

SEC Meeting
14 December 2022,

LBE's Local Plan Consultation

What it is,
what it means,
how to comment



The Local Plan

'The plan will touch almost every aspect of everyday life in Ealing'*

[*LBE website](#)

- Planning is about the use of space. This means making choices
- Statutory basis for the Local Plan is the [2004 Planning & Compulsory Purchase Act](#)
- Applications for planning permission must be decided in accordance with the plan
- The [NPPF](#) explains the rules
- Plans should be:
 - shaped by early, proportionate and effective engagement
 - reviewed every 5 years – some elements earlier
 - clearly written with unambiguous policies
 - deliverable
- Plans should include Strategic and Non strategic issues



Strategic and Non-strategic

- **Strategic issues**

The authority's priorities for the development of land, especially for

- Housing
- Infrastructure
- Open Space
- Conservation – natural and historic environment

- **Non strategic issues**

- Site allocation
- Local infrastructure
- Community facilities
- Design principles
- Other development management policies.

- Strategic Policies trump non strategic ones

Regulation 18 consultations

- [Regulation 18 of the Town and Country Planning regs](#) says a planning authority must notify stakeholders
 - **‘of the subject of a local plan which the local planning authority propose to prepare’**, and
 - invite them to make representations **‘about what a local plan with that subject ought to contain’**.
 - The authority must take into account any representation made
- Rather inaccurately LBE say:
 - ‘The regulations require us to consult local residents, businesses and organisations on **how planning policy can influence important issues such as development, within the borough.**’*
- In fact, we’re being consulted on an already drafted plan



LBE's Consultation documents: an overview

The Plan

- [Chap 1-3](#). Broadly the core strategy.
 - A vision for Ealing
 - Boroughwide priorities & policies,
- [Chap 4](#). Town Plans
- [Chap 5](#). Development Management
- Appendix 1 Monitoring Framework
- Appendix 2 Glossary
- [Appendix 3](#) Atlas of Change
- [Appendix 4](#) Consultation Questions

The Evidence Base

- AMR
- Design Guide & Tall Buildings
- Housing
- Healthy Lives
- Climate Change
- Employment and economy
- Infrastructure
- Spatial Strategies
- Site allocations
- Integrated Impact Assessment
- Natural Environment

First Thoughts

- A mass of documentation. Much new material.
- Where's the beef? A lot of motherhood and apple pie interspersed with some policies that will dominate in practice.
- Much important detail is buried in the 'evidence base'. The draft plan alludes to it without explaining its significance.
- Most is by consultants. It's inconceivable the expertise exists in the Borough to implement it.
- No review of past performance or the trajectory of change.

Response Form – draft new Local Plan Consultation (Regulation 18)

Ealing's draft New Local Plan (Regulation 18) Consultation has launched and will run from 30th November 2022 – 25th January 2023. This is an eight-week consultation.

We are inviting all our residents, businesses, and other stakeholders to get involved in a big conversation about how we want our borough to develop, grow and change over the next 15 years.

How to respond:

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You can also email: localplans@ealing.gov.uk

Or write a letter to:
Strategic Planning Team,
Perceval House,
14-16 Uxbridge Road,
Ealing
W5 2HL

Attend one of our many events – check out the new local plan page on our website: www.ealing.co.uk/newlocalplan to find out more!

Your privacy

Please refer to the **Local Plan privacy notice** and Ealing Council's:
www.ealing.gov.uk/info/201045/data_protection/1420/privacy_statement

LBE's Vision and Strategic Objectives

- Ealing's 15-year vision seeks to:
enhance the unique characteristics and cultural identities of each of Ealing's seven towns and reflects the three core strategic objectives in the Council Plan
- Strategic Objectives
 - Creating good jobs and growth:
 - Tackling the climate crisis:
 - Fighting inequality.



Housing development – The Elephant in the Room

LBE's overriding concern in the past 10 years has been building new homes. We're not told how many.

