

**Publication Stage Representation Form
LB Ealing Council New Local Plan
Consultation dates: 28 February to 6pm 10 April 2024**

Please email back to: localplan@ealing.gov.uk or post to: Strategic Planning Team, Perceval House, 14-16 Uxbridge Road, London, W5 2HL

More information on the New Local Plan and consultation documents can be found here:

https://www.ealing.gov.uk/info/201164/local_plan/3125/new_local_plan

Refer to our privacy notice (also attached) for how we process your data:
https://www.ealing.gov.uk/info/201164/local_plan/3125/new_local_plan/4

This form has two parts:

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and attached all the papers together.

Part A

1. Personal Details (*Mandatory fields if you wish to be part of the next stage of the new local plan, please provide at least one contact information).

If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)

Title*:
First Name*:
Last Name*:

Job Title: Chair

Address Line 1:

Line 2:

Line 3:

Line 4:

Post Code:

Telephone Number:

E-mail Address*: ealingneighbourhood@gmail.com

Name of Organisation: Central Ealing Neighbourhood Forum

Central Ealing Neighbourhood Forum (CENF) is a Neighbourhood Forum established under the Town and Country Planning Act 1990 and has produced a Neighbourhood Plan (NP) that has legal weight in the planning process. The NP sits beneath the NPPF, London Plan and Ealing Local Plan and must be conformant with those plans. It follows that the revised Ealing Local Plan (LP) must take into account its policies and provisions and should be developed with engagement with and input from the Forum.

The following NPPF references on LP content and the process for its preparation provide the context for our responses:

NPPF Para 16 (c) states that plans should *‘be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, ...’* There has been no effective engagement with communities with regard to the proposals in the LP.

NPPF Para 29 states that *‘Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan.’* As above, the Neighbourhood Plan covers Ealing Town Centre and sets out policies for some of the sites in Chapter 4 of the LP. What these policies say is not reflected in that chapter.

NPPF Para 132 which states that *‘Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers’.* We note here the absence of reference in the LP to the content of Central Ealing’s Neighbourhood Plan.

NPPF Para 137 which states that *‘Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests.’* We note here the absence of design considerations in any of the site appraisals.

In Ealing, the new LP has been produced without formal engagement at the development stage with the Neighbourhood Forum (or other local groups). Our concerns regarding Ealing Town Centre closely follow those expressed by other local groups – SEC, Ealing Matters, CERA and Ealing Civic Society. It should be clear to the Inspectorate from the extent of these concerns that the LP proposals do not have the support of the local community’s representative groups, who have not been properly engaged with the process.

CENF thus considers that the plan produced is ***neither legally compliant nor sound***.

We are submitting responses to 6 aspects of the Plan:

- Ealing Town Centre
- Development Sites
- Tall Buildings
- Heritage
- Design and Amenity, and
- Infrastructure Planning



Part B (Please use a separate sheet for each representation).

3. To which part of the Local Plan does this representation relate?

Paragraph: Chapter 3 3.62, Chapter 4 development sites 01EA to 16EA

Policy: E2

Policies Map:

4. Do you consider the Local Plan is: (please tick)

4.(1) Legally compliant No

4.(2) Sound No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please set out your comments below.

Ealing Town Centre

The NPPF Para 90(a) requires planning authorities to ‘*support the role that town centres play at the heart of local communities*’

London Plan Policy SD9B, Town centres: Local partnerships and implementation states ‘*The development of Town Centre Strategies is encouraged, particularly for centres that are undergoing transformative change, have projected declining demand, (or) have significant infrastructure planned*’.

Paras 2.9.1 and 2.9.2 elaborate: ‘*A strategy should be developed for town centres that are experiencing significant change, such as projected declining demand, or significant planned infrastructure, ... 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)’



Ealing Town Centre is at the heart of the Central Ealing Neighbourhood area. The Neighbourhood Forum echoes the concerns raised by Ealing Matters/SEC regarding the inadequacy of the proposed LP in respect of the future of this important area. Of particular concern is that the LP perpetuates the concept of the 'Ealing Metropolitan Centre', a purely artificial construct created by the merging of Central Ealing and West Ealing in planning policy many years ago purely to create a critical mass that might attract funding. Now, as then, the two 'towns' have entirely different characters and needs. The Plan is deficient in not recognising this and treating the two as separate entities. CENF is concerned only with Central Ealing and this response will therefore not address West Ealing.

Ealing Town Centre has changed greatly in the past 10 years. While, through the opening of the Elizabeth Line, it is far better connected than it ever has been, many residents believe these changes have not been kind to it. 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 vehicular traffic, generating constant noise and poor air quality. While major stores and key community facilities have closed the developments replacing them have produced a surplus of on the one hand coffee shops and on the other empty shop units. 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'.

