



**Save
Ealing's
Centre**

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Chair
Save Ealing's Centre

By email

To

Steve Barton,
Strategic planning team,
Perceval House,
14-16 Uxbridge Road,
London, W5 2HL

14 March 2023

Dear Steve

**LBE New Local Plan
Regulation 18 Consultation.**

Response of Save Ealing's Centre (SEC)

Below is SEC's response to the Local Plan Consultation. We look forward to further discussions with you and your colleagues in this regard.

1. Introduction

- 1.1. Save Ealing's Centre is a non-political alliance of 25 residents' associations and community groups which formed in 2007 to provide a more organised voice for Ealing people to respond to development proposals within Ealing Town Centre. SEC seeks to be a channel through which the Council can feed development proposals in the town centre to local groups and through which those groups can express their views back to the Council.
- 1.2. This is SEC's response to LBE's consultation on its new local plan. SEC has found the huge documentation very difficult to cope with and to understand exactly what is being proposed. We note the very large supporting evidence base much of it written by consultants in reports apparently submitted only shortly before the date the consultation on the draft plan commenced. These reports say things that appear to conflict with the provisions in the plan and it is very hard to reconcile their findings with the policies in the plan. This is especially the case with the policies on tall buildings.

- 1.3. SEC also notes that this is a consultation under Regulation 18 of the Town and Country Planning Regulations. Regulation 18(1b) requires a local planning authority to notify persons including residents 'to make representations to the local planning authority about what a local plan ... ought to contain'. This clearly refers to the scope of the plan. But with the subject to this consultation a fully drafted local plan this important first step seems to have been overlooked. None of the consultation documents that we have seen asks the public what it ought to contain so we are concerned firstly that this may have misled members of the public who are not acquainted with Regulation 18 and secondly how the Council will respond to our comments. We trust however the Planning Authority will consider our comments as they take account of all the representations to them as they are required to do under Regulation 18(3).
- 1.4. These and other anomalies have made it very difficult for us to comment with much confidence on just what matters we are being consulted about. We hope this will be borne in mind first by the Council when it considers our representations under Regulation 18(3) and then by the appointed Inspector as (s)he is required to do under Regulation 23.

2. A lack of vision

- 2.1. Insofar as Ealing town centre, the Borough's most important centre, is concerned the most fundamental matter missing from the draft plan is a clear vision for the town centre's future or any strategies for how it will arrive there in the face of the transformative changes Ealing is now subject to. The NPPF requires planning authorities to produce '*succinct and up-to-date plans (that) provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.*' The Plan under consultation does not do this for Ealing.
- 2.2. Ealing town centre has changed greatly in the past 10 years. Many SEC supporters believe these changes have not been kind to it. Unfortunately, neither the Plan nor the evidence base that underpins it has documented what has happened. Statutorily required monitoring reports have not reviewed the implementation of the last plan's strategy or discussed how it could be modified. This omission has continued into the preparation of the present plan.
- 2.3. Over the past 10 years our town centre has come to resemble a major building site with development schemes such as Dickens Yard, Ealing Filmworks and Ealing Broadway Station disrupting pedestrian and vehicle traffic, generating constant noise and poor air quality. While key stores, our major cinema and key community facilities have closed the developments replacing them have produced a surplus of empty shop units with many others apparently in the pipeline. Historic England lists two of the town centre's Conservation Areas as under threat. Unsympathetic new developments have eroded the character of a centre that once rejoiced in the title of 'the Queen of the Suburbs'.
- 2.4. It is not just the urban quality of the town centre that has declined. The draft plan notes that it is stagnating in other ways 'Over recent years the local population growth has stagnated and there has been a decline in higher paying jobs'. Ealing's role as a retail centre, which once attracted shoppers from the wider west London region has grown markedly diminished. These days Ealing struggles even to attract shoppers from its immediate hinterland. By many measures, then, Ealing town centre has lost its way and it needs to repurpose itself.

