

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

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Dear ██████████

Re: Stop The Towers Response to Reg 19 of the Local Plan

This is the response to Ealing Council's draft local plan from Stop The Towers (STT) a residents' group covering all of Ealing. It is a non-party political community association representing local people in the area as described above and active membership currently stands at over 1700 people. STT was set up over 5 years ago in response to the rapidly rising number of planning applications for large high density developments of residential flats in West Ealing.

Our view is that the Local Plan is not legally compliant due to its lack of a coherent argument and evidence base that links the actions of the plan with its stated objectives and its lack of meaningful consultation. The Plan presents a huge amount of information and yet there is no understandable narrative as to how the Plan will deliver its objectives. Having consulted experts in the field we conclude this is a failure of the plan not our ability to understand its language. We also support the analysis done and conclusions reached by trusted local organisations including Ealing Matters, West Ealing Neighbours and Save Ealing's Centre (SAC), Friends of The Earth which can be summarised as:

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 assumes that there must be massive housing development in Ealing and explores only variations on this theme. The biggest feature of the plan is the development of around 40,000 new dwellings and there is no evidence that Ealing or London needs housing of the type proposed or that it can accommodate such a huge population increase. It also fails to reference what other Boroughs are doing or long term post-pandemic trends in need.

It is not justified. It's not 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 aimed at delivering huge volumes of housing of a particular high density type and does not consider why or for who. There is no analysis of housing needs in Ealing or London and evidence of Ealing resident's needs that should be met. 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.

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 new 'Town Centre' areas without considering the impact and necessary infrastructure would be hugely 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 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 are in line with net zero policies the plan itself would act against this.

STT also has specific Concerns regarding the use of Zones and offering 'blanket approval' for tall buildings within these zones. Including blanket approval for all developments under 6-7 stories by defining 'tall' as higher than this and indicating that the sites are suitable for tall buildings, i.e. buildings above this height, opens the way for uncontrolled development. Furthermore, the plan applies the designation 'metropolitan town centre' to several areas which are currently largely residential areas. The plan has no assessment of potential negative impacts, no strategy for mitigation and sets no limit on the density of development. While the impacts in the zones will be different we feel all will be negatively impacted.

- E14. Ealing Broadway. Ealing has an attractive and historic centre with many fine green spaces and historic buildings. The type and scale of development envisaged could have a massive negative impact. While this may be a 'metropolitan town centre' it is a green and historic one which the plan needs to develop sensitively.
- E10. West Ealing Broadway. This area is in need of development and has potential for development, but it needs to preserve local communities and businesses not swamp them with high density housing.
- E13. Gurnell. This site is designated Metropolitan Open Land (MOL) and any development should respect the fact that development permission was only granted for a leisure facility and any future development should respect this and full preserve the amenity of the MOL.

Of the Ealing Development Sites listed above, two are of major concern to STT members:

EA15 Waitrose

STT 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 and requested that the Planning Department should create a Supplementary Planning Document. Unfortunately this did not happen, allowing developers to come in with piecemeal proposals. 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. Reducing the maximum height to 13 storeys is an improvement but STT 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'. STT 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.

EA16 West Ealing Station Approach

This site, although close to West Ealing Railway Bridge, it is not actually the approach to the new West Ealing Station which is 100 metres down Manor Road on the other side of the railway so this site name is misleading and inappropriate. Why not call it 'Hastings Road West'? Ideally due to its proximity to the Station it should form part of an area based plan strategy. However STT does not agree that this site is actually a 'town centre' as it is separated from the other West Ealing Town Centre plots by Drayton Green Road and it is adjacent to two storey residential homes. STT 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. Adequate provision for parking including that of deliveries and services must be made. Adherence to all planning policies and guidance should be mandatory.

Overall we feel that despite the word-count and number of documents this does not come near to meeting the threshold for a coherent and valid local plan. It appears to have one

objective only, which is to build tower blocks of flats and has been developed without the engagement of local communities and disregards the significant evidence that the plan will damage Ealing, not improve it. In addition we feel that while it may deliver housing units it would not deliver new homes or sustainable communities and would have a huge negative impact on Ealing.

 Co-Chairs on behalf of Stop The Towers