

Draft Local Plan Consultation Response – Ealing Civic Society

Introduction

The starting point for the draft plan is given as a 15-year vision for Ealing – aligned to the core themes of *'tackling the climate crisis, fighting inequality and creating good jobs and growth'*. A high-level vision statement is offered, supported by three strategic policies related to the core themes, in turn supported by priorities. Much of the vision and strategic level policy is so general as to be impossible to question, but as with any plan, the 'devil is in the detail' and it is at the detail level that the draft plan fails in many areas. In particular, much of the detail conflicts with the aspirations in the higher levels.

In this response, we concentrate on those aspects of the plan of most relevance to the objectives of Ealing Civic Society – the preservation and improvement of our borough – covering such aspects as conservation, heritage, masterplanning, design and open space and with a focus on the 'towns' of Ealing, Acton, Hanwell and Southall.

Conservation and Heritage

Ealing Civic Society is extremely concerned about the lack of reference to and support for heritage and conservation in the draft plan. There is a passing reference in paragraph 1.14 of chapter 1, which mentions that the Local Plan *'shows what needs to be protected, conserved or enhanced such as ... heritage assets'*; policy SP.4.1 refers to *'taking a strategic approach to the preservation and enhancement of Ealing's built heritage, including the capacity for heritage-led regeneration and development where appropriate'*; paragraph 3.34 of the explanatory text elaborates that *'Ealing has a wealth of designated heritage assets including over 300 buildings and structures covered by statutory listing including six scheduled monuments and four registered Parks and Gardens, as well as 28 conservation areas. In addition, there are over 700 non-designated heritage assets identified in Ealing's local heritage register ... and new development has the potential to offer significant opportunities to enhance and better reveal heritage assets to enable cultural, social and economic benefits of these assets to be realised. This will be achieved by placing heritage at the heart of place-making, good growth and good design.'* However, these themes are not developed. There is no further explanation of how the aspirations will be achieved and no detail of the Council's specific policies relating to them. This gives the strong impression that heritage and Conservation Areas will be of minor importance when decisions on development are taken in the future.

Furthermore, there is no mention of heritage assets or Conservation Areas in Chapter 5, which deals with development management policies, beyond a brief reference to *'conservation documents'* in the section on *'positive visual impact'* in paragraph 5.12. Developers and other applicants for planning permission will not know how or where to find the necessary policy guidance; in the absence of specific information, they could assume and argue that the Council has no such policies. It is essential that developers and other applicants for planning permission are directed clearly from the overall policies set out in the Local Plan to these more detailed documents, including Conservation Area policy and guidance documents.

It should be noted that the current local plan includes far more detail in this area, following direction from Historic England's predecessor English Heritage. Current policy on heritage assets including Conservation Areas should be updated as appropriate, with advice from Historic England, and set-out clearly in the main section of the Local Plan, with further detail to be added in the development management policies in Chapter 5.

Listed and locally listed buildings all contribute to the character of an area and are valued by the community, but this value is not reflected in the weight given to them in the draft plan. For example, specific concern has been raised in relation to the Hanwell area, where a number of heritage buildings listed by Historic England such as St Mellitus Church, City of Westminster Cemetery, Kensington and Chelsea Cemetery, and residential property Crossways, have been omitted from mention, suggesting that Hanwell's heritage is not

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valued and this could lead to the character of the area being diluted and diminished in the Local Plan.

Masterplanning

The Society welcomes the proposed masterplanning approach set out in the draft Local Plan. A comprehensive view is needed for the major changes proposed, particularly in formerly exclusively industrial/commercial areas.

We consider that the content of master plans and the process for their adoption needs to be clarified and to form a specific part of the Local Plan – the proposed definition and current references are too vague.

Master Plan content

Specific items that should be included are:

- Guidance on allowable building height
- Amount of Industrial and Commercial floorspace
- Total residential units
- Mix of unit-sizes and tenures
- Amount of open space required to meet GLA standards
- Amounts of community open space
- Amounts of community space for children including 0-5 year olds and 6-18 year olds
- Specific proposals for creating the required open space where this cannot be achieved within individual development sites

Guidance on S106 agreement requirements

- To include financial contributions needed to make up shortfalls in reaching the required standard eg for open space and community space

Master Plan approval and adoption

Many proposed plans cover areas with more than one ownership. The plans will have significant effects on communities within the masterplan area and surrounding communities too. There should be a formal adoption process which allows engagement of interested parties beyond the Council and the initiating developer. The plans should ideally be approved in advance of specific development consents for individual sites. A hybrid process may be applicable where the plans form an outline consent part of a more detailed planning application. In either case, there must be opportunity for a formal consultation before the masterplan is adopted.

More reference is made to masterplanning in the Acton town section below.

