

I am commenting on the draft Ealing Local Plan as Chair of the GRASS (Gordon Road and Surrounding Streets) Residents' Association which represents numerous households in the Central Ealing area. The areas of concern are outlined below:

- **Consultation**

The draft document released on 30 November is very long and complex and residents have been given very little time to read and digest the contents. The timing of the publication just before Christmas was presumably deliberate to make it even more difficult for residents to respond. Moreover, local residents were not, as required by the regulations, given the chance to have any input into the draft plan, which was presented to them as a fait accompli .

- **Housing and Infrastructure.**

We are particularly concerned about the proposed housing policies. In the last ten years the London Borough of Ealing has built blocks of flats on every available site in the Borough. There has been no review or evaluation of this massive building programme and nothing in the draft plan suggests how the policy will work in the future.

The Plan will make tall buildings even easier to build and its policies do not meet the London Plan's requirements. The criteria used to define what constitutes a tall building and the implications of their designation are unclear and unjustified. Central Ealing has already seen a proliferation of what residents perceive to be high rise developments- the suggestion in the plan that tall buildings are only those which have more than 21 storeys is absurd. Central Ealing is already becoming dominated by high rise buildings such as the Manor Road towers currently under construction, the proposed tower blocks following the demolition of Perceval House and the proposed Waitrose redevelopment etc. These high-rise tower blocks will

permanently change the character of the area. Ealing is essentially a Victorian low rise suburban area and includes a number of conservation areas, for example, Ealing Town Centre, Haven Green, Brentham Gardens, Grange and White Ledges, Ealing Common, Montpelier Park, Mount Park and St Stephen's to name but a few. According to Ealing Council's website "Ealing's 29 conservation areas are a rich assortment of nineteenth and early twentieth century residential development, treasured open spaces, industrial and transport heritage and remnants of ancient villages. The council seeks to preserve and enhance these areas and resist inappropriate development." There is no evidence of this commitment in the draft local plan.

Moreover, the existing towers offer very little affordable housing and there is no reason to suppose from the draft plan that this will change.

We are also concerned that the housing policy lacks a carefully formulated and justified housing target. The draft plan also does not show how the proposed new housing developments will be funded, where the new homes will be built - construction over the past 10 years has already utilised many brownfield sites or what their impact will be. There are no estimates of the resulting population growth following Ealing's building boom or its impacts on the Borough's quality of life and there are no detailed plans to mitigate the potential problems.

There are also no detailed plans for the provision of physical infrastructure, for example drainage, water, gas and electricity, plans for increased traffic etc and social infrastructure, for example schools, health services, community facilities and transport etc ) to support the inevitable increase in population .

- **Environmental policies.**

We are also extremely concerned about the draft plan's failure to protect the environment. The National Planning Policy Framework (NPPF) and the London Plan both require development plans to identify, protect and enhance valued landscapes, sites of biodiversity or geological value. The proposals in the draft plan to dedesignate large areas of Metropolitan Open Land will destroy rather than protect the current much needed green spaces in Ealing. The proposals also suggest that they will become available for development. The plan should focus on the creation of new areas of green space that would be accessible to the growing population. The draft 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

There are also no specific policies in the draft plan with regard to climate change. The proposed demolition of relatively new buildings like Perceval House seems likely to continue and we consider that policies should prioritise refurbishment and reuse of existing buildings over demolition and redevelopment. Policies should also favour more energy efficient low-rise buildings over tower blocks. A policy is also required to prevent the paving over of front gardens usually for car park

- **The town centre**

The proposals for the management of the Ealing town centre are extremely vague. The town centre has declined significantly in the last ten years with the loss of most major retailers, which have been replaced by a proliferation of coffee shops and fast-food outlets. It is no comfort to the residents to be advised

after the closure of a shop that the nearest store is now in Westfield or that the new 8 screen cinema will arrive 'soon.' There has been no consultation with local residents about the town centre policy, if indeed there is one.

- **Local Input**

The NPPF also requires plans to be developed with input from local communities which would use local knowledge and expertise and reflect local aspirations. The plan being consulted on has not done this, and Neighbourhood Plans have been completely overlooked .

- **Monitoring the plan.**

Ealing has consistently failed to monitor and evaluate the performance of the current plan, and there is nothing in the draft plan to suggest that this will change even though Section 35 of the Planning and Compulsory Purchase Act 2004 requires Local Authorities to report on their plans at least annually. To avoid future problems the new plan must contain a binding commitment that the new plan will be monitored in compliance with the legal requirements.