thanks to the highly dubious combination of two separate centres - Ealing and West Ealing - which are 1km apart. Between them these two places may once have boasted higher level attractions when the retail hierarchy was first established, but neither has kept pace with changes within the West London sub region and both struggle to attract customers even from within the Borough. Department stores, leisure and other town centre attractions have now departed both centres which do little more than attract convenience shoppers and coffee drinkers. Successive rounds of planning have done nothing to reverse this decline, and the continuing misclassification of the centre makes a mockery of what the hierarchy claims to be for. It has created a policy vacuum which policy makers at all levels appear to have totally turned their back on.

Policy D2 Delivering good design

To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans ... which cover ... socio-economic data ... health and wellbeing indicators, population density, employment data ... housing type and tenure... urban form and structure for example townscape, block pattern, urban grain, extent of frontages, building heights and density transport networks ...

... The findings of the above evaluation ... should inform sustainable options for growth ...and be used to establish the most appropriate form of development ... for an area in terms of scale, height, density, layout and land uses.

... Design and access statements submitted with development proposals should provide relevant information to demonstrate the proposal meets the design requirements of the London Plan.

... Boroughs and applicants should use design review to assess and inform design options early in the planning process.

This catch-all policy establishes the Plan's new approach as being that of 'design led planning'. It sounds impressive but a close reading of it shows it to be a policy that offers no measurable criteria in relation to specific development proposals. Almost certainly it will prove impossible to enforce. When applications are assessed it will certainly carry less weight than policies like HI and H2.

And if this policy fails in what it purports to be aiming to do, many other of the Plan's key policies, particularly those that are supposed to regulate housing density will prove equally toothless. So, however alluring it may sound there is a very serious danger that this policy alone will unleash a new wave of speculative development proposals that will prove impossible to regulate.

The risks of basing the overall Plan on an immeasurable aspiration such as this is particularly high at the present time when budget cuts have caused many boroughs - certainly the London Borough of Ealing - to run down the capacity of their planning departments - particularly where they concern design skills - to the point that they are almost non-existent. The lack of expertise in the Borough is likely to make implementation of this policy simply impossible.

Policy D3 Inclusive design

To deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design.

The Design and Access Statement, submitted as part of planning applications, should include an inclusive design statement.

As worded, this policy promises far more than it seems able to deliver. A much clearer commitment to genuinely inclusive design is required. Design can only be inclusive if it involves and takes account of the views of people who will be affected by a development. The growing trend in London over recent years has been to exclude communities from decisions that affect them, leaving decisions about fundamental changes in the hands of technocrats who are unfamiliar with a locality and as often as not less knowledgeable about a development than groups wanting to input into the decisions. A worrying democratic deficit is developing and it is leading to a growing dissatisfaction with the planning system.

Policy D4 Housing quality and standards:

New homes should have adequately-sized rooms and convenient and efficient room layouts which are functional, fit for purpose and meet the changing needs of Londoners over their lifetimes. Particular account should be taken of the needs of children, disabled and older people. ... A minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for additional occupants.

These standards are too low. They fall short further than ever of Parker Morris standards and are insufficient to meet the needs of individuals and families. Unfortunately, too many developments in Ealing fail to provide accommodation of this level which means that new slums are being built. It must therefore be a requirement of the plan that these standards are a minimum, below which no residential development should be accepted.

Policy D6 Optimising housing density

Development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:

- 1) the site context**
- 2) its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)**
- 3) the capacity of surrounding infrastructure.**

We object to the loss of the Density Matrix (Table 3.2 of FALP).

Notwithstanding the fact that Ealing planners have persistently misapplied this policy - the planning committee is routinely misadvised along such lines that *'Density is not to be used mechanistically but rather as a guide to assist high quality design.'* - it is one that has been the bedrock of the London Plan for a decade. Greater residential densities than the matrix provides for may well be both necessary and appropriate in some locations but there is no reason why the matrix should be totally jettisoned with so little debate. London has a distinct quality that distinguishes it from other

cities, and this has much to do with its built form and the density of its development. The Plan should seek to understand these qualities and employ policies to protect and enhance them. This is what the Density matrix sought to do.

