Towards a new London Plan

Public Consultation

Joint response by Ealing Matters and Save Ealing's Centre

Introduction

Ealing Matters and Save Ealing's Centre are umbrella alliances of local groups and residents' associations wanting a voice in the way the Borough is changing. We have discussed in some detail the GLA's 'Towards a New London Plan' consultation document and wish to make the following submissions on it.

We are aware many people are preparing representations on the consultation document. We strongly endorse the submissions Just Space will be making (Ealing Matters has fed into them) and the London Branch of CPRE and their 10 myths on the housing crisis, which merit far greater debate than they have so far received.

General

The 'Towards a New London Plan' consultation starts from the wrong place. It should begin by reviewing the outcomes of the 2021 plan. What worked and what didn't? The six 'good growth' principles need urgent evaluation. These six principles watered down policies from earlier plans – especially the density matrix - but what are they achieving? Few will argue with their sentiment but their outcomes can't be measured. They offer very hazy guidance for managing development and their sole purpose seems to be to make acceptable whatever the Mayor wants them to mean. This is not a good basis for policy-based planning.

Chapter 2 Increasing London's housing supply

The consultation document is preoccupied with **increasing house building** in the capital and we fear this will crowd out ALL other considerations of good planning. The London Plan is supposed to be a spatial plan whose task is to integrate all three pillars of sustainable development. This consultation document suggests that the authors have lost sight of this essential purpose of planning. Too many planning decisions in Ealing over recent years bear out this view.

The emphasis on housing numbers is driven by the national government's target of building 880,000 new homes in London in the next 10 years. But before mindlessly committing to these numbers, some **analysis of the existing housing stock** and how it might be used in future is needed. The present housing shortage dates from the 1980s when baby boomers settled in London and raised their families. Speaking from experience, many boomers have evolved into mortgage free empty nesters, with homes larger than they need and no

incentive (either stick or carrot, but both are needed) to downsize. Besides, over the 10 years of the plan their inescapable life expectancy will free up many homes and boost the supply of the kinds of homes many families prefer over high rise blocks of flats.

We therefore need more understanding of the demographic dynamics before giving commercial developers carte blanche to expand their current tall building programme which is already impacting very heavily on established neighbourhoods. It is widely recognised that repurposing existing buildings where it is possible is a more sustainable approach than comprehensive redevelopment and the construction of tall towers.

It is not even as if the major housebuilders can be relied on to deliver the kind of numbers the Government's targets envisage. Since the rise in interest rates, housing starts in London have slowed considerably[i]. Housebuilders have shown they are driven by their bottom lines rather than a genuine concern to meet arbitrary government targets. If the need for so many new homes really does exist we need a more dependable mechanism to deliver them.

This is especially the case for **affordable homes,** particularly homes for social rent, which are a very high priority in Ealing as across the rest of the capital. Far too few affordable homes are being built. The reliance on viability assessments to secure affordable homes has grown deeply unreliable. These are used by developers to predict that schemes offering far below the numbers of affordable homes required by the London Plan would result in huge financial losses.[ii]

As it is, too many of the new homes our developers are building are not designed for local people. Many are not marketed locally and enquiries by local people often go unanswered. While a better evidence base is needed to confirm the picture, Figure 2.5 of the consultation document reveals very high numbers are sold to overseas buyers (the proportion in Ealing is likely to be higher still) where, we believe, much is left vacant or let out as Airbnb.

As it is, the consultation is overly concerned about the absolute number of new homes to be built, irrespective of their quality, their affordability, the availability of necessary infrastructure to support them, their impacts on the existing city, and the long-term sustainability of the developments and their implications for climate change. We fear that, in the longer run, an overemphasis on housing targets will lead to public costs greater than those incurred in trying to put right the mistakes made by the 1960s comprehensive redevelopment schemes. Fears are growing in Ealing as to the impact on the quality of life in the Borough as a consequence of the rapid growth it has already experienced, and this in turn is leading to a potentially very damaging **loss of trust among the community** in planning generally, and in the integrity of local politicians and local officers.