It is not just the urban quality of the town centre that has declined. As the LP notes, 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 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. Yet the LP 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 these worthy aspirations, there are few tangible clues as to what state Ealing will be left in by the end of the plan period.

As it stands, the Regulation 19 plan for Ealing Town Centre fails to meet the NPPF's fundamental requirement for plan-making which is 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.'* (Para 15).

With the coming into play of both the 01EA (Broadway Connection & Arcadia) site and 02EA (Ealing Broadway Centre & Crystal House) site the draft plan envisages almost total redevelopment of Ealing Town Centre's retail core. Yet it includes no vision for the centre's future or any strategies for how it will arrive there. The plan fails to respond to the London Plan's Para 2.9.2 advice. It seems content to stand by and watch as the town centre declines. This is not for want of encouragement on the part of the Ealing community. 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 the Council in 2008 and updated in 2010, SEC's Vision for Ealing 2012, and our Central Ealing Neighbourhood Plan, adopted by the Council in 2017.



Unfortunately, none of these initiatives have been taken up to manage Ealing's growth and the opportunity presented by the new LP to correct this has not been exploited. Work by Allies and Morrison, especially their borough character studies published in the evidence base might have informed a way forward, but there has never been any public discussion of their findings or how they should fit into the draft plan.

Absence of a clear vision in the consultation plan or strategies for delivering it has led instead to a set of unconnected lower level policies on which we are being consulted at Regulation 19 stage. If allowed to stand these will lead to a grossly disjointed centre that will not tap into the very significant economic opportunities Ealing's location and history create for it and one that will not well serve the communities who use and depend on it. Aspects that should be addressed are detailed in the Ealing Matters response; of concern to CENF are:

- An analysis of Ealing's strengths and opportunities and development of strategies to exploit them
- The lack of a Town Centre character appraisal
- The lack of a heritage appraisal and supporting policies
- Tall buildings definition
- Provision of a highways, transport, and permeability strategy

The Regulation 19 plan makes no serious attempt to support the role of Ealing Town Centre as the heart of the Ealing community. There has been no proper community involvement in its preparation and it offers no vision for the way it will change following its prospective comprehensive redevelopment in ways that are not consistent with national policy for protecting the historic environment. Policies with regard to this aspect of the LP have not been positively prepared, and are not adequately justified. They are **neither legal nor sound**.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

In summary, the new plan must follow Policy SD9B of the London Plan and include a town centre strategy for Ealing Town Centre. The strategy must be prepared in collaboration with



stakeholders before the futures of the many development sites within the centre are considered by the Inspector so that their future can be considered in the context of it.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

The Forum has no confidence in the process of plan preparation that has been adopted to date. With multiple failings in the Regulation 19 plan, it is essential that the Inspector has the opportunity to explore concerns with the community raising them in order to fully understand those concerns and the background to them. Written responses are unlikely to adequately convey these.

Part B (Please use a separate sheet for each representation).

3. To which part of the Local Plan does this representation relate?

Paragraph: Chapter 4, Ealing Development Sites

Policy:

Policies Map:

4. Do you consider the Local Plan is: (please tick)

4.(1) Legally compliant No

4.(2) Sound No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please set out your comments below.

Development Sites

This representation covers all of Chapter 4's development sites within the area covered by the Central Ealing Neighbourhood Plan and should be read alongside CENF's response on Ealing Town Centre and in the context of our representations on tall buildings, heritage, design and infrastructure planning.

An overriding concern regarding Central Ealing is the absence of an overall master plan for effective development of this flagship Town Centre. Rather, development sites are arbitrarily identified without any reference to one another and with no basis for their selection and definition. Many sites are identified as suitable for residential development but without any indication of the quantum of development proposed for them individually or overall.

The 'evidence base' commissioned by the Council and prepared by Allies and Morrison could provide this context but is flawed in that it has again been produced in a vacuum without local input or the opportunity to comment. Furthermore, it is not clearly set out where, how and why the report's findings have informed the Plan or, alternatively, have been ignored.

Unaddressed concerns on specific development sites follow.

EA01 Broadway Connection and Arcadia Shopping Centre. This site, which has had a long and highly controversial planning history, has doubled in extent since the Regulation 18 plan was consulted on without any explanation or pre-announcement to the communities who have been long involved with it. Planning consent was granted earlier in 2024 on the eastern half of the site in the face of criticism from local groups, Historic England, GLA



officers and the Metropolitan Police, but their comments are not acknowledged and reflected in the site proposals.

