

**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](mailto: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](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](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:

Retired

Address Line 1:

Line 2:

Line 3:

Line 4:

Post Code: [REDACTED]

Telephone Number: [REDACTED]

E-mail Address: [REDACTED]

Name of Organisation: West Ealing Neighbours

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

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

Paragraph: the whole of the Plan'

Policy:

Policies Map: I have no idea. No reference to this in TOC

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

4.(1) Legally compliant ☐

4.(2) Sound ☐

**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.*

**See attached.**



**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.*

**To ask residents to amend a Local Plan from a legal and soundness point of view is asking too much of unqualified town planners.**

***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:

*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.*

**This is necessary because most residents will not have the time or patience to plough through 100s of pages of plan and evidence. Many will have had limited exposure to consultation exercises and have limited quantitative and qualitative inputs to make. I'm attempting to represent residents' interests.**

**Attachment to Form B**

1. Preface

At 516 pages long this Local Plan (LP) guidance for Councillors in determining Planning Applications is unwieldy and unhelpful. Charles Dickens epic 'Tale of Two Cities' is slightly longer at 540 pages. The 'West Ealing Centre Neighbourhood Plan' is a mere 51 pages long. There is far, far too much repetition in the LP.

Add in the 1,000+ pages in the 'NPPF' and the 600 pages of 'The London Plan', Councillors will have to wrestle with some 2,116 pages in order to determine planning permission.

The LP reads like an election manifesto which is grossly inappropriate and offensive.

2. Introduction

The Leader of the Council has stated publicly that in future residents would be in the driving seat for developing Ealing. To stretch this metaphor somewhat my perception is that it's a driver-less vehicle travelling at the universal Ealing funeral road pace of 20mph.

The elephant in the room, however, is the housing target by 2039 of 41,571 new homes. The GLA population prediction for Ealing is 81,117 new residents by 2040. That will give us a 2040 population figure of 477,257 somewhat greater than Coventry - England's 9<sup>th</sup> largest city. If this growth is to be enabled by the Elizabeth Line (EL) then without major upgrades in frequency of rush hour trains and Ealing EL train station platforms becoming safe for all passengers – this population growth will stall.

Do the current residents in Ealing want this growth? Have they ever been asked?

3. GLA Housing Target

Why is this so high when compared to most other London boroughs? The massive population increase is very different to other neighbouring boroughs. Hounslow's is 45,617 and Harrow's is 15,966. Kingston even has a population reduction by 2040!

4. Needs

The LP apparently 'seeks to meet the area's objectively assessed needs'. Where is the evidence articulating these needs? The only assessment of needs is for housing. Where's the objective needs assessment for social services?

5. The Shibboleth of 'Development'

The concept that the LP does not cover maintenance is a flawed one. Whether referring to social, residential, environment or infrastructure maintenance - it makes no difference. There is a very strong logical argument which posits that 'development' is but the first phase of 'maintenance'.

The need for maintenance of public land and buildings is in the interests of the 'public good'. It's also climate change compliant. It's very good for the environment to re-use/not ignore the energy already invested and expended to create a building.

There should be an NP policy for maintaining the public realm and our roads over the next 15 years. Repairing cracked pavements, filling potholes, repainting road markings regularly and removing obsolete yellow Planning notices are examples of maintenance tasks.

6. Heritage

Another policy needed in the NP is for maintaining heritage. Grade I, Grade 2 and Locally Listed buildings must have annual maintenance budgets over the next 15 years. Such buildings and land includes Warren Farm, Ealing's new Regional Park and Southall Town Hall. If such a policy had been included in the current LP we may never have 'lost' Ealing Town Hall, Gurnell Swimming Pool and the old multi-storey car park in Singapore Road in West Ealing.

7. Working From Home (WFH)

Some assumptions need to be made on estimating the impact of WFH on transport, infrastructure, energy, water, culture, social and environmental needs over the next 15 years.

8. Capacity Planning

The classical approach to capacity planning would begin with some assumptions. There are precious few capacity planning assumptions made for the 'pillars' of economics or environment.

9. Accommodating Asylum Seekers

Some capacity planning for this must be transparent in the LP. How many more or fewer hotels and temporary accommodation will be needed up to 2039?

