Ealing Matters response to the Draft London Plan

Introduction

Please find below the representations of Ealing Matters in response to the Mayor's draft New London Plan consultation.

Ealing Matters is a borough-wide alliance of more than 70 residents' associations and community groups. Our aims are to raise awareness of how Ealing is changing and to help the Borough's community to shape these changes and enhance their quality of life. Ealing Matters has followed closely the evolution of the New London Plan and we have made representations on it at earlier stages in the process.

Our submissions are necessarily concise. They have been prepared to highlight matters in the draft Plan that the Ealing community is most concerned about. We confirm that we would wish to pursue what we say at the EIP at which time we will provide supporting material.

MBUL 2 Optimising the use of land and site capacity

Ealing Matters welcomes what appears to be greater recognition that developments need to be designed to respect the context of the site in which they will be built. We see the Sustainable Access Measure (SAM) as marking a retreat from the 2021 Plan which abandoned the long standing density matrix in favour of the woolly 'design-led approach'. Our experience has been that the 2021 Plan, Policy D4 in particular, gave developers and their advisors a carte blanche to bulldoze through almost any proposal they came up with. The safeguards which were in theory written into Policy D4 counted for very little, not least with the Mayor in his Stage 2 decisions.

We are pleased too, that densities are to be assessed in habitable rooms per ha, rather than residential units. We see this as promoting more family homes which is where the need is greatest for in London, rather than the smaller studio or 1 bedroom units that now over provided.

To the extent that we understand how it will be applied – and we think it will take a while for this truly to emerge - we also agree that the SAM seems to be a more sensitive tool for appraising developments than the old density matrix. In summary therefore we believe that MBUL2 looks capable of providing clearer guidelines on appropriate residential densities, especially if it is implemented systematically. For this reason we broadly support it.

We remain concerned, however, that Table 2.1 – the Optimisation Framework - carries a rider at its foot which reads '*It may be acceptable to exceed the heights and densities expressed in the table above, particularly in better-connected locations*.' This sentence is similar to the opt out in earlier London Plan Density Matrices which, in the FALP, read that there were '*exceptional circumstances where densities above the relevant density range may be justified'*. In Ealing it seemed that almost every development was one in which such circumstances arose and it led to developments being approved at densities ever higher than those the matrix provided for. This practice created amongst Ealing's communities a very deep distrust of the planning system and a wider cynicism of local government more generally.

While we recognise that there must always be reasons in planning to depart from adopted policy, doing so must never be allowed to become routine. The wording in the footnote needs to be significantly strengthened and clarified to say when it would be acceptable to exceed the optimisation framework. Those who object to departures from the policy must be given the opportunity to make representations to the Mayor and he/she must be required to respond by justifying why the policy should be overridden.

MBUL3 Tall buildings

We are generally pleased to see a clearer strategic framework for tall buildings and that these are distinguished in height as those between 30m and 100m+ - 'metropolitan tall buildings' which should be concentrated within identified clusters.

Outside of those clusters, we see the Plan as seeking to establish four to nine-storey development as a normal part of London's future built context which is something that communities across Ealing have argued for. If, and Ealing Matters emphasises this 'IF', the new policy is adhered to, it will reduce much of the disillusionment that has arisen over recent years with the planning system. The jury, for now then is out. If this new tall building policy is once again disregarded and if developments way in excess of plan policy in Ealing continue to be approved as they have been in recent years, we believe that the gap between the planners and the planned will continue to widen unhealthily.

Key to MBUL3's implementation will be the extent to which its spirit is adhered to, and we are concerned that Development Management Policy B provides an exception that developers will be able to exploit to negate its intent and purpose. The exception reads *'Isolated tall building should only be considered where they clearly mark a place of particular functional or spatial significance and respond proportionately in height to their context.'* A good barrister will be able to argue that such circumstances could apply at almost any site. If they do this just once they will set a precedent that others will follow and this would destroy the spirit of Policy MBUL3, further weakening the trust that local communities have in the planning system generally.

As we say above at Policy MBUL2, we recognise that there must always be reasons in planning to depart from adopted policy, doing so must never be allowed to become routine. The wording

in Development Management Policy B needs to be strengthened significantly to say when it would be acceptable to exceed the optimisation framework. Those who object to departures from the policy must be given the opportunity to make representations to the Mayor and he/she must be required to respond to them.

