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Perivale Community Hive

Dear Steve Barton - LB Ealing Strategic Planning Manager, LB Ealing Regeneration Team, and New Local Plan consultation co-ordinators, I write further to my previous submission, in which I commented specifically on the Perivale Town Plan. In this second response I will make some further comments about the draft New Local Plan as it relates to the LB Ealing more broadly. I have particular concerns about the following proposals:

De-designation of Metropolitan Open Land (MOL) and re-classification of Greenbelt land as MOL - Maps 1 and 2, p521 (Appendix 3)

Given that LB Ealing already has less open green space per 1,000 residents than the City of Westminster, it is very concerning how much land is proposed to be de-designated from MOL in LB Ealing as indicated in the draft new Local Plan. De-designation will make it easier for important green open spaces to be developed for residential or other use. Instead these must be protected as green spaces for future generations.

I note with alarm at some of the following areas being earmarked for MOL de-designation: - Grove Farm (Greenford) (MOL2) - Belvue Park (Northolt) (MOL4/GB4)

- Greenford Park Cemetery (MOL5) (where my mum and my grandparents are buried)
- Trailfinders Sports Ground (Ealing) (MOL13)
- Hanger Hill Park and Woodland (MOL20)
- Twyford Abbey (MOL22)
- Acton Park (MOL23)
- Gunnersbury Park (MOL18)

I further note with concern that large swathes of greenbelt land in Northolt and Greenford are being downgraded to MOL. These sites include GB1, GB2, GB5 and GB6. **Of particular concern should be the de-designation of MOL land in areas where there is already a dearth of open green space and where air quality is extremely poor. For those reasons, I particularly strongly oppose the de-designation of Acton Park where green space amenity is very poor, Hanger Hill Park and Wood (NO2 levels regularly exceed 50ug/m3 at Hanger Lane and Hanger Lane roundabout), as well as the de-designation of any allotment sites. I am also naturally concerned (given close members of my family are buried there) by the de-designation of Greenford Park Cemetery - while I have faith this site will never be developed on, it is unclear what legal protection from development cemeteries are afforded and concerning that its MOL protection should be removed.. However, I am opposed to all these proposed de-**

designations as I believe all these sites should be protected as green spaces. The mere act of MOL de-designation poses serious concerns and questions about what LB Ealing plans for the future of these sites.

All green open space provides amenity for recreation, mental wellbeing, space clean air and exercise for those who seek respite from busy working lives. This is incredibly important given increasing fragmentation, and social isolation for so many people, particularly in the wake of pandemic lockdowns... Open green spaces of course, also provide ecological habitats for wildlife, including some protected species.

Absence of a strategy to manage Homes of Multiple Occupation (HMOs) The absence in the draft new Local Plan of a strategy to tackle growing number of HMOs and the associated crime anti social behaviour they cause, which is a growing concern for local residents, is a point I raised in my first consultation response (below). (See for example this petition begun by another Perivale resident - <https://www.change.org/p/ealing-council-stop-hmos-in-perivale-other-neighbourhoods>) I did not specify a remedy, and feel I should do so now. **I and other residents would like to see Article 4 directions under the General Permitted Development Order applied strategically in certain areas where HMOs are proliferating rapidly - this would require landlords to obtain planning permission before creating a new HMO, adding an obstacle and making it harder for new HMOs to be created. An HMO strategy should be included in the draft new Local Plan.**

Policy D9: Tall Buildings London Plan - Ealing LPA – local variation p474 (Chapter 5)

It is extremely concerning to learn that under the proposed Ealing Local Plan, in parts of Ealing (E14) and Acton (A2 and A4) a 20 storey building, or a 13 storey building, respectively, would not be classed as a 'tall building'. **This is a (one would hope not intentionally) misleading policy for residents: that the definition of 'tall building' differs depending on where one is in the Borough.** More broadly, LB Ealing Cabinet has faced a backlash from the scale of high rise developments in the Borough and councillors must take heed from the views of residents - local voters, Council tax and rate payers - and tread cautiously.

Policy HOU: Affordable Housing – Ealing LPA – local policy p474 (Chapter 5)

I am very concerned to read:

"Affordable housing need in Ealing and across London significantly exceeds the proportion that can be funded solely by development contributions, and indeed also outstrips the 50% strategic target that is set by the London Plan, and which anticipates various forms of subsidy in order to increase delivery"

Section 106 Town and County Planning Act 1990 contributions and Community Infrastructure Levy (CIL) funds must not be used to subsidise developers to meet affordable housing targets. This must come from developers' own pockets, rather than being subsidised by funds which are more needed than ever before to improve local community facilities and infrastructure.

