

Response to Ealing Local Plan 2023 - [REDACTED], Ravenor Park Residents Association

From [REDACTED],
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I am writing to provide feedback on three specific aspects of Ealing's draft Local Plan.

- Aspect 1: Greenford Centre and Tall Buildings policy as proposed.
- Aspect 2: Support for Broader Land Use and Function within and around Greenford Centre, especially (a) More Effective Support for Civic and Community Spaces, and (b) Provision of Low Cost Workspaces, and (c) Promotion of Non-Retail, Non-Fast Food, Businesses and Employment.
- Aspect 3: Open spaces, in particular MOL5.
- Aspect 4: General Issues.

Aspect 1: Greenford Centre and Tall Buildings policy as proposed.

My feedback and comments on this aspect relate most specifically to **Site GR01, "Greenford Hall, Methodist Church, Police Station & Clinic"**, as shown on page 248, 'Local_Plan__Chapter_4_Town_Plans_and_Development_Sites.pdf'.

I wish

- (i) to point out a number of **inaccuracies**,
- (ii) to comment on, and make several challenges to, the **fact/evidence base**, (iii) to propose different '**Design Principles**' from those suggested.

Aspect 1-(i) Inaccuracies.

1. There is no health clinic on this site. There used to be but it ceased to be used as a health clinic some years ago. It was sold to a private person who now lives there in that building as his and his family's home. In the Plan documentation, at the least, this building should be described as a "former clinic" or "former clinic and current private residence".
2. Under Relevant Planning Applications it states there are no applications but this is wrong. There is currently a relevant application that has been submitted by a developer to build two blocks of flats, one 5 storeys and one 9-storeys. It is, I believe, waiting for a Planning Committee hearing.
3. It currently appears likely this development application will be heard within a few weeks or months. If so, the indicative time-frame will begin "less than 5 years" not "beyond 5 years".
4. Similarly, if the aforementioned application is passed, the Proposed Use must include "residential". This may not be the most preferred, especially in the absence of a masterplan

or support from the community, but it will be the case. (What is the point of proposing a use, or uses, if the current reality is ignored?)

Aspect 1-(ii) Fact/evidence base.

- In 'EALING Character Study A1 REPORT Borough-wide Characterisation, January 2022', ('Character_Study_Part_1___Boroughwide_characterisation_s.pdf'), on p40, there are almost no buildings shown over 4 storeys.

- In ' EALING Tall buildings strategy', ('Tall_buildings_strategy_November_2022.pdf')
- p6 Inappropriate height
 - An "inappropriately tall building" would, among other things "negatively impact the local townscape due to their massing, whether or not they are technically defined as tall buildings"
- p11 Existing building heights in Greenford
 - It is completely unclear, and therefore potentially misleading, what "Greenford" is (G1) versus what "Greenford Centre" (G2) is. The latter has been defined but not the former (that I could see).
 - For "Greenford Centre" (G2), the tallest building height is 7.9 storeys but I don't know which this applies to. It is not a building I am familiar with.
 - The prevailing height is given as 2 storeys (the column heading is missing but I assume it is this). Yet tall is defined as three times this. That is completely inappropriate for GR01 while it may or may not be for the rest of Greenford Centre.
- p13 Heritage
 - The map shows GR01 as having heritage importance at this location. Yet tall buildings are considered possibly appropriate that are three times existing building height. This is clearly not appropriate.
- p15 and p21 Sensitivity and Suitability
 - The map on page 15 shows GR01 as being sensitive for tall buildings, more sensitive than the rest of Greenford Centre.
 - The map on page 21 shows GR01 as being moderately suitable for tall buildings. ○ These are inconsistent with each other, or at least appear to be without further clarification.
 - The best outcome is for GR01 to be *excluded* from the tall buildings recommendation applied to the rest of Greenford Centre or proposed development sites within it. Otherwise the sensitivity map that acknowledges criteria such as heritage, history, existing building heights and other actually existing local conditions, needs to be ignored and contradicted. That would not be appropriate for this specific area, or fair to the people who live here who overwhelmingly want to feel some connection to their history maintained and their views are accounted for. Otherwise the path will be open to leaving virtually no connection left.
- p44 Greenford
 - I strongly disagree that Zone M is given 6-8 storeys as prospective building heights without clarification as described below.
 - Zone M needs to be subdivided, or else clear statements made to allow for different tall building proposals within it.
 - Zone M is too large a zone to give a single universal tall building height because it cannot account for differences of existing building heights, heritage and local factors within this zone.

