

## **Consultation on Ealing's draft new Local Plan (Regulation 18) – comments from The Park Community Group**

We have the following comments on the draft Local Plan.

We are concerned about the amount of new housing proposed and the desirability and practicality of implementing it in the way proposed. As a residents' association towards the north-western corner of Ealing Common ward, we are already concerned about the amount of new housing that has been provided in the centre of Ealing in recent years and its impacts on the local area. The streets are full of people, the shops and shopping centre are crowded, and "green" spaces like Walpole Park are overrun with people.

We would like to see a clear justification for making these issues worse, along with a clear and credible plan for implementing any proposed developments. In particular, there needs to be clear estimates of local demand for more housing including size and type of tenure. Whilst "Shaping Ealing" showed up a concern about the lack of affordable housing, it is not clear that the Local Plan is deliverable in this regard.

Given the great range of both income and wealth of Ealing residents, the only way that affordable housing can be provided to the less well off is by receiving some sort of subsidy. The sources of such a subsidy seem to vary between unclear and unlikely. Previous attempts at this were based on getting developers to provide "affordable" housing using the proceeds of the sales of units at full market value. However, developers often found that they couldn't provide that many units this way and the proportion of "affordable" units was scaled down.

The problem seems to have got worse recently, as evidenced by the issues with the planned Perceval House redevelopment. It is unlikely that the proposed development will go ahead without further subsidy from public funds. The source of all the required funds is unclear. There are limits to the amount of national and London public money that will be provided. Any further money looks as if it would have to come from Ealing, perhaps from increased Council Tax or other levies. This may prove unpopular with many residents.

If it looks to be impractical to provide much "affordable" housing in this area, then the plan should say so and be adjusted accordingly.

There is clearly a big problem with getting approved developments built. This particularly shows up in sites like EA11 Arden Road car park and EA10 Perceval House which are in Ealing Council ownership. These have had planning permission for quite some time, yet there is no sign of work having started. New office planning approvals don't look to be doing any better. EA13 Craven House, EA12 CP House and parts of EA02 Ealing Broadway Shopping Centre are in the same approved but nothing happening state. Some of these approvals look as if they will simply time out. There needs to be an assessment of the types of development that are likely to be viable and the Local Plan needs to be modified appropriately.

The concept of 20-minute neighbourhoods is very attractive. Indeed, our residents' association is already in an area where most of the things many residents normally visit are within a 15-minute walk. However, the plans going forward don't seem to add to this and in many ways detract from it. Most of the site proposals in the centre of Ealing seem to be residential led or with at least some residential element. Some of these seem to do away with the very facilities that many residents use, like the Royal Mail delivery centre, shops and a DIY store. At the same time, a greater number of

residents would want to use the already overrun green space, whilst having to travel further to some of the shops etc. that they would need to use.

It would be better to concentrate much development in other areas which are currently too sparse and spread out to achieve 20-minute neighbourhoods.

There is also a concern about the proposed height of many of the buildings. The area to the south of the Uxbridge Road is characterised by buildings of low to medium height and adding tall buildings would seriously detract from the current character and attractiveness of the area.

A few comments on the development sites.

#### **EA02 Ealing Broadway Shopping Centre**

This is a distinctive feature of Ealing that provides the core set of shops that people use. Redeveloping it to include a tall residential block could take away many of those shops and cause huge disruption in the process. It is also not clear that it would be economically viable to do such a redevelopment.

#### **EA04 Ealing Broadway Station**

There are serious difficulties in building new uses here around a working station, as well as the cost issues in mitigating noise and vibration from trains.

#### **EA09 Ealing Studios, Royal Mail Delivery Office & Telephone Exchange**

Despite what the Local Plan site description says, there is a recently approved planning application for a sensitive redevelopment of part of Ealing Studios. Telephone Exchanges are normally very difficult and expensive to relocate, and the RM Delivery Office is a very valuable and much used local facility that would involve longer (and probably non walking) journeys for residents if it was to be relocated.

#### **EA33 Ealing Riding School and EA34 Old Actonians Sports Ground**

There is concern about the further loss of green space.

#### **EA35 University of West London**

This site is already full and it is not obvious where any additional residential could go.

#### **EA36 Wickes, South Ealing Road**

This is valuable local facility and any relocation would involve additional journeys for residents and tradespeople alike.

#### **EA37 Travis Perkins, Popes Lane**

This is valuable local facility and any relocation would involve additional journeys for residents and tradespeople alike.

  
(Chair of The Park Community Group)

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