Design

Policy SP.3.3 has the aspiration of *‘Ensuring new development meets the highest design standards, responds positively to the local character and recognises the role of heritage in place-making.’* yet there is again no detail on how this is to be evaluated and ensured. Policies are needed that provide a strong framework within which planning decisions may be made that reflect local aspirations. Without these, the current situation will continue, where time and again developments have been approved, often against significant local objection, that are not in keeping with local character, adversely impact the local area or allow the destruction of heritage assets and architecture. Local communities, amenity groups and neighbourhood planning groups and forums must be involved in developing these policies and identifying what characterises, and what would be acceptable design in, local areas. The role of heritage assets and architecture must be clearly defined.

One specific design related area is tall buildings policy. The draft plan includes metrics defining what is considered a tall building in a number of defined areas. The implication is that any building of lesser height is not ‘tall’ and thus acceptable. These area boundaries and associated heights appear to have been plucked out of the air, with no criteria offered

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against which the proposals have been assessed and no justification provided for the heights, which are often entirely inconsistent with the surrounding area.

Open Space

Under the ‘tackling the climate crisis’ theme, policy SP.2 states that the plan will ‘*Maximise opportunities for urban greening and a net gain in biodiversity.*’ and will offer opportunities for ‘*Maintaining, enhancing and expanding the network of green infrastructure.*’ Yet in the detail (Appendix 3 – Atlas of Change) are set out proposals relating to the redesignation or dedesignation of a number of areas of Green Belt and Metropolitan Open Land (MOL). This is however in itself incomplete and depends on awareness of an earlier Green Belt/MOL review, which is not referenced and has not been consulted upon. These proposals are justified by claims that any changes more accurately describe the areas of green space. What they in fact do, and when taken in conjunction with some of the development sites detail, is to reduce or remove what protection these areas have from development with the clear objective of facilitating their removal from the network of green space, in total contradiction to the stated policy. On this topic, we refer to and support the detailed responses made in respect of MOL20 by Ealing Cricket Ground Conservation Area Panel and HHGERA & the HHGE Conservation Area Panel.

It is also proposed to remove MOL status from five allotment sites and to include the Northfields allotment site in a proposed Strategic Area for Regeneration. Allotments provide valuable growing space, opportunities for recreation, exercise and mental wellbeing and are a habitat for wildlife. This draft plan and also the Council’s Climate and Ecological Emergency Strategy specifically state that they should be protected; a further conflict between the plan and the Council’s stated position. We support the requests of the Ealing Allotments Partnership that both these proposals be dropped.

Policy Sp.2 also states that it supports, amongst other things, ‘rewilding’, yet this is very clearly not the Council’s position, proposing as it has recently to allow a large area at Warren Farm, naturally rewilded over the past few years, to be destroyed for sports provision, when a far more suitable area for such development is available adjacent to the rewilded area that could be used without the environmental destruction proposed.

We oppose the inclusion in the plan of any reduction (other than small boundary changes) in the amount or designation of the Borough’s green spaces.

Ealing’s ‘Towns’

SP.1 – A vision of Ealing – states that ‘*The unique characteristics and cultural identities of each of Ealing’s seven towns will be respected and enhanced, through the application of locally sensitive Good Growth principles.*’ These principles are not defined but it is clear that the draft plan does not respect and enhance the unique character of Ealing town. Policy SP2.3 also states that the plan will ‘*Ensure that development supports the delivery of necessary new social infrastructure and has no adverse effect upon existing infrastructure.*’ Significant development has already been allowed in many areas without such delivery and protection and it is unclear in the draft plan how this will be accomplished. The plan needs far stronger and specific policies on the delivery of infrastructure such as schools, medical facilities, open space and community facilities – not merely financial contributions that fail to deliver such infrastructure.

Ealing

The unique character of Central and West Ealing, that together make up Ealing ‘town’ is, and still remains, despite some ill-conceived recent development proposals and implementations, that of an area offering low-rise family-friendly housing, much dating from the Victorian and Edwardian eras and with architectural styles typical of those eras. Rather than being respected and enhanced, this character would be utterly destroyed if the tall buildings policy D9 were to be adopted. This policy defines a tall building solely by height, an arbitrary definition unrelated to existing streetscape and character. A better definition would be ‘one

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taller than the prevailing built environment'. The draft plan considers that no building under 7 storeys would now be considered tall anywhere in the Ealing town area and could be permitted anywhere. Even a 6-storey building would be over-tall in many existing residential locations. More concerning is the suggestion that no building under 22 storeys would be tall in area E14, central Ealing. This height is far and away the greatest proposed for any area within the whole Borough and is not confined to the Uxbridge Road corridor (where it would still be unacceptable) but would be deemed acceptable in several traditional residential streets.

The plan goes on to say that it will *'Identify appropriate areas for tall buildings and change that adds quality to and complements Ealing's character and place-making ambitions.'* Yet many of the development sites identified that would in theory allow unrestricted building heights would, if so developed, do untold harm to that character.

The entire approach to the definition of a tall building and associated policy needs rethinking, in conjunction with the local community, who are best able to define what is acceptable.

In terms of identified development sites, much of the detail provided is inaccurate or misses detail of, in particular, recently approved planning permissions.

