

These are comments and feedback provided by Southall Community Alliance to the Local Plan consultation process and documents.

a) Consultation Process

The Local Plan documentation and process have had a number of flaws.

The regulations require Ealing Council to allow residents and groups to input into the development of a plan. However, much of the recent consultation has been about an already prepared and very lengthy draft plan. Therefore, as a process we are being consulted about a pre-existing document, not as the regulations require allowing local people to shape a Local Plan.

b) Other problems with the consultation:

In Southall a copy of the plan documents was available at the Dominion Centre but the bulk of documentation was so overwhelming that it was almost impossible to read, digest and comment upon the proposals in the very short space of time allotted.

The period of consultation included the Christmas and New Year break. This consultation should have been conducted in a continuous period without any seasonal or national breaks allowing for wider engagement and awareness of the plan to be raised.

SCA has spoken to organisational representatives who complain about the lack of translated materials particularly in Punjabi. Many people we have spoken to would have valued further information about the plan and process but were hindered by a lack of basic information being available.

The consultation process should also have made it very clear which areas of our local planning framework could not be contested or changed. Usually national or sub-regional plans may take precedence over local plans but this was not shared with us. Consequently many people may have submitted views and opinions without realising that they were effectively rendered irrelevant.

Council officers should have made it absolutely clear in guidance that there were issues upon which consultees can legitimately comment and seek to influence but also that there were areas which they could not influence. This would have allowed greater concentration upon matters that we could genuinely affect or change.

c) Housing

This is probably the most contentious issue within the whole planning policy discussion. SCA meetings have regularly heard about local worries and opposition to high rise housing growth in Southall. The Local Plan is unclear or inadequate about this issue:

- Unclear from the plan documents whether there is a target for housing build and if so what that target is.
- The evidence base for a housing target must be transparently shared so that we can understand the justification for yet more housing, at a time when the Council's housing waiting list has shown no sign of decreasing, even though more flats are built.
- In spite of the growth in housing led development over the past 5-10 years there has been no clear review or evaluation of the current building programme. The impact of the housing upon local communities, need for green space, demand for social infrastructure etc have not been reviewed.
- Without a review of this impact it is impossible to make a compelling case for yet further development into the next decade.

The greatest need in Southall and Ealing is for genuinely affordable homes. The policies within the plan do not mention this. There is a new ten-year homes target of 21,570 homes and this appears in policy SP 4.3.A.

It is worrying that there is no evidence to show how this can be achieved. The local authority has failed to provide any monitoring reports from the past to evaluate housing impact and there has been no assessment of land availability or the infrastructure resources needed to make for a successful development.

d) Site assessments

The selection of sites for possible development is also a source of concern. Ove Arun assessed 123 sites across Ealing for their suitability for development. There was no appraisal of approximate capacity or development numbers.

Out of those 123 sites the largest number, 35, were in Ealing (28%). The second largest number of sites, 27, were in Southall. (22%). It is very worrying that such a number can be proposed given the burgeoning growth of high-rise buildings in Southall. It cannot be sustainable and there should be an immediate review of these assessments, involving local panels of residents and organisations with an interest in planning policy.

e) Capacity and infrastructure

There has not been sufficient consideration of how any further housing redevelopment is likely to be resourced, nor where those homes might be built. Construction over the past decade has already utilised many brownfield sites notably the former Gasworks site in Southall.

There has been no consideration of the increased demand for energy and water supply created by further residential development.

Crucially there are no estimates of the population growth that may result from further redevelopment and certainly no identification of the impact of such growth upon quality of life. This is a serious omission and suggests a lack of objective data to justify further growth in Ealing wards.

The Local Plan does not adequately consider the infrastructure needs of Southall and other areas. The London Plan requires local development plans to assess the ability or capacity of existing physical, environmental and social infrastructure to support any population growth. However, the plan at present contains no real assessment of how to address the lack of essential new infrastructure that would enable sustainable development to take place.

The proposals for Southall make no reference to the high levels of traffic congestion that blight the lives of local residents. This is a unique opportunity to consider solutions to problems that have existed for decades and planning policy needs to design infrastructure which mitigates the rise in car usage.

We understand there may be concerns from national electricity suppliers about their ability to generate sufficient electricity to use in the new homes being planned. This would be a complete failure of the planning process if more and more housing is being proposed with no assessment of whether sufficient electricity energy is available to make this possible.

A secondary and most important consideration relates to the poor state of the sewers in Southall. Most of the sewerage system is antiquated and residents in certain areas of Southall Green will attest to the disgusting smell emanating from some of the sewers over the past few years. In part this is a reflection of the huge demand upon a Victorian sewage system which has been created by the enormous growth in the local population. It is not possible to carry on building more and more homes without recognising the need for immediate investment in this basic infrastructure.

f) Social Infrastructure

Ealing needs an immediate rethink about its current approach to using S106 agreements to mitigate development impacts. The authority is one of very few in London that does not implement a Community Infrastructure Levy (CIL).

The Local Plan needs to confirm a speedy introduction of the CIL and creation of a clear framework for future negotiations on planning applications with the developers.

