

From: [REDACTED]
Subject: Ealing Local Plan comments
Date: 9 April 2024 at 14:38
To: localplan@ealing.gov.uk, [REDACTED]
Bcc: [REDACTED]



Dear Councillors

I am writing as Chair of the GRASS (Gordon Road and Surrounding Streets) Residents' Association which represents many households in the surrounding area. We fully support detailed comments made by Ealing Matters, Save Ealing Centre and Stop the Towers but would like to reiterate some concerns.

General failure of the Council to review existing plans.

Ealing Council has consistently failed to comply with National Planning Policy, which stipulates that Local Plans should be reviewed at least once every five years in order to take into account any change in circumstances in the area. The plans should then be updated if necessary. We understand that there has been no published review of the current Local Plan since its adoption in 2012 even though LBE's housing target has shown a significant increase over the last 12 years. The most recent full Authorities Monitoring Report for LBE (published in 2015) dates back to 2013-14. Residents have been asking for updates since 2016 without success. We are concerned that unlike other London Boroughs, such as Camden and Wandsworth, the Monitoring Framework is an appendix to the new Ealing Local Plan and not a policy within it. There are no strategies to monitor or manage the risks associated with the plan. As it is a statutory requirement to review and monitor Local Plans, it is essential that the Local Plan includes a specific policy to this effect.

Tall Buildings - Policy D9

The definition of a tall building in the Local Plan varies considerably across the borough ranging from 6 storeys in some areas to 21 storeys in Ealing's Town Centre. Policy D9F states that 'tall' buildings above defined thresholds are exceptional and should be located upon specified Development Sites. There is no definition in the policy of the word 'exceptional' but it is suggested that it means 'rare,' 'uncommon,' or 'unprecedented.' This is not how the policy is being applied in Acton where 50% of development sites are identified as being suitable for tall buildings, or Ealing 60% (94% in the Metropolitan Town Centre) or Southall (40%). The fact that Ealing Town Centre is close to several Conservation Areas appears to be ignored in the Plan. The Plan also fails to assess the growing evidence that high density tower blocks have high carbon impacts and short lives and are therefore socially and environmentally unsustainable.

Heritage Conservation and Growth

We consider that the Local Plan should include policies and strategies for the conservation and enjoyment of Ealing's historic environment. This requires a clear recognition of the role of heritage and should be used in the planning and design process. The plan lacks a positive strategy for the conservation and enjoyment of the historic environment and therefore puts heritage assets at risk through neglect and decay. The plan does not take into account the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation. It ignores the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring and the opportunities to enhance the contribution made by the historic environment to the character of the area. There is no comment about Ealing's Conservation Areas in the Plan which, because it fails to meet the requirements of the National Planning Policy Framework and the London Plan, is fundamentally unsound.

Housing and Infrastructure

The kind of infrastructure planning envisaged by both the NPPF and the London Plan is entirely absent from the Local Plan. No attempt at all is made to get to grips with the type or the scale of the infrastructure that Ealing's house building targets will require. The Local Plan is inconsistent with national policy and therefore unsound.

While the plan itself omits to say how many new homes will be provided over the period, the Housing projection in the Council's evidence base puts the figure at 41,571. Although this figure is close to London Plan expectations, the Plan fails to consider the additional physical and social infrastructure required for the increased population. The GLA's population forecasts predict that if Ealing's housing stock grows at the London Plan's target rate, the Borough will be housing 80,317 additional people by 2041. The plan does not address the issue of the impact that this would have on the quality of life. Many services are already at breaking point and a report by Ove Arup published in October 2022 as part of the regulation consultation found huge gaps already exist in most of the Borough's infrastructure. Moreover, the proposed construction of high rise tower blocks for students would create 'dormitory' residents destroying existing local communities which are mixed in terms of culture, income and age. The proposed tower blocks would put pressure on services like the Elizabeth line which is already operating at above capacity, so that at the smaller stations like Hanwell and West Ealing, passengers are unable to board at peak times. There was no chance for people to point out these problems or to note that things could be much worse at the end of the plan period when 15,000 new homes in Southall alone will significantly increase commuter demand. With no input from the public, the plan cannot be deemed to have been positively prepared and is therefore unsound.

Provision of amenities and play space

The proposed Plan fails entirely to consider standards for, or the design of, amenity and play space in new developments. With so many new homes proposed, many of which are in large residential blocks, it is essential that proper provision is made for residents to be provided with outside space. Indeed, many schemes in the borough, which have received consent fail to meet the London Plan's minimum standards. Instead, small existing areas of outside space are held as being available to thousands of new residents, many of whom would have to cross main roads to access them.

The Regulation 19 Plan is not consistent with important higher level policies and the reasons for this have not been justified. To

this extent the Plan is unsound.

The need for the plan to understand and work with communities to create high quality sustainable buildings

The National Planning Policy Framework (Chapter 12) establishes that the 'creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.'

NPPF Para 132 states '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. This is not reflected in the Local Plan.

It is important that there is public engagement in the design of new developments and that the Council will require that development:

respects the area's local character and preserves or enhances the historic environment and heritage assets. Developments should provide a high standard of accommodation which is accessible to all, uses high quality materials and is sustainable in design and construction mitigating the impact of climate change. Tower blocks have high carbon impacts and short lives. Vague comments on 'net zero' suggest that the Plan would not attain the targets. Moreover, new developments should integrate well with the surrounding streets and open spaces and should preserve gardens and incorporate high quality landscape design and outdoor amenity space.

Policy DAA in the Regulation 19 Plan does not respond either to the NPPF's or the London Plan's requirements. It is therefore inconsistent with national policy and therefore unsound. The Policy has not been developed with local communities, does not respond to local aspirations and shows no understanding of Ealing's reputation as Queen of the Suburbs. While some useful studies of the Borough appear in the evidence base, they have not been drawn together in a coherent way and the public has been given no opportunity to comment on them

Town centres

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

Over the past 10 years Ealing 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. Major stores and key community facilities have closed resulting in a growing surplus of empty shop units. Historic England lists two of the town centre's Conservation Areas as under threat. It is not just the urban quality of the town centre that has declined. As the plan notes, 'Over recent years the local population growth has stagnated and there has been a decline in higher paying jobs'. Ealing is no longer a retail centre, attracting shoppers from the wider west London region. Today, Ealing struggles even to attract shoppers from the immediate area.

Although the draft Plan envisages almost total redevelopment of the Metropolitan Town Centre retail core, it is devoid of any vision for the centre's future and does not include any specific strategies to prevent further decline. A striking omission of the draft plan is an appraisal of the town centre. Ealing has a number of advantages (access to London and via Heathrow the rest of the world, its heritage and cultural history - theatre, film and music festivals, the university, etc etc) that should be used to enhance the local economy and create jobs.

The Town Centre is also 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. The draft Local Plan is silent on its understanding of Ealing's heritage, both its contribution to existing amenity and its potential for enhancing its future growth.

The Plan also adheres to the outdated notion that Central Ealing and West Ealing Town Centres comprise a single centre. In reality, the two centres serve quite different functions and different populations. We suggest that each centre requires its own growth strategies.

West Ealing is a busy centre that serves a large local community. There are many independent units that are let at relatively low affordable rents. The site allocations suggest that it is the Plan's intention to almost totally demolish West Ealing's retail centre and replace it with new units charging much higher rents, which will remain empty as is now the case in Ealing Town Centre

We look forward to your response.

Yours faithfully



(Chair GRASS Residents' Association)