Ealing town has 37 identified development sites without the benefit of an overarching masterplan, properly consulted on with the community. While some of these sites may be suitable for and could be enhanced by sensitive redevelopment, the assumption that all are suitable for 'tall' buildings is flawed since many cover or adjoin low-rise housing. We comment on these sites below.

EA01 Broadway Connection. As has been raised in response to the current application for development of this site, the proposed (and sanctioned by the draft plan) 21 storeys on the site would harm designated heritage assets. A considerably lower maximum height is required.

EA02 Ealing Broadway Shopping Centre & Crystal House. This site has been the subject of recent improvements and refurbishment without a damaging increase in height. Further or upward development would be unacceptable; the site should be removed from the development sites.

EA03 Sandringham Mews. Subject of a current application of up to 8 storeys. Objections have been raised to even this proposed height and the plan suggestion of up to 12 storeys is excessive.

EA04 Ealing Broadway Station and **EA05** Central Chambers. Adjacent to at risk CAs making them sensitive locations entirely unsuited to an indicative height of 21 storeys.

EA06 Haven Green Car Park. Could possibly be suitable for low-level development respecting its position adjacent to Haven Green.

EA07 Carmelita House. No justification for a proposed maximum of 21 storeys.

EA08 Eastern Gateway. 8 storeys would be excessive for this location adjacent to low-rise residential buildings.

EA09 Ealing Studios, Royal Mail Delivery Office & Telephone Exchange. Should be removed from the development sites as site-sensitive plans to refurbish, extend and retain the Studios as working studios have recently been approved and the other parts of the site remain necessary for important infrastructure.

EA10 Perceval House. Despite the approval of a 26-storey tower on this site, against significant local objection, a precedent has not been set that suggests this site would be suitable for the proposed maximum of 21 storeys.

EA11 49 - 69 Uxbridge Road Some development may be appropriate here but should be restricted to the current maximum 11-12 storeys of existing or consented buildings, primarily because of the impact of taller proposals on Walpole Park.

EA12 CP House. As above, should be restricted to 11-12 storeys.

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EA13 Craven House. Any development should be restricted to the 10 storeys consented for the vacant part of the site, with lower heights appropriate to the rear; traditional terraced housing would be a preferable use of the vacant site.

EA14 Arden Road Car Park. Approval was recently granted for development of this site to 9 storeys maximum and appears to be progressing; the site should be removed from the plan and would in any case not be suitable for development of the suggested height.

EA15 1 - 19 Broadway, Aviation & Pioneer Courts, West Ealing. These two residential blocks are of relatively recent construction and for reasons of sustainability and environmental impact should not be considered for redevelopment. Some small improvements may be possible to the frontage buildings but the site should not be designated as a development site or as suitable for anything other than low-rise.

EA16 to EA22, West Ealing. Before further development sites are allocated to West Ealing, a detailed master plan should be prepared, consulted on and agreed to counter the damaging piecemeal and excessive development that has been allowed along the Uxbridge Road in recent years. Heights of up to 13 storeys are unacceptable.

EA23 Green Man Lane Estate. Should be removed as it is already under development.

EA24 Waitrose, West Ealing. Development of this site could be acceptable provided it retains the existing retail use with appropriate parking provision and any residential development is limited to the height of existing neighbouring buildings of around 10 storeys.

EA25 West Ealing Station Approach. The previous local plan identified this site as a possible development site but set out that the height of any buildings should respect the scale and massing of the surrounding residential roads; this requirement should be preserved.

EA26 Castle House. Already the subject of a planning approval; site should be removed.

EA27 Access House & T Mohan. Possible site for redevelopment; height should respect the adjacent low-rise residential buildings.

EA28 Gurnell Leisure Centre. Following the recent refused development proposals, any development must not encroach on MOL and height should reflect the opposite Gurnell Estate development.

EA29 Downhurst Residential Care Home. No apparent justification for change of use; any development should be low-rise and reflect the prevalent architectural character of the area.

EA30 Twyford Abbey. Residential-led redevelopment approved; remove from site allocations.

EA31 Former Barclays Sports Ground. Any development should retain the existing open green space and be confined to already built-on land; height should reflect adjacent buildings.

EA32 96 Queens Drive & Telephone Service Centre. Could be suitable for residential development not exceeding 6 storeys.

EA33 Ealing Riding School. Should be retained as green space/similar use to present; remove from development sites list.

