



7<sup>th</sup> February  
PDF sent by email

Dear Ealing Council

**PITSHANGER COMMUNITY ASSOCIATION comments on draft Local Plan**

Please see below our comments on the draft Local Plan, thank you.

**Development:**

The draft Local Plan not only includes proposals for the development for some 115 sites, but also the de-designation of several areas of Metropolitan Open Land, which causes concern that these too will be turned over to property developers. Despite what people have said (either in the Shaping Ealing responses or, more importantly, in their objections to high-rise proposals) the priority is to provide housing through large and tall development projects to meet unspecified demand across the Borough at the expense of other important aspects of planning policy and guidance (e.g. the National Planning Policy Framework (NPPF)) and the London Plan.

In addition the Local Government Ombudsman upheld the complaint regarding the lack of an Annual Monitoring Report. Since the LGO's decision, the Council has made little or no progress on meeting its legal obligation to produce an AMR.

We fail to understand how decisions to give more priority to providing new housing are valid when there is little or no information about the amount of new housing being created or required. We think Ealing Council would be advised to hold developers to account for progress in projects rather than simply accepting further sets of proposals to build high-rise tower blocks in the Borough.

Although the draft Local Plan refers to infrastructure to support new developments, it lacks details as to how the Council can implement or influence the necessary improvements in infrastructure and how to improve support of local communities.

In the Integrated Impact Assessment, there are the suggested mitigations:

- Ensure where new development is not directly supported by services that there is good access, including via public transport and active travel modes, to other development centres providing services.
- Connectivity should be enhanced to ensure that residents in areas of the borough away from the east-west corridor are also able to benefit from the major employment opportunities that would be focused on Ealing and Southall.
- This option has the potential to have a positive impact on education/skills, however further detail is required on any educational or training opportunities that could be delivered.

How does the connectivity enhancement and mitigation sit against the aim to introduce 20 minute neighbourhoods which would enable people to fulfil the majority of their daily needs within a 20-minute round-trip walk from their homes?

There is much talk about transport connectivity. In 2019/2020, TfL introduces the Slide scheme as a trial in Ealing. The trial stopped thanks to lockdown. However, it was a brilliant service that connected people and communities to all parts of the borough. We recommend that LBE work with TfL to reinstate the trial.

While it is commendable that the draft Local Plan includes the policy of supporting walking and cycling routes safe and accessible to all, it does not clearly address the needs of disabled people who might need to travel in cars or other forms of transport (eg mobility scooters).

If the Council is to place importance on providing new affordable housing, it must prove that its decisions lead to new housing by providing an Annual Monitoring Report. The lack of the AMR exposes the Council to successful challenges to rejected planning applications (as was the case of the Manor Road decision). The sense is that planning decisions are often taken not just on the basis of planning policy and guidance but also against the risk of decisions to reject being challenged.

We note the reference to North Ealing being maintained and improved and that this includes the Pitshanger Lane neighbourhood centre's community infrastructure, leisure and shop uses. Hanger Lane Gyratory Strategic Industrial Location will be redesignated as a Locally Significant Industrial Site to help increase the amount of industry and jobs. We would welcome information on how and why such improvements to these areas will be made and how funded.

We reminded ourselves of the Shaping Ealing Survey – its summary states that it told the Council much about what respondents liked and what they felt could be made better. For example, quotes page 25:

- 'Council's obsession with very high-rise flats of which too many are too expensive for the local people on medium income and also are spoiling the landscape of Ealing.'
- 'Stop those which are yet to be built and replace them with low rise...'
- 'Air quality, compromised by traffic.'
- 'Air quality, too many high rises being built'.

The summary also says this: "Having this feedback is important to us to better understand how people think and feel about our borough and the seven towns. In particular, this engagement exercise will help inform the contents of our New Local Plan."

It seems that the draft Local Plan has been shaped in a way at variance from the issues covered in the Shaping Ealing Survey.

### **Metropolitan Open Land:**

Ealing Council is proposing in its Draft Local Development Plan to remove Metropolitan Open Land protection from several green spaces, for example Hanger Hill Park, Hanger Hill Wood, Fox Wood, Barclays Sports Ground and Trailfinders. Not only will this make it easier for developers to build on these areas in the future, resulting in the permanent loss of green spaces and significantly important habitat, it also creates a precedent for the removal of MOL protection from all green spaces in the borough. We consider that Ealing Council has not established the exceptional circumstances

justifying removal of MOL designation. The fact that these proposals are put forward in the draft Local Plan without consultation shows that the Council has not worked with partners to enhance the quality and range of uses, or understand fully the current use and importance of these spaces to the communities they support.

The comments made by Friends of the Earth, CPRE and Save Ealing's Parks should all be listened too.

Central government policy (NPPF) and London policy (The London Plan) both require development plans to identify, protect and enhance valued landscapes, sites of biodiversity or geological value; e.g. Fox Wood is a designated Local Nature Reserve and site of ancient woodland, 1 of 2 that are threatened by the de-designation of MOL20. The proposals in the draft Local Plan to de-designate large areas of Metropolitan Open Land have the opposite effect as such areas will no longer have the protection afforded by MOL status and should these sites be developed, they are lost for good, ancient woodland cannot be restored. The proposals also suggest that they will become available for development. The concern therefore has to be what precedent does de-designation make for other MOL areas and green spaces in the Borough.

#### **Time allowed to respond**

The Pitshanger Community Association is concerned that Ealing Council has produced a long, complex document – many of our members are used to analysing long complex documents, but the lack of the clarity in the proposals and the cross-referencing to other documents has made the process difficult. It is unreasonable to expect anyone volunteering, living or working in the Borough to analyse a complex document in the margins of their personal and working lives within the timescale proposed. While there is also a summary document, it omits significant aspects of the proposals in the draft Local Plan. While we acknowledge that the Council extended the deadline for comments, nevertheless the amount of time allowed was still unreasonably short, given that the consultation period opened at the end of November, when many businesses and families in the borough find this the busiest time of year. Moreover, the majority of consultation events were held in the early days of the consultation period when the publicity for the draft Local Plan was still being ramped up.

By comparison, the Shaping Ealing exercise was done over the space of six months.



For the Pitshanger Community Association

7th February 2023