

Model Representation Form for Local Plans

LPA Logo	Local Plan Publication Stage Representation Form	Ref: (For official use only)
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Name of the Local Plan to which this representation relates:

Ealing

Please return to [name of LPA] BY [time/ date/year]

NB - LPA to include data protection / privacy notice, see para 4 of Explanatory Note

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.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
First Name	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Last Name	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Job Title (where relevant)	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Organisation (where relevant)	<input style="width: 95%;" type="text" value="Save Ealing's Centre (SEC)"/>	<input style="width: 95%;" type="text"/>
Address Line 1	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Line 2	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Line 3	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Line 4	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Post Code	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Telephone Number	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
E-mail Address (where relevant)	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>

Part B – Please use a separate sheet for each representation

Name or Organisation: XXXXXXXXXX Save Ealing's Centre

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="No"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

Please tick as appropriate

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 also use this box to set out your comments.

Please note that this representation should be read in the context of other references in the plan to Ealing Metropolitan Town Centre including those at Chapter 3 Para 3.62, and sites 01EA to 16EA.

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)

The Regulation 19 plan makes no serious attempt to support the role of Ealing Metropolitan Town Centre as the heart of the Ealing community. 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. We consider that policies with regard this aspect of the plan have not been positively prepared, and are not justified. This makes them unsound.

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 SEC supporters believe these changes have not been kind to it. Unfortunately, neither the Plan nor the evidence base that underpins it has documented the changes that have occurred. 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.

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 major stores, 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'.

It is not just the urban quality of the town centre that has declined. As the plan 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.

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.

As it stands, the Regulation 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 the Metropolitan Town Centre's retail core. Yet it is devoid of any 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. Inexplicably it seems content to stand by and watch as the Metropolitan 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 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 initiatives have been taken up to manage Ealing's growth. Now is the time to correct this. Work by Allies and Morrisons, especially their borough Character Studies published in the evidence base had suggested this might be the case. It contributes some valuable insights, and SEC was looking forward to commenting on it but had no opportunity to do so. In fact, 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 in the Regulation 19 Plan. 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.

We focus on some of the most important, although this is by no means a complete list.

- **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 the 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 replace 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.

- **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, its 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.

- **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.
- **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 and 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.
- **Tall Buildings.** The draft plan identifies Ealing Town Centre as a location where tall buildings would be deemed to be buildings of 21 storeys or more. It claims this is based upon 'rigorous assessment of local character and prevailing heights'. As our comments on Policy D9 explain, we are deeply concerned about the unexplained conflict between the policy in the plan and the contents of Allies and Morrison's evidence base, on which it is based, but which proposes that tall building should be defined as 9 storeys or more. As it stands, however, the wording of the policy would say that no buildings of 20 storeys could therefore be deemed as tall which seems ridiculous since according to Allies and Morrison the prevailing height of buildings in the Town Centre is just 4.4 storeys.
- **Character Studies.** 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)

- **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.

(Continue on a separate sheet /expand box if necessary)

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. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). 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.

In the face of the changes that now confront it, SEC believes the new plan must follow Policy SD9B of the London Plan and prepare a town centre strategy for the Ealing Broadway Metropolitan Town Centre.

The strategy must be prepared before the future of the many development sites within the Metropolitan Centre is considered by the Inspector. This is necessary to ensure that new development is truly sustainable and best meets the need of the whole community as well as the developers who are promoting them.

(Continue on a separate sheet /expand box if necessary)

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.

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:

Save Ealing's Centre which I chair is an umbrella group of local residents and other interest groups concerned about the future of Ealing Town Centre. Since we formed 15 years ago, we have sought to establish channels of discussion with the Council and other public bodies over the changes in the Town Centre and how they can best be managed to continue to serve existing communities.

I consider the Local plan is an important role to play in the management of these changes and I want to continue to be involved in discussions about them.

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.

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Ealing

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Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

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Post Code	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Telephone Number	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
E-mail Address (where relevant)	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>

Part B – Please use a separate sheet for each representation

Name or Organisation: Save Ealing's Centre

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

Paragraph	Chapter 4, Ealing Development sites	Policy	<input type="text"/>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is:

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

No

4 (3) Complies with the
Duty to co-operate

Yes

No

Please tick as appropriate

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 also use this box to set out your comments.

