

CERA Views on Draft Local Plan

The Central Ealing Residents' Association (CERA) covers a large central Ealing area defined by Uxbridge Road/The Broadway to the south, Hanger Lane/the North Circular Road to the east, Argyle Road to the west and Cleveland Road, Mount Avenue and Hillcrest Road to the north.

- 1 CERA finds it unacceptable that Regulation 18 of the Planning and Compulsory Purchase Act 2004 has been totally ignored. There should have been a consultation about what this Local Plan would cover, not a *fait accompli* comprising hundreds of pages and only made public just before the Christmas holiday season, with a very tight deadline for comment.
- 2 The Draft Local Plan has been prepared in a manner which is contrary to recent and proposed Government planning reforms which put communities at the heart of the planning system. There are forthcoming changes to the NPPF and recent amendments to the Levelling Up and Regeneration Bill which reflect this.
- 3 There is no overall vision put forward for Ealing Town Centre. The draft Plan is driven by numbers and targets not by a detailed and informed character appraisal of the Centre and a focus on 'place'. There should be a comprehensive character analysis of the age, height and appearance of buildings and density of development. The extent and location of conservation areas in central Ealing is very important but is hardly mentioned in the draft Plan. Consequently, the draft Plan does not reflect the priorities and aspirations of CERA residents.
- 4 The Government has made clear (Gove - statement on 6 Dec. 2021 and his more recent announcements) that housing targets are an advisory starting point to inform plan-making. They are not mandatory and should not encourage development at densities significantly out of character or at an inappropriate scale and impact. This is highly relevant for places like Ealing where the Draft Local Plan proposes high-rise buildings for numerous sites in the town centre that are entirely out of scale with existing buildings.
- 5 The concept of '20-minute neighbourhoods' appears in the Plan, but from examples elsewhere (Oxford, Canterbury) it seems that this is a weasel term to bring in restrictions on residents needing to drive outside their own zones. LBE has very recently had to backtrack on the catastrophic imposition of LTNs. These 20-minute neighbourhoods – which can only happen if businesses create them, not local authorities – are unrealistic. Moreover, residents do not want to have to get permits to move around, nor will they tolerate increased surveillance by CCTV or road blocks in their streets, let alone police-state restrictions on their movements.
- 6 A substantial number of utility/amenity sites are deemed to be unworthy of retention in the Draft Local Plan and so potentially available for re-development (primarily for residential use), such as car parks (standalone and ancillary), those for builders' merchants, for supermarkets, for vehicle repair and MOT centres, and many others. Quite apart from being anti-consumer and anti-business, the removal of such facilities will require residents to drive greater distances. Even community and health centres are on the hit list, which makes no sense at all.

- 7 Policy C0 makes reference to 'carbon offsetting' but scant consideration is given to embodied carbon in existing buildings, many of which would be adversely affected as a result of inevitable demolitions to accommodate high-rise developments, which would use large quantities of cement/reinforced concrete. There is growing government support for the reuse of existing buildings and retrofit measures to minimise emissions as far as possible with demolition being the least preferred option. This is a major concern if wholesale demolition of relatively recently built developments, such as the Ealing Broadway Centre, is approved over the Local Plan period. LBE cannot possibly meet its own Net-Zero carbon emissions target by 2030.
- 8 Lacking is any policy which has a presumption for the retention and adaptation of existing buildings, in particular the Ealing Broadway Centre (EA 02) built in 1985. The proposal to demolish and replace with 'perimeter blocks of varied heights' is contrary to the London Plan and Government intentions. Development Management policy DAA (Design and Amenity) is vague and inadequate to prevent damaging and inappropriate development being brought forward.
- 9 Buildings above 4 to 6 storeys are currently an exception in the town centre. There is no justification for a policy which does not regard buildings up to 21 storeys as 'tall'. What is the significance of 21 storeys when this height is so much greater than the height of existing buildings in the town centre? A definition of a 'tall' building should reflect this. The Plan should acknowledge, using sensitivity criteria and an urban design appraisal, as over-scaled development can - and has - caused damage to the skyline, to vistas and to the backdrop to buildings of merit.
- 10 Conservation Areas, heritage and urban design policies are inadequate, or missing. This leaves it wide open for exploitation of the planning system by those intending to build at densities harmful to the character and appearance of central Ealing. Densification of appropriate sites with sensitive adaptation and high standards of design could be welcomed, but the Plan fails to provide policies and guidance to achieve this. It lacks an acceptable vision.
- 11 Individual sites in the town centre are mentioned with indicative development heights and design principles and reference to the Tall Buildings Strategy, but there is no reference to the location of Conservation Areas or reference to existing building heights adjacent to or near development sites. No explanation or justification is provided for the building heights of the schemes on any of the Local Plan sites or why all sites north of the Broadway, New Broadway or Uxbridge Road, including Ealing Broadway Station and the Central Chambers site opposite, may be redeveloped up to 21 storeys, hugely higher than existing building heights and much higher than sites opposite on the south side of the Broadway, New Broadway or Uxbridge Road, where the maximum height for redevelopments is considered to be 8-12 storeys.