- 2.5. And yet, the Plan suggests that growth, requiring further comprehensive redevelopment of major sites is set to intensify. It says 'Building on its excellent connectivity, Ealing Metropolitan Town Centre will be the location for significant, high density residential and employment growth.' For all the draft plan's worthy aspirations, there are few tangible clues as to what state Ealing will be left in by the end of the plan period. There is simply no vision for the future.
- 2.6. In the face of the changes that now confront it, SEC believes the new plan must follow Policy SD9B of the London Plan which calls on Boroughs to develop a strategy for town centres like Ealing that are undergoing transformative change such as declining demand or significant planned infrastructure.
- 2.7. The London Plan explains at Para 2.9.2:

'Town Centre Strategies should be tailored to each town centre. A clear vision should be developed with the local community, taking account of the town centre's strategic role, opportunities for growth, potential to support regeneration, spatial characteristics, economic challenges, and location in inner or outer London. Strategies should also consider the role of the night-time economy, as well as the cultural, heritage and tourism characteristics of the area. Town Centre Strategies should cover a broad remit, co-ordinating a tailored approach to planning, environmental health, licensing, Healthy Streets, transport strategy, highways management, logistics and servicing, regeneration, air quality, investment and projects. They should be developed with input from relevant stakeholders, including TfL, commercial landlords and investors, Business Improvement Districts and business associations, social infrastructure providers, Historic England, and community and amenity groups.' (our emphasis)

- 2.8. Over the past 20 years several initiatives have tried to develop a strategy for Ealing's future. They include the Ealing Town Centre Partnership in 2000, the Tibbalds Study commissioned by LBE in 2008 and updated in 2010, SEC's Vision for Ealing 2012, and the Ealing Town Centre Neighbourhood Plan adopted by the Council in 2017. Unfortunately, none of these have been taken up to manage Ealing's growth and the new plan for Ealing should correct this. SEC had been anticipating that the Allies and Morrison's Borough-wide Character Studies published as part of the Evidence Base was commissioned for this purpose. A&M contribute some valuable insights that SEC wished to comment on but was given no opportunity to. There has never been any public discussion of their findings or how they should fit into the draft plan.

3. Preferred approaches to managing Ealing Town Centre.

- 3.1. Absence of a clear vision in the consultation Plan or strategies for delivering it has led instead to a set of rather unconnected lower level policies on which we are being consulted. If allowed to stand these will lead to a grossly disjointed centre that will not tap into the very significant economic opportunities its location and history create for it and one that will not well serve the communities who use and depend on it.
- 3.2. We focus on some of the most important, although this is by no means a complete list.
- 3.3. **Ealing and West Ealing are separate centres.** The consultation plan cleaves to the outdated notion that Central Ealing and West Ealing Town Centres comprise a single centre. SEC have long queried this as the two centres are a long way apart, separated by non-retail uses and

serve quite different functions and different populations. We say that each centre requires its own growth strategies, as indeed is reflected for the separate Neighbourhood Plans covering the two. Allies and Morrison's character study supports this view stating the need to 'Re-inforce distinctiveness of West Ealing'.

SEC is especially concerned about the approach being given to West Ealing which is a busy centre that serves a large local community. There are many independent units here let at relatively low rents which are all that small business can afford. The site allocations suggest it is the Plan's intention almost totally to demolish West Ealing's retail centre and replacing them with new units charging much higher rents which will remain empty as is now the case in Ealing Town Centre. The great danger then is that key businesses will close and the West Ealing community will be deprived of them as they do now.

- 3.4. Understanding Ealing's strengths and opportunities and developing strategies to exploit them.** Our Local Plan needs to start by describing what Ealing has to offer. In SEC's mind, strengths include its accessibility to London the rest of Britain and the world through Heathrow airport, its built environment and history, its heritage, cultural importance especially its theatre, music, film and festivals, the University, its highly skilled local population and the rich diversity of its communities. These create advantages to use to enhance the local economy, and create jobs and business opportunities. One view is that these strengths are opportunities for Ealing to become a destination for the West London region and make it the place for visitors to London and the South of England to locate themselves. To make this happen would require the Plan to identify the best characteristics of Ealing so they can be protected and enhanced through positive planning policies. Lacking a vision this plan cannot do that.
- 3.5. Character Appraisal.** A striking omission of the draft plan then, is a character appraisal of the town centre. What are the qualities that are good about it and what are its deficiencies? Early research undertaken by Allies and Morrison offered a useful starting point, but this needs to be discussed with stakeholders and refined, with key threads brought into the plan.
- 3.6. Heritage Appraisal.** Particular attention needs to be given to Ealing's historic role and character which Allies and Morrison should recognise (p24 of its Character study) as an 'historic centre' and not a 'high road centre'. The Town Centre is the site of several of the Borough's most iconic buildings (Pitzhanger Manor, Church of Christ the Saviour, Ealing Town Hall the Victoria Hall) and open spaces (Haven Green, Walpole Park and Ealing Green) and these could be the basis for a strategy of heritage led regeneration. Both the NPPF (para 190) and the London Plan (Policy HC1) require development plans to demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge they say should be used to inform the effective integration of London's heritage in regenerative change. The draft local plan is notably silent on its understanding of Ealing's heritage, both its contribution to existing amenity and its potential for enhancing its future growth. No policies are proposed relating to it. SEC believes they should be.
- 3.7. Tall Buildings.** The draft plan identifies Ealing Town Centre as a location where tall buildings would be deemed to be buildings higher than 21 storeys. It claims this is based upon 'rigorous assessment of local character and prevailing heights'. As we read this proposed policy no building of just 20 storeys could therefore be called tall SEC considers this notion completely