10. 'Fight Inequality'

A fatuous aspiration in terms of the LP. Inequality must be tackled at a national level. However as we don't have an explicit National Plan this is somewhat problematic.

11. 'Create Good Jobs'

This aspiration written by the Council Leader on page 9 is completely unachievable and a distraction in any iteration of the LP. British Land building an office block across the road from Ealing Broadway Station is no guarantee that the building will be filled by employees with jobs – never mind 'good jobs'.

12. Energy

The June 2022 'West London Electrical Energy Constraints' report by the GLA revealed that parts of Ealing are at full capacity with regards electrical connections for residential developments of over 25 homes. For large residential developments, electrical connections cannot be guaranteed by SSE/National Grid before 2030. This fact needs to be spelt out in the LP.

13. Water

London is facing a water crisis due to a combination of factors such as loss of green space, growing population and climate change. London has experienced water shortages in recent years. London has been described as 'seriously water stressed'. Water demand is expected to exceed supply over the next 10 years – and severe water shortages could affect London by 2040.

The precarious finances of Ealing's water supplier Thames Water is concerning and should be flagged up in the LP. With £18 billion of debt, Thames Water is at risk of a disastrous corporate failure.

#### 14. Health and Social Care

There are no plans to create new GP surgeries which will be needed to service the 80,000+ new Ealing residents. The Ealing town most likely to be the most affected by this GP shortage in Acton – which has currently the most populous Primary Care Network in the whole of the borough.

There are currently no residential beds in Ealing for those adult men given Section 2 Orders under the Mental Health Act for assessment. This is a massive unfitness for purpose as patients have to be securely diverted to West Middlesex Hospital or Charing Cross Hospital. Clearly with 80,000+ more Ealing residents more male patients will be Sectioned. The LP provides no plan to rectify this local failing.

Ealing Hospital – our only hospital - does not provide cancer diagnosis or treatment services. 1 in 2 people in the UK will be diagnosed with cancer in their lifetime. Cancer incidence in London is 556.7 people per 100,000. At the 2040 population prediction of 477,257 (Ealing's 2022 population of 396,940) the cancer incidence will be over 2,500 sufferers who will not be able to receive cancer diagnosis or treatment in their own (very large) town.

#### 15. 20-Minute Neighbourhoods

It's an interesting concept. It breaks down completely when I consider that I and my close friends know of no-one who walks 10 minutes to their work. I accept that those who work 2/3 days at home are partially compliant. A 10 minute walk to a sport or cultural venue is highly unlikely for most Ealing residents today or in 2039. There are no LP initiatives to add tens (or 100 or so) of sporting and cultural venues throughout the borough during the next 15 years.

#### 16. Transport

If 41,000 new homes are to be built in Ealing during the next 15 years, there have to be policies to cope with the increased traffic which will support these 80,000+ new residents. These policies include capacity planning for pedestrian space, public transport, private individual vehicular transport and commercial vehicular transport.

Most of these new homes will be flats in tower blocks with little or no car parking space. Such residential enterprises will require significant local facilities for delivery and collection of individuals and goods. The areas where such transport planning is most needed is likely to be North Acton and central Southall. There's no sign of such planning in the LP.

The new Crossrail/Elizabeth Line (EL) is currently unable to cope with the morning rush hour demands of commuters at Ealing Broadway Station (EBS), Hanwell Station and West Ealing Station (WES). The EL trains are so packed it's impossible for commuters to board the rush

hour trains at these stations. Many more trains /hour are needed in rush hour. Nothing in the LP about this

Added to this, passengers alighting at EBS and WES are in danger of hurting themselves as a 12 inch vertical gap exists between the rail carriage floor and the platform. Evidence to support this is my broken foot bone incurred exiting a busy EL train at EBS on 27 February 2024. EL is unfit for purpose at EBS, WES and probably other stations for single parents with buggies, disabled passengers, those travelling with big cases and the elderly generally. There is nothing in the LP about closing this huge vertical gap at EL stations.