- The real driver seems to be delivering affordable homes. Policies in the plan don't reflect this.
- A 10 year new homes target of 21,570 equivalent to about 50,000 people. This target only appears in Policy SP 4.3.A 'Genuinely affordable homes.'
- There's no evidence showing how this can be done. No:
 - Authorities Monitoring Reports,
 - statement of 5 housing year land supply,
 - land availability assessments,
 - resourcing

SP 4.3 Genuinely affordable homes

A. Meeting and where appropriate exceeding the 21,570 unit 10-year housing supply target identified in the London Plan for the period 2019-22 to 2028-29.

B. Providing new homes in truly mixed, inclusive communities across a range of tenures.

C. Maximising the provision of affordable homes with a particular emphasis on social rented properties including delivering 70% of new affordable housing as affordable rent.

D. Improving opportunities for higher quality market rented properties including build to rent where appropriate.

E. Working with residents to support the development of local community-led housing initiatives, including Community Land Trusts, to provide solutions to local housing issues.

Infrastructure

- An Infrastructure Delivery Plan due early 2023 will reveal a 'huge gap' in critical infrastructure.
- [The Infrastructure topic paper](#) prepares the ground:
 - High levels of traffic congestion
 - Severe capacity constraints for essential infrastructure:
 - Energy,
 - Water,
 - Waste water
- And for some key social infrastructure:
 - Secondary schools
 - Leisure and sports facilities
 - Emergency services
 - Unequal access to green space.
 - Special needs education
 - Community facilities in some places
 - Local health premises
- Capacity constraints are ascribed to aging infrastructure and population growth.

Development Management Policies

Policy DAA: Design and Amenity – Ealing LPA – local policy

A. New development must take responsibility for mitigating any adverse effects upon its neighbours and surroundings. This mitigation process should follow a sequential approach of first avoiding impacts through design, and then mitigating any remaining adverse impacts.

B. In particular, development should ensure:

(i) protection of sensitive uses within or outside the development

(ii) high quality design

(iii) good levels of daylight and sunlight

(iv) good levels of privacy

(v) positive visual impact

- Supported by separate [design guidance](#). Pretty good, but it's only guidance whose application will be at the whim of planning officers.
- A nod to Heritage BUT no clear policies

Development in Ealing's CAs will be delivered following careful, contextual design that is informed by existing character areas and promotes heritage assets. This is particularly the case in Ealing town centre and Haven Green, where heritage is at risk.

Tall Buildings

- A strong emphasis on tall buildings.
- Detailed thinking in the Evidence Base including a [review of the Manor Road decision](#).
- Purporting to adapt London Plan Policy D9, the plan concentrates on defining tall buildings.
 - Generally, 6 or 7 storeys, rising to
 - 14 storeys in central Acton and
 - 21 storeys in Ealing.
- Policy wording does not reflect the London Plan Policy

London Plan Policy D9.

B.1: Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan.

Policy D9: Tall Buildings London Plan Ealing LPA – local variation

E. The definition of a tall building in different parts of Ealing is set out in Figure DMP1.

F. Tall buildings above this threshold should be located upon allocated development sites defined in the development plan.

G. Tall buildings on designated industrial sites will be subject to agreed masterplans and based upon local impacts and sensitivity.