unfounded. Buildings above 4 to 6 storeys remain the exception in Ealing. There is only one of 21 storeys (the Apex building at 32-38 Uxbridge Road) and none are higher. We consider anyway that a 21 storey threshold height, is manifestly excessive in terms of the policy objectives of London Plan D9 and the recent statements of the Secretaries of State.

Furthermore, the draft policy disregards the findings of Allies and Morrison's Characterisation Studies, Volume 2 of which proposes that the 'Scale of intensification' for Ealing Town Centre comes under the category of 'Repair'. This view seems to arise from A&M's more detailed findings that:

- 'As the historic core of the borough, Ealing has magnificent buildings including Grade I Pitzhanger Manor at Walpole Park. ... Much of the area is covered by conservation areas, though **Ealing town centre CA is considered heritage at risk**'.
- There is an 'Opportunity to **sensitively increase density in Ealing town centre to take advantage of Crossrail, while being mindful of its heritage at risk status**'.
- There is a 'potential to intensify along the Uxbridge Road in general, **with mansion block/flatted development**'.
- Under its 'character based growth themes' there are 'opportunities for **mid-rise intensification**', **around Ealing Town's 9 stations** to make 'use of good access to transport links and the services found here'.

(our emphases)

Besides, the wording of Policy D9 Local Variation F which states that 'Tall buildings above this threshold should be located upon allocated development sites defined in the development plan' suggests that even buildings above 21 storeys could high be acceptable almost anywhere in the Town Centre since the site allocations for most of them say they 'fall within an area potentially appropriate for tall buildings'.

3.8. **Highways, transport, and permeability.** There have been many attempts to pull together a coherent plan for the town centre to cover these complex and interconnected topics, the latest of which was the 2019 study by Allies and Morrison which is inexplicably missing from the evidence base. Sadly, none have come to fruition and instead longstanding problems remain unaddressed with nothing more than piecemeal meddling that more often than not makes everything worse. The new local plan for Ealing needs to grasp the nettle by pulling together earlier initiatives into a strategy in which all stakeholder views are respected.

3.9. **The Tall Buildings Strategy Appendix Guidance for Study Sites** document in the Evidence Base appears to try to pick up some but not all of the threads above for some but not all of the sites and it is in turn referenced by some but not all of the individual site allocations. The Study identifies several 'Clusters' of development that are not referenced in the main plan document. It is very unclear what status this study has and how, if at all, it fits into the current consultation exercise. It is also unclear why it appears as an appendix to the Tall Buildings study since it covers matters far beyond. The introduction to this appendix says in effect that it an embryonic attempt to develop a masterplan approach to some of the major sites in the town centre. If that is the idea, rather than bury it in an Appendix to the tall building study, it needs to be brought to the forefront of this consultation so that people can understand what it is saying and respond to it.

