



Creffield Area Residents' Association
PO Box 94939, London, W3 9YU
Info@caraealing.org

Local Plan Consultation
Steve Barton,
Strategic planning team,
Perceval House,
14-16 Uxbridge Road,
London, W5 2HL

CC. Creffield Conservation Panel
CC North Acton Councillors
CC Ealing Common Councillors

8 February 2023

Here is the response from the Creffield Area Residents' Association to the Local Plan consultation.

1 Conservation Areas

Although the Local Plan Initial Proposals mention Conservation Areas –there is no specific reference to the ongoing Conservation Area Review and the importance that this should / will play in the future of Ealing.

As part of the Conservation Area Review, conservation area panels and resident groups are expected to help produce Design Guides for their local area to complement the proposed Generic Conservation Area Management Plan. This aligns with paragraph 127 of the NPPF, *“Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics.....”*

The local plan needs to be specific about the weight that the Generic Conservation Area Management Plan, and the individual Conservation Area Appraisals, Addendums and Design guides will have in determining planning applications.

As per Paragraph 190 of the NPPF *“Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats....”*

Street signs could be used to make the public more aware that they are entering a Conservation Areas.

2 HOUSING

2.1 Streets Under Conversion Stress

We are very concerned about the number of houses in the Creffield area that are being given planning permission for subdivision into small flats, these are mostly studio and 1 and 2 bedroom flats that just meet the minimum living spaces listed in the London Plan.

One of the defining characteristics of the Conservation Area is that it is predominantly made up of single family residences. Subdivision will therefore inevitably erode this character, in usage, density and in the architectural detailing of the properties which need to be substantially amended as part of the sub division process and lead to overall degradation of the street views. This includes additional rooflights in sloping roofs, threat to front garden areas with increased bin store and bike store facilities etc.

And of course, this leads to a decrease in the amount of family housing, (generally defined as having three or more bedrooms – London Plan 3.4.), in the area. We are not opposed to subdividing houses, but feel that one apartment per floor is more appropriate.

We support the statement in Section 5.87 of the _CA Generic Management Plan says that as a *general rule the predominant urban density of CAs must be respected and overdevelopment resisted*. Developers are commonly being given permission to convert original 4-5 bedroom semi-detached houses into 5 flats that can house far more people than originally intended. This is even worse when a basement extension is approved.

Our understanding is that we have a huge amount of flat development already in Ealing, therefore to strengthen the case for retention of family sized dwellings, we would like to see a section in Ealing's new Local Plan dedicated to Houses under Conversion Stress. As a reference point, Lambeth council incorporated a very robust statement into their local plan (Lambeth Local Plan September 2015, Policy H6, Page 50) that says that family housing should be protected from conversions. Here is a brief extract:

" a) To ensure mixed and balanced communities with a choice of family-sized housing and to manage the cumulative effects of residential conversions on environmental quality and local amenity, the council will protect dwellings suitable for occupation by families from conversion into flats or houses in multiple occupation (HMOs) as follows. (i) In parts of the borough under conversion stress, all dwellings suitable for occupation by families will be protected,....."

Similarly Haringey have chosen to designate parts of their borough as Family Housing Protection Zones (FPHZs) where there is a requirement that there is no net loss of family sized units (3 bedrooms or more). Something similar is needed and would be welcome for the Creffield Area.

This isn't unique to the CARA area; the Ealing Fields Residents Association have also raised the same issues:

<https://www.london.gov.uk/sites/default/files/Ealing%20Fields%20Residents%20Association%20%283142%29.pdf>

We would like Creffield to be designated as a FPHZ and guidance added to the new Local Plan for Ealing for house divisions in the borough as a whole.

The proposals that in residential neighbourhoods there should be a minimum of 20% of units as family accommodation with 3 bedrooms or more is not a big enough proportion.