Policy HN1 Increasing London's housing stock Part A(1)

Policy HN1 is not positively prepared, not effective and not consistent with the National Planning Policy Framework (NPPF).

Para 3.15 states that 'the housing targets in Table 3.1 are capacity based, with the evidence supporting the London Plan demonstrating the extent to which the identified housing needs of London can be accommodated'. At 558,451 units, they are more than 34% short of the London housing need calculated by the Government's standard method. However, this shortfall is very unevenly spread across the London boroughs, with most LPA targets set at less than 90% of need and six at less than 30%.

Ealing's target of 31,979 units (Table 3.1) is close to meeting its housing need under the standard method (98%). This marks a 48% increase over the borough's target under the 2021 London Plan. However, the additional capacity of 10,409 units is entirely down to the proposed release of Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) – the greatest loss of industrial land across the whole of London (24% of the total additional capacity achieved by relaxing this constraint), and the associated loss of around 7,000 jobs.

Ealing's housing target is the second highest in London after Barnet (first if the borough's share of the OPDC target is taken into account) and follows on from a 71% increase in the 2021 London Plan. The highest number of units the borough has ever delivered in a single year was 1,994 in 2020/21, yet the LPA would have had to deliver between 3,000 and 4,000 units per annum for most of the 2021 Plan period to achieve its target, which it has signally failed to do. The economic and geopolitical factors that contributed to that failure have, if anything, worsened, making it inconceivable that the new, even higher housing target can be achieved.

Apart from the failure to deliver, these unrealistic targets have resulted in Ealing persistently falling foul of the 5-year Housing Land Supply and Housing Delivery Tests, leading to repeated application of the tilted balance in individual planning decisions, thus undermining the planning process generally and the Good Growth objectives (Table 1.1) of the draft Plan in particular.

Modification:

HN1 Table 3.1 Ealing's housing target should be replaced with at most 21,570 units (its 2021 London Plan level).

Evidence:

1) 2026 London Strategic Housing Land Availability Assessment (SHLAA)
2) Ealing's Authority Monitoring Report 2014/15 – 2018/19 (Interim Report)

3) Five Year Housing Land Supply Position Statement & Housing Trajectory, February 2025 (position statement and spreadsheet)
4) Housing Delivery Test

HN3 Delivering affordable housing. Part B(2)

Policy HN3 Part B(2) is not effective.

The high point of affordable housing completions to date under the 2021 London Plan was 30% (or 15,768 units) in 2022/23. By comparison the figures of 238,430 low-cost rent and 129,020 intermediate homes by 2037 represent a 66% share of the draft Plan's overall housing target of 558,451 units, which we consider to be unachievable.

Evidence:

1) MHCLG Affordable Housing Statistics
2) London Strategic Housing Market Assessment, 2026 (SHMA)

HN3 Delivering affordable housing. Part C, Table 3.2

Policy HN3 Part C is not positively prepared.

The relaxation of the share of affordable housing required of large schemes under the Threshold Approach to Planning Applications will further reduce the volume of affordable housing completed, particularly when compared with the 50 per cent strategic affordable housing target and the 35% requirement (50% for public sector land) under the 2021 London Plan.

Modification:

HN3 Part C should at least be replaced with the respective volume shares of affordable housing required under the Threshold Approach to Planning Applications in the 2021 London Plan. At best this approach should be dropped in favour of the strategic target across the board.

Evidence:

1) London Strategic Housing Market Assessment, 2026 (SHMA)
2) London Plan 2021

HN5 Managing specialist accommodation. A(1/2)

Policy HN5 A(1/2) is not positively prepared.

We question the rationale for PBSA and LSPBSL as 'diversifying the market and speeding up build-out', which seems to be self-serving rather than responding to a real need.

With sharply competing housing needs, we believe that the acute, unmet need for permanent affordable housing should be prioritised. Neither PBSA nor LSPBSL count as permanent accommodation as they do not meet minimum space standards.

With regard to PBSA, the SHMA additionally acknowledges that 'affordability remains a significant barrier', that 'PBSA is less flexible than general needs housing' and that 'if student numbers fall or policy directions shift, PBSA may be less easily repurposed for other uses.'