4. Site Allocations

- 4.1. SEC notes that despite being the focus of intensive comprehensive redevelopment over the past 10 years, the new plan appears to believe the rate of redevelopment will accelerate in the next 10 years. 25 sites across the town centre are listed for redevelopment. Chapter 4 (Figure 2) of the draft plan considers all of them development would be at a 'significant development intensity', and almost all 'potentially appropriate for tall buildings'.
- 4.2. The proposals for many of the individual sites in Chapter 4 of the Draft Plan raise particular questions. We raise some of them here briefly, noting that many of these sites are of such significant size an potential impact on the town centre that their major parameters for redevelopment should not be established through a plan consultation exercise that seems so ill thought through as this one. The proper practice for the larger sites should be through the preparation of Area Action Plans, Master Plans or Site Briefs as Supplementary Planning Documents on which the public would be consulted about before adoption by the Council. Until just a few years ago this was the practice eg for the Ealing Filmworks site.
- 4.3. **EA01 Broadway Connection.** This is subject of a planning application which SEC has objected to on grounds primarily to do with excessive height and bulk and impact on designated heritage assets. It should be noted that two previous applications to redevelop this site were called in by the Secretary of State after being granted consent by LBE. In overturning the first of these the Secretary of State agreed with the Inspector that that the bulk, massing and certain aspects of the design of the scheme would be inappropriate in its surroundings. It would fail to preserve or enhance the character and appearance of the Town Centre conservation area and the setting of the Haven Green conservation area, as well as harming the setting of the Grade II* listed Church of Christ the Saviour.' The second inquiry which was called off at the last minute was to consider proposals for an 18 storey tower. Historic England heavily criticised the design which it said 'Council have failed to give the significance of the historic environment its due weight, as required by law and policy. This is leading to substantial harm being caused to a designated heritage asset without any clear and convincing justification. The Council has ignored its own policies which are designed to protect and conserve the historic environment in its area and has failed to follow the clearly set out heritage-led approach to regeneration' Instead HE pt forward a less harmful scheme that would reduce the tower to 14 storeys.

British Land who are the applicants for the current scheme justify the height and bulk of their proposals on the grounds that they need to provide sufficient commercial floorspace to suit the needs of a major client. However, BL also own the EAL2 site that we discuss below. If this site is also coming into play we see no reason why a significant part of the commercial floorspace BL says it requires could not be located there.

- 4.4. **EA02 Ealing Broadway Shopping Centre and Crystal House.** The idea of redeveloping this major town centre asset less than 40 years after its opening by the Queen should not be contemplated. This is a locally cherished, award winning shopping centre which was once locally listed. Moreover, it is widely recognised that building materials like steel and concrete are major generators of CO2 and that the battle against climate change mean that we should be thinking in terms of refurbishing and reusing solid buildings like the Broadway centre and not wastefully redevelop them. In this connection we would refer to the arguments at the called in plans to redevelop the Marks and Spencer Oxford Street store where this was a major point of discussion. We note that possible height and massing of a new development is contained in the Appendix of the Tall Buildings Study as Cluster A. If it were to proceed it would have a

transformative effect on the Town Centre. As we say in Para 3,9 above, this study should not be hidden deep in an appendix. It must be brought to the open and the public given a fair opportunity to comment on it.

- 4.5. **EA03 Sandringham Mews** This is a sensitive site at the heart of the town centre SEC notes that there is a pending planning application on part of it to construct buildings from 3-8 storeys which SEC members have already commented on and raised some area of concern that SEC as a whole supports. Inclusion of the wider site into Cluster A creates additional issues that need to be examined in connection with the rest of that Cluster. As we say above, this should be part of a properly prepared SPD.
- 4.6. **EA04 Ealing Broadway Station** We are unclear what is being proposed in the plan for Ealing Broadway Station which has only recently been refurbished as part of Crossrail. Adjacent 'at risk CAs' make it a sensitive location and one that is entirely unsuited to an 'indicative' height of 21 storeys. The station building itself plays a key role as a major transport interchange used by thousands of people on a daily basis. If its major redevelopment is envisaged there needs to be a wide public consultation involving other nearby sites at EA05 and EA06 followed by the adoption by the Council of an Area Action Plan.
- 4.7. **EA05 Central Chambers.** See comments above for EA04. Its location adjacent to two at risk CAs means in our view that the site is not suitable for a tall building.
- 4.8. **EA06 Haven Green Car Park** SEC has previously raised the need in central Ealing for a bus terminal to get buses off Haven Green and we have repeatedly proposed this site, which the UDP once designated for this purpose would be a suitable location for it and the site allocation should say so. If, for whatever reason it cannot be used in this way consider that building on it must pay close heed in its design to Haven Green which is a very sensitive CA in the town centre but one that HE has listed as being under threat
- 4.9. **EA07 Carmelita House** Carmelita House is another relatively recent building dating only from the 1970s. The first option for buildings of this period should their refurbishment rather than climate damaging redevelopment. Recent high density planning consents for development between the Mall and the Railway are already generating congestion and overcrowding that is seriously detrimental to local amenity. Redevelopment of this site needs to be carefully designed to avoid exacerbating this problem. It is likely to require a building of a considerably lower density than one with a height implied in the 'indicative range' of 9-21 storeys as is indicated in Policy CENP1 of the Neighbourhood Plan.
- 4.10. **EA08 Eastern Gateway** Consent to redevelop this site with a 6 storey building was granted in 2021 and we note that the pre-commencement conditions have now been discharged. We are therefore unclear why this site should be included in the Plan but would object to a further height extension as suggested in this draft plan.
- 4.11. **EA09 Ealing Studios, Royal Mail Delivery Office and Telephone Exchange** SEC is unclear what is proposed for this site. Planning consent has recently been granted to improve the Ealing Studios site which SEC warmly supported. There is no information as to what is envisaged for the Royal Mail Delivery Office and Telephone Exchange but these buildings occupy sensitive locations and any plans to develop them need to be widely consulted on.
- 4.12. **EA10 Perceval House** Consent to redevelop Perceval House including its 26 storey residential tower was granted in 2021 in the face of very strong local opposition and HE's objections to its