- GR01 is the site within this zone which should be excluded from zone. ○ Or, GR01 should be excluded from this prospective building height if there is no other way of differentiating where the proposed tall buildings height of 6-8 storeys may be located.
- No existing building in this site is over 3 storeys. 6-8 storeys is twice to nearly three times any existing building height.
- GR01 has special characteristics within this zone not applicable elsewhere, such as its historical significance with the War Memorial, with the existing buildings most notably of Greenford Hall and Greenford Library and the Methodist church.
- Geographically, the site is near the top of a hill. Higher buildings would have much greater visual impact on the immediate environment.
- The site back onto Ravenor Park. This is a precious park in Greenford Centre and everyone in the park would see any tall buildings twice or more the existing building heights.

-- In 'Character_Study_Part_1___Boroughwide_characterisation_s.pdf'

- p38 – The local heritage map shows Greenford GR01 site having Local Heritage Assets which supports the comments above.
- This is also supported by pages 104-105 in 'Character_Study_Part_2___Typologies_and_Scope_for_Growth.pdf'

Aspect 1-(iii) Design Principles.

- In the 'Local Plan Chapter 4 Town Plans', page 248, is the Tall buildings policy as applied to GR01
- The description within PLANNING DESIGNATIONS/SITE CONSTRAINTS seems accurate: "Grade II Listed Greenford War Memorial, locally listed buildings, Site of Local Importance for Nature Conservation (adjacent), Greenford District centre."
- But the DESIGN PRINCIPLES do not in any way recognise the logical conclusion from this, and from my analysis above.
- It says: "Majority of site falls within an area potentially appropriate for tall buildings – refer to Tall Buildings Strategy; further guidance will be produced. Indicative heights range between 6 - 8 storeys (21 - 28 metres)."
- This may be true for the other sites such as GR02 or GR03 or elsewhere in Greenford Centre, but as shown within these comments, GR01 is different and exceptional in terms of location, history, cultural importance, and uniqueness when compared to anywhere else across Greenford.
- Therefore, GR01 should have its Design Principles changed to not allow buildings twice or even three times existing heights.
- Otherwise it should be excluded from this zone.

Aspect 2: Support for Broader Land Use and Function within and around Greenford Centre, especially (a) More Effective Support for Civic and Community Spaces, and (b) Provision of Low

Cost Workspaces, and (c) Promotion of Non-Retail, Non-Fast Food, Businesses and Employment.

- I very much like the proposals to broaden the range of activity across Greenford as a whole and in Greenford Centre specifically. The community is crying out for more civic and community spaces that meet their needs. Likewise, Greenford could become known as a place where workspaces and low-cost business opportunities that are not in retail or fast food are available and supported.
- This is strongly supported just by reading the circumstantial evidence offered by 210+ submitted pieces of feedback on the planning application for development of 2 blocks of residential flats on Oldfield Lane which make many comments about the current lack of civic and community options available.
- I strongly support what is says in the 'Local Plan Chapter 4 Town Plans', page 237, regarding In terms of work opportunities.
 - "4.3.40 The opportunity exists to support the development of a Greenford Innovation Hub within Strategic Industrial Locations (SIL) that builds on its existing provision of high-value employment and specifically high-tech manufacturing and act as a catalyst for new investment."
- I like this idea. An Innovation Hub in Greenford would be excellent. I would argue for this to be located nearer Greenford Centre than further north such as Greenford Quay.
- I would like to suggest (or support if I've missed them as specific recommendations) additional ideas for mixed use: small-scale workshop spaces and/or maker-spaces.