References to "20-minute neighbourhoods" (Chapter 4)

"20-minute neighbourhoods" are referenced at various junctures in Chapter 4 of the draft new Local Plan (Town Plans and Development Sites) I have no objection to this at face value. It is a good thing, of course, that people should be able to walk 10 minutes to their local shops and facilities. However, the reality is that local authorities have very little real control over the opening of new retail facilities and the types of local shops on offer. In reality, the free market operates, and while the Council might facilitate certain individual local amenities local neighbourhoods are not going to be rebuilt to the extent that 20 minute neighbourhoods would materialise for all LB Ealing residents... The terminology is concerning, because there is disturbing precedent: sanctioned zoning has been introduced to enforce "20-minute neighbourhoods" by local authorities elsewhere in the UK and abroad. Oxford and Canterbury City Councils in England, for example are creating city zones where residents will need to apply for permits and will be charged to drive outside their zone. This is being opposed by large numbers of residents in those local authority areas, and there is increasing awareness and opposition to such proposals nationally and internationally. **We must never have such zoning and movement restriction in Ealing. LB Ealing must recognise that private vehicular access will always be necessary for all residents even if residents themselves do not have their own private vehicles.** Fresh in the minds of local residents are the "Low Traffic Neighbourhoods" (LTNs) introduced by Ealing Council and other Councils, only to be reversed by Ealing and other London Boroughs after local opposition to the road blocks. Residents were not impressed by road blocks causing increased traffic congestion and tailbacks - and thus worse air quality - on adjacent roads... Fortunately Ealing Cabinet reversed its decision before the spectre of reduced accessibility for disabled and vulnerable less mobile residents and the Council lining itself up well for Equality Act judicial reviews were even addressed... Sincerely,

Alex Nieora
Trustee and Legal Secretary

Perivale Community Hive

Perivale Library
Horsenden Lane South,
UB6 7NT LONDON

Dear Steve Barton - LB Ealing Strategic Planning Manager,
LB Ealing Regeneration Team, and

New Local Plan consultation co-ordinators,

It was a pleasure to meet you on the Perivale Town walking tour and at Perivale Library on 9th January.

This is my response to the draft New Local Plan (Regulation 18) consultation. I will make some limited wider Borough-wide comments but I am responding specifically in relation to Perivale, where I live and have lived and worked for the last 16 years and where I carry out a wide range of volunteer work. I am also in direct contact with many hundreds of local residents. I grew up and have spent most of my life living in LB Ealing and my local knowledge is fairly encyclopaedic.

Firstly, **I welcome that Perivale is recognised as a defined town**, with its own identity making up one of the seven towns in the Borough. While it is the smallest of the Borough's seven towns at 15,000 people, St Mary's Perivale and its parish [dates back to 1135](#). (It may thus be older than the Holy Cross Church in Greenford, which *only* dates back to 1157). Throughout most of its history, until the 1930s when it suddenly exploded in population with the opening of the Hoover Factory and Sanderson Wallpaper Factory, Perivale was a rural agricultural hamlet. As John Betjamen wrote in his poem, *Middlesex "Parish of enormous hayfields, Perivale stood all alone"*. Perivale now has a proud and celebrated Art Deco industrial heritage, flag-shipped by the Hoover Building, with a quasi-rural and green marchland that gives it a very distinctive character.

Specific challenges presented by Perivale

I strongly agree with paragraph 4.6.11 - *"While Perivale has a number of small shopping parades, it lacks a coherent local centre that provides a central meeting point for the town. This is compounded by high levels of severance and fragmentation caused by the road network that have contributed to the lack of a singular community identity"*.

As I often say when trying to explain Perivale to people, if a town planner were to sit down and design an ideally structured town from scratch, Perivale would be the very last thing they would come up with. From:

- the limited north south road networks;
- the isolation of the Medway estate accessible by road only by one route and by a poorly lit pedestrian footpath from Perivale station;
- the isolation of Rydal Crescent and nearby roads by the railway line and A40;
- the industrial core and surrounding residential periphery;
- Perivale south of the A40 cut off from the rest of the town;
- Perivale's lack of a coherent town centre, instead with "bookend" shopping parades on the Medway and at the eastern end of Bilton Road,

Perivale really is a disjointed mess.