Previous proposals for the entire site were the subject of a 3 week public inquiry after which the Secretary of State overturned LBE's planning consent, agreeing with the Inspector that that the bulk, massing and certain aspects of the design of the scheme would be inappropriate in its surroundings and 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 entire site also is covered by an existing SPD that was consulted on and approved in 2012 after the Secretary of State's decision. This set out principles for its development including on pedestrian movement, sight lines and visual impact and built form and height. The current document ignores the contents of the SPD and its principles.

Further concerns are that this is not one of the sites considered by Allies and Morrison. British Land, which owns the eastern half of the site, also owns the EAL2 site considered below. The combined impact on the Town Centre if these two significant sites were to be developed as suggested would be immense and has not been considered. This underlines the importance of producing a master plan for the Town Centre in conjunction with all Ealing's stakeholders, and especially its local communities.

EA02 Ealing Broadway Shopping Centre and Crystal House. This major Town Centre asset was developed and opened by the late Queen less than 40 years ago and has been the subject of recent improvements and refurbishment without a damaging increase in height. It includes a locally well-liked, award-winning shopping centre that was locally listed in Ealing's 2004 UDP. It is also a very busy centre that continues to meet the needs of the Ealing community. Further or upward development would be unacceptable. Again, there has been absolutely no local engagement with any proposals for its redevelopment despite the fact that if it were to proceed, demolition and redevelopment of the site would have a transformative effect on the Town Centre. Allies and Morrison's considerations of the possible height and massing of a new development are buried deep in the evidence base in the Appendix to their Tall Buildings Study as Cluster A. This study has never been discussed locally. It must be brought to the open and the public must be given a fair opportunity to comment on it.

EA03 Sandringham Mews. This is a sensitive site at the heart of the Town Centre. Consent has recently been granted to construct buildings from 3-8 storeys over the southern half, despite objections to the maximum height. Consideration of even greater heights is excessive and 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 mentioned above, this should be part of a properly prepared master plan.

EA04 Eastern Gateway. Consent to redevelop this site with a 6 storey building was granted in 2021 so it is unclear why this site remains in the list of development sites. The suggested 8 storeys would be excessive for this location adjacent to low-rise residential buildings.

EA05 Perceval House. Despite the approval of a 26-storey tower on this site, against significant local objection, no precedent has been set that suggests this site would be suitable for the proposed maximum of 21 storeys. This would still have an excessive and detrimental visual impact on important heritage assets. If a new scheme is to emerge it



needs to take greater heed of the Central Ealing Neighbourhood Plan as well as Historic England advice, the design principles of the NPPF, and the London Plan.

EA06 49-69 Uxbridge Road. This is a property that should be refurbished rather than redeveloped for climate change reasons. We note, and generally support the reduction from the Regulation 18 proposals to a maximum height equal to existing or consented buildings.

EA07 CP House. Consent to redevelop this site for a 12 storey office development was granted in 2022 in the face of objections that the height and bulk would impact detrimentally on the Ealing Green CA and Walpole Park. This consent has not yet been implemented. We note, and would support, the proposed reduction in the maximum height to 10 storeys, which would reduce the impact on Walpole Park and the Ealing Green CA.

EA08 Craven House. This long vacant site has consent (164805FUL) for a 10 storey office building and is the subject of revised but not yet applied for proposals that retain this maximum height and include some other improvements on the consented scheme. We note and support the Regulation 19 proposal that no scheme should be taller than the 10 storeys in the consented one; however, we consider that traditional terraced housing would be a preferable use of this vacant site.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

The missing engagement with Ealing’s communities to hear and properly respond to concerns should be undertaken before this part of the plan is adopted. Engagement should include open discussion of the Allies and Morrison tall buildings findings and their application to the development sites and also the requirements of a Central Ealing master plan.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)



Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The Forum has no confidence in the process of plan preparation that has been adopted to date. With multiple failings in the Regulation 19 plan, it is essential that the Inspector has the opportunity to explore concerns with the community raising them in order to fully understand those concerns and the background to them. Written responses are unlikely to adequately convey these.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.



Part B (Please use a separate sheet for each representation).