One exception to these lower heights on the south side of Uxbridge Road is CP House at the western end of the town centre where planning permission for a 12 storey redevelopment was recently approved but the Draft Local Plan gives an acceptable height of 9-21 storeys. Even more extraordinary is a small car park site at Arden Road slightly further west in West Ealing and owned by the Council, where planning approval was recently obtained for a 9 storey development, but the site is shown in the Draft Local Plan as being suitable for 9-21 storeys! Equally perverse is the Perceval House site, owned by the Council, which should

include a policy to state that if the current scheme does not proceed a tower of 26 storeys in any revised scheme will not accord with the policies and design principles of the Local Plan.

- 12 It is clear that some of the good design work and conclusions re design by Allies and Morrison, the Council's urban design consultants, have at last been published with the Draft Local Plan, but now should be brought forward as policy as a central part of the Local Plan. This might relate to the points referred to above and help explain them but there has been insufficient time for residents to read and digest all these consultants' documents.

What is needed are examples of inappropriate development and guidance on what are unacceptable and inappropriate building heights that negatively impact the local townscape due to massing, plus the identification of those aspects of local character worthy of protection including townscape qualities that have helped the town centre establish itself as a centre with a distinct and attractive ambience - and a presumption against development which undermines these principles. Also needed is the inclusion of a policy that covers buildings that significantly exceed the height of their immediate surroundings and which will not be considered as an appropriate form of development.

- 13 CERA residents have great concerns about recent urban design changes in central Ealing and many of the policies in the Draft Local Plan which do not address these changes, in fact seem likely to make them worse. Also of deep concern are development pressures for flat conversions/new developments of the large Victorian/Edwardian houses surrounding the town centre. Residents' concerns are the lack of strong planning policies controlling these conversions/developments to avoid over-development and very large new basements and back land development in the gardens of these houses.
- 14 Strong policies are needed in the Local Plan covering these schemes which are often of excessive scale, propose large rear balconies and patios, highlighting privacy issues to adjoining properties and lower level flats in the houses being converted. The vibration from construction work to create enormous new basements potentially causes long-term problems of subsidence, drainage and increased risk of flooding to adjacent houses. Many of these old existing houses have small Victorian basements which are often flooded because of the high water table and pressure on the Victorian drainage and sewage system.
- 15 NPPF and the London Plan both require development plans to identify, protect and enhance valued landscapes, sites of biodiversity or geological value. The Plan's proposals to de-designate large areas of Green Belt or Metropolitan Open Land, some of which are close to CERA's boundaries, will destroy rather than protect the current precious green spaces in Ealing, strongly suggesting that these spaces will become more available for development. All allotments are under threat too, it seems. These proposals are totally unacceptable. The Plan should focus on the creation of new areas of green space that would be accessible to the growing population. The Draft Local Plan also ignores the value of local waterways such as the River Brent and thus fails to take advantage of their social, environmental and economic benefits, as well as overlooking the fact that water companies regularly discharge effluent into them – a result of over-development in the borough.

- 16 We further note that a new policy on 'Enabling development' has appeared with little justification and the term is not defined in the Plan's glossary. It would appear to establish a principle for allowing development where planning permission would not normally be granted, for example, on MOL at Gurnell or on the Barclays Sports Ground, where 'a leisure led scheme is proposed with enabling residential use facilitating access to sports and play pitches'. What does 'enabling residential use' mean when this is already a sports ground with access?
- 17 Moreover, certain vital components of the Plan are missing altogether. There is no infrastructure delivery plan, for example. The Infrastructure Topic Report highlights several major problems with various aspects of infrastructure in Ealing, yet there is nothing which spells out how the current or future challenges are to be addressed.
- 18 Also missing are documents on the management of Ealing's green space and green infrastructure, such as Haven Green in the heart of CERA territory. Again, given LBE's strategic objectives for tackling the climate crisis, how can this crucial strategy not be covered in the Draft Local Plan? Judging by LBE's recent Warren Farm nature reserve decision, all green spaces in Ealing are under threat.
- 19 This Local Plan, when finalised, should be carefully monitored and reported upon annually, unlike previous plans.