The 5,295 new residents in the 2,118 rented homes at Greenford Quays will generate considerable traffic through Greenford Station and the shuttle to WES (and onwards to the city centre). More rail and station capacity will be needed to support this. No mention of this in the LP. The massive residential building programme (covering over 21 hectares at 7 sites) in Northolt will generate significant volumes of passengers on the Central Line into London. The next stop on the line is Greenford Station. So even more congestion for Greenford commuters leading up to 2039 – with no evidence to suggest any expansion of the station.

17. Climate Change/Carbon Neutral

The target of the borough to be carbon neutral in less than 6 years is surely, clearly unattainable. Building 41,000 new homes by 2039 will come at a huge carbon price.

18. New Residents' Needs

Because Ealing has no control over meeting the economic, social and environmental needs of the 80,000+ new residents – even if it had assessed their needs – there can be no 'control of or certainty of adequate capacity being provided by 2040 of services including energy, water, healthcare, policing, social, transport, employment culture or sport.

19. Overall my view is that the plan **has not been positively prepared**. The specifications of the area's objectively assessed needs – except housing – are missing.

20. As for **effectiveness** there is no historic evidence which demonstrates Ealing has met any London Plan housing targets since 2019/20. So why would anyone have confidence in Ealing meeting its 2039 target?

21. As to whether the plan is justified – I see no evidence of discussions of 'reasonable alternatives'. And so I deem the LP to be **unjustified**.

22. Consistent with National Policy?

Just to pick one example. Ealing plans to become Carbon Neutral by 2030. This does not reflect national policy. The recent updated DEFRA 'Environmental principles policy statement' makes no mention of a 2030 Carbon Neutral policy. So **not consistent with national policy**



Form B

SP 2

SP 2. 1

A

I can find no definition in the Local Plan (LP) Glossary as to what 'new growth' actually means. If it means 1,000s of new flats and 10,000s of more residents, it is almost certain that current Ealing residents would not welcome additional competition for water, energy, transport, healthcare, culture, sports law and order and other public services.

'...benefits of new growth' are not demonstrated or proven.

Unsound policy.

B

'Retaining vital public assets and buildings...'

There is a clear recent history of this policy not being applied egs Ealing Town Hall, Gurnell Leisure Centre and the W13 Singapore Road multi-storey car park.

At Development Site 11EA there is no reference to retaining/rebuilding the existing public asset West Ealing Community Library. This approach is inconsistent with this policy.

Unsound policy.

SP2. 2 Climate action

B

- (i) The '20 -minute neighbourhood' is an interesting idea – but implementing it across Ealing's 21 square miles is impossible. Most Ealing residents need to work. Apart from some working from home 2/3 days /week, most Ealing residents' journey to work takes longer than 10 minutes. As does their journey home. How is it possible that any Council measures or workplace re-locations could bring about this 20 minute 'dream' by 2039 or ever? As for being 10 minutes travel to a sports or cultural venue? Where are the plans to build the 10s or hundreds of these which would be needed to realise the '20-minute' dream?

Unsound policy

(iii)

'Improving public realm, which will ensure greener, healthier and safer neighbourhoods'.

Where is the evidence that whatever public realm improvements (changes) are made will lead to healthier and safer neighbourhoods?

Unsound policy

- (v) 'Reducing the number of motor vehicle trips in and through Ealing'.

How might this policy be implemented? What is the current number vehicle trips in and through Ealing? If the number was reduced by one would this constitute a sound policy? With 10,000s of new residents living in the 41,000 new homes by 3039, most of them will live in car parking sparse or no car parking tower blocks. The movement of goods and less mobile people into and out of these tower blocks will only be expedited by the use of a significantly increased number delivery vehicles and taxis, ubers and private cars. There are no plans for the Council or TfL to extend existing public bus services or create new public bus services to cater for the transport needs of the being constructed/ planned tower block clusters in Southall, Acton and Northolt.

Unsound policy

C

- (ii) '...identifying sufficient sites and capacity for waste management facilities'. This needs to explicitly include what we used to call 'tips' to where residents can take their waste. With currently only one such tip (in Greenford) in Ealing, the 80,000+ new residents will need at least one new tip to be created to meet their waste needs. It should be a drive-in/no booking tip unlike the current Greenford tip at which Covid driven booking protocols still shamelessly exists.

