



**LOCAL PLAN/COMMUNITY ENGAGEMENT  
MINUTES OF A MEETING BETWEEN COMMUNITY GROUPS AND EALING COUNCIL**

Perceval House, 28 October 2024

**Present:** Cllr Shital Manro, Cabinet Member for Good Growth and New Homes (SM)  
Cllr Sanjai Kohli, Chair of Local Development Advisory Committee (SK)  
Peter George, Strategic Director for Economy and Sustainability (PG)  
Alex Norfolk, Cabinet Support Officer – Homes & Jobs (AN)

Geoffrey Payne (Chair) (GP)  
Minni Dogra, Residents Association Longford Avenue Management (MD)  
Will French, Save Ealing's Centre (WF)  
Libby Kemp, Kay Garmeson, Ealing Matters (LK), (KG)  
Nic Ferriday, Ealing Friends of the Earth (NF)  
Justine Sullivan, Stop the Towers (JS)  
David Tennant, Cap the Towers (DT)

**1. Apologies**

Jennifer Peters, Assistant Director for Planning, Design and Sustainability (JP)  
Steve Barton, Strategic Planning Manager (SB)  
Alex Jackson, Development Planning Manager (AJ)

**2. Minutes of 29 July meeting**

Noted and agreed that individual points arising would be dealt with under the relevant headings in the agenda.

**3. Local Plan**

**3.1. Submission date to the planning inspectorate**

PG revealed that, contrary to his email of 18 September, LBE's Local Plan would not now be submitted at the end of October, but that the date had been put back to the end of November/ beginning of December.

WF complained that work had started in 2018 and that local people had been told at that time that there would be a new Local Plan by 2020. He added that people had been consulted and now wanted to see the end product. He also expressed concern that Labour's new National Planning Policy Framework (NPPF) is nearing adoption, and that the Local Plan needs to be submitted before it comes into force. He begged LBE to submit its Plan to the planning inspectorate to avoid having to start the Plan afresh.

PG responded that LBE is aware of this risk, but downplayed it because Ealing's Local Plan had reached and completed the Reg 19 consultation (in contrast to some councils that had only reached the Reg 18 stage). He reasoned that the Government wants growth, and that this would be impeded were LBE to have to start anew on its Plan.

PG stated that LBE is working together with the Government/GLA on what can be expected from the next London Plan, given that the capital's housing target under the new NPPF would be 80,000 units per annum compared with 52,000 now. SM said that there would be changes. PG has started scenario planning on the basis that LBE's housing target could go up to 3,000 per annum (rather than 2,157 as now) were the additional units to be evenly distributed across London. He added that last year it was a struggle to achieve half of the target. An interim local housing target will be provided w/commencing 11 November. Once that is adopted, LBE would have to plea to the planning inspector for a variation to the Local Plan.

**Action:**

- LBE to submit Local Plan to the planning inspectorate for examination by end November/beginning of December 2024.
- LBE to publish interim local housing target w/commencing 11 November

**3.2. Implementation of the Local Plan**

*Why is the emerging Local Plan being ignored by officers?*

With regard to PG's comments, JS observed that LBE is working on the new London Plan and on the next Ealing Local Plan, yet the Reg 19 Local Plan is not being applied, despite the fact that it is relevant and could be referred to when taking planning decisions. She questioned the fact that the current London Plan was applied before being formally adopted, whereas LBE's planning committee is continually told that the Reg 19 Local Plan is not relevant.

LK raised the issue of pre-application discussions between LBE planning officers and developers. She asked whether SM sits in on these meetings. SM does as the Cabinet portfolio holder for Good Growth. PG and the Leader of the Council do not attend formal pre-application meetings, but PG does have informal meetings with developers who are active across multiple sites in order to discuss more strategic issues and to be briefed by planners on the development pipeline. LK questioned whether officers are aware of the Local Plan when meeting with developers. PG said that they are and that JP and AJ refer to the emerging Reg 19 Plan at that point. LK suggested that they do not point out to developers that they are not allowed to build towers due to the Local Plan.

The community group referred to a number of schemes as examples:

Acton

DT raised the fact that a recent news article claimed that the numbers of social housing units in the Friary Park scheme had gone down from 237 to 190. PG responded that he and SM were aware that the figures from Peabody published in the article were wrong. He confirmed the correct figures to be:

- Social rent (council/social housing): 237
- London Affordable Rent: 78
- Shared Ownership: 140

- Market housing: 890

PG had told Mount Anvil that the figures were wrong at their last meeting, and that the original numbers were correct. He added that the share of affordable units is down due to more private homes being added to the scheme to improve viability. WF asked how this mistake will be corrected. PG responded that the planning committee would be made aware of the correct figures.

