



Mill Hill Park
Residents'
Association
Acton

London Borough of Ealing Local Plan Consultation

Mill Hill Park Residents' Association Response

The Mill Park Residents' Association is confining its comments on the Draft Local Plan to issues affecting the Borough of Ealing as a whole, such as green and open space policies, and those relating to Acton and specifically to Acton Town Centre and South Acton, where Mill Hill Park is situated.

1. Conservation Areas

In 2021 The MHPRA worked with the planning consultant employed by Ealing Council to conduct the strategic review of the Borough's Conservation Areas. We highlighted those sections of the existing Mill Hill Park CA Management Plan and Appraisal which needed to be changed or updated. We took part in the 2022 consultation on the Draft Generic Management Plan for Conservation Areas. We are concerned that there is no mention in the Draft Local Plan of this recent strategic review, nor of the Generic Management Plan and its role in future planning policy relating to Conservation Areas.

2. De-designation of Green Belt Areas

Chapter 3 of the Draft Local Plan 3.26 (pages 56-57) concludes that that none of Ealing's seven Green Belt areas meets the criteria for this designation with some areas reverting to Metropolitan Open Land designation. However, it does not provide any information on the criteria they do not meet. Policy G2 of the 2021 London Plan advocates, subject to national planning policy tests, supporting the enhancement of the Green Belt to provide functional beneficial uses for Londoners. It also states that exceptional circumstances are required to justify either the extension or the de-designation of the Green Belt through the preparation or review of a Local Plan. Ealing's Draft Local Plan does not provide details of any exceptional circumstance for the proposed de-designation of its Green Belt areas. Accordingly, the whole issue of Green Belt area de-designation should be re-visited. If it is decided that some actions should, after all, still be taken, none should proceed in the absence of evidence of 'exceptional circumstances' having been placed in the public sphere.

3. Metropolitan Open Land (MOL)

In Chapter 1 (Page 36 2.17) Strategic Greenspace, the Draft Local Plan states that the Green Belt and MOL sites are mostly concentrated in the central and western parts of the Borough with more limited provision in the east of the Borough, which has a more urban character and fewer green spaces. Despite this acknowledgement of less green space in the east of the Borough (Acton), there is a proposal to de-designate one MOL site in Acton. Map 2 in Appendix 3 Atlas of Change (page 521) shows changes to Metropolitan Open Land designations. Where changes to the boundaries of MOLs are proposed, the MOLs are identified by their name and location on a list. However, no such details are provided for the MOLs which are to be de-designated and no reasons are given for the proposed change of status. One such example is MOL 23 (Acton Park?) in East Acton. The descriptions of these MOLs, what they comprise of, and the lack of reasons for the proposed de-designation should have been included in the Draft Local Plan, along with information on whether they are to be given other designations. Once again, the absence of essential data in the public sphere ought to preclude proceeding with any of these MOL de-designations.

4. London Plan Policy G5: Urban Greening

Chapter 5 of the Draft Local Plan (Development Management Policies) describes the Council's plans to meet and exceed the targets set out in the London Plan and provides a list of these which include creating 10 new parks and open spaces, and giving back to nature areas for rewilding, for example, but it provides no information on where these new parks and open spaces are to be situated.

5. Acton

Population growth: On page 33 (2.10) of the Draft Local Plan, reference is made to growth in the past decade having been concentrated in Acton and Southall. When all the proposed developments in Acton which have received planning permission have been completed, there will be considerably more growth in the local population. However, the Draft Local Plan does not adequately address the issue of the social infrastructure needed to support this growth. For example, in the Acton Town Plan (Chapter 4 page 85), it states that Acton's health and infrastructure will be enhanced by addressing GP capacity as a result of population growth in Acton. It does not explain how this will be achieved when there is a shortage of GPs. The issue of how much more development (and population growth) Acton can absorb without it having an adverse impact on its existing residents needs to be taken into account. Additionally, there are issues relating to the pressure that increased demand will put on the electricity grid and drainage system in West London. These have not been addressed.