Unsound policy

D

- (vi) 'Facilitate the use of existing buildings where this represents the optimum outcome' This is helpful but without an explicit mention of taking into consideration the energy expended in creating the existing building – this policy is unsound.

SP2. 3

A

The LP Glossary includes the following facilities as 'social infrastructure': '...colleges, universities, cultural, sports facilities, places of worship and policing...'

The LP states 'safeguarding, improving and facilitating the restructuring of existing social facilities...'

The Council has no control over virtually all these social infrastructure facilities.

Unsound policy

Form B

SP 3.3

I

‘Working closely with the NHS partners to identify need and opportunities for new health infrastructure and health services particularly within and around developments particularly within Acton and Southall’.

This isn’t a plan – it’s an aspiration. With no quanta of housing quoted in Development Sites’ profiles it’s impossible to estimate the increased need for Primary Care. Such a real plan would compute these numbers and actively plan to extend existing GP surgeries and build new ones – with sites identified.

Unsound policy

SP3.3

G

‘creation of a new outdoor swimming pool’.

Where is the evidence that Ealing residents have asked for this. Where is the research on the size of the demand? Where is the evidence that such a facility would be economically viable?

Unsound policy

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**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)*

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First Name\*:

Last Name\*:

Job Title:

Address Line 1:

Line 2:

Line 3:

Line 4:

Post Code:

Telephone Number:

E-mail Address\*:

Name of Organisation: West Ealing Neighbours

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

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

Paragraph:

Policy: SP2.1 paragraph B

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.**

Policy SP2.1 paragraph B says that Ealing Council will promote an inclusive economy by *retaining vital public assets and buildings, using them for the maximum benefit for the borough's residents and keeping them in public hands for public use.*

This policy is not deliverable and is therefore not effective and is unsound.

If there is one blindingly obvious "vital public asset" In Ealing it is the Town Hall. This cherished Victorian building has long been used for weddings, the welcoming of new citizens, election-day polling, and COVID vaccinations among other uses. Its position in the heart of Ealing and its august appearance provide the ultimate in "wayfinding" and a visceral connection with Ealing's past.

Yet what Ealing Council has done, against the wishes of Ealing residents, is attempt to sell the Town Hall to a hotel developer. This is the opposite of what Policy SP2 proclaims:

- The vital public building has not been retained.
- It is no longer available to provide any benefit whatsoever to residents.



- It has not been kept in public hands for public use.

Ealing Council has ceased maintenance of the building so that its structure and furnishings are becoming ever less able to serve the Ealing public. The situation is so bad that the council is having to spend money putting up tents in Walpole Park to support the May elections – with deleterious effects upon the park and discomfort for the voters. If the council had any true concern for “vital public assets” the Town Hall would have served its customary role on election day.

The council has not been content in trying to sell off its “vital public assets”. It has also attempted to sell off Victoria Hall, which abuts the Town Hall, even though the council does not own it. Victoria Hall is owned by the Victoria Hall Trust. It was placed into trust in 1893 to ensure that it would be available for use by the citizens of Ealing in perpetuity. Yet Ealing Council has spent over £2 million battling against residents for the right to sell off this property which it does not own, to hotel developers.

**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.**

The site of the Town Hall and Victoria Hall should be designated as a Development Site in Chapter 4. It must be made clear that both buildings should be renovated to preserve their heritage value, with an absolute minimum of modifications, and that the Town Hall should remain in public hands.

If this change is not made to the Local Plan then, sadly, paragraph B of policy SP2.1 should be deleted as being dishonest PR twaddle.

***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**, 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.*

Very few people feel that they have understood the 516-page Local Plan and all its related documents. The Council has in effect stifled objections by structuring the plan in this unnecessarily cumbersome way. Therefore those few of us who have spent hours reading the plan must be prepared to speak on behalf of our neighbours.



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Post Code:

Telephone Number:

E-mail Address\*:

Name of Organisation: West Ealing Neighbours



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

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

Paragraph: Infrastructure Delivery Plan, Part Two: Infrastructure Delivery Schedule

Policy: E1 Ealing Spatial Strategy, paragraph P

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.**

The Local Plan is not consistent with national policy nor with the London Plan, and is therefore unsound.