DT also questioned the fact that the affordable housing for rent would be split half and half between Social and London Affordable tenures. SM observed that social rents within the Housing Revenue Account had been held down, and that, had they been raised earlier, LBE would not have the problems it has now. PG added that those tenants who had lived on the estate and were returning would be paying comparable rates to previously, but that people moving to the state for the first time were considered to be capable of paying more.

DT raised an issue about possible misconduct on the part of the LPA relating to the Friary Park scheme. The accusation submitted by more than 100 residents relates to the concealment of the ultimate quantum of development planned. DT showed an artist's impression dated 27 February 2019 (prior to the original planning approval) of a similar size to the final development should the Phase 3 application be accepted, and much larger than the scheme approved in 2019. DT concluded from this that the developer always intended to build a larger scheme than originally approved, that this was already being discussed with planning officers at that time and that this was achieved via follow-up applications claiming the scheme to be unviable.

**Action:** PG to get the planners to investigate this claim.

#### Southall

MD raised the issue of the towers going up in Southall, showing an image of the skyline from her home in Dormers Wells, and argued that they look worse in reality than in the planning applications. She pointed out that Southall is under a huge amount of pressure due to the number of towers being built there, and added that, because the town is the most affordable location in the borough, the population density is unbearable, with four or five people living together in poor conditions. She was keen for LBE to consider the effects of its planning and development activities on Southall.

SM responded that the Honeymonster will no longer be a 2,100-unit residential development, and that the Middlesex Business Centre may not go forward. MD complained that the development goalposts are constantly shifting, citing the Southall gas works site as an example. WF pointed out that the 2014 Southall Opportunity Area Framework (SOAF) specified building heights of 6-8 storeys, but that this was ditched once LBE started to attend MIPIM.

#### West Ealing

WF asked why big schemes going to planning committee, e.g. Hastings Road, Waitrose, are not following the new Local Plan. JS added that she has been in meetings with the Leader of the Council, who asserts that he has been telling developers that they are not in the driving seat. Yet at planning committee the planners are saying that the new Local Plan does not carry much weight. She asked why planning committee members are ignoring the Local Plan, adding that, if she did this in her job, she would be sacked. She added that the Manor Rd scheme that was approved on the basis of being 100% affordable is being promoted in Asia.

With regard to Waitrose, PG explained that LBE was not happy with application and contemplated recommending refusal on the basis of the heights of the towers and the lack of affordable housing. They had to consider the prospects of winning and the costs to the taxpayer should Waitrose appeal (more than £300,000). PG thought they could make the scheme more acceptable. Waitrose continued to negotiate but in bad faith, with LBE only finding out about the appeal on the day it was lodged. While it is rare for barristers to indicate the prospects of success, LBE's lawyer believed that there was a high probability of losing because of the lack of a 5-year Housing Land Supply (FYHLS) figure.

WF pointed out that the Statement of Common Ground (SOCG) between Waitrose and LBE contains a 4YHLS figure, with the result that the tilted balance does not in fact come into play. PG responded that he was not involved in putting together the SoCG. WF added that the role of the planning department is to determine planning applications, not to appear at inquiries. With regard to 5YHLS, JS and LK added that other boroughs are able to produce figures. SM explained the absence of a 5YHLS figure for LBE on the basis that the Council cannot guarantee that developments will be delivered in the next five years. GP argued that this argument is spurious, and that LBE cannot guarantee that any development would be built within five years.

WF argued that this problem is not confined to Waitrose, and that developers get planning consent, bank it and move on, e.g. Southall Gas Works, Friary Park. LK observed that the Government generally believes developers.

PG observed that a planning system with housing targets makes the Council responsible for making land available making it difficult for the Council to defend the Waitrose appeal. LBE has taken the view that growth has to go somewhere. GP observed that the Council is under pressure to provide more and more planning permissions, and queried whether there had been any discussion about land tax at a rate according to approved use. SM commented that the Leader of the Council, Cllr Peter Mason, now occupies a senior position re housing.

#### *Statement of Common Ground with the GLA*

WF queried what had happened to the Statement of Common Ground with the GLA regarding tall buildings and affordable housing.