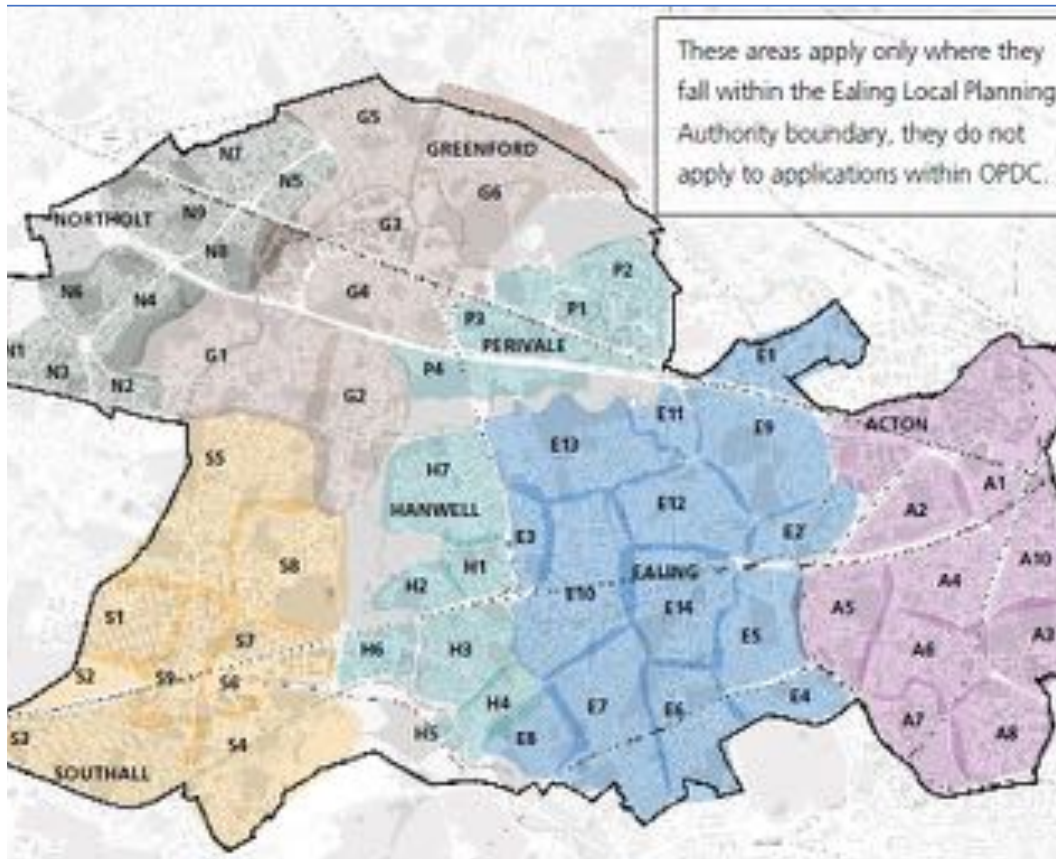


Table DMP1:
Definition of tall building by area

Town	Area	Tall Building (m)	Storeys	Town	Area	Tall Building (m)	Storeys	Town	Area	Tall Building (m)	Storeys
Acton	A1	31.5	9	Greenford	G1	21	6	Southall	S1	21	6
	A2	49	14		G2	21	6		S2	21	6
	A3	24.5	7		G3	21	6		S3	21	6
	A4	49	14		G4	21	6		S4	21	6
	A5	24.5	7		G5	21	6		S5	21	6
	A6	28	8		G6	21	6		S6	24.5	7
	A7	28	8	Perivale	P1	21	6		S7	21	6
	A8	21	6		P2	21	6		S8	21	6
	A10	21	6		P3	21	6		S9	21	6
					P4	21	6	Hanwell	H1	21	6
Ealing	E1	24.5	7	Northolt	N1	21	6		H2	21	6
	E2	21	6		N2	21	6		H3	21	6
	E3	21	6		N3	21	6		H4	21	6
	E4	21	6		N4	21	6		H5	21	6
	E5	21	6		N5	21	6		H6	31.5	9
	E6	21	6		N6	21	6		H7	21	6
	E7	21	6		N7	21	6				
	E8	21	6		N8	21	6				
	E9	21	6		N9	21	6				
	E10	24.5	7								
	E11	21	6								
	E12	21	6								
	E13	21	6								
	E14	73.5	21								

Shared Living (a term not defined in the [Glossary](#))



Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation

B. Development of Large-scale shared living will only be permitted within Ealing Metropolitan Town Centre.

QUESTION

Do you agree with the approach towards large-scale shared living development?

Click here or scan the QR code to give us your views



Whether in the form of completely new build or the conversion of existing buildings, large-scale shared living depends for the amenity of its residents upon access to excellent public transport connections and a wide range of local amenities. Within the borough this type of development is therefore directed to Ealing Metropolitan Town Centre.