Chapter 4 – 'London's capacity for growth and design quality'

One way to address these points would be by expanding the content of Chapter 4 and strengthening, and adhering to, the policies that result from these considerations. In its

present guise we see Chapter 4 as unacceptably thin. In particular we need a review of the **Policy D9 Tall Buildings** which is recognised as being a sensitive issue. Tall buildings are very much a strategic matter in London as there are limited alternatives for accommodating the housing targets imposed on it. Policy D9 needs to be strengthened and clarified in recognition of this and not left to boroughs like Ealing to decide. One way to do this would be through maximum and minimum building heights as the consultation document proposes.

Paragraph 4.4 on heritage also requires elaboration. The opportunities for heritage-led regeneration are well recognised and must continue to play an important role in London. It is insufficient to leave this issue to national government as Para 4.4 suggests.

Housing standards, amenity space etc also need to be more fully addressed. Our perception is that standards have declined across the board over recent years (especially with the take-up of co-living developments, and we believe we are now building what will become the slums of the future. This is an unsustainable approach to development. London must guard against it.

Chapter 5 London's infrastructure, climate change and resilience

Chapter 5 is disappointingly thin the Mayor's ambitious growth targets. Good planning means not just building new homes but providing the infrastructure to support them. The consultation document is silent on the ability of public services like health and social care, law and order and welfare to cope with the increased population. While much evidence demonstrates it is struggling to deal with existing demand, it is also thin on the future capacity of hard infrastructure like water supplies and waste water and electricity generation and supply. While acknowledging the need to reduce car use, the absence of any reference at all to the road network and its purpose is a grave omission. The highway network plays a fundamental role in London's economy.

Also missing from the consultation document is a serious discussion about adapting to and mitigating climate change. The Mayor has committed to **London becoming carbon neutral** by 2030 and it is not clear how this can be achieved so we need to know what policies will be pursued to make this happen and how their performance will be measured.

Comments specific to Ealing

Our further comments concentrate on what the new plan might mean for Ealing.

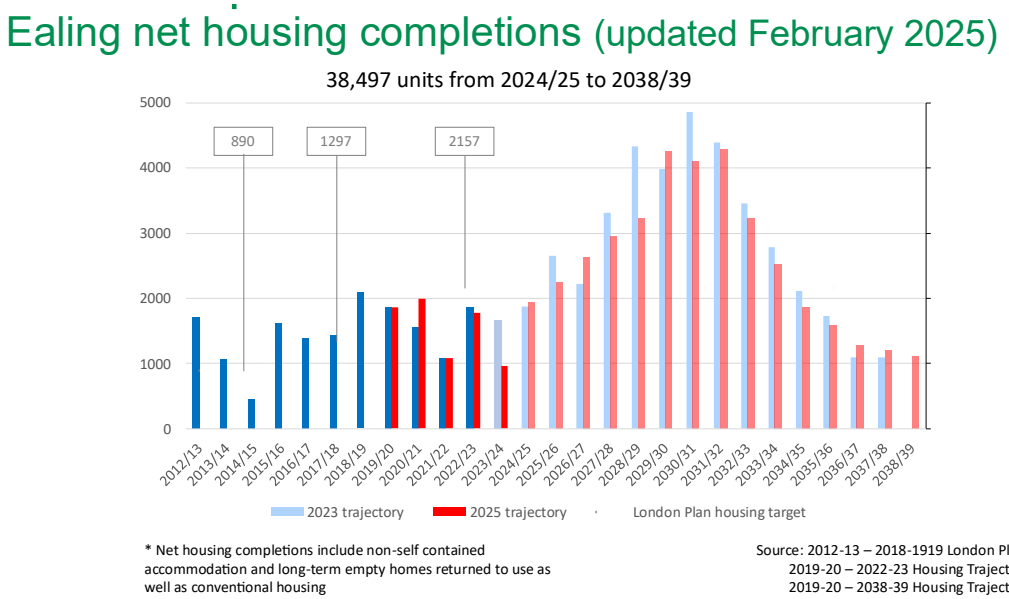
1. We understand that housing targets for individual boroughs will emerge following the publication of the SHLAA and SHMA this autumn. The assumptions underlying both documents need to be available for public comment – something that has not happened in the past. The SHLAA must recognise the fact that Ealing is already an extensively developed residential suburb, which has provided homes for countless families over the

years. The scale of its development is most characterised by low-rise family housing[iii]. As a residential suburb, the Borough had relatively few large industrial brownfield sites and many of those which did exist have recently been built out. It is unclear to us where the further sites exist that could raise the Borough's housebuilding targets significantly without removing treasured areas of MOL or increasing the densities and heights of new developments to levels that would permanently destroy Ealing's character.