3. To which part of the Local Plan does this representation relate?

Paragraph:

Policy: D9 Tall buildings

Policies Map:

4. Do you consider the Local Plan is: (please tick)

4.(1) Legally compliant

4.(2) Sound No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Tall Buildings

Ealing Matters/SEC have provided a comprehensive response on policy D9, concluding that this is **not sound**. We concur. Without repeating the detail in that response, we conclude that the policy as drafted is arbitrary and not based on any rational and agreed evidence base. Such evidence as may be found (Allies and Morrison report) is not being adopted, with excessive and unjustified thresholds for what constitutes a tall building being applied to, in particular, the area covered by the Central Ealing Neighbourhood Plan, where the proposed policy states that only buildings of over 21 storeys would be considered tall. The Town Centre is largely included with two Conservation Areas, has a number of nationally and locally listed buildings and buildings of heritage significance, and is characterised by typically low-rise conventional Victorian and Edwardian housing; it is thus particularly sensitive to inappropriate development. No recognition whatsoever has been given to the objectives and policies of the Neighbourhood Plan regarding building heights, amongst them policy HBE3 – Building Heights – that states ‘Tall buildings (ie those substantially taller than their immediate surroundings and/or which significantly change the skyline) will only be permitted if they are of the highest architectural and sustainable urban design and do not have an adverse impact on Conservation Areas and their setting or on other designated heritage assets.’

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.



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Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Comprehensive redrafting of the policy is required, incorporating the detailed points made by Ealing Matters/SEC. In particular, this should address the need for site appraisals to be more thorough and where, in 'exceptional circumstances', a site is deemed appropriate for a tall building a proper justification is required. The findings of the Allies and Morrison report regarding acceptable building heights must replace those greater heights arbitrarily included in the current plan.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

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The Forum has no confidence in the process of plan preparation that has been adopted to date. With multiple failings in the Regulation 19 plan, it is essential that the Inspector has the opportunity to explore concerns with the community raising them in order to fully understand those concerns and the background to them. Written responses are unlikely to adequately convey these.



Part B (Please use a separate sheet for each representation).

3. To which part of the Local Plan does this representation relate?

Paragraph:

Policy: Relates to a missing policy area. Note that this objection should be read in the context of Chapter 3 policies SP2.2 B (iii), SP2.2 D, SP2.2 F (i) and (vi), SP3.1 C, SP3.3 D, SP4.1 A, SP4.1 D–F.

Policies Map:

4. Do you consider the Local Plan is: (please tick)

4.(1) Legally compliant

4.(2) Sound No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Heritage

This representation concerns the need for the plan to contain policies for the conservation and enhancement of the historic environment. The Central Ealing area is particularly rich in heritage, with a number of listed buildings, Conservation Areas and architecturally interesting Victorian and Edwardian residential development. These contribute to its particular character, but in the absence of policies to protect them, are at risk.

London Plan Policy HC1B: Heritage, Conservation and Growth requires that *'Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:*

- *setting out a clear vision that recognises and embeds the role of heritage in place-making*
- *utilising the heritage significance of a site or area in the planning and design process*
- *integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place*
- *delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.'*



NPPF Chapter 16: Conserving and enhancing the historic environment requires at Para 190 that:

‘Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.

This strategy should take into account:

- *the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
- *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- *the desirability of new development making a positive contribution to local character and distinctiveness; and*
- *opportunities to draw on the contribution made by the historic environment to the character of a place.’*

The Council recently undertook and consulted on a comprehensive review of its Conservation Areas. Although the Council has formally implemented one element of this work (a revised Generic Management plan applicable to all Conservation Areas in the borough) none of the individual updated character assessments or management plans produced by the consultant who carried out this work for each Conservation Area has so far been promulgated. The consultant was only employed to undertake the comprehensive work after many reminders by conservation and heritage groups in the borough that the existing guidance relating to Conservation Areas was long out of date and urgently needed to be revised. Recent administrations have given the strong impression that conservation of heritage gets in the way of redevelopment projects in the borough and should be discouraged. Instead, they have actively promoted developers to carry out new developments with the single intention of increasing the housing stock in the borough without any consideration of other factors.

Beyond depicting each town’s CAs in their individual ‘Existing Context’ maps, (Ealing’s CAs are also listed but without comment) and the occasional passing reference to the borough’s rich heritage without explaining the relevance of this heritage for any individual policy, the Plan fails totally to meet the requirements of both the NPPF and the London Plan. It is therefore inconsistent with national policy and thus **unsound**.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*



After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

A full strategy and specific policies for heritage must be included in the plan in line with the NPPF and London Plan requirements. The lack of adequate policies in the current Local Plan has facilitated the inadequately controlled development described above, and must be addressed in the new plan to prevent further harm.

Alongside the work in the evidence base by Allies and Morrison, the recent Conservation Area review can serve as the necessary evidence base.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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The Forum has no confidence in the process of plan preparation that has been adopted to date. With multiple failings in the Regulation 19 plan, it is essential that the Inspector has the opportunity to explore concerns with the community raising them in order to fully understand those concerns and the background to them. Written responses are unlikely to adequately convey these.