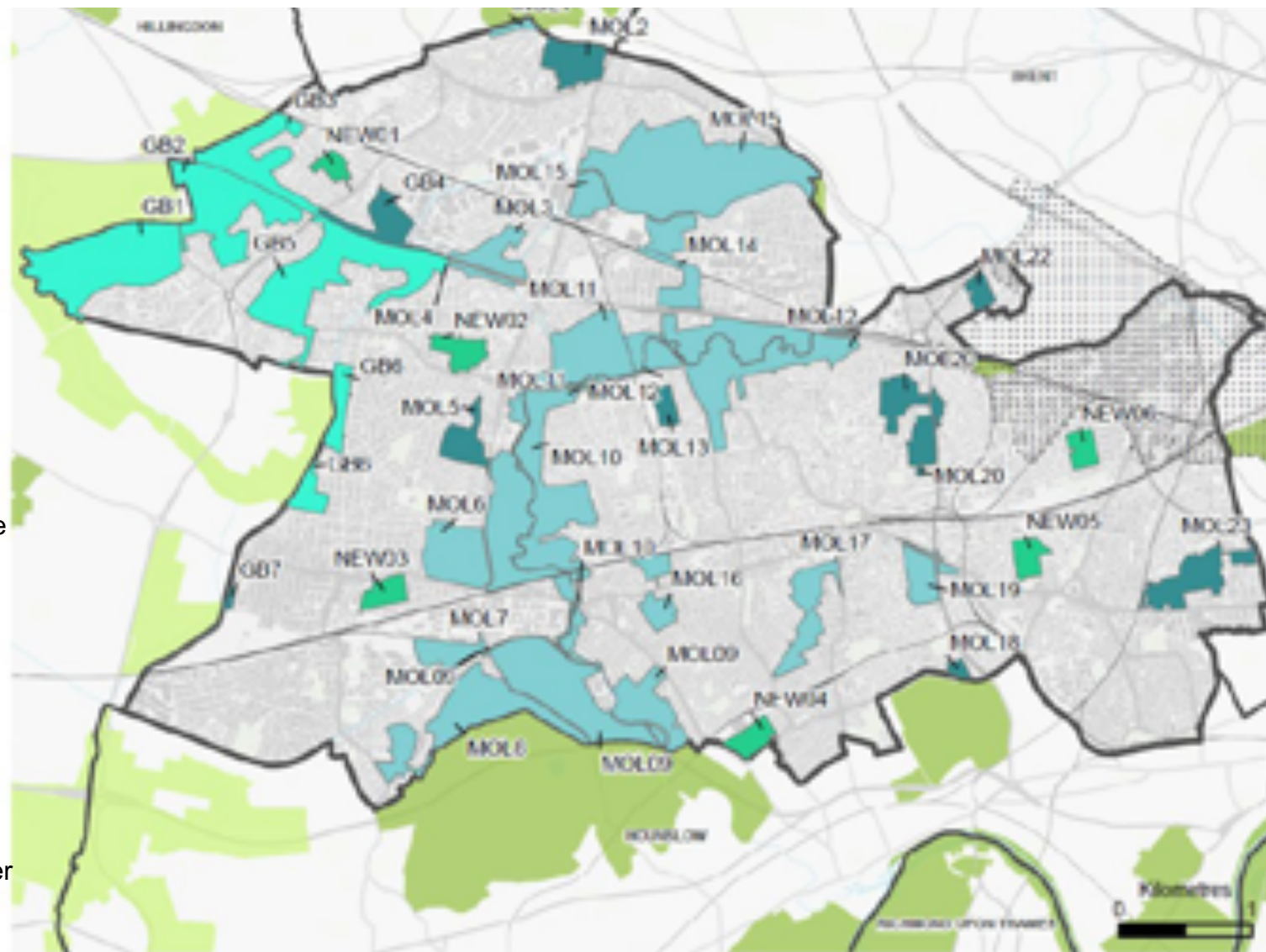
Green Belt, MOL and Open Space

- No strategic green or open space policies.
- Non Green Belt/MOL green space not identified
- Hard to spot important new designations in Appendix 3: [Atlas of Change](#).
- [Green Belt and MOL Review](#) in the evidence base proposes:
 - to dedesignate all Ealing's Green Belt land, most to be MOL
 - to declassify several MOL sites altogether
 - Boundary changes to some remaining MOL
- No new areas of MOL are proposed.