Heritage: In Chapter 2 (page 44 2.52), reference is made to new development and that it should respect the character and the heritage of the borough's valued places. In the Acton Town Plan (page 91), reference is made to Acton Town Centre's inclusion on the 'heritage at risk register'. The Acton Town Plan (Page 85) states that it recognises the role of heritage in placemaking and conserving and enhancing the historic centre at Acton Town Centre through active measures including the creation of a Heritage Action Zone. Despite this, the

Acton Town Plan includes two development sites in the town centre which are listed as potentially appropriate for tall buildings. One (AC01) is the Morrisons supermarket site which adjoins The Mount, facing older buildings and the Grade II listed St Mary's Church. We would object to a tall building on the part of the site adjoining The Mount. The other (AC08), is the Salisbury Street Car Park & Neville Close site located within the Acton Town Centre Conservation Area and close to the locally listed Old Acton Town Hall, the old Acton Library, the old Acton Magistrates' Court on Winchester Street (converted into flats) and other low-level buildings. Another issue relates to the loss of greenery should the Salisbury Street Car Park site be developed as there are 12 fairly mature trees planted throughout it. Both sites would potentially be considered as appropriate for buildings of up to 15 storeys. Tall buildings on these sites would adversely affect Acton's historic centre. The inclusion of these sites as potentially appropriate for tall buildings is inconsistent with the cited aims to conserve the historic centre of Acton. In our view, it throws into doubt the extent to which such high-minded assertions mean anything, or will actually shape what does and does not get built

Policy A2 Acton Town Centre Neighbourhood Centre (page 89): We support the approaches outlined here, subject to the points made above about the two proposed development sites (AC01 and AC08). We agree that steps need to be taken to address the high vacancy rates in retail units and to improve the desirability of retail frontages and footfall along the High Street and Churchfield Road. We also support the strategies outlined on page 91: 4.1.33 and in particular items (i) – (vii) which include better integration of incidental greenery into the street scape and improving The Mount public square with greenery, lighting and seating.

Acton Spatial Strategy 4.1.27 refers to 'public realm enhancements coupled with the expansion and improvement of green walking and cycling routes'. Specific routes to be promoted include one from Acton Town Station to Acton town centre, running along Gunnersbury Lane and Mill Hill Road (part of the MHP Conservation Area). The route is designated as a 'minor green link' (Figure A2 page 83) but there is no explanation of what a minor green link entails and what alterations, if any, will be made to the roads included in the route which may have an impact on the residents of these roads. Mill Hill Road, for example, has insufficient space to accommodate a segregated cycle lane, if one were planned as part of a 'minor green link'.

Policy A. K(ii) (page 85) states that Acton's health and infrastructure will be enhanced by improving living conditions alongside Gunnersbury Lane (amongst other roads/areas) but gives no details as to how this will be achieved.

Development Sites

Acton Town Station Approach

Some of the information provided is out of date:

AC05: The 83-85 Gunnersbury Lane site is described as also featuring takeaway food provision. The takeaway food business closed several years ago and the small single-storey wooden building it occupied is vacant.

AD06: The map provided is out of date. The London Transport Museum appears as a factory on the map, although the information in the text relating to this development site is correct.

Ealing Development EA34

Although not in Acton, we are concerned that the Old Actonians Sports Ground in Pope's Lane in Ealing, close to the border with South Acton, has been designated as a development site. A large development on the site would obviously result in a loss of green space.

6. Tall Building Strategy (Chapter 5 Table DMP2)

It is significant that Acton is the only part of the Borough with two areas where a definition of a tall building is one with more than 14 storeys. In all the other parts of the Borough, buildings defined as tall are those above only six or seven storeys with the exception of one area in Ealing (21 storeys) and one in Hanwell (9 storeys). Given the intensive development of the Ark Soane Academy site, of Acton Gardens, of other developments built or already approved along Bollo Lane, not to mention the two bitterly opposed tall building proposals in Crown Street (the Caspian Centre – decision still pending) and the massive re-development of the Women's Pioneer Housing buildings in Gunnersbury Lane (decision pending), we think Acton has already had more than its fair share of tall buildings