The most recent Local Housing Needs Assessment in Ealing found no identified need for LSPBSL. Indeed, the report concluded that 'LSPBSL provides short term rather than permanent housing. Therefore, as with any active policy, there is a risk of an over-supply of LSPBSL.' This seems to be coming to fruition with the number of LSPBSL applications supplanting those for permanent housing in recent years.

In these circumstances PBSA and LSPBSL seem to be contrary to Table 1.1 Good Growth Objectives, specifically 'making the best use of land'.

Modifications:

HN5 A(1/2) should ideally be removed, particularly as regards LSPBSL. Should PBSA remain, the quantity needed should be monitored closely on the basis of changing student numbers across London.

Evidence:

1) London Strategic Housing Market Assessment, 2026 (SHMA)
2) Ealing Local Housing Needs Assessment Update: report of findings, November 2022

HN5 Managing specialist accommodation. Table 3.6

Policy HN5 Table 3.6 is not positively prepared.

We welcome the move from a London-wide PBSA target to individual targets for each LPA.

However, it is not clear how the individual LPA targets were arrived at. Of particular concern is the target for Ealing, at 2,003 the second highest across London after Barnet despite the fact that the largest higher education body based in Ealing is the University of West London. Neighbouring boroughs such as Brent (1,582), Hillingdon (1,562), Hammersmith and Fulham (1,049) and Harrow (781) are also well located for public transport connections.

Modifications:
HN5 A(1) should ideally be removed. Should it remain, the draft Plan should explain on what basis the individual LPA targets were arrived at.

GLE3 – Data centres

Data centres are an environmental, placemaking and social issue, not just an economic one. At the workshop run by Ealing Council and also the Just Space conference, Data Centres were very much the hot topic. At best people accepted they were a necessary evil.

The London Plan should review the building of data centres. Experience with the building of data centres in Park Royal has not been good. There are four next-door to two housing estates and a Travellers site. They are far too close.

The Construction Management Plan was not fit for purpose and the support for the residents was minimal. Working 24/7, continuous procession of heavy lorries, workers parking in nearby resident parking spaces and no traffic wardens, dust. The residents of the Wesley Estate had four years of hell.

Schedule 1 of the EIA Regulations, Environmental Impact Assessment is discretionary rather than mandatory.

EIAs for data centres should be mandatory.

All schemes should be published with a noise assessment or condition. The specific decibel figure should also be given

The potential loss of water pressure and electricity should be modelled for the planning application. Local residents should not have issues with loss of electricity and water with a Data Centre taking precedence over residents.

The use of generators can be high creating very large carbon offset payments. This should be discouraged in favour of less use of generators

Demand tighter standards on backup generators

Scrutinize “latency” and “financial edge” justifications □

Experience with the build of Data centres in Park Royal has not been good. There is a cluster of four surrounding two housing estates and a Travellers site. They are far too close and have been “managed” very badly, if at all by OPDC and Ealing Council.

Policy should:

- Every data centre should be required to have a full Environmental Impact Assessment before applying for planning approval.
- Demand tighter standards on backup generators:
- Look to the siting as the actual impact of Data Centres on homes and community is within the first 500 metres.
- Separately, for noise, the continuous hum, the operation of the Data Centre brings its own issues, ‘it's a similar range, 500 metres with the built environment, and other factors influencing further reach to other receptors.

- An all encompassing Construction Management Plan should form part of the planning application and be monitored throughout the build.
- Scrutinize “latency” and “financial edge” justifications.

GHR7 Green infrastructure and urban greening

Policy aim: To secure multi-functional urban greening of sites and buildings

Applies to: All Local Plans and all major developments

Locations: All

Urban Greening has been used as an excuse for removing/not replacing Open Space by Developers and Planners alike see Ealing Local Plan reg 19.

The costs of managing planters and similar used for creating Urban Greening are passed onto to the tenants in service charges, but they are rarely well kept and frequently end up with dead plants and trees. This should be re-thought.