I quote from the NPPF:

(paragraph 8a) an *overarching economic objective* is coordinating the provision of infrastructure

(paragraph 11a) all plans should promote a sustainable pattern of development that seeks to ... align growth and infrastructure

(paragraph 86c) planning policies should seek to address potential barriers to investment, such as inadequate infrastructure

The London Plan says in policy D2.B:

Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.

The electricity supply in the West Ealing area is already overburdened. There have been recent power cuts – such as that of 19 January 2024 – and a major fire at the



ageing Dean Gardens substation. This is just one of many ageing assets that need replacing – but no plan for this is apparent.

The Local Plan does not address this issue which is already critical. Please see the table at the end of the *Infrastructure Delivery Plan, Part Two: Infrastructure Delivery Schedule*. Near the beginning of this table are five “Electricity Supply” projects. All five are marked “Critical”. Four of them have a delivery period of “TBC”, including both of the projects earmarked for Ealing.

With the current situation liable to cause further outages and fires, and the impending creation of 41,000 new homes, it is simply not good planning to leave electricity supply projects for a date TBC.

Plus, we have no basis for confidence that these specific infrastructure projects will suffice to support the new homes on top of existing electricity consumers. More improvements may be needed in addition to the five listed. A true plan would chart the expected growth in megawatt consumption per year against the electricity supply components needed to provide those megawatts. No such plan is apparent.

The Local Plan has not been positively prepared, because it does not seek to meet the area’s objectively assessed needs for electricity.

**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.**

Establish target dates in the immediate future for all Electricity Supply projects in the IDP final table. Make corresponding changes to Chapter 4, Ealing Town Plan, Table E1, page 159.

Better still, include a true **plan** for electricity consumption and supply mapped over the next 15 years.

Failing this, the plan should include a statement, agreed between the council and the relevant electricity providers, guaranteeing that sufficient electrical supply will be available for all site allocations in the Ealing Town Plan before they are completed.

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

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



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Name of Organisation: West Ealing Neighbours

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

Paragraph: Chapter 4, pages 154-155, 159, 169, IDP Part Two section 3.9

Policy: E1 Ealing Spatial Strategy, paragraph P

Policies Map: Site 06EA (49-69 Uxbridge Road, pages 182-183 of Chapter 4)

**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.**

The Local Plan is not consistent with national policy.

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(paragraph 8a) an *overarching economic objective* is coordinating the provision of infrastructure

(paragraph 11a) all plans should promote a sustainable pattern of development that seeks to ... align growth and infrastructure

(paragraph 86c) planning policies should seek to address potential barriers to investment, such as inadequate infrastructure

An item of infrastructure that every large community needs is a police station where the public can go to seek help or, for example, to leave goods which appear to have been stolen. Central/West Ealing, a town of 91,149 people, has been without such a police station for several years.

The Local Plan does not address this in a timely way. In Chapter 4 page 159, Table E1, the refurbishment of Ealing Police Station has a target date "TBC". The table at the end of the Infrastructure Delivery Plan, Part Two also says "TBC". Chapter 4 site selection 06EA sets a target for completion of **2038**.

This is not soon enough. New housing developments in Central/West Ealing adding thousands more people should not go forward until there is water, electricity, transport ... and a fully functional police station.



The Infrastructure Delivery Plan, Part Two: Infrastructure Delivery Schedule, page 20 does not give one any additional hope: *In terms of planned service provision, the Metropolitan Police Service identified the ‘Strongest Ever Neighbourhood Policing’ initiative, which would see investment by the Metropolitan Police in more local police officers and police community support officers (PCSOs) in the neighbourhood.* There is nothing concrete in this statement. It is neither a plan nor a schedule. It’s what is commonly called “waffle”.

The Local Plan has not been positively prepared, because it does not seek to meet the area’s needs for access to police.

**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.**

The 06EA site plan in Chapter 4 pages 182-183 should be changed to specify a timeframe for delivery of a new police station within 5 years. Corresponding changes should be made to Table E1 on page 159 and to the table at the end of the Infrastructure Delivery Plan, Part Two. The 06EA site plan should make it clear that the new police station will have a public-facing desk, open all hours every day.