Given its location Perivale Park should really be called Ealing Central Sports Ground, and *vice versa*. And yet, somehow, Perivale manages to cobble itself together. Just about.

Redressing that lack of coherence, severance, accessibility issues and fragmentation should be the starting point, at the forefront and overriding objective throughout when considering how to improve Perivale from a planning perspective.

Perivale Spacial Strategy (page 370)

In terms of broad outline, **I strongly agree with sections A, C, D, E and F of the Perivale Spacial Strategy**. I generally agree with section B, **but take issue with some of the wording and direction of policy in section B**.

More specifically:

A. *"Within Perivale, the focus will be to reinforce the town's strong economic offering, diversifying the town's retail, residential, community, and leisure offer, improving the accessibility and functional role of its green open spaces and improving residents' quality of life."*

I strongly agree with these broad objectives, in line with the New Local Plan strategic objective of making Perivale, and LB Ealing in general, a place on a map where people want to spend their lives, rather than simply a commuter belt dormitory suburb of the Greater London conurbation. **In order for this to happen, LB Ealing and each of its towns need to improve the quality, diversity and attractiveness of their retail, residential, community and leisure offers.**

I strongly agree that Perivale's high street retail offer should be diversified. I set this out in greater detail, in my response to section C. below.

I strongly agree that Perivale's community and leisure offers should be diversified. Aside from the Council-run Perivale Community Centre, which offers a range of sporting and leisure activities such as karate, art and language classes, tennis and archery, **Perivale is very heavily reliant on resident volunteers for the provision of community and leisure activities, which are limited.** [Perivale Hive](#) (the Community Managed Library I set up together with other local residents) has ensured that Perivale continues to provide a reference and lending library service, but equally hosts activities

ranging from dance classes, yoga, clay craft and a cinema club once a month. The next objective for Perivale Hive is to open an on-site café. The [Perivale Festivals Committee](#), which I also set up with other residents 10 years ago, organises annual festival events for Perivale (mainly the Perivale End of Summer Fair and Bilton Road Street Parade) in answer to the Ealing Summer Festival events and the absence of Perivale from the Council-run Summer Events programme map. Then there are the [Jubilee Road allotments](#), [Perivale Athletics Track](#) [Ealing Golf Club](#) and [Perivale Golf Course](#). The activities run at Horsenden Farm (which is technically located just outside Perivale ward but spiritually located within Perivale) by the [Friends of Horsenden Hill](#), including [Perivale Brewery](#), Tap Days, local produce - freshly baked bread in a clay oven, local honey, jam, vegetable produce etc are well supported by the Council. There is also a resident-led initiative to restore the currently empty and unused Horsenden Farm farmhouse building which I plan to be involved with this year. There are, however, two [Scout groups](#) in Perivale, and the [Perivale Residents' Association Sports and Social Club](#), again run by volunteers **which could be better supported with grants from the Council.**

The limited extent of leisure activities in and near Perivale was exacerbated by the closure of the nearby Gurnell Leisure Centre 3 years ago. I used the Gurnell Leisure facility frequently when it was open. With one application for a new leisure centre and residential development having been refused in 2021 following inadequate affordable homes and local opposition and retrofitting and reopening the existing facility ruled out by the Council, there is no light currently on the horizon. Ealing Council set up the [Gurnell Sounding Board](#) last year to find a way forward with stakeholders. I understand two options have currently been presented - the first of which, Option A would be a reiteration of the first redevelopment plan that was rejected, and the second Option B would involve a residential development on the current building and car park footprint, while relocating the leisure facility to the greenfield site meadow adjacent to Stockdove Way, which is Metropolitan Open Land and River Brent floodplain. While there are clear issues with Option B, **I would welcome, in principle the opening of a new leisure centre facility in Perivale ward** (the meadow adjacent to Stockdove Way is north of the river and therefore in Perivale ward).