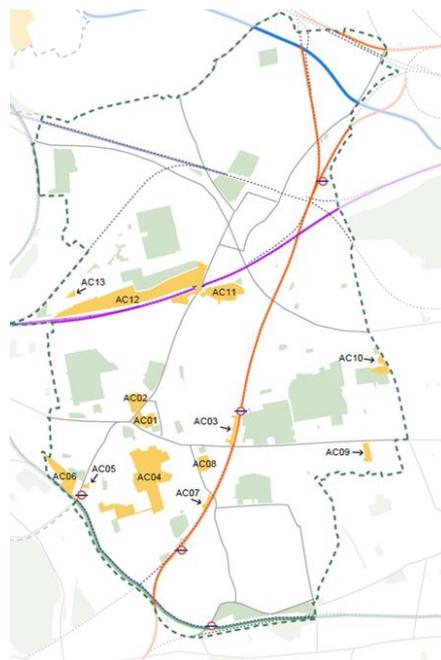
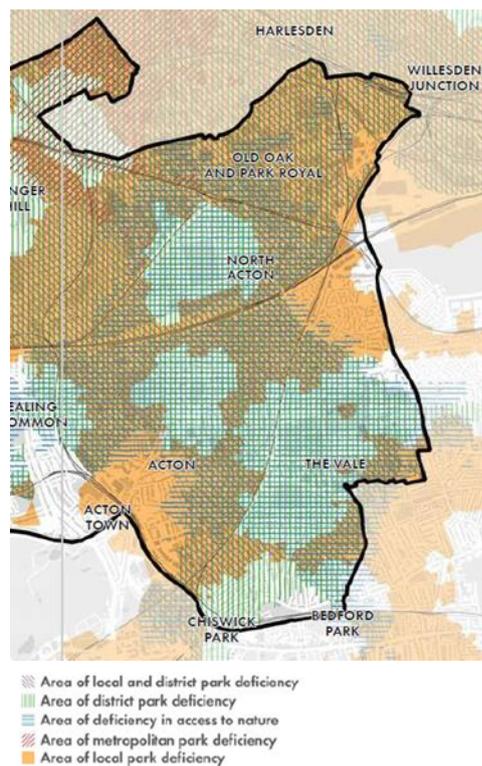
EA34 Old Actonians Sports Ground. Should be retained for sports facilities and undeveloped; remove from development sites list.

EA35 University of West London. Site already intensively developed; refurbishment of YMCA building possible as residential without increase in height.

EA36 Wickes, South Ealing Road. Potential site for residential development respecting scale and height of neighbouring houses and low-rise flats.

EA37 Travis Perkins, Popes Lane. Potential site for low-rise residential development respecting the setting of the adjacent South Ealing Cemetery and scale of terraced housing opposite.

Acton



Open Space Deficiency in Acton: copied from Allies and Morrison Ealing Character Study

Acton sites with development potential: From Arup's Suitability and Deliverability Assessment, Appendix E

Issues to address in Acton

Virtually the whole of Acton suffers from Open Space deficiency identified in the Allies and Morrison character study of the borough - see copy of plan above.

The Local Plan and the Opportunity sites within it are the opportunity for the Council to address these deficiencies.

Acton policies propose:

Policy A.1 Acton Spatial Strategy

Section K includes:

- (i) Improving the public realm, network of green open spaces, and children's play spaces

Section L includes high-quality development on key sites.

There is no reference to taking advantage of development to mitigate and remove deficiencies in all levels of open space provision from small and pocket parks up to local and district parks.

4.1.30 identifies *'Development will need to respond sensitively having regard to the growth and intensification themes and associated tall buildings guidance/indicative heights identified in each local character sub-area.'* Again there is no reference to the increasing demands that additional residents at increased density will make on already deficient availability of open space.

In the view of Ealing Civic Society, the Local Plan must identify and address explicitly the open space deficiencies within the Acton area. The Local Plan should make specific proposals for how deficiencies will be mitigated/eliminated.

Specific site proposals for residential use in Acton within areas of open space deficiency should each require that the full needs for amenity and open space of its residents are met on site. This must include needs for amenity space, needs for children of all ages including ages 0-5 and ages 6 and above and needs for private open space. The needs for public open space should also be met in full. The Council has from time to time required in-lieu payments under Section 106. These have not been effective in meeting local open space

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needs as the Council has not been able either to collect Section 106 payments or to plan their use to meet the intended purpose.

Masterplans, where required for larger site assembly and for residential development in areas of open space deficiency, should follow the same principle. The masterplan should identify in detail how the different levels of open space requirements will be met and the specific sites to be set aside for these.

Policy A2: Acton Town Neighbourhood Centre

The policy proposes significant growth and improvement of the town centre. We welcome the focus on making the centre more attractive. However we note that intensification of use will increase pressure on limited open space resources. The whole of Acton centre appears to lack access to District parks (see Allies and Morrison map). Southern parts of the centre also lack sufficient access to local parks.

Policy A2 should recognise these deficiencies and make proposals to mitigate/eliminate them within the Acton town centre area.

Policy A3: South Acton

Ealing Civic Society welcomes the successes to date of the Council with its housing association and developer partners in South Acton. The already completed residential development of Acton Gardens is attractive and a huge improvement over the previous South Acton area that it has replaced.

We are however very concerned that Policy A3 appears to continue the current “masterplanning” mode for dealing with new development proposals. A “masterplanning” approach has been referred to in development documentation for recently approved schemes, eg for the TfL Bollo Lane developments, for piecemeal developments along the eastern edge of Bollo Lane opposite the TfL sites and for developments behind these, moving into the South Acton Locally Significant Industrial Site (LSIS).