impact on designated heritage assets. SEC does not believe that a tower of this height establishes an acceptable benchmark for development for the site, and should for any reason whatsoever the consented project not proceed new proposals must be more in accordance with HE advice and the design principles of the NPPF, and the London and Local Plans.

- 4.13. **EA11 49-69 Uxbridge Road.** This is another property that should be refurbished rather than redeveloped for climate change reasons. We note there is little guidance offered for the development of this site except that indicative heights would be between 9-21 storeys. SEC would strongly object to development on this scale for similar reasons to those below for CP House. We have some concerns about the proposal to improve permeability to Mattock Lane as we think care has to be given to possible impacts on the Ealing Green CA and Walpole Park. WE think this needs fuller discussion.
- 4.14. **EA12 CP House** Consent to redevelop this site for a 12 storey office development was recently approved in the face of SEC objections that the height and bulk would impact detrimentally on the Ealing Green CA and Walpole Park. The site proposals in the draft plan now say that up to 21 storeys would be acceptable here. This would be completely unacceptable.
- 4.15. **EA13 Craven House** This long vacant site has consent (164805FUL) for a 10 storey office building which SEC was concerned would create over-dominant views along Uxbridge Road since the building frontage would project forward and be much closer to Uxbridge Road than the adjacent buildings, disrespecting the established building line along the north side of Uxbridge Road. SEC believes any redesign of this scheme needs to take our concerns into account and that no scheme should be taller than the 10 storeys in the consented one.
- 4.16. **EA14 Arden Road Car park.** Planning approval was obtained in 2020 for a 9 storey residential development on this site. This was in the face of SEC objections that the height would impact detrimentally on neighbouring occupiers including residential uses. SEC cannot accept the Draft Local Plan's proposal for this site as being suitable for a 9-21 storey development.
- 4.17. **EA15 1-19 Broadway, Aviation & Pioneer Courts** The site includes two relatively recently built 4 storey residential blocks. Since the Council is working to fight climate change it is hard to see the justification for redeveloping them so soon after their construction. The draft plan offers no guidance as to what its redevelopment would be appropriate, except for a height of up to 13 storeys which SEC considers is excessive for this location.
- 4.18. **EA16 66-68 Broadway** The draft plan offers no guidance as to what redevelopment of this site would be appropriate, except for a height of up to 13 storeys. This is excessive for this location.
- 4.19. **EA17 Lidl** Lidl Supermarket is a popular store serving the West Ealing community. The draft plan offers no guidance as to what its redevelopment would be appropriate beyond the suggestion that it is appropriate for a tall building. The 'Guidance for study sites' is no more informative, suggesting only a maximum height of 8 storeys, although the wording of the Tall Buildings policy could be used to argue for a greater height.
- 4.20. **EA18 Sainsbury & Library.** This major site with its multiple uses plays an important role in the lives of the West Ealing Community. It would involve redevelopment of relatively recently built buildings which the planning authority ought to be discouraging in its fight against climate change. We note that this is one of the sites examined as Cluster B in the 'Guidance for Study Sites' which envisages building heights of up to 13 storeys. We note that Cluster B also considers topics including 'movement' form of development' public realm' and 'relationship to

surroundings' that are not discussed in the consultation document SEC does not think this is sufficient guidance for the future of this site in the Local Plan. If redevelopment is to be countenanced it should only be after a proper scoping out exercise in which the local community should be consulted, followed by the adoption of a site brief as a SPD.