The nightlife in Perivale is currently largely non-existent and where it does exist problematic, limited or substandard catering to very small closed sections of the community. There are no pubs north of the A40 in Perivale. This is largely for historical reasons - Percy Bilton, who constructed the vast majority of Perivale's 1930s housing and after whom Bilton Road is named was a Quaker. He objected to drinking to the extent that he imposed restrictive covenants on all the land he developed in Perivale prohibiting the creation of any pubs. There is one pub in Perivale on the south of the A40 - [the Mylett Arms](#) - and one licensed premises on the north side, the [Perivale Residents' Association Sports and Social Club](#),- essentially a working men's club with a function room - which has a bar, and occupies part of the pavilion building (once UCL's sports ground pavilion and now owned by Ealing Council). (The pavilion building predates Bilton and hence is not subject to the restrictive covenant). Aside from these, there are no drinking establishments in Perivale. There are a few shisha bars and entertainment establishments in the Bideford Avenue/ Wadsworth Road area with late night opening licences like [Nai Lounge](#). These cause regular evening and late night road blockages and traffic/ accessibility issues on Bideford Avenue particularly by the railway bridge, where there is no parking enforcement (traffic wardens are only there to issue PCNs during the daytime, and even then vehicles - including industrial lorries and cars

stopping to pick up takeaways from [Yasmin](#) - are known to regularly park on pavements blocking the pavements and forcing school children and mobility scooter users to walk dangerously into the middle of the road to get past).

The accessibility of Perivale's many green open spaces is not, I would argue, an issue (aside from the temporary closure of Ealing Central Sports Ground by Ealing Council for the last 2 years for topographical elevation groundworks). I think they are all very accessible (with exception to [Perivale Wood Nature Reserve](#) which is an ancient wood managed by the Selborne Society, fenced off and only accessible to the general public on Open Day at the end of April once a year). The **functionality of Perivale's green spaces, however, could certainly be improved**. In particular, **I would like to see the creation of a wetlands area at Ealing Central Sports Ground and a diversified use of the green space in general there**, rather than simply football and cricket pitches. I believe given the creation of swales surrounding the elevated land at Ealing Central Sports Ground the groundwork has been done (quite literally) to enable the creation of a localised section of depressed land and basin features, with minimal additional groundwork.

B. *"Perivale will reinforce the town's economic identity as a well-connected industrial hub with a strong presence of manufacturing jobs by:*

(i) Safeguarding, intensifying, diversifying, and enhancing its industrial core which makes a significant contribution to its economy and provides a good range of employment opportunities. This will include providing affordable workspaces for small businesses and new start-ups.

(ii) Better connecting Perivale's industrial uses to those in Northolt, Greenford, and Park Royal as part of the Ealing Productivity Arc.

(iii) Maintaining good levels of accessibility, both for workers travelling there by public transport, as well as heavy goods vehicles, while addressing issues of severance and safeguarding the safety of active travel around the industrial estates.

(iv) Improving quality of life for local residents by enhancing the public realm; providing safe and attractive active travel modes; and mitigating the severance, heavy goods vehicle (HGV) traffic, and environmental impacts caused by industrial activity."

I am less happy with section B. I would welcome the recognition of Perivale's industry as part of its historical identity. I also appreciate the continued importance of industrial use land in providing high skilled manufacturing and technical employment. **However, I strongly feel this should be better counter-balanced with the interests of Perivale residents who must co-exist alongside the industrial land and have to live with the day-to-day reality of HGVs passing by often late at night, as well as a poorly maintained and congested public realm in the industrial area.** I recognise these concerns are somewhat touched upon in paragraph iv) but I feel the interests of local residents should be balanced more effectively. Moreover, while Perivale's industrial hub indeed provides a good range of

employment opportunities, **it should not be assumed or implied that Perivale residents are presently the main benefit recipients of these industrial employment opportunities.**

For these reasons, while I welcome the term "*diversifying*" - as I agree the industrial hub area requires regeneration and should provide greater local employment, including affordable workspaces for small local businesses - and am neutral on "*safeguarding*" **I take exception to the terms "*intensifying*" and "*enhancing*" in paragraph (i) and would suggest removing them.** There is no scope or local appetite for greater industrial growth in Perivale, only the more effective redeployment of *existing* industrial land to provide improved local employment opportunities.

In my view a smarter industrial strategic approach should be developed for Perivale focusing on optimising industrial land use management. This should include aiming to reduce HGV residential road routing and the congestion and poor air quality and noise this produces for local residents. The overriding objective should be to improve local resident quality of life.

