



**Ealing Council Local Plan Consultation**  
**February 2023**  
**Response of Ealing Fields Residents'**  
**Association**

Ealing Fields Residents' Association (EFRA) is a large residents' association with a subscription membership of some 500 members across around thirty streets which are centred on Northfields station and our community library. There are over 2000 households that live in our area which is entirely within the Northfield Ward (part of 'Ealing Town' as defined by the Council). EFRA was created in the late 1970s when local people were galvanised to establish a representative body to oppose a planning application to convert a local cinema into a night club.

The residents' association has several detailed comments about the Local Plan (LP) as it affects our area, as well as general comments/observations about overarching elements in the plan.

We trust that the Planning Inspectorate, when reviewing Ealing's LP, will give additional weight to the comments of EFRA as we are a democratically constituted body that is recognised by the Council as broadly representative of those that live and work in our local community.

**a) Specific comments about the impact of the LP on Northfields**

1) Development proposed for Northfield Ward

Unlike many other parts of Ealing, there are no specific sites designated for future development in Northfield. Orion Park opposite Northfields station is already earmarked for development but building works have yet to start because of funding issues faced by the developer (a housing association).

EFRA has identified a site which may be suitable for housing development at the back of **Overdale Road** adjacent to Northfields station. Currently this land is used primarily for storage. Within the last ten years the principal land owner put forward a proposal to develop the site for housing. However, this proposal foundered because of problems associated with land assembly. Although there were some reservations about the development proposal expressed by local residents, if a sensitive low density housing estate were to be constructed on the land, this is likely to attract support within the local community. To affect such a development the Council would probably need to exercise its compulsory purchase powers to assemble a viable site for the development. Although private housing for sale or rent would likely compose some of the tenure mix on the site, EFRA would like to see a major part of the development given over to affordable housing of one kind or another.

2) Building height

EFRA welcomes the Plan's proposal to restrict new building heights in the ward to 21 metres/six storeys. It is assumed that any building of this height would only be around suitable sites (such as Northfields station). In predominantly residential areas building heights should not exceed three/four storeys.

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Although outside the EFRA area, we are concerned that prospectively any redevelopment of the **Wickes store in South Ealing** could include a building of 73.5 metres/ 21 storeys given the Council’s proposal re. the height limits for buildings in the wider ‘Ealing Broadway’ area (E14 in the draft LP). This would be completely unacceptable in an area where properties are low rise and no more than four/five storeys in height.

With reference to building heights in Ealing Broadway, EFRA is disappointed to see buildings in excess of 21 storeys currently going through the planning process. The principal sites affected are the Perceval House site used as the present civic centre (owned by LBE) and the building proposed for the site opposite the Ealing Broadway Centre (EBC) owned by British Land. The recent redevelopment sites in Ealing Broadway – at Dickens Yard and Filmworks – have been well designed and have generally enhanced our town centre. The proposals for Perceval House and the site opposite the EBC will detrimentally affect the visual amenity along the Broadway and destroy the late Victorian/Edwardian character (or what remains of it) of the town centre.

### 3) Proposed Conservation Area for Northfields

In 2022, EFRA became aware of a proposal initiated by a few residents to designate some of Northfield Ward as a Conservation Area (CA). Much of the neighbourhood proposed as a CA contains roads that are within the EFRA area. This issue is not covered in the LP although we believe it should not have been ignored. It is for this reason that we want to put on record our views on the proposed CA for Northfields in response to the draft LP.

EFRA has serious reservations about the local area coming under a CA. Residents will find it harder and more expensive to make alterations to their homes (such as erecting loft extensions) and the opportunity for infill development will be significantly curtailed. Such developments make a small but important contribution to meeting housing need in our part of Northfields. Our area has already seen a lot of changes to the built environment since it was developed in the Edwardian era. Attempting to designate a CA for Northfields 120 years after it was developed would, we believe, achieve very little.

If designation does go ahead, we believe that only buildings along Northfield Avenue should be subject to such restricted covenants. Residential streets should be excluded from such a designation.

## **b) General comments**

### 1) Consultation process

We understand that the regulations for composing a Local Plan require that councils give local residents and businesses the chance to input into the scope of any LP. The Council did carry out a survey that attempted to ascertain the key concerns of those living and working in Ealing about matters that most affected them. This survey – with apparently 10,000 respondents - was carried out in 2021/22. However, it is unclear how the results of that survey have fed into the current plan.

The consultation is complex making it very difficult to understand its overall purpose. There is a significant evidence base, much of it made up of lengthy reports by commissioned consultants published less than a month before the launch of the consultation. It is difficult to think these have been brought together into a well-considered plan.

### 2) Housing

The Council’s planning and regeneration policies have resulted in significant growth in house building in the borough over the last 10/15 years. However, there has been no clear review or evaluation of this house building programme and there is little in the LP explaining what new housebuilding will achieve going forward. The only new homes target seems to be set out in Policy SP4.3 on affordable housing linked to the London Plan’s target of 21,570 new units for the Borough. This seems to conflict with the evidence base’s housing supply topic paper, which suggests the Council intends a greater rate of house building. A properly justified housing target must be provided.