Deficiencies with the current approach have been:

- Where a “Master Plan” has been applied, there has been no transparent method for its approval and adoption. For example there has been a “masterplan” for the development of the block that includes varied ownership between Bollo Lane and Stirling Road, stretching southwards from Roslin Road to Colville Road. A version of undefined status of the “masterplan” was included in the developer’s documentation submitted for development of two sites within this strip at 29-39 Stirling Road and 2-10 Roslin Road Acton W3 8DJ ref:204553FUL. The “masterplan” was included as one chapter (Chapter 5) in the Design and Access statement for this development.

The process adopted for dealing with the “Masterplan” for the TfL Bollo Lane development was described by the developer as a “co-ordinated illustrative master planning process”. Illustrative plans were submitted for outline approval as part of a major hybrid planning application 201379OUT. Again there was no clear approval process.

Ealing Civic Society supports proper master planning to deal with these major sites. We believe that a formal local plan approach should be adopted to develop “Inset Plans” or “Action Plans”. These should include formal publication and consideration of full master plan proposals. There should be a proper opportunity to for these to be considered in public and to receive and consider local representations and objections before formal plan adoption. These master plans should then have formal statutory status within the Local Plan. This approach should be adopted for all seven areas of the borough.

Policy A4 Acton Main Line station and environs

Ealing Civic Society welcomes the ambition to create a thriving neighbourhood centre around Acton Main Line station. In relation to the new homes to be included in the plan, all proposals must ensure that a full quantum of amenity and open space is provided within the development. New residents must be able meet their open space needs on-site without adding to pressure on already overcrowded existing open space facilities nearby.

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Policy A.5 East Acton Neighbourhood Centre

Ealing Civic Society welcomes the ambition to create a thriving neighbourhood centre at East Acton. We note that most of East Acton lies within an area of Local Park deficiency. In relation to the new homes to be included in the plan, all proposals must ensure that a full quantum of amenity and open space is provided within the development. New residents must be able meet their own open space needs on-site without adding to pressure on already overcrowded local park facilities nearby.

Policy A6 North Acton and Park Royal

Ealing Civic Society has no special comments in relation to the Council's proposals for this area.

Acton Sites

Ealing Civic Society has noted deficiencies identified by consultants Arup in their Suitability and Deliverability assessment carried out on behalf of the Council. Our assessments have in particular noted open space deficiencies which current proposals for the sites have not dealt with. We have summarised the deficiencies as identified and included a requirement for each site. The Local Plan must ensure that new development meets new residents' open space needs in full where there is a local deficiency.

01. Acton Gateway (Morrisons)

- The site has District Park access deficiency.
- Proposals must ensure that a full quantum of amenity and open space is provided within the development. New residents must be able meet their open space needs on-site without adding to pressure on already overcrowded existing open space facilities nearby.

02. The Steyne Estate

- Public Open space will be lost.
- Areas retained are unlikely to match public open space lost.
- The site is within an area of District Park access deficiency.
- Proposals must ensure that a full quantum of amenity and open space is provided within the development. New residents must be able meet their open space needs on-site without adding to pressure on already overcrowded existing open space facilities nearby.

03. Acton Central Station Yard (Jewsons builders merchants/Birkbeck Mews)

- Green corridor and SBINC (Site of borough importance to nature conservation)
- The site is within an area of District Park access deficiency.
- Proposals must ensure that a full quantum of amenity and open space is provided within the development. New residents must be able meet their open space needs on-site without adding to pressure on already overcrowded existing open space facilities nearby.

04. Acton Gardens Estate

- The site includes public open space on Avenue Road, Ludlow Court recreation Grounds and the Jerome Allotments
- The site is within an area of small, local, pocket and district park access deficiency.
- Proposals must ensure that a full quantum of amenity and open space is provided within the development. New residents must be able meet their open space needs on-site without adding to pressure on already overcrowded existing open space facilities nearby.

05. Acton Town Station Approach, 83-85 Gunnersbury Lane

- Halfords Garage/MOT centre
- The site is within an area of small, local, pocket and district park access deficiency.
- Proposals must ensure that a full quantum of amenity and open space is provided within the development. New residents must be able meet their open space needs

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on-site without adding to pressure on already overcrowded existing open space facilities nearby.

06. Ealing Common Depot

- Current Use: The site is currently used as a museum and depot by the London Transport Museum. The site also features operational transport maintenance workshops and associated offices.
- Proposal: Residential-led, mixed use scheme, and potential reprovision of TfL museum on site or another suitable location.
- The site is within an area of small, local, pocket and district park access deficiency.
- Proposals must ensure that a full quantum of amenity and open space is provided within the development. New residents must be able meet their open space needs on-site without adding to pressure on already overcrowded existing open space facilities nearby.