A particular concern in this regard is removal of any distinction between the different settings of sites in London, leaving the determination of the appropriate density of a new development to the discretion of a design review panel. Different parts of the metropolitan area have different qualities dependent on their location and when they were developed. Developments must show they are cognisant of this by respect their setting.

The proposed replacement of the matrix with the much looser set of criteria for establishing optimal housing densities will effectively remove all checks on developers' natural propensity to overdevelop unsuitable sites. The matrix at least put some curbs on the way that developers valued new sites. The hope values raised by its removal will trigger a bidding war for sites and a new rise in land prices.

Equally as bad as we say in our comments on Policy D2, the design-led approach which is proposed as an alternative, is so woolly in its wording that it will accelerate the decline in architectural standards or respect for site context.

We object too to this policy's suggestion that residential development will be related to infrastructure provision - it is far too imprecise. While the sentiment is right, the policy has no teeth and, as it is expressed, it will be incapable of being implemented.

Policy D8 Tall buildings

Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. ... Boroughs should identify on maps in Development Plans the locations where tall buildings will be an appropriate form of development in principle ... The impacts of a tall building can be visual, functional or environmental. All three elements should be considered within plan-making and in deciding development proposals.

We object to the unquestioning acceptance of the need for tall buildings across the whole of London - an idea that is based on no evidence whatsoever. Previous versions of the London Plan have made it clear that increasing residential densities does not necessarily require tall buildings and we can see no justification why this long-standing policy needs to change.

Furthermore, tall buildings are not a strategic matter that the London Plan ought even to be discussing, except where they impact on strategic concerns such as strategic views. This is borne out by the three categories of impact this policy identifies which are all for Boroughs to consider.

We do not agree that Boroughs should be required to include suitable locations for tall buildings in their development plans as this will establish the principle that tall buildings are a requirement across the capital.

We object particularly strongly to the idea that tall buildings are needed as an aid to navigation which is a contention without any justification. Historically, folk may have used church towers, to help guide them through unfamiliar territory but these were invariably individually designed and in harmony with the landscape. In our age of SatNav and smart phones the need for assistance from the anonymous boxes sprouting across the capital has never been less.

Policy H1 Increasing housing supply

Table 4.1 sets the ten-year targets for net housing completions which each local planning authority should plan for.

Boroughs must include these targets in their Development Plan documents.

Borough	Minimum 10 year target
Ealing	28,070
Brent	29,150
Hounslow	21,820
Hillingdon	15,530
Harrow	13,920
Hammersmith & Fulham	16,480
Richmond upon Thames	8,110
Old Oak Park Royal DC	13,670

We object to Policy H1 as it applies to the LB Ealing. Table 4.1 imposes a disproportionate burden on the Borough to deliver the number of new homes London undoubtedly needs. Ealing's targets are based on the SHLAA, whose new home targets for allocated and small sites are not publicised. The public therefore has no chance to participate in their formulation as the Aarhus Convention entitles it to do. The targets cannot therefore be imposed on boroughs and boroughs cannot be held to them, at least until they have prepared their own Local Plan.

As things stand, the SHLAA does not justify Ealing's targets either in absolute terms nor as they compare with nearby boroughs. If they are adopted they will destroy many of the Borough's most cherished neighbourhoods which have already been seriously damaged over the past 10 years by a growing number of badly planned and increasingly insensitive re-developments which are doing serious harm to established neighbourhoods.

The borough, is expected to deliver 28,000 new homes over the next 10 years or 2,800 per annum. Of all London Boroughs it is expected to deliver the largest increase over the targets set by the 2011 London Plan, and this does not include new development in the Old Oak opportunity area which has its own entry.

Development on this scale is comparable to the creation of a new town. New towns have traditionally been distinguished by careful planning to determine where so many homes would be built. Such plans do not exist in Ealing. The nearest thing Ealing has is a core strategy which was adopted in 2012 and provides for 14,000 new homes to be built over a 15 year period – or 890 homes per annum. Most of the sites identified in the core strategy have already been built out, or will be shortly.