Please note that this representation covers all of Chapter 4's development sites within Ealing Metropolitan Town Centre. It should be read alongside SEC's general response on the Metropolitan Town Centre, and its overarching concerns about the extent of comprehensive redevelopment envisaged in both Ealing and West Ealing Town Centres and the absence of any clear vision for what will replace them once they have been redeveloped. It should be read too in the context of the Ealing Matters representations on (i) tall buildings, (ii) the need for a heritage policy, (iii) design (iv) infrastructure planning and (v) embodied carbon and fighting climate change.

A general concern covering all of the sites in the Metropolitan Town Centre is the failure to include any indication as to the quantum of the development proposed for them, such as for example, how many homes they are expected to produce. This does not conform with the National Planning Practice Guidelines on [assessing land availability](#) (Paragraph: 026 Reference ID: 3-026-20190722) which requires that the standard outputs of assessment of land availability must include each site's potential type and quantity of development, and that the assessments must be made publicly available. The inadequate detail on the assessed potential of the sites makes it difficult to conceive what their impacts on the existing built environment or on existing infrastructure might be. They are details that must be provided as they are in plans in other London Boroughs.

While they do not feature in the plan itself our comments have been drafted in the light of the work provided in the evidence base by Allies and Morrison and commissioned by the Council. To what extent this work should be seen as part of the justification for the Plan's policies is not stated and so it is unclear. Much of it is of high quality but:

- i. Ealing's communities were not invited to engage in its preparation and its findings have not been presented to them for comment.
- ii. In many cases Allies and Morrison's findings are not reflected in the draft local plan, and the reasons and explanation for this is not explained. We identify some of the anomalies in our comments below, but the extent of the subject matter and the limited time available to us mean we have likely missed key examples and we would like to reserve the right to comment on these at the examination if it proves necessary.

Also, as our comments all refer to sites in the Metropolitan Town Centre, they are made in the context of the following requirements of the NPPF:

NPPF Para 16 (c) states that plans should '*be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, ...*' We note there has been no effective engagement with communities with regard to the proposals in these site allocations.

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.*' We note that two Neighbourhood Plans cover the Metropolitan Town Centre and they set out policies for some of the sites in Chapter 4. What they 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 to the content of Ealing's two Neighbourhood Plans

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 discussion about design considerations in any of the site appraisals. As this is the first stage in the evolution of these individual proposals it should be.

Turning now to the individual sites in the Metropolitan Town Centre, SEC has the following comments:

01EA Broadway Connection and Arcadia Shopping Centre. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development.

This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

We note that this site, which has had a long and highly controversial planning history, has doubled in extent since the Regulation 18 plan was consulted on with no 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 reflected in the site proposals.

The entire site was the subject of a 3-week public inquiry after which the Secretary of State overturned LBE's planning agreeing 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 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.

We are also concerned that this is not one of the sites Allies and Morrison's have considered and does not appear for instance in their Cluster A illustrations for the Town Centre.

We are also concerned that British Land which owns the eastern half of the site also owns the EAL2 site discussed below. With this site also coming into play it is essential that an area plan for the town centre should be drawn up in conjunction with all Ealing's stakeholders, and especially its local communities.

O2EA Ealing Broadway Shopping Centre and Crystal House. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

The idea of redeveloping this major town centre asset less than 40 years after its opening by the late Queen is very hard to contemplate. It is a locally cherished, 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. Again, there has been absolutely no local engagement with any proposals for its redevelopment despite the fact it seems unavoidable and that its impact would be considerable.

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 2024 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.

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. The Borough can never hope to meet its aspiration to be carbon neutral by sanctioning the constant redevelopment of still viable and well performing

buildings.

03EA Sandringham Mews We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

This is a sensitive site at the heart of the town centre. SEC notes that consent has recently been granted to construct buildings from 3-8 storeys over the southern half. 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.

04EA Eastern Gateway We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

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.

05EA Perceval House We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

Consent to redevelop Perceval House including a 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 is pleased that the Council is not to proceed with it. We note that the maximum height of new development is proposed to be reduced to 21 storeys but continue to think this would 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 Ealing Town Centre Neighbourhood Plan as well as Historic England advice and the design principles of the NPPF, and the London Plan.

06EA 49-69 Uxbridge Road. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

This is another property that should be refurbished rather than redeveloped for climate change reasons. We note, and generally support a reduction from the Regulation 18 proposals to the proposed maximum height. 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.