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

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

Very few people feel that they have understood the 516-page Local Plan and all its related documents. The Council has in effect stifled objections by structuring the plan in this unnecessarily cumbersome way. Therefore those few of us who have spent hours reading the plan must be prepared to speak on behalf of our neighbours.

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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:

Address Line 1:

Line 2:

Line 3:

Line 4:

Post Code:

Telephone Number:

E-mail Address\*:

Name of Organisation: West Ealing Neighbours



**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, pages 192-193

Policy: E2 Ealing Metropolitan Town Centre, paragraph G.

Policies Map: Site 11EA (Sainsbury's and Library, West Ealing)

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.**

For site 11EA, Chapter 4 says on page 192 “design analysis indicates a maximum height of 16 storeys”. But I see no design analysis in the Local Plan or its supporting documents which would support that assertion. On the contrary, the “Tall buildings strategy, main report” gives guidance for West Ealing overall on page 28, with prospective tall building heights being **7-13** storeys.

Further, the “Tall buildings strategy appendix – Guidance for study sites” includes on page 49 a map more specific to this site’s area, clearly showing that no building taller than 13 storeys is desirable.





Further, a maximum height of 13 storeys for this site was proposed at the Regulation 18 stage of consultation. I have found no explanation for the increase between stages 18 and 19.

If the council's aim was to add a certain number of new homes in the area, an increase to this site's target height was not necessary, because sites 12EA and 14EA will inevitably produce significantly more homes than envisioned for them in the Local Plan. (See further Part B representations below.) Site 12EA will provide four storeys more than planned, and site 14EA will provide another three storeys more than planned. The sum of new homes across sites 11EA, 12EA and 14EA will be enough to meet the council's aims even when the 11EA target is reduced back to 13 storeys where it stood at Regulation 18.

If I may refer again to the "Tall buildings strategy, main report", it says on page 6: *Examples of inappropriately tall buildings include developments that ... exceed the upper limit of the guidance set out for an appropriate location for tall buildings.* The proposed 16-storey replacement for West Ealing Sainsbury's would thus be inappropriately tall, by the council's own definition.

NPPF paragraph 31 says *the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned.*

Ealing's Local Plan does not conform to the NPPF, because no relevant evidence has been shown for increasing the height of site 11EA beyond 13 storeys.

**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.**

Chapter 4, pages 192-193 should be changed to set a maximum height of 13 storeys. Any other references to the height of 11EA should be changed accordingly.

The current public library and sheltered housing must be replaced in any redevelopment. If their mention under "Key Infrastructure Requirements" is not sufficient to force their inclusion, then re-state these requirements elsewhere so that they are mandatory in any redevelopment.

The Design Principles on page 193 must state that car parking **will** be required for the supermarket and community facilities (even if car parking for the residential components of the site is to be restricted).

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

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

Very few people feel that they have understood the 516-page Local Plan and all its related documents. The Council has in effect stifled objections by structuring the plan in this unnecessarily cumbersome way. Therefore those few of us who have spent hours reading the plan must be prepared to speak on behalf of our neighbours.

**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, pages 194-195

Policy: E2 Ealing Metropolitan Town Centre, paragraph G.

Policies Map: Site 12EA (Chignell Place, West Ealing)

**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.**

The plan for site 12EA is not deliverable, since Ealing Council has already approved application 215125FUL for an 8-storey development on this site.

The draft Local Plan calls for a maximum of 4 storeys, and specifically states that the site "is not in principle suitable for a tall building". But these words and these aims have no meaning, following the council's approval of the 8-storey development.

**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.**

The appearance of site 12EA in the Local Plan is misleading, because the council has already given away control, and it is now undeliverable. I leave it to the Inspector to decide whether there is sufficient merit to keep it in the Local Plan at all.

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



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

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**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, pages 198-199

Policy: E2 Ealing Metropolitan Town Centre, paragraph G.

Policies Map: Site 14EA (Western Gateway, West Ealing)

**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.**

The plan for site 14EA is not deliverable, since Ealing Council has already approved application 225080FUL for a 9-storey development on this site.