The first step towards this is recognising the existence of two distinct industrial zones in Perivale with their own strategies - a) the Segro Park industrial area (the site of the former Sanderson Wallpaper Factory), under one unified enclosed site management, and b) the zone around Aintree Road and Wadsworth Road, which is a geographical grouping of individual industrial units dating back to the 1930s located along public roads. The next step would be to identify specifically problematic industrial land use such as businesses characterised by regular HGV movements (land users like [Palletline](#) in Segro Industrial Park) and to work with land managers (Segro) to replace problematic industrial tenants at the expiry of their leases with new industrial tenants who are less disruptive and more valuable for local residents. This might begin to reduce industry-resident relations and severance issues.

More interesting tenants at the Segro industrial estate include the [BBC National Archives](#) and [Artem](#), which specialises in pyrotechnics and spectacular special effects for film sets, and created among other things the [Bull at the Commonwealth Games in Birmingham last year](#).

Concurrently, in my view **a separate local Perivale employment strategy should be developed and de-coupled from the industrial land policy**, recognising that while the industrial land provides employment opportunities so too would the diversification and improvement of the local retail (including night life), leisure and community offer. I do agree that: "*partnering with local landowners and stakeholders would create opportunities to increase the provision of local, skilled jobs and access to vocational training*" (para. 4.6.19)

C. "Perivale's local shopping parades will be enhanced through diversification and public realm improvements with an emphasis on improving the appearance and role of local centres and their connectivity to the residential areas they serve by:

(i) Improving and diversifying the existing neighbourhood centre at Perivale (Bilton Road) and local centre at Medway Parade to better serve the day to day needs of local communities (see Policies P2 and P3).

(ii) Promoting the creation of a new local centre on Horsenden Lane South that will help meet the daily needs of local residents, workers, and people travelling to and from Perivale station (see Policy P4)."

In relation to (i) I strongly agree that Perivale's high street retail offer should be diversified. This would be better facilitated through reform of non domestic (business) rates. Perivale has a limited selection of high street shops. Aside from the Tesco Hoover superstore, there are no "Big 4" high street supermarket stores in Perivale (some might argue this is a good thing). There is a Londis and a Polish grocery chain store ([Mieszko](#)) on Bilton Road (the existing neighbourhood centre). The type of stores otherwise located on Bilton Road are what one might find in a village - opticians, post office, estate agents, nail bars, hardware, newsagents, accountant, dentist, hairdressers, Christian bookshop, and a few take-away restaurants (sandwich shop, fish and chips, Chinese). There is one [sit-in Lebanese restaurant and shisha bar](#) but otherwise no high quality sit-in restaurants. The Medway Parade offer is even more limited. As a resident **I would welcome the opening of health food shops and high quality sit-in high street restaurants in Perivale.** [Royal Nawaab](#), which occupies the former canteen building adjacent to the Hoover Building, offers a banqueting hall but this tends to cater specifically for wedding and other such events and demographically more or less exclusively to the Pakistani community. Given the ongoing street drinking cultural anti-social issues in Perivale, I would not welcome the installation of street seating facilities on Bilton Road. I think the way to tackle street drinking is instead to create high quality indoor venues where people actually want to go. **I would also welcome better street and pavement cleaning and crate/ box decluttering on Bilton Road, and tighter restrictions on permitted loading delivery hours for retailers. I have seen grocery delivery lorries unloading in the middle of the day causing traffic congestion tailbacks for hundreds of metres along Bilton Road. This has a detrimental environmental impact. Deliveries should be made in early morning when there is no traffic.**

Perivale notably is the only one of Ealing's seven towns without a town centre. I very strongly agree with the objective set out in ii) to create a new local centre in Perivale on Horsenden Lane South, at the geographical heart of Perivale and near to Perivale tube station, Perivale Community Centre and Perivale Library. I set out at the Perivale walking tour and Perivale Library consultation very specific locations where the creation of new retail facilities on Horsenden Lane South might have the greatest probability of success, considering the possible likelihood of landowners being in agreement. The first location on Horsenden Lane South would be to extend the Perivale station building slightly to the south (or building a new building on the land) on land currently taken up by Perivale station car park visible where the railings are on the right of [this photo](#) Perivale Station Car Park is very under used. If TfL were in agreement they might benefit from leasing new retail units next to a busy station. NB. The original station building was designed to have additional retail units there, but they were never

built due to a shortfall in funding at the time (1947). The second location on Horsenden Lane South where retail or leisure use might be possible would be [Unit 31 of the Segro Industrial Park](#). Unlike the rest of the Segro Industrial Park, which is all enclosed behind residential house, this building faces out onto Horsenden Lane South. The building, currently let but providing no use to local residents, would be ideally suited for a supermarket, gym or local activity centre. Indeed I know of a gym owner who showed an interest in the site in the past but the previous owners of the then Perivale Industrial Park were not interested in leasing it as a gym at the time. I understand Segro might have a different perspective.

