

COMMENTS ON EALING COUNCIL'S DRAFT LOCAL PLAN from CAP THE TOWERS: ACTON

The National Planning Policy Framework states (p 8) that Local Plans should be '*succinct...clearly written and unambiguous.*' Ealing Council has managed to produce exactly the opposite of this: an impossibly long, rambling, repetitious, frequently inconsistent and - worst of all - **unclear** document or set of documents which has left residents of Ealing and community organisations utterly befuddled.

This general criticism, which seems to be echoed by all the community groups in the Borough, has a particular relevance to Acton and to the Friary Park development. Ealing Council's obsession with building more and more homes (most of them unattainable or unsuitable for Ealing residents and many of them being marketed to Far East and Middle East investors) has led to high rise developments on sites which have not been previously designated as appropriate locations for this kind of housing. Friary Park is surrounded by 2/3 storey houses in a largely Victorian suburb. The Council has encouraged and approved developers' applications for intensive overdevelopment on Friary Park and now, in this scandalously delayed Local Plan, they are proposing, retrospectively, to re-designate Friary Park as what they are pleased to call... 'Significant Development Intensity' (Chapter 4, p 83).

What the NPPF and the London Plan require, is that housing development should be plan-led.

Ealing Council has flagrantly reversed this sequence. Starting in 2019, they approved an intensive housing development at Friary Park and it's now underway in a totally inappropriate location. And only now do they come along with their new local plan to 'propose' the re-designation for intensive housing which they have already set in motion. This is the very opposite of what the NPPF and indeed the GLA require: the **plan** should come first, then the development. Not the other way round.

Even more confusion follows, when residents come to read in this new local plan on page 122 of Chapter 4: 'Indicative heights at Friary Park range between 6 - 14 storeys'. 14 storeys? But the Council has already approved the developers' plans for 7 towers at Friary Park (one at 24 , two at 22 floors, one at 18, one at 17.) Residents do not know what to make of such an absurd contradiction and muddle in this draft. The NPPF says that a Local Plan should be 'unambiguous and clearly written'. Multiple examples of this **lack of clarity and confusion** in the draft plan have been identified by other community groups across the Borough, not just in housing but in relation to climate change, equality, infrastructure, open and green space etc. In addition, there is much talk in the draft about 20 minute neighbourhood schemes, job opportunities etc with precious little detail of how the Council plans to deliver on these ambitions.

But the most egregious flaw in the proposed local plan, is that this draft reads like an attempt by the one or two planners who have authored this report to **justify** or **legitimise** some appalling planning decisions made in the recent past, Friary Park and Perceval House being two notable examples. Having rejected the principle, or rule, of not building huge housing developments in locations where they are totally out of sympathy with all the houses around them, they're aiming to use this new local plan to re-designate more and more areas where extreme urban levels of housing can be permitted. They positively intend to change the character of Acton Ealing and Southall in particular into a

hotchpotch of suburban and urban without the infrastructure to cope with that. The result, if these planners get their way, would be a **mess**: architecturally, socially, environmentally. We can already see the signs, and this draft plan makes it clear that the Council, or the planners, seem hell bent on even more of the same. The people of Ealing will not tolerate this kind of Council-sponsored vandalism any longer. That is obvious from the feedback of the community groups on 6 February when a clear call went up for this draft plan to be 'torn up', 'scrapped', and 'started again with genuine community involvement'.

There are two equal and opposite dangers with yet more of this high-rise housing. If all the apartments fill up, the Borough will be over-populated with all the social and economic consequences of that. Communities are not formed when people live on top of each other to the degree that Ealing planners are envisaging. Communities are formed when people live alongside each other, sharing streets, becoming a neighbourhood. The opposite danger, of course, with all this high-rise is that most people will just not choose to live in such unattractive towers looking at other unattractive towers, and Ealing will be left with white elephants and defaced neighbourhoods.

Acton residents in particular are looking for something like this in the new Local Plan:

'Ealing Council recognises the very high level of dissatisfaction felt by Acton residents who have **consistently** and **unanimously** opposed the Friary Park redevelopment on both occasions that planning applications have been made and approved, in 2019 (November) and in 2022 (October). In the 15 year period covered by this Local Plan, it is therefore proposed that there will be no further intensification of the Friary Park development in terms of buildings or population. It is to be noted that, as things stand (February 2023), the development suffers from an extreme lack of public open space: 43,651m² is required and only 9,585m² is provided in the developers' plan.'

The Council has invited us all to 'have a say on the way the Borough is shaped over the next 15 years'. Unfortunately, Ealing Council seems unaware of the deep levels of cynicism amongst Ealing residents as regards the sincerity of any offers of consultation made by this Council. A common response from residents runs along these lines:

"Even if I had the time to go through over a thousand pages of largely incomprehensible documents relating to this Local Plan, how can I have any confidence that anything I say will make any difference to what the Council has already decided it wants to do. If the Council wants to re-designate Friary Park for intensive development, they'll just get on with it as they have already done anyway, then stick it in the Local Plan and the community of Acton will have had no effective say in this re-designation of their neighbourhood. Genuine democracy is dead in this Council."

This sentiment is particularly strong in Acton following the Borough's consultation last year on the planning application 221747Hybrid, which proposed even greater overdevelopment of an already overdeveloped scheme at Friary Park. Not a single Acton resident wrote in support of this application; every response sent in, all 881 of them, were strong objections on sound planning grounds. Yet when the planning committee

discussed this application (October 2023), not a single councillor even referred to the public consultation in their questioning of officers or in their debate : a repetition of what had happened in the earlier Planning Committee decision (November 2019) to proceed with the extreme overdevelopment of Friary Park when the consultation had revealed 100% opposition from the community.

One last point from Cap the Towers. Acton residents will never agree to proposals to remove MOL protection from Acton Park and Gunnersbury Park, and we promise the author or authors of this Local Report, who have tried to sneak this preposterous proposal into their draft, that any such notion will go the same way as their earlier plan to build even higher towers at Friary Park and also to encroach on the Common Land of Friars Place Green. Both those plans had to be abandoned. If truth be told, the same fate now looks set to befall this entire draft local plan, given the radical changes that are required and the fact that the whole direction of travel outlined by a few Ealing planners is not shared by the overwhelming majority of the people of Ealing. This draft is impossibly flawed. Time to start over perhaps.

And next time a draft is attempted - because this one is doomed -why doesn't the Council try drafting their new local plan by working closely WITH the communities who, as was evident at the meeting on 6 February, have given the thumbs down to this hopeless draft. Why don't we **all** heed the words of our Council Leader, Peter Mason:

From now on, communities will be in the driving seat when it comes to regeneration in Ealing. Local communities need to LEAD the process of change in the Borough.

Cap the Towers: Acton February 2023