Policy G4: Open Space – London Plan Ealing LPA – local variation

H. Development proposals on green and open space should:

- (i) Be led by the purposes of nature conservation and recreation. The size of development within green and open spaces and its impact upon visual openness must be kept to a minimum.
- (ii) Preserve and enhance the visual openness of green and open spaces particularly with regard to views to, from, within, and across these areas.



Proposed MOL dedesignations

- GB4 Belvue Park and Golf Range
- MOL 02 Former Kellogg Tower/ Grove Farm / Ealing Northern Sports Centre
- MOL 05 Greenford Cemetery & Windmill Lane Allotments
- MOL 13 Trailfinders
- MOL 18 Gunnersbury Sports Grounds/ Old Actonians
- MOL 20 Hanger Hill Park & former Barclays Sports Ground
- MOL 22 Twyford Abbey
- MOL 23 Acton Park, Sports Grounds and Trinity Way

[See Green Belt and Metropolitan Open Land Review Stage 1](#)

Strategic Place Interventions and study sites

The Borough's 7 Towns

- Acton
- Ealing
- Greenford
- Hanwell
- Northolt
- Perivale
- Southall



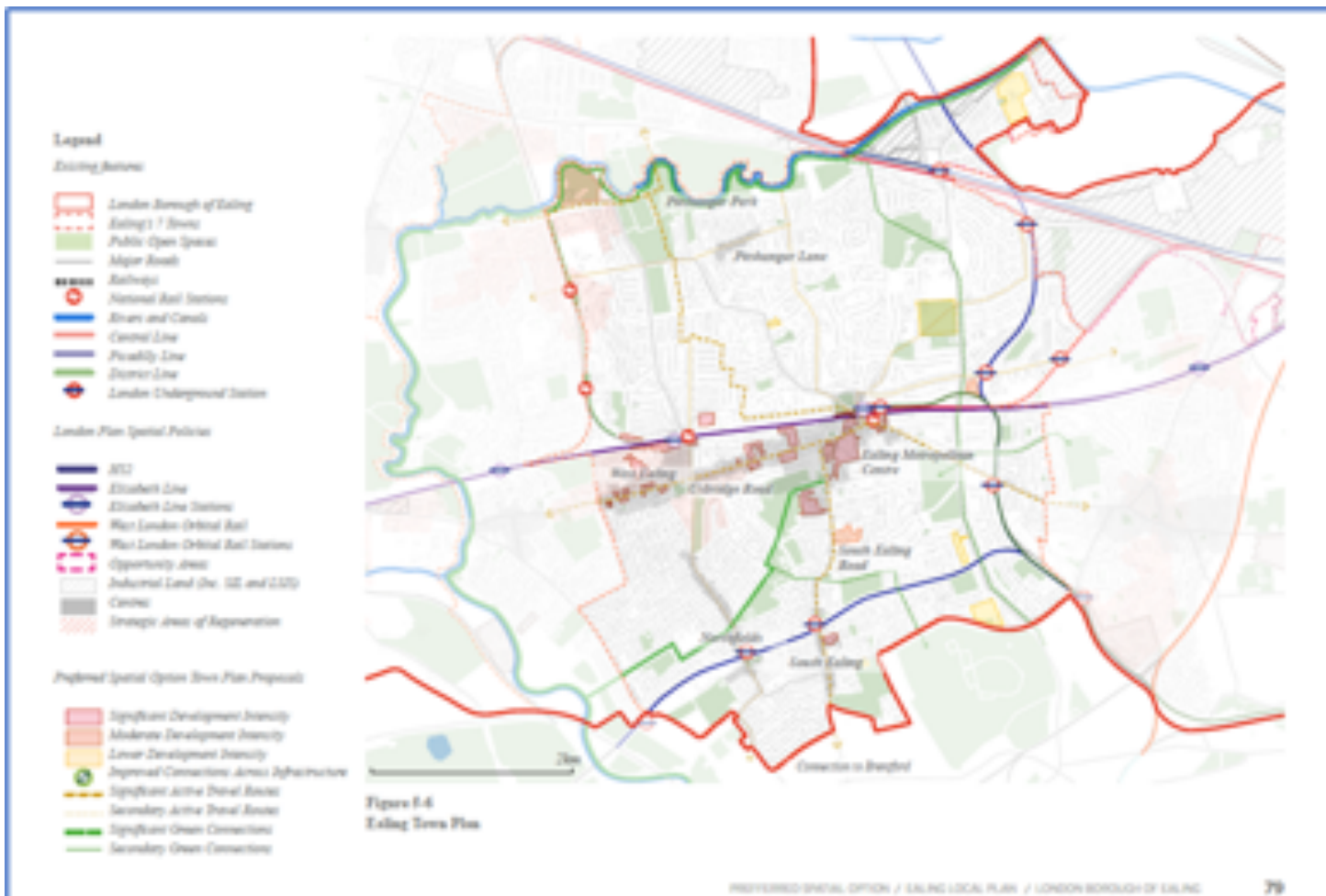
Towns in BOLD have their own 'spatial strategies' – follow the links

