

Drayton's Community Association and Stop The Towers
Response to the Draft Ealing Local Plan
7th Feb 2023

I am commenting on the draft Ealing Local Plan in my capacity as Chair of the Drayton's Community Association which represents numerous households in the West Ealing area. I am also commenting on behalf of Stop The Towers of which I am a member. This response is based on our analysis of the draft Local Plan, historic engagement with Ealing Council and a survey of local residents regarding their views on the Local Plan which received 796 responses at the time of writing a copy of which has been provided with this response.

Overall

We support the stated aims of the Local Plan; we want to see affordable housing, sustainable communities, safeguard the environment and make our communities more resilient to the impact of Climate Change. However, it is our view that the proposed draft Local Plan will deliver the opposite of these aims. It will not deliver affordable housing, will weaken not strengthen communities, deepen inequalities, add to climate change globally and make us more vulnerable to it locally. It is our view that it is critically flawed, should be withdrawn and the process of drafting it should start again with appropriate expert advice and community engagement. This Plan will shape Ealing for a generation or more and in its current form we feel it would have potentially disastrous consequences.

Consultation

As a residents association we have been attempting to engage with Ealing Council to shape the Local plan for well over five years. However, there has been no meaningful engagement and this plan which has been presented as what appears to be a near final version. It is our view that the Local Plan has failed in its obligation to consult. Meaningful consultation involves engaging with community representatives at the earliest stage of the process of plan development and working collaboratively to agree objectives, priorities and key assumptions. It involves talking to all interested parties and allowing them to shape the process so that the result represents a true consensus. STT has consulted the majority of community groups across Ealing through its networks and in our view no such consultation occurred. This was confirmed by every community representative speaking at the 6th February meeting of the Ealing Council Local Plan Development Committee stating that they and their communities were not consulted.

It is also our view that process that Ealing Council followed for sharing the draft Local Plan was deeply flawed. The draft document released on 30th November is very long and complex and residents have been given very little time to read and digest the contents. There is no concise summary and many key elements appear to be contradictory and or vague in their meaning. Publication just before Christmas made it even more difficult for residents to respond. Our members also found the online response forms are hard to navigate and confusing.

In illustration of this point the focus of Local Plan is primarily on building homes and it appears that there has been significant consultation with developers and the GLA. However, there is no discussion of context or seeking views from residents regarding the merits and impacts of a major increase in population or alternative approaches such as a focus on social housing. Similarly other aspects of the Local Plan are simply presented as objectives without any supporting evidence or discussion of why and who supports them.

This lack of consultation is evidenced by a survey of almost 800 Ealing residents done in collaboration with local residents groups including the DCA. The overwhelming majority of participants felt the Local Plan was wholly inadequate with fewer 3% saying they believed it likely to deliver most or all of its stated objectives.¹ If consultation had occurred there would not be such a huge lack of confidence in it.

Housing and Infrastructure.

We are particularly concerned about the lack of a coherent plan or supporting analysis on Housing and Infrastructure. For example no evidence is provided regarding the capacity of the Borough and its communities to accommodate large increases in its population.

Between 2011 and 2021 Ealing's population increased by 8.5% which is higher than the increase for London (7.7%). This significant increase is not considered in the plan which simply assumes more growth is desirable and can be accommodated. There has also been no review or evaluation of the impact of the massive building programme associated with Crossrail that has already completed or developments approved and being built. There is no reference to a 5 year Land Supply or figures on units completed and nothing in the draft plan suggests how impact will be assessed or limits will be set in the future. This makes it impossible to assess the Plan in terms of its impact at a borough level, the validity of its housing targets or to measure if the targets are being met as there is no evidence base.

The Plan will also make tall buildings even easier to build by identifying areas designated for them. However, it fails to address the issue of local over-development and the creation of 'super-dense' housing areas where there are multiple towers side by side and little or no amenity space to support them. West Ealing has already seen major new housing developments and yet the plan appears to be to develop it to the maximum possible degree. There is no mention of maximum or target densities. This also seems contradictory to the goal of '20 min cities' as it removes the spaces in which small businesses, shops and amenity spaces exist.

We also have wide concerns regarding infrastructure. Areas including West Ealing have seen rapid population growth and the Local Plan has no proposals for ensuring infrastructure is adequate or even assessing need. It is already clear that Crossrail is seeing much higher demand than anticipated meaning it is approaching capacity far more quickly than anticipated. The plan does not address the issue of Crossrail having finite limits which may soon be reached in terms of developing new homes near Crossrail stations.

¹ The survey involved members of the Draytons Community Association, Stop The Towers and Ealing Matters.