At an occupancy rate of 3 people per unit, the population of the Borough would increase by around 84,000 people if the London Plan's target is to be met, or by 25%. A huge range of infrastructure and services would be required to support so many new residents, but our borough is currently experiencing a sharp decline in the services our communities rely on. Our hospital and police stations are due to close, civic buildings are being sold off, new school provision cannot keep pace with current demand, our main library is to be reduced by two thirds and our green spaces are being sold off and/or built over. Is anyone considering what new demands the growth in numbers will put on systems that are being reduced this way?

In short, therefore, while there can be no argument about the need for more homes, the London Plan's targets will completely transform the Borough. They raise – or they should raise - serious questions about the implications for the quality of life both for new and existing residents. Until these are properly addressed we shall object to them.

Policy H2 Small sites

Small sites should play a much greater role in housing delivery and boroughs should pro-actively support well-designed new homes on small sites through both planning decisions and plan-making ...

Boroughs should recognise ... that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments.

To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development which provide between one and 25 homes:

Borough	Target
Ealing	1074
Brent	1023
Harrow	965
Hillingdon	765
Hounslow	680
Richmond	634
Hammersmith	298

- 1. infill development on vacant or underused sites**
- 2. proposals to increase the density of existing residential homes within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary through:**
 - a) residential conversions**
 - b) residential extensions**
 - c) the demolition and redevelopment of existing buildings**
 - d) infill development within the curtilage of a house**
- 3. the redevelopment or upward extension of flats and non-residential buildings to provide additional housing.**

the presumption in favour of small housing developments means approving small housing developments ... unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets ...

Incremental intensification of existing residential areas within PTALs 3-6 and within 800m of a Tube station, rail station or town centre boundary is expected to play an important role in meeting the housing targets for small sites, particularly in outer London. This can take a number of forms including new build, infill development, conversions, demolition and redevelopment or extension of existing buildings, where this results in net additional housing provision. Within these areas, there is a need for the character of some neighbourhoods to evolve to accommodate additional housing. Therefore, the emphasis of decision-making should change from preserving what is there at the moment towards encouraging and facilitating the delivery of well-designed additional housing to meet London's needs.

Policy H2 raises very great concerns for many residents in Ealing and we object to it strongly. The Borough has a longstanding and well publicised problem of 'beds in sheds' and unauthorised HMOs which the planning authority has proved powerless to manage. We are concerned that the presumption in favour of intensifying residential uses will encourage the proliferation of sub-standard housing conversions and homes in residential back gardens by unscrupulous developers intent only on making a quick buck.

We are particularly concerned about the very large numbers of new units that Ealing is expected to deliver on small sites, especially when the borough is compared with its neighbours which have similar densities of developments. We note that the numbers are derived from the SHLAA but the

huge differences between similar boroughs are unexplained. The discrepancies between boroughs is particularly worrying given paragraph 4.2.5's rather euphemistic acknowledgement that the character of some neighbourhoods needs to evolve. We recognise very clearly the urgent need for more housing in London, particularly those that meet the needs of ordinary people, but what is the justification for Ealing neighbourhoods 'evolving' so much more drastically than those of its neighbours?

We have little confidence in the encouragement that the draft plan gives to Boroughs to produce design codes. The denudation of planning capacity in Ealing has left the Borough with zero capacity to undertake such exercises or even to commission them. We are equally unimpressed by the protection the policy purports to provide to heritage assets. Ealing as a Borough has just one conservation officer who deals with heritage assets on only two days a week. Few other of the borough's planners appear to have even basic training in this area.

The presumption in favour of development within the curtilage of a dwelling house would set its back on the safeguards against garden grabbing that Greg Clark introduced in 2010. It will intensify the loss of family accommodation through conversion of family homes into houses of multiple occupancy which has become an accelerating trend in recent years. The new opportunities this policy would create will drive up house prices as developers compete for available sites and put traditional family homes ever further from the reach of normal families.

Policy H3 Monitoring housing targets and Policy M1 Monitoring

The ten-year housing targets set out in Table 4.1 should be monitored in net terms taking into account homes lost through demolition or change of use.

We support the practice of monitoring housing targets and think annual reporting should be mandatory for Boroughs - we note that the London Borough of Ealing has failed to produce an Annual Monitoring Report to cover any period beyond 2014.

Given the ambitious new housing numbers, it is important that AMRs also report in detail spending on s.106 contributions and the implementation of other key conditions attached to major development planning approvals.