Ealing

Delivery of significant levels of development at Ealing Metropolitan Town Centre

Development will focus on delivering strategic office, commercial, retail, and residential growth, while improving key health determinants including accessibility to and provision of healthcare facilities, deficiency in green open space provision, and improving air quality within the town centre.

This will enhance Ealing Metropolitan Town Centre's role as a destination, with a diverse retail, leisure, and cultural offer and a stronger night-time economy.





Existing massing - view north-eastwards



Proposed massing - view north-eastwards

See [Tall buildings strategy appendix - Guidance for study sites](#)

Save Ealing Town Centre ...

- No review of the Town Centre's in last 10 years.
- In 2012 Ealing was trying to compete with White City as a Metropolitan Centre
- Retailers have moved out. Ealing now a coffee shop
- Locally listed buildings have been lost. Others are threatened
- Tall buildings out of character with Ealing's traditions have proliferated. Many more to come
- Ealing Boulevard has been encroached upon
- Loss of leisure and entertainment facilities



... too late to save?



Sainsburys West Ealing



See [Tall buildings strategy appendix - Guidance for study sites](#)

Southall

Delivery of moderate levels of employment-led development at Southall



See [Tall buildings strategy appendix - Guidance for study sites](#)

Acton

Moderate levels of development along key north-south corridors through rail-based public transport investment in the West London Orbital at Acton Central and South Acton stations



See [Tall buildings strategy appendix - Guidance for study sites](#)

Hanwell

A lower quantum of residential led development within Hanwell due to fewer opportunities



See [Tall buildings strategy appendix - Guidance for study sites](#)

Resourcing Development

- ‘Big gaps’ in social infrastructure.
- **Community Infrastructure Levy (CIL)**. LBE is almost alone in London for not levying CIL to fill these gaps.
- A new policy proposes to think about changing this as part of a proposed infrastructure plan.

C. Create a clear framework for future negotiations on planning obligations, including developer contributions that will include a new Community Infrastructure Levy (CIL) for Ealing LPA. More detail will be provided in a separate Supplementary Planning Document on Planning Obligations and Legal Agreements.

Site Assessments

- Important information on individual sites is in the [Site Selection Report and Appendices](#)
- Ove Arup appraise 123 individual sites across the borough for suitability for development.
- No appraisal of approximate capacity or development quantum
- Some sizeable changes from the previous plan
- Not part of this Reg 18 consultation. By Reg 19 it may be too late to comment so check to see if any of these sites interest you.

Table 2: Summary of preferred sites to be taken through the site selection process


Ealing Town Area	Number of Sites
Acton	13
Ealing	35
Greenford	9
Harwell	16
Northolt	16
Perivale	4
Southall	27
Ealing/ Harwell	2
Greenford/ Southall	1
Total	123

Changes to Development site appraisal

2013

2022

EAL11 West Ealing Station Approach
 Drayton Green Road / Hastings Road West Ealing W13



Site area: 0.27ha
Ownership: Private
Current uses: Retail, vehicle repair/MOT, and storage space
Development Strategy Policies: 1.2(e), 2.5
Setting: Urban
PTAL: 4
Planning Designations: Metropolitan Centre
 Adjacent to Green Corridor
Relevant Planning Applications: None

Allocation: Mixed used development appropriate to the town centre.