Secondly, there needs to be a regular forum in each of Ealing's seven town centres that will allow for transparent sharing of information about developers contributions. At present this information is extremely opaque and not shared. Decisions appear to be made by officers at the local authority and local residents have no voice or say in how resources are allocated in their own neighbourhoods.

g) Community facilities

The Local Plan makes insufficient provision for community facilities in Southall. We currently have one community centre (ie Dominion Centre) for a population of over 70,000 residents. This is an unacceptable ratio and planning policy documentation needs to prioritise the development of two forms of community facility.

The first are micro-facilities based within or near newly built structures to accommodate the immediate need of the new residents on that site.

The second facility is a much larger development to cater for needs which residents have repeatedly expressed over the past 20 years in Southall. This would be for a community building centre that can cater for 2000-3000 residents for weddings and receptions, large-scale events and now given our linkages to and through the Elizabeth Line, we need a large conference style facility for Southall. This should be an integral part of the planning vision for Southall's six wards.

In a policy document which identifies 27 possible sites for housing development, it should be straightforward to identify just one site for a large new community facility.

h) Climate change

In spite of the national and regional focus upon this issue the Local Plan contains very little information about how climate change will be addressed through the redevelopment plans.

It is not clear from the consultation how Ealing Council will use planning policies to address climate change issues. There is a need for unequivocal policies which protect green spaces and prioritise refurbishment and re-use of existing buildings over re-developing them.

We also need policies about energy efficient development in low rise buildings and a policy to encourage more green space in residential accommodation.

i) Green spaces

One of the most worrying aspects of this Local Plan documentation is the suggested redesignation of large areas of Metropolitan Open Land (MOL). This is clearly contrary to the London Plan which requires localised plans to have appropriate designation and policies for protecting open space and meeting the need for a greener environment.

In a policy which clearly favours further expansion of housing led development there are no policies to protect existing areas of green space or policies that promote the creation of new areas of publicly accessible open spaces.

If Southall's population is expected to increase, possibly by over 20,000 residents in the next few years, it is crucial that we have more accessible green spaces for the community to enjoy. This should be made an explicit part of the Local Plan.

j) Ealing Allotments

The Council should provide an assurance that it will honour the statement in its Climate and Ecological Emergency Strategy (January 2021), which states that existing allotments should be protected.

Quite unacceptably, in the draft Local Plan, the Council proposes:

- To remove Metropolitan Open Land (MOL) status from seven large green spaces sites in the borough. This includes four private allotment sites in Acton, Bromyard Avenue, The Vale, Chestnuts and Perryn, and one Council site, Windmill Lane in Greenford. Removing MOL status will make these allotment sites vulnerable to development. We strongly oppose this proposal.
- To include Bixley Fields allotments site in areas identified for potential development. We strongly advocate that the Bixley allotment site and Bixley Fields meadow should be excluded from the development areas.
- To include the Northfields allotment site in a proposed Strategic Area for Regeneration, an Area of Intensification, and an Opportunity Area. We request that the Northfields allotment site should not be included in these designated areas.

Some additional reasons why allotment green space needs to be preserved:

- At a time of high inflation, allotments provide high quality, organically grown food that is distributed well beyond the homes of ploholders. Many allotment sites donate produce to charities.
- They provide recreation and exercise for those who seek respite from busy working lives, and solace for those who value their mental health.
- They provide a diverse community that cuts across generations, a sense of belonging and the opportunity to share and work with others, which is vital at a time when many people lead isolated lives.
- They provide a habitat for wildlife, including some protected species.
- In recent years allotment waiting lists have expanded. Much of the demand comes from those who live in small homes without outside space.

Ealing Council should therefore prioritise the protection of all allotment sites across the borough. Failing to do so is contrary to the Council's Climate and Ecological Emergency Strategy (January 2021), which specifically states that existing allotments should be protected.

k) Heritage

There are buildings of significant historic or heritage value in Southall including Southall Manor House, Southall Town Hall, Kings Hall etc. Contrary to the London Plan, our draft plan fails to have a development plan that covers heritage assets and explains how to protect and promote them.

l) Town Centre strategies

There is no vision for Southall and its development, nor appreciation of a changing dynamic with regard to our town centre. The possibility of two primary centres, one on Southall Broadway and the other in Southall Green is not even explored in the planning framework.

The Local Plan is deficient as it fails to have a specific policy that encourages strong, resilient and accessible town centres, as required by the London Plan.

m) Monitoring and reporting on the plan

Our understanding is that Ealing Council have thus far failed to monitor and evaluate the performance of the existing plan and within the proposed new plan there are insufficient details about future monitoring. This is totally unacceptable.

Public confidence will be completely eroded in the planning process and local consultation if there is a failure to establish a body that can receive and oversee monitoring compliance within the final version of the plan. Residents and organisations need to see how their consultation feedback has been considered and used.

In accordance with Section 35 of the Planning and Compulsory Purchase Act (2004) the Council is required to report on this plan at least annually. Once again, we need an unequivocal confirmation that this will happen regularly.