Environmental policies.

In our view the Local Plan is wholly inadequate in terms of its environmental policies and fails to such an extent that it will destroy not protect the environment locally and globally:

- **Protecting Green Belt and Metropolitan Open Land.** Probably the most indefensible part of the plan is the re-classification of Green Belt. This is clearly designed to make this land available for development and the Council stated at the recent Local Plan Development Committee that sale of such land for housing is part of its financial strategy. Given the climate crisis and growing population density these spaces are more valuable than ever in physically protecting us from heat and flood as well as offering space for recreation. Once given up to housing they may never be recovered. It is not worth it for a new club house or changing room on an ever shrinking sports field.
- **Adapting to climate change.** The plan fails to address the issue of adaptation to a changing climate including managing heat, cold and flood events. There is no joined up thinking, each site is looked at in isolation. The impact of towers and super-dense housing developments is not considered. There is no consideration given to how Ealing needs to enrich nature, protect rivers and use water-meadows and parks to act as climate buffers. They are seen simply as a commodity to be sold for cash.
- **Sustainable legacy housing.** Much of Ealing's housing was built more than 100 years ago and uses gas fired boilers for heating and water. This is carbon intensive and probably the major source of air pollution in residential areas. The plan has no mention of addressing the task of insulating and retro-fitting heat pumps or electric heating systems. Other Local Authorities are investing significantly in gaining the expertise needed to implement or advise on the massive retro-fit programme that will be needed. Ealing's Plan lacks any strategy.
- **Sustainable new housing.** The Local Plan lacks any aspirations in terms of achieving passive house standards and building to cope with extremes of heat, cold, wind and rain for new build. This means these new buildings may not be fit for purpose when they are completed or need retro-fit within a few years. Ealing accepts this and yet has no strategy for preventing it by setting higher build standards. It ignores research on embodied carbon and the fact that towers are inherently carbon intensive in embodied carbon and in terms of carbon needed to heat, cool and service them. It also ignores research on the effect towers have on the local environment in terms of creating heat islands and intensifying wind effects.
- **Demolition and refurbishment policies.** The Local Plan entirely avoids addressing the issues of embedded carbon and refurbishing rather than demolishing buildings. Its focus appears in fact to be on new build with no mention of re-purposing or refurbishing as a strategy to minimise carbon emissions. It has itself approved the demolition of Percival House to build another set of towers.

- **Sustainable Communities.** The plan talks about sustainable 20 min neighbourhoods but lacks any of the holistic planning and thinking needed to deliver them through ensuring mixed developments with supporting amenities.

Town centres

The proposals for the management of the Ealing's 'town centre' areas such as West Ealing Broadway are entirely inadequate. The world is changing and we need a coherent and active strategy to maintain economically and socially healthy town centres. This means looking beyond housing and at the businesses and amenities that support communities and provide employment. It also means creating areas people want to visit and connecting them, this is not part of the plan. We wholeheartedly support developing local Town Centres, but feel this Local Plan would hasten their demise not develop and sustain them.

Affordable Homes – Social Cleansing

In our view the plan fails to address the key issue of providing truly affordable homes to local residents who need them and in particular the need for family homes. The Plan has no figures that link affordability to income or to family size. This is likely to have the effect of driving out existing residents born in Ealing to be replaced by those who can afford the kinds of properties being built. In our view true social housing must be part of the plan and explored alongside the current market driven approach where developers offer lower cost units as part of larger schemes. We also note that this strategy of reliance on developers has been at the core of Ealing's housing policy for nearly a decade with no evidence of any significant positive effect. There are anecdotal examples of social housing; but it runs at tens of units vs. tens of thousands of unaffordable ones.

Age and Disability Discrimination

We have noticed a trend in new tower developments to exclude old and or disabled residents by designing housing that cannot meet their needs in terms of access, amenity and supporting regular visits by carers. This is we feel morally wrong and fails to recognise the needs of an ageing population. It may also act to break down community cohesion by driving the old and less able out of the borough. This is not addressed in the Local Plan and we feel it may be in breach of the Equalities Act as no analysis of the plans impact on groups with protected characteristics was included.

Conclusion

We feel development of this plan is fundamentally flawed and has been created without meaningful consultation, it should be discarded and a new Local Plan should be created using a meaningful engagement plan and appropriate expert support and evidence. Our predecessors built a Borough that they could rightly be proud of with housing that is still comfortable 100 years later and green open spaces for residents to enjoy and a good public transport system. This Plan is an insult to that legacy.

Dr Gerald Power on behalf of STT and DCA

8th February 2023

geraldpower100@btinternet.com