Justification: Currently dominated by small-scale retail units and car parking, the site is underused in relation to its location within the town centre, and appropriate for an intensified mix of uses. The proximity to a residential area and the arrival of Crossrail make it suitable for the introduction of higher-density mixed use, enhancing the character of the town centre and the main route from the station to the high street area.

Indicative Delivery Timetable: 2016-2021

Site Context: The site sits by the railway in a highly accessible location opposite West Ealing Crossrail station. The site's immediate surroundings have seen a large amount of development in recent years with Waitrose, Luminosity Court and Sinclair House. This site however sits in a residential area as well as being within town centre boundaries, making it particularly vulnerable to inappropriate and overbearing design. The adjacent railway further makes development sensitive to potential issues for end users such as noise and pollution.

With the introduction of Crossrail, a substantially increased pedestrian movement to and from the station is then to be expected between the nearby residential areas, West Ealing high street, Crossrail and the designated shopping parades of Waitrose and the Avenue. Traffic congestion is known to take place along Drayton Green Road, and Hastings Road has been closed to circulation to avoid rat-running


Design Principles: The height, scale and massing of new development must reflect the historic character of the surrounding residential areas on Hastings and Drayton Green Road. New development along Hastings Road must be low rise and not overlook the adjacent two storey terraced residential properties on this side, to create a harmonious streetscape and respect the current building line.

Ealing – EA25

W13 ADDRESS	SITE AREA (hectares)	NEIGHBOURHOOD AREA	OWNERSHIP
44 - 54 Drayton Green Road, 8-11 Hastings Road, West Ealing W13 8PH	0.27	West Ealing	Private

West Ealing Station Approach

CURRENT USE	DESIGN PRINCIPLES	INDICATIVE TIME FRAME FOR DELIVERY
The site features a warehouse retail unit and an MOT testing centre.	Site falls within an area potentially appropriate for tall buildings – refer to Tall Buildings Strategy; further guidance will be produced. Indicative height range between 7 - 13 stories (24.5 - 45.5 metres)	Beyond 3 years.
SETTING/TYPOLGY	PLANNING DESIGNATIONS/ SITE CONSTRAINTS	RELEVANT PLANNING APPLICATIONS
Centres	Existing Site Allocation (EA11), locally listed buildings (nearby), St Stephen's Conservation Area (nearby), Site of Borough Importance for Nature Conservation and Green Corridor (adjacent), Tree Preservation Order.	No relevant planning applications
PROPOSED USE		



Enabling Development

- New policy with little justification.
- ‘Enabling development’ is not defined in [the Glossary](#)
- Aimed at Gurnell or Warren Farm?

Policy ENA: Enabling Development Ealing LPA – local policy

A. Enabling development must be:

(i) Demonstrably led by the objectives of the designation in question.

(ii) Proportionate to the costs of the objective that is enabled.

B. Meeting housing or any other development target is not in itself enabling development.

Next Steps in the Plan's Formulation

Local Development Scheme

- Consultation ends 25 Jan 2023
- Planners report March 2023
- Changes to the draft plan published as 'Final Proposals' in a Regulation 19 consultation October 2023
- LBE submit the new local plan for examination Jan 2024
- Planning Inspectorate examine new plan Summer 2024

How to Respond

- This is the public's only real chance to engage in the plan.
- Consultation Deadline is Jan 25
- The Authority and an Inspector must take into account representations made.
- Respond by:
 - emailing localplan@ealing.gov.uk
 - Completing an [online survey](#)
 - Filling in the [Appendix 4 Questionnaire](#)
 - Writing to Steve Barton
 - Filling in this form available from your library

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Final Thoughts

- The plan seems clearly driven by LBE's political affordable housing agenda
- Documents are full of flannel, inaccuracies, ambiguities and inconsistencies
- No implementation strategy
- LBE has minimal capacity to implement the Plan as a whole
- How can we encourage a response?

Discussion

1. This presentation? Errors and omissions
2. Inferences and implications of the Plan?
3. How should we respond?