Policy H12 Housing size mix

A To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to ... the nature and location of the site, with a higher proportion of one and two bed units are generally more appropriate in more central or urban locations ... the ability of new development to reduce pressure on conversion and sub-division of existing stock.

... For low cost rent, boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs. This guidance should take account of ... the local and strategic need for affordable family accommodation.

We support this policy. It is essential if London is ever to have the mix of accommodation that its people need. A diverse and balanced community requires a mix of housing stock suitable for all. Our concern is that residential developments in Ealing almost invariably fail to demonstrate this thinking. The Mayor must insist that proposals for new residential developments demonstrate that the requirements of the boroughs current and future residents are being catered for.

Policy S1 Developing London's social infrastructure

Boroughs, in their Development Plans, should undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities. ... Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.

This policy is absolutely crucial at a time of rapid population growth. Our concern is that it has not been and will not be observed. Almost every site that becomes available is given over to new housing. Social infrastructure in all its forms is not keeping pace. With an average occupancy rate of 3 people per new dwelling unit, the Borough of Ealing's population of Ealing will grow over the next 10 years by 84,000 people – roughly the equivalent of present day Stevenage. New towns like Stevenage were carefully planned in terms of infrastructure provision, but not in Ealing.

Chapter 7 Heritage and Culture

FALP Policy 7.9: Heritage-led regeneration has been deleted without explanation.

This key policy has a key role to play in delivering things that Policy HC1 in the New Plan aspire to. It was inadequately pursued both over recent years at both Metropolitan and Borough levels but that is not a justification for jettisoning it.

Policy HC1 Heritage conservation and growth

Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London's historic environment. ...

Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change ...

... Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

As stated, the policies are laudable. They reflect the guidance provided in eg the NPPF and are not dissimilar to the policies in the existing London Plan. Our concern is in the way the policy is applied in Ealing - or not applied. There are too many examples of developments that manifestly conflict with the Plan's heritage policies which the Mayor disregards when he is consulted about proposals. The policy therefore needs to be much more tightly drawn to prevent this, and when commenting on Borough proposals either in their local plans or on major developments referred to him, the Mayor should insist that HC1 policies are implemented as completely as the Plan's housing policies.

Policy HC5 Supporting London's culture and creative industries

In Local Plans and through planning decisions, boroughs should protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues in town centres and places with good public transport connectivity ... Boroughs are encouraged to work with the Mayor and relevant stakeholders to identify Creative Enterprise Zones in Local Plans ...

We strongly support the vision behind this policy. Our concern is that like similar policies in previous plans, no effort will be made to implement it. Instead, with the very strong drive to provide additional housing on every available site, this policy will carry no weight in practice. For example, where major proposals are referred to the Mayor where cultural or creative industries should be promoted they will not be because additional housing will be seen to be the greater priority.

Policy T4 Assessing and mitigating transport impacts

... Transport assessments should ensure ... impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development.

It is important that the impacts and opportunities which arise as a result of development proposals are identified and assessed so that appropriate mitigations and opportunities are secured through the planning process.

We strongly support the principles behind this policy which are reflected in earlier versions of the Plan. However, this is another area where the rhetoric of the policy is not matched by a sufficient clarity or firmness in implementation. It is clear now that myopic planning in and around Ealing's 5 Crossrail stations has very seriously led to lost opportunities to mitigate problems or take opportunities to embed the Healthy Streets Approach, especially because inputs from the local communities who are most familiar with areas around the stations and how they work have not been sought.

Policy M1 Monitoring

implementation of the London Plan will be kept under review using, Key Performance Indicators and reported in the Annual Monitoring Report.

The GLA's Annual reports are well produced and contain much interesting information. They should be improved however, by highlighting emerging GLA concerns about how the Plan's policies are being implemented and the implications of changes in the broader environment. Reflections on the options for policy refinement would be especially valuable.

Plan monitoring is - or ought to be - part of planning's continuous cycle. Its aim must be to avoid unheralded changes in tack which Londoners who are the Plan's primary stakeholders do not understand or buy into. London is too large and too complex an organism to be steered by sudden lurches in direction like those in this version of the Capital's Strategic Plan.