2. We especially wish to see that the SHLAA recognises the 24,000 sites in the Borough (London's third highest and around 10% of its total) which have been consented for development but remain unimplemented according to the Planning London Datahub[iv].

3. The consultation offers no consideration for the population growth that would result from an increase to Ealing's housing targets. GLA figures say our Borough will grow by 80,317 by 2041[v] based on current housing targets, the third highest growth in London despite the relative dearth of brown field sites. Any new plan that raises the targets will stretch this number considerably and the new plan needs to discuss the implications.

4. Anyway, Ealing's delivery record makes it unlikely these numbers can be attained. Existing targets require the Borough to deliver over 3,000 new homes pa for 5 consecutive years and over 4,000 for 3 of them. The chart below shows that the Borough has only once built more than 2,000 homes in a single year since 2012.



* Net housing completions include non-self contained accommodation and long-term empty homes returned to use as well as conventional housing

Source: 2012-13 – 2018-1919 London Plan AMRs
2019-20 – 2022-23 Housing Trajectory 2023
2019-20 – 2038-39 Housing Trajectory 2025

5. Ealing's delivery of affordable housing is very poor. The Waitrose inquiry Inspector found the Borough produced just 13 affordable homes 2023-4, and some sites promising new affordable homes (e.g. the Council owned site at Dean Gardens) have stalled. The Borough requires a more honest debate about how to increase the delivery of affordable homes. Relying on private developers to deliver them is not working.

6. Along with building the new homes Ealing people need, our existing housing targets require it to absorb significant numbers of incoming residents. This in turn will raise the demand for further affordable homes to levels even more unattainable than they are now.

7. We strongly support the proposal at para 2.14 for estate regeneration to retain social rent homes for the purpose for which they now exist. In Ealing there have been many examples where social rent homes have been lost and this practice must end.

8. The discussion of purpose-built student accommodation (PBSA) at Para 2.18 envisages setting targets for individual boroughs. PBSA has recently become a very popular type of development for developers who have speculated on sites in Ealing. To our understanding the popularity of this type of development can be ascribed to the fact that it is less costly to provide than proper housing. PBSA appears to contribute nothing locally in terms, for example, of Council tax or business rates. The accommodation is often let out during vacation periods for Airbnb, whose benefits don't feed back into the Borough through local taxes. We are particularly concerned about how dominant it is becoming in the Metropolitan Town Centre where it is crowding out uses appropriate to a subregional town centre as Ealing is supposed to be. There is a reported national decline in overseas student numbers, and we would like to see how this is reflected in future demand. We would also strongly support a proposal for maximum targets within boroughs, and one that will be adhered to.

9. We are disappointed Chapter 3 places so little emphasis on reviewing the role played by Town Centres and High Streets in the changing economic climate. It has long been apparent that the Ealing Metropolitan Town Centre no longer fulfils its stated role of attracting custom from the sub region – these days it struggles to attract its immediate catchment population. With no sense of direction and a lack of promotion, Ealing cannot even function as a mid-range office location any more. These days we are told it is only fit for PBSA. Yet Ealing's potential is huge and wastefully unexplored. We would like to see the GLA encouraging much more innovation in identifying opportunities for our town centre in order to grow the £50bn contribution that creative industries are said to contribute to London's economy.

Will French

For Ealing Matters and SEC
10 June 2025

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[i] Indicators of house building, UK: permanent dwellings started and completed by country

[ii] A build to let development at Waitrose offering just 20% affordable homes at DMR is predicted to lose £77.8m

[iii] See Ealing Characterisation Study, Allies and Morrison 2023

[iv] See The London Datahub

[v] Interim 2021-based Population Projection Results. Section 13.2, Tab 13.2.3