Aspect 3: Open spaces, in particular MOL5 and GB5

- MOL5 – Greenford Cemetery and Windmill Lane Allotments
 - I am strongly against this land being designated. The reasons given in the MOL assessment are insufficient.
 - In ('Character_Study_Part_1___Boroughwide_characterisation_s.pdf')
 - p28 map shows the importance of not losing MOL5. Elsewhere the Plan states relatively poor access to green space in many parts of central Greenford. This map shows its location at the far west edge of Brent Valley means its loss would be critical.
 - its value is not diminished by not being contiguous with Brent Valley.
- GB5 – Boundary changes: Removal of the southern edge of the site south of Ruislip Road (along Broadmead Road), 'Ealing Green Belt and Metropolitan Open Land Review Stage 1 Report, November 2022', ('Green_Belt_and_MOL_Review_Stage_1_report.pdf')
 - I am strongly against this part of the boundary changes.
 - While in terms of mapping it may look like it is not intrinsically part of GB5 – which as described in the document is more like Metropolitan Open Land, it plays two distinct roles as open land.
 - It is a wildlife corridor bridging Rectory Park and Willow Tree Open Space.
 - It provides for a break in the housing estates in the immediate area. Other documents note that the Grand Union – ex-Taylor Woodrow – estate has a higher density of habitation than across this part of Ealing in

general. All existing open space is valuable especially where housing and density of habitation is higher.

- Retaining the designation for this part of GB5 adds some extra protection against future building and so further increasing the built environment and reducing protection for the marginal extra open space offered here.

Aspect 4 – General Issues.

- I am very concerned that development in Greenford across the life of this forthcoming Local Plan, whether 10, 15 or 20 years, will be piecemeal and be constrained too much by whatever developers want to do, and whatever development applications come in.
- There is not enough in the plan to say how the goals described will be met in practice in each area.
- This applies as much as anywhere to GR01 within Greenford Centre.
- There is not enough to convince residents how plans will materialise.
- There do not appear to be sufficient safeguards to constrain development until a medium term strategy can be enacted.
- The planning and regeneration teams need to do better, by describing the measures, to reassure residents that one-by-one applications will not end up, for example, providing only residential use when the plan has stated the importance of other uses.
- There is not enough clarity in the Local Plan how competing aims may be reconciled. For example, where heritage is noted, it is only very slightly or broadly noted how to evaluate it. This is especially problematic when each development is often taken only on its own merits and only appears to minimally weigh local factors. When the clear priority for the council to provide affordable housing, pushing up the total housing that is built to satisfy what developers will take on, how is 'affordable housing' measured against, for example, heritage or open space. In the short term, recent development clear shows one wins. So then show safeguards the medium term, let alone the long term?
- In the 'Local Plan Chapter 4 Town Plans', page 237, ○ "4.3.37 There is opportunity to provide additional housing to meet the growing and diversifying needs of the town, including at Greenford Town Centre as part of a masterplan-led mixed-used development that will diversify and enhance the town centre." ○ There is nothing I have heard of that shows the existence of, let alone the consultation with residents on, a masterplan for GR01?
- If on the planning application for development of 2 blocks of residential flats on Oldfield Lane goes through, GR01 won't be "masterplan-led".
- Even aside – or in addition to – the data collected by surveys etc on the local plan, there is a lot of evidence out there that shows the community want something different. They want a better mix, however laudable providing affordable housing is as a target alone.
- Although not specifically transferable themselves as feedback to the Local Plan because they were elicited in relation to that proposed development, the 210+ submitted pieces of feedback on the specific planning application for development of 2 blocks of residential flats on Oldfield Lane, if read as a moment-in-time's voice of the community, these

comments show the desire for a better mix. These comments have total relevance when considered as possible sources of information on how the residents, where the vast majority live locally, feel about this area of Greenford Centre that they live in, or near, or know well and visit or work here.

- These voices show a demand for better control of the outcomes over a period of time.
- This needs better policies that demonstrate how residential development will be controlled, show a better grip on outcomes, and much improved communication with, and inclusion of, residents.
- The communication to residents needs to be better not just in terms of reach but explanation. After several hours with the documentation, I think a lot of it is well designed and accessible when you understand something of how it works. However, not enough was done to introduce people into the documentation. The summary document served a different purpose, as an overview of the Plan, but less how to help people get into it. The in-person consultations I attended tried to cover too much in too confusing a way. The consultants may have done a good job preparing the material, but they didn't know how to lead people through it in a way they, the residents, could manage. In this way, although many responses were received to the surveys etc, I would think, unfortunately, that a much smaller percentage of those people would have responded in an informed way about the specific proposals in the Plan itself.