07. Bollo Bridge Road, Builders Merchants

- Proposal: Mixed use or residential.
- The site is within an area of District Park access deficiency.
- Proposals must ensure that a full quantum of amenity and open space is provided within the development. New residents must be able meet their open space needs on-site without adding to pressure on already overcrowded existing open space facilities nearby.

08. Salisbury Street Car Park/Neville Close

- The site consists of a car park and residential uses.
- The site is within an area of small, local, pocket and district park access deficiency.
- Proposals must ensure that a full quantum of amenity and open space is provided within the development. New residents must be able meet their open space needs on-site without adding to pressure on already overcrowded existing open space facilities nearby.

09. Acton Vale Industrial Park/Westgate House

- A range of workshops and small industrial units. There are offices in Westgate House.
- Proposed for mixed use intensification.
- The site is within an area of small district park access deficiency.
- Proposals must ensure that a full quantum of amenity and open space is provided for any new residential development within this site. New residents must be able meet their open space needs on-site without adding to pressure on already overcrowded existing open space facilities nearby.

10. Haddon Court & Burghley Tower

- The site is Trinity Way housing estate and associated green space surrounding Haddon Court and Burley Tower.
- Trinity Way Open Space is designated as Metropolitan Open Land.
- This designation as Metropolitan Open Land must be preserved to protect the amenity of surrounding residential areas which suffer from deficiency of access to open space.

11. Friary Park Estate

- Proposals are for mixed-use including residential, commercial and community uses
- The site has small, local and pocket park access deficiency
- Proposals must ensure that a full quantum of amenity and open space is provided within the development. New residents must be able meet their open space needs on-site without adding to pressure on already overcrowded existing open space facilities nearby.

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12. Acton Crossrail Station and Sidings
 - Proposal for mixed use development with significant provision for community space.
 - The site has small, local, pocket and district park access deficiency.
 - Proposals must ensure that a full quantum of amenity and open space is provided within the development. New residents must be able meet their open space needs on-site without adding to pressure on already overcrowded existing open space facilities nearby.
13. West Acton Community Centre
 - Current use is Community Centre including sports clubs and parking.
 - Proposed residential and reprovision of sports clubs on-site or elsewhere.
 - The site has small, local, pocket and district park access deficiency.
 - Proposals must ensure that a full quantum of amenity and open space is provided within the development. New residents must be able meet their open space needs on-site without adding to pressure on already overcrowded existing open space facilities nearby.

Hanwell

Issues to address in Hanwell

Only 15% of Hanwell respondents in the Shaping Ealing survey 2021/2022 agreed with the statement “I’m happy with the way my area is changing”. A resounding 55% disagreed.

Factors that may have contributed to the above are approval of inappropriate, out of character and unsympathetic, tall developments in the town centre and the failure to protect adequately the character and extent of Hanwell’s Conservation areas.

The aspiration in the draft Local Plan ‘*To retain the town’s **unique character** alongside supporting inclusive growth, Hanwell’s **historic assets should be protected**, and future opportunities **sensitively planned to support Hanwell’s wealth of existing assets** whilst supporting sustainability and attracting new business and affordable housing to the area.*’ has already been overturned by recent planning decisions. Development proposals will further obstruct rather than deliver this aspiration.

Development Sites

Following from the comments above, the prevalent reaction to the identified Hanwell development sites is that the suggested maximum heights are too great and would result in overbearing impact on surrounding residential and retail buildings.

HA01 – Ealing Hospital (car park)

DESIGN PRINCIPLES

This site is adjacent to the River Brent and Fitzherbert Walk. Also to the Historic England, Grade II-listed Hanwell Bridge which has been a river crossing at least back as far as the Romans.

The site is also bounded by the original 1831-built brick boundary wall of the Hanwell Asylum.

The site is opposite Brent Meadow, a Site of Importance for Nature Conservation managed as a hay meadow and designated Metropolitan Open Land, is important for the view and setting of Wharncliffe Viaduct.

Whilst Ealing Hospital itself has shockingly poor external, and dysfunctional internal, architecture, it was built at the end of the 1970s when neither local Council nor the national Government were concerned about respecting architectural heritage.

The policy should ensure that Ealing Hospital’s visual appearance and massing are not taken as the guide for new buildings on the adjacent car park site. The tall building’s strategy of 9-12 storeys is far too high for this closeness to the important green corridor, and so many heritage assets. The building should be set back from the green corridor, should protect and enhance the existing asylum boundary wall, and be low and unintrusive.

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PLANNING DESIGNATIONS/ SITE CONSTRAINTS

In addition to the aforementioned comments on design principles, the site is immediately adjacent to the boundary of the St Mark's and Canal which encompasses the River Brent and its green corridor along Fitzherbert Walk. This is a significant constraint and should be respected.

HA02 (Car Sales, Hanwell Bridge)

DESIGN PRINCIPLES

This site lies within the St Marks and Canal Conservation Area. It is adjacent to the River Brent, a green corridor. It is adjacent to the Historic England, Grade II-listed Hanwell Bridge which has been a river crossing at least back as far as the Romans. Hanwell Bridge is noted in the title of the site.