- 4.21. **EA19 Chignell Place** The draft plan offers no guidance as to what redevelopment of this site would be appropriate, except for a height of up to 13 storeys. This is excessive for this location. With sensitive receptors adjacent and nearby, and as a WENP designated site a site brief should be prepared for this site in which the public needs to be involved.
- 4.22. **EA20 99-115 Broadway** Although included in Cluster B of the Guidance for Study Sites' the draft plan itself offers no helpful guidance as to what redevelopment of this site would be appropriate for, except for a height of up to 13 storeys. This is excessive for this location. If development of this site is envisaged it should only be after a wider SPD has been prepared for West Ealing on which the public has been consulted.
- 4.23. **EA21 130-140 Broadway**. The draft plan offers no helpful guidance as to what redevelopment of this site would be appropriate, except for a height of up to 13 storeys. This is excessive for this location. If development of this site is envisaged it should only be after a wider SPD has been prepared for West Ealing on which the public has been consulted.
- 4.24. **EA22 131-141 Broadway**. This is another site addressed under Cluster B in the Guidance for Study Sites, but whose 'guidance' does not appear in the consultation plan itself. See our comments on EA18.
- 4.25. **EA23 Green Man Lane Estate**. SEC does not understand why this site is included since it appears to be part of the Green Man Lane Estate now under development.
- 4.26. **EA24 Waitrose**. The current store has only existed for 18 years, and the one it replaced was only 14 years old. We have very major concerns about the sustainability of Waitrose's slash and burn business model and its impact on climate change. It really should stop. If development were to go ahead a maximum height should be restricted to around 10 storeys. Development should include a replacement for Jacobs Ladder footbridge across the railway.
- 4.27. **EA25 West Ealing Station Approach**. Development of this site should accord with the 2013 site brief which required compliance with the height scale and massing of the surrounding area on Hastings and Drayton Green. Development along Hastings Road must be low and not overlook the adjacent two storey terraced residential properties.

5. **Plan Monitoring**

- 5.1. SEC has long been concerned about the inadequate arrangement for monitoring our Local Plan and we are not confident the proposals in Appendix 1 of the draft Plan address our concerns.
- 5.2. The Glossary of terms in the draft plan states 'Authorities Monitoring Report: 'Previously known as the Annual Monitoring Report, it is no longer required to be updated annually.' This statement is at odds with the Planning and Compulsory Purchase Act 2004 section 35, which states that:

Authorities monitoring reports

- (2) *Every local planning authority must prepare reports containing such information as is prescribed as to –*
- (a) *the implementation of the local development scheme;*
 - (b) *the extent to which policies set out in the local development documents are being achieved*
- (3) *A report ... must –*
- (a) *be in respect of a period –*
 - (i) *which the authority considers appropriate in the interests of transparency,*
 - (ii) *which begins with end of the period covered by the authority's most recent report under subsection (2) and*
 - (iii) *which is not longer than 12 months or such shorter period as is prescribed*

5.3. The need to monitor and report changes in Ealing Town Centre is particularly important. Policy 2.9.3 of the London Plan requires boroughs to undertake town centre health checks regularly. These should be tailored to local circumstances. Town centre health checks should take information from a variety of sources, including desk-based research as well as on-the-ground surveys, to establish the overall health of the town centre. This should include an analysis of the performance of commercial premises in the town centre as well as wider issues such as environmental quality and accessibility.

5.4. SEC does not think that the indicators in Appendix 1 are sufficient to monitor change with regards the Town Centre. They need to be strengthened and a greatly improved method of reporting provided. To this end, PAS provide a useful [good practice guide](#) to help local authorities prepare their AMRs and we recommend it to LBE. They stress the way that 'good monitoring and reporting showcases the work of the authority and its partners. It tells communities what planning is doing and who it is working with. It is central to the council's overall consideration of how it is performing and where to focus efforts in the future'. These are principles that we support.

We trust that you find the foregoing of interest and that it will be a helpful input into the plan's formulation

Yours sincerely

Chair
Save Ealing's Centre