2.2 Waste / Retrofit First

CARA supports the RetroFirst campaign to prioritise retrofitting our existing buildings rather than demolishing them and rebuilding. We can't allow all the environmental costs of sending old building materials to landfill, and the waste of energy and resources to create new. This should be part of the core strategy for tackling the climate crisis and would help to ensure *"future growth within London and its boroughs is socially and economically inclusive and environmentally sustainable.... And that Ealing's unique character is respected and celebrated..."* (Section 1.3 Local_Plan__Foreword__Contents__Chapters_1_3)

3 Green Space

The NPPF and the London Plan require plans to identify, protect and enhance landscape, this does not seem to be evident in this consultation for the London Plan.

3.1 Green Belts

Much of the case given for the de-designation of the Green Belt areas in the North West of the borough uses the argument that Ealing is not on the edge of London. However, whether Ealing is on the edge of London or not, we need to preserve green belt areas as green lungs for the city, and green views to stop London merging into one big sprawl. Ealing itself is as big as many of the larger cities in the UK – that surely justifies a green belt area to be retained.

As per Policy G2B of the London Plan, “Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan.”

3.2 Metropolitan Open Land – MOL 20

Hangar Hill Wood, Hangar Hill Park and Fox Wood are within walking distance for CARA residents.

The MOL assessment (Appendix _3_c of the Green_Belt_and_MOL_Review_Stage_1_report) is not fair or valid - the very fact that the North Circular cuts through these, means it is of great importance to contributing to the physical structure of London by providing green space that helps reduce the pollution caused by the North Circular, and reduces the noise of traffic for the surrounding residential areas.

The woods are described as ancient woodland with in the “*Review of SINC (Sites of Importance for Nature Conservation) in Ealing (2008)*” “this would contradict the MOL assessment that the site is of slight or negligible importance.

Policy G3C states that “MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified”.

3.3 Street Trees and Maintenance of Green Spaces

It is welcome that Ealing are planting a lot of street trees, however there needs to be a means by which they are watered through the growing season in their early years. CARA urge its residents to water trees, but we often see young trees that die simply because they do not receive enough water to help them get established. Some of the following policies could be implemented:

- a) Laminated / waterproof notices attached to newly planted trees asking nearby residents to water them
- b) Communications to residents and businesses to ask to water
- c) Planting trees at road level rather than pavement level to trap natural rainwater
- d) Stopping contractors from laying tarmac right up to tree trunks / better use of tree grids
- e) Maintenance to remove tree stakes and ties, when they are no longer needed, to stop trees being strangled

Without such maintenance, the trees will never thrive, and need to be continually replaced, thus never increasing the canopy cover.

There needs to be a proper budget for pockets of planting across the borough, and for ongoing maintenance.

3.4 Allotments

Policy G8A of the London Plan states that boroughs should:

1) protect existing allotments and encourage provision of space for urban agriculture, including community gardening, and food growing within new developments and as a meanwhile use on vacant or under-utilised sites “

There do not seem to be any specific sites recommended for new allotments, despite many maps and sites for development identified.

3.5 Front Gardens / Electric cars

A lot of the front gardens in the CARA area have already been lost to parking. In many cases they have been completely paved over, taking no notice of the current Front Garden legislation which requires water to drain into a permeable subbase or planted areas. This results in a large amount of rain water flowing off private housing into the street drains (see Twyford Avenue in a downpour!).

And of course, every time a front garden is paved, this removes 2 parking spaces from the shared residents' provision in the street, and so more people request a dropped kerb.

We are concerned this will become more of an issue with a demand to charge electric cars, and need some lateral thinking about how people can have access to cheap charging points without having to turn their garden into a car park. We can't have a situation where owners of large front gardens feel they have no choice, but to turn their front gardens over to parking in order to benefit from domestic energy rates, whereas those with smaller gardens have to drive around looking for charging points that are in short supply.

The easiest option would be to allow cables to be run across the pavement from individual householders, with legislation requiring cable protector ramps to be used. A development of this would be to allow electrical wiring to be passed under the pavement to popup charger units on the kerbside that are owned by the householder.

Where off street parking is in place, electric charging units should be installed at the side of a house to avoid unsightly boxes added to the front elevations of houses in the Conservation Area.