07EA CP House We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

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

08EA Craven House We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

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. We note and support the Regulation 19 proposal that no scheme should be taller than the 10 storeys in the consented one.

09EA 66-86 Broadway. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

We do not understand the justification for redeveloping this relatively recently redeveloped site which seems to be functioning perfectly satisfactorily and we are concerned that the draft plan offers very little guidance as to what form of redevelopment of this site would be appropriate. We note that the maximum height of a development has reduced to 10 storeys which we continue to think is excessive in light of the Allies and Morrison advice which sets the tall building threshold at 7 storeys

10EA Lidl We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

Lidl Supermarket is a popular store serving the West Ealing community. The draft plan offers no guidance as to what redevelopment would be appropriate beyond the suggestion that it is appropriate for a tall building. We continue to think that a development of 8 storeys would be excessive and that it conflicts with the Allies and Morrison advice which sets the tall building threshold at 7 storeys.

11EA Sainsbury's & Library. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

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 Zone C in Allies and Morrison's 'Tall Buildings Strategy' which envisages building heights of up to 13 storeys. In contrast, the draft Plan indicates that the maximum height is 16 storeys with no justification or explanation why. 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 Regulation 19 plan. SEC objects that this is insufficient guidance for the future of such an important 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.

12EA Chignell Place We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

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.

13EA 99-113 Broadway We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

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 which has been reduced since the Regulation 18 plan without explanation from 13 to 12 storeys. This remains excessive in this location as the Allies and Morrison study with its 7-storey tall building threshold would support. 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.

14EA 131-141 Broadway. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

The draft plan offers no helpful guidance as to what redevelopment of this site would be appropriate, but we support the reduction since the Regulation 18 plan of the maximum height to 6 storeys. 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.

15EA Waitrose. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

SEC considers that the arrival of the Elizabeth Line required the Council to prepare an area strategy for sites around West Ealing Station to ensure the widest public benefits would accrue from this major infrastructure investment. Unfortunately, this did not happen, and it has resulted in a wholly avoidable legacy of distrust on the part of the local community. Even now opportunities exist to repair relationships through an area-based plan involving both the community and key landowners including the John Lewis Partnership.

The current Waitrose 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. We applaud the proposed reduction in the maximum height to 13 storeys but think this would still be excessive and that it should be restricted to around 10 storeys. This would still exceed the tall building threshold of 7 storeys in West Ealing. As Allies and Morrisons say in their Tall Building Strategy (page 4) '*it follows that in all other locations beyond (areas identified as suitable for tall buildings) – that is, the vast majority of the Borough – tall buildings are not considered to be an appropriate form of development*'.

SEC has commented elsewhere on the Waitrose proposals and we believe our comments need to be taken on board in the preparation of a more appropriate scheme for this site than has so far been presented. Consideration of the appearance of the development when viewed from residential streets both to the north and the south is crucial.

Development should include a replacement for Jacobs Ladder footbridge across the railway.

16EA West Ealing Station Approach. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability.

This is another site close to West Ealing Station that should form part of an area-based plan strategy. (Having said that, SEC does not understand why this site has been given this name. It is nowhere near the approach to the new West Ealing Station which is 100 metres down Manor Road on the other side of the railway.)

SEC holds that redevelopment of this site should accord with the 2013 site brief which required that *'the height, scale and massing of new development must reflect the historic character of the surrounding residential areas on Hastings and Drayton Green Road. New development along Hastings Road must be low rise and not overlook the adjacent two storey terraced residential properties on this side, to create a harmonious streetscape and respect the current building line.'* We see no reason to depart from this principle. In particular, we do not accept that it is appropriate for the height of a development to be as high as 13 storeys as is now proposed. It should remain within the 7-storey tall building threshold which Policy D9 proposes.

(Continue on a separate sheet /expand box if necessary)

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. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). 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.

Proper engagement with Ealing's communities ought to have been undertaken before these proposals were drawn up, and it should be now before this part of the plan is adopted.

Engagement should include two area-based strategies, one for Ealing Town Centre and the second for West Ealing Centre.

(Continue on a separate sheet /expand box if necessary)

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.

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:

Proposals for some of these sites will potentially have a major impact on the Borough and on the Metropolitan Town Centre in particular. As the Chair of Save Ealing's Centre which is an umbrella group of local residents' associations that has endeavoured to work with the Council to manage the considerable changes in both Ealing and West Ealing town centres I would wish to be involved in discussions about those sites.

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.