

██████████
Strategic Planning Team
Ealing Council

localplan@ealing.gov.uk

April 9, 2024

Dear ██████████

Re: Drayton's Community Association Response to the Local Plan

This is the response to Ealing Council's draft local plan from the Drayton's Community Association(DCA). The DCA is a residents group covering Manor Road, Drayton Road, Drayton Gardens, Drayton Avenue, Drayton Grove, Sutherland Road and Drayton Green in West Ealing. It is a non-party political community association representing local people in the area described above and active membership currently stands at over 350 people. The DCA was set up over 15 years ago to improve the quality of life in the Drayton's area of West Ealing. It has dealt with issues of anti-social behaviour, responded to the pandemic in protecting vulnerable residents, it organises street parties and events and improves the local area with litter picking and flower planting.

In summary, our view of the Local Plan is that it is poor, would negatively impact Ealing and its residents and that it is not legally compliant due to its lack of a coherent narrative and evidence base that links the actions of the plan with its objectives and the lack of meaningful consultation during its creation. The plan, its Annexes and its supporting documents represent a huge amount of information and yet there is no coherent narrative that explains how the plan will deliver the stated policy objectives or how the evidence offered supports the plan. Nevertheless the DCA and other local groups have scrutinised the plan and the DCA supports the conclusions reached by other local organisations including Friends of The Earth, Ealing Matters, West Ealing Neighbours and Save Ealing's Centre (SAC) including that:

It has not been positively prepared. It does not *'provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.'* The plan starts with the assumption that there must be massive housing development along the Uxbridge Road and Crossrail route using tower blocks and explores only variations on this theme. It does not explore current needs within Ealing, locally in West London and across London. It does not look at how needs are changing. It does not address what 'sustainable development' would look like or the implications of going beyond this.

It is not justified. It cannot be described as an appropriate strategy, *'taking into account the reasonable alternatives, and [is] based on proportionate evidence' as it has not considered the current and future needs of Ealing and London.'* It is essentially 'one dimensional' in that it seeks to deliver massive amounts of new housing using towers and does not look beyond this. In particular there is no granular analysis of housing needs in Ealing or London and

evidence of specific needs that should be met. The need for family housing, truly affordable housing and housing for elderly people and/or people with disabilities is noticeably absent. If this had been considered then low-rise and more dispersed and mixed options might have been considered. There is also no analysis of dis-benefits and risks which is a massive omission given the planned population increase of around 80,000 people. There is also no justification for the zones where tall buildings will be permitted or analysis of their impact. There is no justification for defining a tall building as anything over 6 or 7 stories.

It is not effective. The plan offers no convincing evidence that its stated outcomes and policy objectives are *'deliverable over the plan period and is based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground'*. In fact the opposite is true in the key areas of achieving net zero, creating truly affordable housing and maintaining the social fabric of Ealing. In our view the effect of actively encouraging massively dense housing in tower blocks in newly designated 'Town Centre' areas without considering the impact and necessary infrastructure and implementing monitoring and controls would be hugely risky and damaging. The analysis from Friends of The Earth clearly demonstrates the plan would not meet net zero commitments and would in all likelihood have a significant negative impact on nature in Ealing.

It is not consistent with national policy. The plan will not *'enable the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant'*. The plan does not align with The London Plan as an integral part of the statutory development plan for the Local Planning authority in Ealing. Ealing's Local Plan will not be in "general conformity" with it. The local plan 'cherry picks' from the London plan when this supports high density tower-based development and ignores it when it does not. This is clear in its definition of 'tall buildings' and where they are appropriate. The London Plan acknowledges that new tall buildings can have a very detrimental impact on a community. The Ealing local plan simply changes its definition of what a tall building is and then designates areas for tall buildings without offering any evidence of impact assessment. Similarly while policy statements in the plan are in line with net zero policies the plan itself would act against this.

The DCA also has specific Concerns regarding the Zone E10 area which directly impacts our members and where the following sites have been listed as suitable for tall buildings:

- 09EA 66-86 Broadway West Ealing.
- 10EA Lidl.
- 11EA Sainsbury's and Library.
- 13EA 99-113 Broadway.
- 15EA Waitrose.
- 16EA West Ealing Station Approach.

Giving blanket approval for all developments under 6-7 stories on these sites by defining 'tall' as higher than this and indicating that the sites are suitable for tall buildings effectively opens the flood gates without any meaningful means of controlling developing. It says 'build towers' and gives not indication of how impact would be monitored or when it would

be time to stop. It should also be noted that these developments would be in addition to the massive Green Man Estate development and other tall buildings in Zone E10 built since the last plan, already approved and under consideration or in planning.

We also note that following our earlier representations and those of many other community groups there has been little or no change to the plan and no meaningful community engagement. This feels very much like Ealing Council 'going through the motions' of consultation when in truth it has no desire to engage or change the plan in any meaningful way.



On behalf of the DCA