It is opposite the Brent Meadow, designated, amongst other things, as MOL.

The proposed 6-8 storeys would overpower the River Brent which is narrow at that point, and have a detrimental impact on the setting of the CA.

Anything over the three storeys of the adjacent Victorian houses and the local listed Viaduct Pub opposite, and the two storeys of Walker Close to the south, would be inappropriate and unacceptable.

HA03 (Hanwell Children's Centre)

DESIGN PRINCIPLES

This site is to the south of the Victorian/Edwardian family housing now as The Lawns, and its address is in this residential road, although it lies between Laurel Gardens and the Uxbridge Road. It is equidistant between the locally listed Viaduct Pub and Old Hanwell Police Station. It is close to the Historic England, Grade II-listed Hanwell Bridge.

At a possible 6-8 storeys, the building would overshadow homes in Laurel Gardens for much of the day. Residential units would also overlook family housing and contribute to a loss of privacy.

Within living memory this site comprised a short row of small cottages, one with the date 1612 over the front door.

In line with the earlier stated policy that Hanwell's historic assets should be protected, and future opportunities sensitively planned to support Hanwell's wealth of existing assets this site should be removed from the tall buildings strategy and the local development plan design principles modified accordingly.

PLANNING DESIGNATIONS/SITE CONSTRAINTS

In addition, there is no reference to the public right of way through the site, established and well-used, for over 20 years ago, connecting Laurel Gardens to Uxbridge Road on foot. This would have to be recognised and respected as a site constraint.

HA04 Gray's Garage

DESIGN PRINCIPLES

This site is the in the existing Local Plan and in that is constrained to be sensitive to the heights of the retail parade opposite on the Uxbridge Road with a maximum of four storeys. The site is equidistant between the locally listed Viaduct Pub and Old Hanwell Police Station. It is close to the Historic England, Grade II-listed Hanwell Bridge.

The site is almost opposite the children's centre site HA3, so the overwhelming potential impact of a second overly tall building of 6-8 storeys facing the other across the Uxbridge Road could have a detrimental effect on the street scene. This would further diminish the character of the area.

In line with the earlier stated policy that Hanwell's historic assets should be protected, and future opportunities sensitively planned to support Hanwell's wealth of existing assets this site should not be considered as suitable for tall buildings and the local development plan design principles modified accordingly.

PLANNING DESIGNATIONS/SITE CONSTRAINTS

The inclusion of Maudsville Road, the access road for Maudsville Cottages, and also a public right of way connecting the Uxbridge Road to Vine Cottages, Factory Yard, Boston

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Green, Laurel Bank Villas and Lower Boston Road, is noted. All of the above need to be recognised and respected.

It is also noted that the delineation of the site includes some of the public footpath along Uxbridge Road. Care should be taken to redraw to ensure that the public footpath is not eroded, or indeed overhung as have been allowed for the nearby former Peugeot garage site. There a mature street tree was removed to facilitate the first floor of the new build to overhang the public footpath. This is oppressive and dark for the pavement and should not be enabled. In addition, as a point of principle against the backdrop of climate change and clean air policies mature street trees should not be removed to facilitate increased floorspace and hence developer profit.

HA05 George Street Car Park

DESIGN PRINCIPLES

We note that there are no design principles set out for this site.

This is a key car park in Hanwell for use to support the local businesses.

In addition, the cottages on George Street face onto it. Any tall building would steal daylight, sunlight and privacy from these properties.

It must be made clear in the development plan that any development should be low rise.

PLANNING DESIGNATIONS/ SITE CONSTRAINTS

The site is also almost contiguous with St Mark's and Canal CA at Westminster Road as well as being very close to the Hanwell Clock Tower CA. There is also a row of semi mature street trees lining George Street which should be protected.

HA06 Site of Lidl and discount store

DESIGN PRINCIPLES

It is noted that in the appendix to the tall buildings' strategy, the maximum height for this site is recommended to be limited to six storeys.

Six storeys are still too high for the adjacent family housing to the south in Montague Avenue. It would also overpower the family housing in Hanwell mid-town.

The site is visible from Hanwell Cemetery, the park and garden of which are Grade II listed by Historic England.

PLANNING DESIGNATIONS/ SITE CONSTRAINTS

The original Lidl application specified that a town square should be included along with public toilets.

The Town Square is there, hosts some semi mature trees, and should be retained and enhanced.

The Council in recent years has allowed the removal of the Lidl-managed public toilets with the result that there are no public toilets at all in Hanwell town centre. If the aim is accessibility for all - for young and old, able-bodied and people with health conditions or impairments - this opportunity should be taken to specify inclusion of public toilets.

HA07 (Marshall Site, Gold's Gym & Garages on Montague Avenue)

CURRENT USE

Correction: This site does not include a church. It is adjacent to Our Lady and St Joseph's Catholic Church which is a locally listed building.