I feel the term "*polycentric town*" used in para. 4.6.34 is a useful descriptor which highlights the potential of the new local centre in Perivale on Horsenden Lane South while recognising the reality of the existing polarised retail areas.

D. *"Perivale will see relatively limited levels of residential led development as potential opportunities are primarily located away from town centres or places of high public transport accessibility."*

I welcome this, and this will also be welcomed by the vast majority of the Perivale community. While Perivale residents are not opposed to appropriate low to medium rise residential development on disused industrial and office space and reasonable "in-filling" - for example at Buckingham Avenue, where LB Ealing owns the freehold, I welcome that it has been recognised that: "*Perivale retains a suburban character with predominantly semi-detached homes and high-quality parkland*" and that: "*new development will need to respond sensitively to Perivale's identity, having regard to the growth and intensification themes and associated tall buildings guidance /indicative heights identified in each local character sub-area*". **In fact, the whole of Perivale is a low-rise area and will continue to be so** after the development of the [Wiltern](#) tower at the rear of the Tesco Hoover superstore car park. Indeed, until the very recent construction of the nine storey [Westlinks](#) A2 Dominion building on land formerly occupied by the Starvin' Marvin's diner there was not a single building in Perivale ward over 4 storeys in height.

On housing, I note, with agreement that: "*there is the need to provide a better range of housing types and tenures alongside mixed uses within and surrounding Perivale's town centres, including family housing and specialist accommodation types to meet expected increase in people aged 65+, and high-quality affordable housing options that are accessible to low-income and younger people.*"

However, conspicuous by its absence is any mention in the draft New Local Plan of the issue of proliferating Homes of Multiple Occupation (HMOs), or a recognition that this is an issue which the Council will need to address, given its responsibility to provide high quality housing. It is not correct to say that HMOs cannot be located by the Council, as the Council holds a public register of all licensed properties in the Borough. Therefore the Council should be able to map where HMOs are most concentrated and develop possible strategies including Article 4 directions, which would give the Council some power to limit the number of HMOs in specific areas. I would strongly argue in favour of at the very least recognising the issue of growing numbers of HMOs in the New Local Plan.

E. *"Perivale will see better, safer, and more attractive public transport and active travel routes. These will help address issues of severance caused by the A40, industrial estates, waterways, and the railway line, reducing car-dependency and contributing to improved health and wellbeing outcomes by:*

"(i) Improving public transport connectivity, including providing better links to the Elizabeth line via the currently under-utilised South Greenford station which is located on the Greenford / Perivale border."

South Greenford station is [notoriously London's least used station](#). To wit, I have not used it once in the 16 years I have lived in Perivale. (For much the same reason that my late mum and I never once used Drayton Green station, also on the Greenford branch line, in the 17 years we lived on Cavendish Avenue in West Ealing). The trains (still now diesel) are slow, only leave every 30 mins with no Sunday Service at all and only go to West Ealing. While you can connect to the Elizabeth Line at West Ealing, for most people in Perivale it is far easier to get on at Perivale tube station with trains into central London leaving every 5 minutes on average. For those at the Alperton end of Perivale there is Alperton station on the Piccadilly Line. In Perivale, South Greenford station is particularly uninviting with the entrance to the station by the A40. Unless you live right next to the station, for example on Haymill Close (the site of the former Perivale Maternity Hospital), it is a hassle to get to, with the only option really to walk. The nearest bus stop is 600m away on Argyle Road, and you would need to walk along the A40 from there to get to the station entrance. Having said that I have never gone to South Greenford station and have no desire to do so.

The way to remedy this would be to improve a) the frequency of trains from South Greenford, b) improved public transport accessibility to South Greenford Station, perhaps with a bus route going down Stockdove Way - rerouting the E5 for example - and a new entrance to South Greenford from Stockdove Way. (I can only envisage that happening if a new leisure centre were build on the greenfield site alongside Stockdove Way - see above).

"(ii) Creating new active travel routes from Perivale Station to Perivale (Bilton Road) neighbourhood centre."