Front gardens full of plants and trees provide a far more attractive environment for everyone, as well as creating habitats for wildlife and taking pollutants out of the air. The proposed Generic Management Plan for Conservation Areas will help protect gardens the conservation areas, but Ealing's Local Plan should go further to extend these proposals to the borough as a whole.

Back gardens similarly play a large role in creating wildlife corridors, increase tree cover and help cool the urban environment. Garden grabbing should be resisted.

4 Local Green Space Designation

CARA wish to apply for Local Green Space designation (LSG) for the following areas that sit within the CARA Area and are of importance to local residents:

- Twyford Gardens
- Twyford Sports Ground

This is in accordance with the National Planning Framework (NPPF) that sets out the government's planning policies for England. Paragraphs 101 to 103 introduce a Local Green Space designation (LGS) to protect local green areas of particular importance to local communities.

4.1 Twyford Gardens, W3

Assessment of Twyford Gardens against the criteria laid out in paragraph 102 of the National Planning Policy Framework:

<p>The Local Green Space designation should only be used where the green space is:</p>	
<p>(a) in reasonably close proximity to the community it serves;</p>	<p>Twyford Gardens border the north side of the Uxbridge Road between Hale Gardens and Twyford School. It sits within a residential area and is well used by the local community.</p>
<p>(b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p>	<p>Twyford Gardens were part of the original Creffield estate, and used to contain two ponds which were drained in the 18th Century.</p> <p>It provides a more tranquil space to the traffic on the busy Uxbridge Road and includes a large number of trees that remove pollutants from the air, as well as some central planted beds.</p> <p>It is used by local residents and others, walking along the Uxbridge Road, as the walkways through the gardens are a more pleasant experience than walking along the pavement. It is also used by dog walkers and other passers-by, and offers a number of benches to sit.</p>
<p>(c) local in character and is not an extensive tract of land.</p>	<p>The gardens are included within the Creffield Conservation Area, and important for views of trees in and out of the conservation area and along the Uxbridge Road.</p> <p>The land is not extensive, extending for a stretch of about 275m along the Uxbridge Road and covers an area of approximately 7800 square meters.</p>

In addition

There are no current planning applications for this space.

The land is not classified as Green Belt or Metropolitan Open Land.

Chapter 4 of the Local Plan re Town Plans and Development Sites notes the poor air quality on the Uxbridge Road, page 133: "In addition, many areas suffer from poor air quality with Air Quality Focus areas identified at Hanger Lane (due to proximity to both the A40 and North Circular) and along Uxbridge Road, Ealing Broadway, and Haven Green."

4.2 Twyford Sports Ground, W3

The Twyford Avenue Sports Ground is currently designed as Community Open Space as per SPD6 within the adopted UDP (2004, policy 3.4.)

Appendix_3__d of the Ealing Green Belt and Metropolitan Open Land Review Stage 1 Report (November 2022) considers the land should not be designated as Metropolitan Open Land. If that is the case, then the reasons given there against, lend weight to it being designed as an LGS instead, to ensure the land is protected from development.

An assessment of Twyford Sports Ground against the criteria laid out in paragraph 102 of the National Planning Policy Framework:

<p>The Local Green Space designation should only be used where the green space is:</p>	
<p>(a) in reasonably close proximity to the community it serves;</p>	<p>Twyford Sports Ground sits within a residential area, and is bordered by Twyford Avenue, Creffield Road, Rosemont Road, Buxton Gardens and Chatsworth Gardens, and Twyford School on the south side.</p> <p>As noted in the Ealing Green Belt and Metropolitan Open Land Review Stage 1 Report (November 2022) it serves a mostly local catchment area.</p>
<p>(b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p>	<p>The grounds were originally part of The Elms estate and the site has a long history of being used as a Sports and Social club, previously including football pitches, bowling green, tennis courts and clubhouses.</p> <p>As noted in the Ealing Green Belt and Metropolitan Open Land Review Stage 1 Report (November 2022) "The majority of the site at present is currently in use as a sports ground. Wasps Amateur Rugby club currently owns the majority of the site and it is used by its members. "</p> <p>Twyford High School enjoys access to part of the site for school use. A women's rugby team is also based here. There is also an agreement between WASPS and the local council in respect of community use in return for the planning application for the all-weather pitches. It has also been used for filming and by CARA for social events.</p> <p>The northern part of the site is identified as being of Archaeological Interest.</p> <p>A number of trees with Tree Preservation Orders are present mostly around the perimeter of the Sports Ground, and offer</p>