## **Ealing Local Plan Consultation – EFRA’s Response – p.3**

EFRA would like to see more affordable housing provided for rent and shared ownership to enable young people to stay in the area where they have been brought up. Working with the Mayor of London and others, the Council should restrict the number of new homes developed/bought by speculators and rented out at prices unaffordable to local people.

The LP is silent about the resourcing of the new housing projected over the life of the plan (15 years) and the precise location of the new homes. Sites being (loosely) considered for the new housing present several problems (see below).

### 3) Infrastructure

The London Plan requires borough development plans to assess the capacity of existing and planned physical, environmental, and social infrastructure to support population growth. In the last plan period, growth in Ealing was amongst the fastest in London, and it seems set to grow further. But essential new infrastructure has not kept pace, and LBE’s consultants found ‘big gaps’ in a wide range of physical and social infrastructure categories. This includes well reported problems with the capacity of the electricity grid in West London. In terms of social infrastructure, there are already concerns about the capacity of the NHS to meet residents’ existing health needs. Any new housebuilding must be accompanied by sufficient investment in the capacity of the NHS as well as other elements of the social infrastructure (e.g. education, care, etc.). The LP does not address these major constraints on new development – and needs to.

### 4) Climate change

While noting the urgency of climate change, the consultation plan is thin on how LBE will use its planning policies to address this issue. Policies should prioritise refurbishment and reuse of existing buildings over redeveloping them and favouring more energy efficient buildings. The Council should not consider the sites at Ealing Broadway Centre and West Ealing Sainsbury’s sites (for instance) as potential development sites as they were only built in the 1980s and the carbon dioxide released through demolition and rebuild would run counter to any notion that the Council is trying to be a leader in fighting climate change.

The Plan is silent on how the Council would encourage households to make their homes more energy efficient. There is also no reference to changes needed to move away from the use of traditional means of heating homes/other buildings. The final LP needs to address these issues.

### 5) The Natural Environment

Both the National Policy Planning Framework (NPPF) and the London Plan require development plans to identify, protect and enhance valued landscapes, sites of biodiversity or geological value. The LP does not apparently cover this important issue. De-designation of the remaining Green Belt in the Borough is proposed and further loss of protected Metropolitan Open Land (MOL) space with their many important ecological assets is envisaged. Such policies may be appropriate in some cases but must be subject to meaningful consultation with local people.

### 6) Green and Open Space Policies

The London Plan requires Local Plans to include appropriate designations and policies for the protection of open space to meet needs and address deficiencies. By de-designating large areas of MOL, the LP challenges this position. Policies should promote the creation of new areas of publicly-accessible open space particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change. LBE’s Plan does not do this and there are no policies to protect existing areas of green space.

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### 7) Place design, form, character

The NPPF requires plans to be developed with local communities to reflect local aspirations. Neighbourhood planning groups (like EFRA) can play an important role here. The draft LP being consulted on has not done this, and existing Neighbourhood Plans appear to have been overlooked entirely.

### 8) Heritage

The NPPF and the London Plan both require development plans to understand heritage assets and contain strategies to protect and promote them. The draft LP appears to omit these requirements.

### 9) Tall Buildings

The draft LP needs more clarity about the Council’s policy on permitting the construction of tall buildings. EFRA welcomes the apparent limits on the height of new buildings in Northfield and elsewhere in the borough. However, the criteria used to define what constitutes a tall building and the implications of their designation are unclear and unjustified. The Council also needs to ensure its policies on tall buildings meet the relevant London Plan’s requirements.

### 10) Town Centres

Strategies for managing the Borough’s town centres are unacceptably vague and no specific policies are proposed to deliver them. Ealing’s planners have only partially used the present plan to encourage strong, resilient, accessible and inclusive hubs as the London Plan requires. It is difficult to see how the LP will change this.

### 11) Master planning and Area Action plans

The draft LP identifies many major sites for redevelopment over the plan period while intensive change is envisaged across several sites that will alter the character of whole neighbourhoods. Greater transparency is required in the planning of such projects through the publication of area action plans, masterplans, and site briefs on which the public can be consulted.

### 12) Plan monitoring and reporting

LBE has failed to monitor and evaluate the performance of the current plan, and the draft LP suggests they do not see this changing. Section 35 of the Planning and Compulsory Purchase Act 2004 requires local authorities to report on their plans at least annually. The new plan must contain cast iron commitments that they do so in future.

**In summary**, EFRA questions, amongst other things, how the Council will reflect the concerns of the local community on all issues of the draft LP, e.g. the effect of the height and density of buildings as proposed in the discrete areas of the Borough, the proportion of affordable housing proposed, the potential loss of Green Belt land and MOL to development, whether the infrastructure of the Borough has the capacity to deal with the potential development plans, precise details as to how the Council’s laudable aims (Tackling the climate crisis; Fighting inequality; Creating good jobs and growth) will be implemented and achieved. EFRA expects LBE to give a commitment to report on their plans at least annually, and to involve Borough residents.