While an admirable idea in principle, I cannot see how this is possible without creating a public realm right of way through the Segro Industrial Estate with an entrance/ exit on the Aintree Road side (one exists but only to the police car pound on Walmgate Road). And who would want to walk/ cycle/ drive through an industrial estate? There is at any rate already a pedestrian/ cycle route, other than Bilton Road - also with one way vehicular traffic - being the road/ car park running parallel to the railway line, which we walked along on the Perivale town walking tour on 9th January. (This road was once the site of the railway siding for Sanderson Wallpaper Factory when it occupied the site of the existing Segro Industrial estate).

"(iii) Enhancing the Grand Union Canal and the A40 to act as active travel corridors (including an A40 cycle superhighway with a dedicated lane separate from the traffic) to deliver improved walking and cycling connectivity west into Greenford and east into Brent."

I agree with this, although I am not sure what further can be done with the canal towpath, which was well resurfaced by the Council in the last few years. The cycle superhighway along the A40 would have a [historical Western Avenue precedent](#).

"(iv) New and improved crossings will overcome key barriers to north-south movement posed by the Grand Union Canal, the London Underground and the A40."

I agree in principle, but the location of these crossings has not been identified. **I believe there is a strong case for the rail over road bridge on Bideford Avenue to be replaced or widened. I believe there should also be a specific strategy to address parking and bottlenecking issues around the rail bridge over Bideford Avenue detailing parking enforcement/ minor industrial re-zoning and or road widening options.**

"(v) Improving the existing poor pedestrian and cycling accessibility to South Greenford station and its surroundings through the delivery of new, well-lit A40 crossings."

I don't disagree with this if TfL were amenable to spending money on it, but I don't think it would be the most effective or pressing solution to South Greenford station accessibility. See further above under (i).

"(vi) Providing an enhanced canal crossing that will connect into the eastern edge of Horsenden Hill, with an active travel route through Horsenden Hill to provide a connection to Sudbury Hill."

It is unclear where exactly this would be located and where the entrance and exit to the bridge would be located. Would this be a pedestrian footbridge only? *"(vii) Promoting a continuous active travel corridor from Perivale Park west into Greenford town centre and south to Trumpers Lane (industrial estate) in Hanwell via the publicly accessible spaces of the Brent Valley Park."*

I believe this route already exists as part of the Capital Ring, but undoubtedly could benefit from investment and upgrading.

Proposed Development Sites (pages 376-385)

PE01 - "Starvin' Marvins & Garage"

Firstly the site description is incorrect. Starvin' Marvins (the diner) was located on the adjacent land, which has already been developed by A2 Dominion with the construction of the nine storey [Westlinks](#) - the site delineated in red on the PE01 site plan is the BP petrol garage forecourt and shop.

Given the closure of the petrol station at the rear of Tesco to make way for the Wilton tower development and the fact that the BP garage shop is open 24 hours and frequently used, not only by A40 road users but also by me and many other local residents, **I and other residents would very strongly oppose this site being redeveloped for residential use.**

PE02 - "Land On the South Side of Western Avenue"

I would not oppose the development of this site for low to medium rise residential development.

PE03 - "Alperton Lane North"

The site is *"currently occupied by a number of small businesses, including a car wash, car sales business and IT security company."* These businesses lease the premises from [Vanguard Holdings](#) (Mac McCullogh). My estimation is that he would be willing to

make the land more profitable as he previously developed the site opposite which was previously wasteland and is now leased by him to KFC and Costa Coffee. I note the land is SIL (Strategic Industrial Land) and the proposal industrial-use mixed land development. It is unclear to me why this site is SIL, or why objectively speaking it could not be repurposed for residential land use, if the landowner was willing.

PE04 - "Alperton Lane South and Metroline depot"

I don't believe this site can or will realistically be intensified. Again, the freehold land here belongs to [Vanguard Holdings](#) (Mac McCulloch) but this site includes his core storage warehouse business and land leased to Metroline. I cannot see this land being sold and redeveloped in the foreseeable future.

Other observations and remarks

I very much welcome the introduction of the Community Infrastructure Levy (CIL) in LB Ealing.

I note that the Wilton 16 storey high-rise development at the rear of the Tesco car park, which was overwhelmingly opposed by local residents (the original 22 storey tower which we campaigned against was rejected by the Planning Committee but the subsequent 16 storey application was approved) has not been included as an area of Significant Development Intensity on Figure P2: Perivale's Spatial Strategy (page 369). I can only assume this an oversight.

Sincerely,

Alex Nieora (LLB)
Legal secretary and Trustee

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