**Action:** LBE to provide the promised Statement of Common Ground

### **3.3 Availability of evidence base and other documentation promised**

The missing evidence base and other Local Plan documentation were not discussed due to shortage of time.

**Action:** LBE to provide the information listed at this point in the agenda

GP asked if the Head of Infrastructure is in post. PG reported that Ben Dixon had been appointed to administer CIL/S106. Further recruits were Sara Cook, the Urban Design Lead, who will be responsible for assessing how to apply urban design resources at planning committee, and Mark Thomson as Head of Climate Action.

NF asked if the long-promised Ecology Officer had been appointed. PG was unable to answer.

**Action:** PG to check whether the Ecology Officer has been appointed and inform the group.

### **3.4 S106 and CIL consultation**

#### *S106 reports*

LK would like to talk about how S106 reporting could work, saying that other boroughs are reporting annually. LK will email her thoughts to PG.

**Action:** LK

SM stated that he has seen the S106 reports showing year on year expenditure in draft, and that these will be publicly available in a few weeks, and certainly by the time of the next meeting. LK observed that these reports are a statutory requirement, and that she would have been within her rights to have complained to the monitoring officer's professional body for not fulfilling their duty.

#### *Community Infrastructure Levy (CIL)*

PG said that the CIL charging schedule has been submitted to the planning inspector, and that he is expecting it to be adopted by spring next year. The CIL on residential has two rates:

- Ealing Metropolitan Town Centre: £300 per square metre;
- Rest of the borough: £150 per square metre.

He added that the CIL rates have been reduced due to evidence that CIL and affordable housing are directly competing with one another, but that the CIL schedule can be reviewed in a couple of years. There is no CIL on offices. CIL will be charged at higher rates on student accommodation, hotels and co-living schemes. PG explained that there have been hardly any applications for residential all year, so LBE increased the rates on non-conventional schemes in order to stimulate residential proposals.

WF commented that it is frustrating that the Council is not explaining this to residents, as co-living and student accommodation are not popular. LK referred to a London Federation of Tenants report, which states that students do not pay Council Tax. She queried whether the owners of these buildings pay business rates.

LK observed that residents of a ward have a say over 10-15% of the money raised by CIL. PG revealed the planners' estimate that £60 million worth of CIL will be generated during the 15-year timeframe of the plan. However, he noted that the cost of infrastructure is always greater than the CIL collected. All councils are required to set aside 15% of the CIL pot as a minimum. The Council is putting together a governance framework to determine how this money is spent. This will be based on the seven individual towns. The Your Voice, Your Town (YVYT) consultation process has been established. The process has not yet started, but the intention is that this should be led by communities themselves. GP asked how this YVYT is defined, and whether there will have to be a consultation on the recommended spend.

In the context of the CIL discussion, LK observed that the number of house conversions in Acton are leading to broken pavements due to construction traffic and that money is needed to repair them. PG responded that approval would be given for Article 4 directions. In addition, LBE is in the process of changing the rules to make it more difficult to convert family housing into HMO accommodation. He added that pavement repair belongs within the highways budget.

**Action:** LBE to clarify what CIL will cover and how it will operate.

## 5. Progress on the wider policy framework

PG noted that the GLA consider the Southall and Acton Opportunity Areas to be two of the greatest development areas in London. Stakeholder forums will be chaired to coordinate growth and ensure that all the infrastructure necessary for planned growth, e.g. open space, doctors, shops, transport, is available.

PG mentioned Acton as the most deprived of Ealing's towns in terms of open space. A strategy has been put before Cabinet requiring that:

1. Half of OPDC land should be parkland, of which 60% should be in the form of a single large park
2. 2,000 homes are to be located in the LBE part of OPDC, with half of these units to be affordable.

WF asked whether this information has been publicised. PG responded that the Cabinet report is on LBE's website.

PG observed that the London Plan supersedes the localised planning framework. PG is asking the planners to re-do the evidence base to ensure that infrastructure is not decided based on planning status. Thinking ahead of time would be helpful if the Mayor asked LBE to accommodate more growth. Civil servants are re-visiting the 'gentle density' principle as set out in the Croydon SPG. PG stated that every choice has difficulties. In addition to growth zones, consideration is also being given to small sites.

## 6. Conservation Officer recruitment and the CA review

A Conservation Officer had finally been appointed, with some difficulty. They will start on 6 Jan 2025 and will deal with conservation matters relating to planning applications.

## 7. AOB

PG suggested that the next meeting be held once the S106/CIL reports are available.

**Action:** KG and AN to liaise on dates.