The draft Local Plan calls for a maximum of 6 storeys. But this has no meaning, following the council's approval of the 9-storey development.

It seems likely that the council will also approve application 235015FUL making the 9-storey building wider.

**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.**

The appearance of site 14EA in the Local Plan is misleading, because the council has already given away control, and it is now undeliverable. I leave it to the Inspector to decide whether there is sufficient merit to keep it in the Local Plan at all.

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

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

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**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:

Address Line 1:

Line 2:

Line 3:

Line 4:

Post Code:

Telephone Number:

E-mail Address\*:

Name of Organisation: West Ealing Neighbours

**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, pages 200-201

Policy: E2 Ealing Metropolitan Town Centre, paragraph G.

Policies Map: Site 15EA (Waitrose, West Ealing)

**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.**

The 15EA site definition fails to include the single most important part of the public realm in that area – the footbridge known as Jacob’s Ladder. This has long been a major passage for north-south foot traffic across what is otherwise an impassable railway line. To propose a 15-year plan without addressing the dilapidated state of Jacob’s Ladder, and the key part it plays in active travel, is a terrible oversight. In this regard the Local Plan has not been positively prepared and is therefore unsound.

Chapter 4 page 201 addresses car parking issues for this site. In several ways it is deficient:

- It does not address the significant requirement for supermarket car parking. No reasonable person would claim that the current well-used car park can simply be wished away. Space must be allocated within the site (perhaps underground) for shoppers who need to park and carry significant loads.
- It does not address the routes by which vehicles will approach the site. Alexandria Road may be unable to tolerate the increased traffic required to service hundreds of new homes on the site. Deliveries (Amazon, UPS etc.) must be considered.
- It says “Incorporate car free shopper parking for replacement food store/supermarket”. I cannot make sense of that statement. It seems to imply that car-free shoppers will need parking spaces.

The planning for vehicles is ineffective 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.**

Incorporate Jacob's Ladder – or at least the south end of it – in site plan 15EA, and make clear that whoever develops the site must significantly improve the pedestrian experience there and facilitate north-south wayfinding.

The Design Principles on page 201 should state that car parking **will** be required for the supermarket (even if car parking is to be restricted for the residential components of the site). The Design Principles should also positively address the question of vehicular access to the site.

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

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

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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](https://www.ealing.gov.uk/info/201164/local_plan/3125/new_local_plan/4)

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**Part A**

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

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First Name\*:

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Job Title:

Address Line 1:

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Line 3:

Line 4:

Post Code:

Telephone Number:

E-mail Address\*:

Name of Organisation: West Ealing Neighbours

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

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

Paragraph:

Policy: ENA: Enabling Development – Ealing LPA – local policy

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.**

At the Regulation 18 stage of review, Ealing's draft Local Plan included the de-designation of a great many tracts of Metropolitan Open Land (MOL). It was the council's intent to allow building on much of this land. Had the council had its way, much of the formerly protected green spaces would have been lost forever.

This ploy by Ealing Council was stopped only by direct order of the Mayor of London.

Policy ENA would enable the council to resume its intention to build on MOL. Acting as its own judge and jury, the council could declare that in any given case the benefits of sidestepping planning rules would outweigh any material planning harm.

One political party has an overwhelming majority in the council chamber. Residents are familiar with its tendency to do whatever it pleases, against their wishes. The sudden imposition of Low Traffic Neighbourhoods and the demolition of West Ealing's central Art Deco heritage building are two obvious examples. We, the residents of the borough of Ealing, do not trust our council with the powers that would be bestowed by policy ENA.

The fact that policy ENA is presented only on the last page of the last chapter of the plan, and not described accurately, says much about the council's intent. Historic England, and national policy, make it clear that Enabling Development is intended solely to secure the conservation of a heritage asset. There is no mention of this in Ealing's plan, thus leaving the reader with the impression that the policy can be applied to any situation, even where no heritage asset is at stake.



The policy fails to comply with NPPF paragraph 16.d which says that policies should be *unambiguous, so it is evident how a decision maker should react to development proposals*.

Thus ENA is not consistent with national policy, and is 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.**

Policy ENA should be deleted from the Local Plan.

***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**, 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.***

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