	<p>an attractive outlook to the residents bordering the ground as well as providing habitats for local wildlife.</p> <p>The openness of the Sports Ground creates a breathing space in this largely built up area of Acton.</p>
(c) local in character and is not an extensive tract of land.	This is not an extensive tract of land at c. 94000 square meters or 9.4 hectares.

In addition

There are no current planning applications for this space.

A section in the top right corner is in private ownership. This includes some abandoned tennis courts and an old pavilion, and would lend itself to use as allotments as there are no others in the CARA area.

4.3 General

It is particularly disappointing that there is no mention of Local Green Space designation in any of the Local Plan documentation especially as LSGs should only be designated when a local plan is prepared or updated. In the same way that there is a Call for Sites form, whereby anyone can suggest a site suitable for development, there should also be a form whereby the public can nominate LSGs. This needs to be addressed, proactively, in consultation with local resident groups.

5 Acton

The Acton / Ealing boundary is wrong on all the maps in the *Character Study Part 2 Typologies and Scope for Growth*. The actual boundary is along the western edge of the gardens in Birch Grove with part of Creffield Road in W5 and part in W3, and Fordhook Avenue, Byron Road and Western Gardens in W5, whereas on these maps the boundary is shown as Wolverton Gardens.

It is not clear at all what areas of intensification mean.

Page 78 mentions under 'Character Based Growth Themes: "Intensify along the key spine route of Uxbridge Road at appropriate points, consolidating frontage and increasing building heights slightly to frame the route." That sounds like a deliberate policy to increase the height of buildings without sound justification.

6 Tall Buildings and Final Words

The whole of the local plan seems to be geared to where to place tall buildings! There's a tall building strategy document and in Chapter 4, the Design Principles for every potential development area seems to be evaluated against whether they qualify for tall buildings and many of them say: "Site falls within an area potentially appropriate for tall buildings". There doesn't seem to be any other Design Principles that the areas are consistently evaluated against.

Figure and Table DMP1 in Chapter 5 would seem to be a bit misleading. Although the supporting text says "not a presumption that any height up to this is automatically acceptable", a simple map and a table of heights can easily be misread and misinterpreted.

Taking the Creffield Area as an example, E5 and A5 both cover the Creffield Area. As per table DMP1, the height for potential tall buildings is set at 21m or 6 storeys in E5 and 7 storeys at 24.5m in A5. There are very few tall buildings in this largely residential area at present, and this would not be "character-led and contextual growth across the Borough."

The map should be drawn specifically to be more granular and remove low lying residential areas from the map completely.

NOTE THAT In Chapter_5_Development_Management_Policies, the map boundary between Ealing and Acton is wrong! Part of the Creffield area that sits in Ealing, is shown on the A5 map that is assigned to Acton.

Ealing is a predominantly suburban area, characterised by low rise housing. The addition of tall buildings, despite much local resentment, is against the advice given in Michael Gove's Letter to MPs 5 December 2022:

"Local authorities will not be expected to build developments at densities that would be wholly out of character with existing areas or which would lead to a significant change of character, for example, new blocks of high-rise flats which are entirely inappropriate in a low-rise neighbourhood..."

Clearly Ealing falls into this classification!

At the same time, the plan seems to want to remove all the Green Belt and demote to MOL, and demote MOL completely, as well as failing to designate any new areas for MOL classification. Open space and conservation of our existing heritage and green spaces needs higher priority, and surely helps support one of the core themes of the Local plan consultation "tackling the climate crisis".

It seems that a fairer, less self-serving, assessment is required.