Part B (Please use a separate sheet for each representation).

3. To which part of the Local Plan does this representation relate?

Paragraph:

Policy: DAA Design and Amenity

Policies Map:

4. Do you consider the Local Plan is: (please tick)

4.(1) Legally compliant No

4.(2) Sound No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please set out your comments below.

Design and Amenity

The NPPF Chapter 12 sets out requirements regarding the importance of good design, with paragraph 132 stating ‘Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. **Neighbourhood planning groups can play an important role** (our emphasis) in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.’ London Plan Policy D1A) requires that ‘Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas’ capacity for growth. Together, these requirements can be summarised as the need for the plan to work with communities to understand local aspirations and to reflect them to achieve well designed and beautiful places.

Policy DAA in the 19 Plan does not respond to these requirements and is thus **not sound**.

The Policy has not been developed with local communities, does not respond to local aspirations and shows no understanding of Ealing’s defining characteristics. We understand that a ‘design panel’ was established to contribute to the development of the Plan, but this was comprised only of professionals selected by the Council. Their recommendations were not subjected to community review and feedback and thus cannot be said to address the



requirements for community involvement. The proposed policy text is vague and sets no design expectations to guide developers on what may be acceptable.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

This policy requires redrafting and expanding with the involvement of local stakeholders.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

The Forum has no confidence in the process of plan preparation that has been adopted to date. With multiple failings in the Regulation 19 plan, it is essential that the Inspector has the opportunity to explore concerns with the community raising them in order to fully understand those concerns and the background to them. Written responses are unlikely to adequately convey these.



Part B (Please use a separate sheet for each representation).

3. To which part of the Local Plan does this representation relate?

Paragraph: Tables SS1, A1, E1, G1, H1, N1, P1 and S1

Policy: DAA – Design and Amenity

Policies Map:

4. Do you consider the Local Plan is: (please tick)

4.(1) Legally compliant

4.(2) Sound No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please set out your comments below.

Infrastructure Planning

The NPPF and London Plan include a number of policies that set out requirements that Local Plan policies should provide a broad ‘context framework’ for development, including necessary infrastructure, development contributions, social infrastructure and consideration of development phasing where necessary infrastructure may not be available. We would again refer the Inspector to the detailed commentary on this aspect in the submission by Ealing Matters/SEC, in particular their analysis of the newly introduced infrastructure delivery plan (IDP) included in the evidence base for the Regulation 19 consultation. We would highlight the many existing problems with much of the infrastructure in Central Ealing, including an inadequate and failing sewage system, water supply problems, electricity supply and distribution problems leading to a lack of capacity for new developments and ongoing regular gas leaks. The disruption to the major (and other) road network caused by frequent, lengthy and poorly managed repair works is not acknowledged, nor is there acknowledgement that the much hyped Elizabeth Line, used as justification for proposed massive expansion in housing provision in Central Ealing and elsewhere along the line is already at capacity during some peak hours. Again in Central Ealing, the reductions in library facilities and opening hours and the recent closure of the Town Hall to the community compound the lack of social infrastructure for a growing population. None of this has been addressed with the input of the community affected. The Plan’s response to this appears to be an ‘infrastructure delivery schedule’, but this is merely a list of possible projects, most uncosted and unfunded and unrelated to any needs analysis. For all these reasons, the kind of infrastructure planning envisaged by both the



NPPF and the London Plan is entirely absent from the Plan. No attempt is made to identify and define the type or scale of the infrastructure support Ealing’s ambitious and unsupported housebuilding targets will require. In this regard, the Plan is inconsistent with national policy and therefore **unsound**.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

The Infrastructure Delivery Plan and Schedule should be comprehensively redrafted to properly reflect Ealing’s current deficiencies and identify the type and scale of the infrastructure required to support Ealing’s ambitious housebuilding targets. In accordance with NPPF Para 34 the Plan should set out the contributions expected from development. Along with setting out the levels and types of affordable housing provision required this should include that needed for education, health, transport, flood and water management, green and digital infrastructure.

Policy DAA of the Plan needs to respond to London Plan Policy D2B by making clear that development must be contingent on the provision of required new infrastructure, including public transport services, and that if necessary it must be phased accordingly.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.



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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

The Forum has no confidence in the process of plan preparation that has been adopted to date. With multiple failings in the Regulation 19 plan, it is essential that the Inspector has the opportunity to explore concerns with the community raising them in order to fully understand those concerns and the background to them. Written responses are unlikely to adequately convey these.