DESIGN PRINCIPLES

This site is not suitable for up to 8 storeys as is stated in the Tall Buildings strategy. This would overpower the adjacent locally listed Catholic Church.

PLANNING DESIGNATIONS/ SITE CONSTRAINTS

The site is opposite St Mellitus Church which is listed Grade II by Historic England. Potential height of 8 storeys would have a negative impact on this church and its setting.

HA08 St Mary's Convent

DESIGN PRINCIPLES

There is a large garden to the rear with mature trees at the boundary that are a public amenity for neighbours. These trees should be protected, especially as the garden backs

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onto Westminster Cemetery, which is an important Site of Borough Importance for Nature Conservation, priority habitat and Green Corridor.

PLANNING DESIGNATIONS/ SITE CONSTRAINTS

This site is adjacent to the Catholic Church of Our Lady and St Joseph which is locally listed. It is also diagonally opposite Grade II listed St Mellitus Church with its garden at the gateway to Hanwell. The setting of this church should be taken into account with any design for a building on this site.

HA09 Access Storage

DESIGN PRINCIPLES

This site is surrounded by low level housing and should therefore have a maximum height of three storeys attached to it.

An appropriate minimum distance should be applied to the north where the site abuts with Jasper Avenue (the former Cambridge Yard), and to the east with the town houses on Cambridge Road.

PLANNING DESIGNATIONS/ SITE CONSTRAINTS

All tree preservation orders should be enforced, and additional tree preservation orders attached to mature trees linked to climate change policies.

HA10 Tile Depot & Lambourn Close

DESIGN PRINCIPLES

This site is not suitable for tall buildings as it is surrounded by family housing to west and east.

PLANNING DESIGNATIONS/ SITE CONSTRAINTS

This site back onto Trumper's Way which serves the major trading estate on the south side of the Grand Union Canal. Heavy lorries and commercial vans use this road. Note should be taken that access for children, especially, should be designed carefully.

Evershed Sports Ground

DESIGN PRINCIPLES

Sympathetic design of any new buildings or adaptation of existing buildings to green space and Brent River Park.

PLANNING DESIGNATIONS/ SITE CONSTRAINTS

This land is green space which has never been built on with the exception of the servicing buildings to the north. It is adjacent to the wooded section of the Brent River green corridor. It should retain a designation of Metropolitan Open Land.

HA12 Copley Close Estate

CURRENT USE

Note that whilst Copley Close is regarded as part of the north part of Hanwell, it sits within Pitshanger Ward

DESIGN PRINCIPLES

There should be an emphasis on good landscaping of green open space for family recreation. Also, good lighting and safe parking. Not suitable for tall buildings.

Exemplary health facilities should be provided to address health inequalities.

HA13 High Lane Housing Estate

DESIGN PRINCIPLES

Exemplary health facilities should be provided to address health inequalities.

The site is on the side of a hill, so it is not suitable for taller buildings than are already there. It is also contiguous with the Brent River Park. Tall buildings on a hill would be intrusive to the skyline.

PLANNING DESIGNATIONS/ SITE CONSTRAINTS

Note the proximity to the Brent River flood plain to the south of the site

ECS response to Southall Town Plan

Transformational levels of growth and investment

4.7.6 Ealing Civic Society welcomes the proposals for a new Southall Reset Vision and Masterplan Framework. As we comment elsewhere, there must be a proper statutory framework for developing the masterplan. This framework must allow formal statutory consultation with local communities on masterplan proposals. The masterplan must be formally adopted by the Council following the consultation process. This must be handled separately and as far as possible in advance of planning consents for individual sites. Major planning applications in Southall should be held as premature until a Statutory Master Plan has been adopted.

Issues to address in Southall

4.7.10 In our view, lack of new homes that are truly affordable for the existing community is the key local issue. The summary in 4.7.10 omits this key local concern. The section notes that the pace of new homes provision has been rapid but does not reflect the concern expressed about the lack of affordable homes. The Local Plan must make an unambiguous commitment that every development approved by the Council in Southall will deliver the full quantum of truly affordable local homes required by the London Plan. This delivery must be on site or on specific alternative site(s) rather than by financial contribution. Our experience is that the Council does not have the resources even to collect Section 106 financial contributions efficiently when agreed and it has been completely unable to apply Section 106 financial receipts to meet the deficiencies that they are intended to address.

We welcome the commitment to genuinely affordable housing in Policy S.1: Southall Spatial Strategy, paragraphs F (i), (ii) and (iii).

4.7.11 Ealing Civic Society is aware of significant discontent in Southall with the heights proposed in new developments and the risk of over-intensity of development. Future development planning and heights must be addressed by formal master-planning as discussed above.

4.7.12 The local deficiency in open space must be addressed as an integral part of every major planning application. Each new development must meet in full the open space needs of its residents in view of the existing shortage of open space in Southall. This must include setting aside space within the Master Plans for additional public open space to mitigate the increasing pressures on inadequate public spaces.