



LBE Local Plan Consultation

14 Areas for Comment and Objection

Ealing Council is [consulting on its draft new Local Plan](#). They say their new plan will impact on every aspect of everyday life in the Borough, and they want to know your views about it. Unfortunately, the consultation documents comprise a vast amount of complex material and you have only till **8th February** to digest it.

The plan envisages huge changes in Ealing over the next 10 years. This consultation is your only chance to have your say about them. Email your comments to localplan@ealing.gov.uk. The planning inspector who reviews the plan is required to consider everything people raise, so your comments will count.

After discussing the plan with local groups and residents' associations, Ealing Matters has prepared these 14 topics as possible areas for comment and objection. You are welcome to use them to help you prepare your thoughts on how the plan will impact on the area in which you live.

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1. **This Consultation.** The Regulations require the Council to give people a chance to input into the scope of the plan before it's prepared. We however are being consulted on a fully-fledged draft plan, but one with far too many holes in it.

The consultation is mindbogglingly complex making it impossible to understand its purpose or its significance. There is a huge evidence base, much of it made up of lengthy reports by commissioned consultants published less than a month before the launch of the consultation. It is impossible to think these have been brought together into a well-considered spatial plan.

2. **Housing.** LBE's overriding obsession in the last 10 years has been new home building, mainly in large blocks of flats on every available site in the Borough. There is no clear review or evaluation of their building programme and no policies in the draft plan to explain how it will work in future. The only new homes target is a passing reference in Policy SP4.3 on affordable housing to the London Plan's target of 21,570 new units. This conflicts with the evidence base's housing supply topic paper, which suggests the Council intends a much greater building rate. A properly justified housing target must be provided.
3. **Capacity for growth.** While LBE's hunger for redevelopment is unabated, the draft plan doesn't show how it is to be resourced, where the new homes will be built or what their impact will be. Construction over the past 10 years has already utilised many brownfield sites. New sites deemed suitable for residential development don't show a potential yield nor how they will be delivered. There are no estimates of the resulting population growth of Ealing's building boom or its impacts on the Borough's quality of life. Mitigation is, at best, only vaguely considered.
4. **Infrastructure.** The London Plan requires Borough development plans to assess the capacity of existing and planned physical, environmental and social infrastructure to support population growth. In the last plan period growth in Ealing was amongst the fastest in London, and it seems set to accelerate. But essential new infrastructure has not kept pace, and LBE's consultants found 'big gaps' in a wide range of physical and social infrastructure categories. No plan exists to address this.
5. **Climate change.** While noting the urgency of climate change, the consultation plan is very thin on how LBE will use its planning policies to address it. Firmer policies must protect remaining green space in the

Borough. Other policies should prioritise refurbishment and reuse of existing buildings over redeveloping them, and favouring more energy efficient low rise over tall buildings. A policy is required resisting further paving over of front gardens.

6. **The Natural Environment.** Both the NPPF and the London Plan require development plans to identify, protect and enhance valued landscapes, sites of biodiversity or geological value. The Plan being consulted on does not do this. It overlooks the value to the Borough of the Brent River Valley. In addition, de-designation of the remaining Green Belt is proposed and further loss of protected MOL space with their many important ecological assets is envisaged.
7. **Green and Open Space Policies.** The London Plan requires Local Plans to include appropriate designations and policies for the protection of open space to meet needs and address deficiencies. By de-designating large areas of MOL, this plan does the opposite. Plans should also promote the creation of new areas of publicly-accessible open space particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change. LBE's Plan does not do this and there are no policies to protect existing areas of green space.
8. **Waterways.** The River Brent is a major tributary of the Thames. The London Plan requires Development Plans to address the strategic importance of London's network of linked waterways to maximise their multifunctional social, economic and environmental benefits. The consultation plan does not do this.
9. **Place design, form, character.** The NPPF requires plans to be developed with local communities to reflect local aspirations. Neighbourhood planning groups can play an important role. The plan being consulted on has not done this, and Neighbourhood Plans have been overlooked entirely.
10. **Heritage.** The NPPF and the London Plan both require development plans to understand heritage assets and contain strategies to protect and promote them. The Consultation Plan omits these requirements.
11. **Tall Buildings.** The Plan will make tall buildings even easier to build and its policies do not meet the London Plan's requirements for them. The criteria used to define what constitutes a tall building and the implications of their designation are unclear and unjustified. It is for example ludicrous to suggest that a 20-storey building in central Ealing between Popes Lane and Castlebar Road would not be 'tall'.
12. **Town Centres.** Strategies for managing the Borough's town centres are unacceptably vague and no specific policies are proposed to deliver them. Ealing's planners have not up to now used the present plan to encourage strong, resilient, accessible and inclusive hubs as the London Plan requires, and it is difficult to see how the draft plan will change this.

The policy vacuum for Ealing Town Centre is especially unfortunate. Ealing has declined badly in the past 10 years. Its character is eroding through insensitive redevelopments, and major retailers and cultural attractions have closed. The plan expects intensive redevelopment to accelerate, and yet no strategy for managing the changes has been published and there has been no engagement with local communities in the preparation of one.
13. **Master planning and Area Action plans.** The Plan identifies many major sites for redevelopment over the plan period while intensive change is envisaged across a number of sites that will alter the character of whole neighbourhoods. Greater transparency is required in the planning of such projects through the publication of area action plans, masterplans and site briefs on which the public has been consulted.
14. **Plan monitoring and reporting.** LBE has failed to monitor and evaluate the performance of the current plan, and the draft new plan suggests they do not see this changing. Section 35 of the Planning and Compulsory Purchase Act 2004 requires Local Authorities to report on their plans at least annually. The new plan must contain cast iron commitments that they do so in future.