These plants are now dead and have been for some time

GHR8 Accessible green space

Policy aim: to improve access to greenspace, taking account of areas deficiency and local green infrastructure priorities

Applies to: all local plans and major development that introduces an increased population into an area and therefore increases the burden on existing green infrastructure or where a proposal involves any impact on designated AGS (or applicable public open space)

Locations: all designated AGS (or applicable public open spaces), as set out in borough policy maps; all locations where major new developments that create additional burden on green space proposed

All local plans and major development that introduces an increased population into an area and therefore increases the burden on existing green infrastructure, or where a proposal involves any impact on designated AGS (or applicable public open space)

Open space, accessible green space, and local deficits. There is severe open space pressure in some boroughs e.g. Ealing, where Southall, Acton and central Ealing have little applicable public open space, the council relying on the "new" park which for those in Acton and Southall can be a three-bus journey. There has been no updated public open space audit since the 2011 census despite major population growth and development. FOIs and repeated requests have not produced updated figures. As a result, there is no clear understanding of open space per ward despite obvious losses of space and increased population. The most heavily used central Walpole Park 12.28h, is now being monetized and approximately 1/3rd 'temporarily' built on for 3 years with a major visitor attraction (treated as a meanwhile use).

New policy GHR8 Accessible Green Space (AGS). LGAs should already have up-to-date audit of open space (many don't). They should designate AGS in their local plan, Ealing doesn't keep designations up to date. I do not see how the new London Plan will change this situation.

- Planning decisions "development should not result in a net loss of designated publicly AGS". This is the current policy for ALL open space; by definition, this protection now only relates to designated AGS and all other open spaces are no longer so protected.
- Many problematic open spaces e.g. private London squares are not publicly accessible and therefore no longer protected.
- Ecological "sink" sites (for newts, toads, biodiversity) that are intentionally not publicly accessible or private gardens like Lambeth Palace gardens no longer have any protection.
- Local authorities seeking to increase densities on estates and elsewhere will not designate housing amenity spaces, which is often significant green space, effectively gardens for social housing.
- This is especially concerning in places like North Acton, where there is a serious lack of AGS/POS within a 10 minute walk. Southwark designates all its parks MOL, but some authorities don't designate any MOL. Incoherence: sometimes in the policy it talks of AGS, and sometimes of publicly accessible green space, sometimes applicable public open Phrases like "applicable public open spaces" and vague criteria: "the focus is on AGS rather than public open space more generally, including spaces the public expects to use or has a right to access, and that should be available to all under Equality Act principles. arbitrary thresholds and borough discretion can erase important spaces from protection, a concern now returning with AGS.

Policy HN8 Housing design

We note that Policy HN8 will reduce minimum residential ceiling heights to 2.4m from 2.5m, and that the need for homes to be dual-aspect is to be relaxed. The new policy continues what has been a steady process of reducing space and design standards which we fear will lead to the construction of unhealthy homes that will need to be replaced after a very short life time.

There should be no relaxation of these standards. We need to be building homes that will last for many years into the future. Repetition of the redevelopments we have been witnessing of homes built in the 1960s and 1970s is not environmentally sustainable.

Policy PV3 Town centres and high streets

We are concerned that there are no longer policies in this draft plan describing how the Mayor wants to develop the City's network of town centres, particularly its Metropolitan Centres, the strategic centres about which the London Plan ought to be most concerned. Appendix B of the draft Plan continues to classify the different levels of Town Centre. But nowhere is the purpose of this designation explained. What criteria are used to define them, and how should development proposals within them, specifically in Metropolitan town centres, be regarded?

As regards Metropolitan Centres we are told at page 270 (Annex B):

> ***Metropolitan Centres;*** *'Very large town centres with significant employment, culture, retail, leisure and service functions and excellent public transport access, serving wide catchments that often extend across over several boroughs and into parts of the wider South East. Typically, they have a higher proportion of high-order comparison goods retail relative to convenience retail relative to convenience retail.'*

Chapter 8 of the NPPF contains detailed policies for ensuring the vitality of town centres. It requires development plans at the most appropriate level to be informed by a strategy for town centres to ensure that the full range of potential needs and opportunities for development is considered. The draft London Plan does not do this. Neither are any KPIs or outcomes to be included in the Plan's monitoring. It seems that our important retail centres are no longer a concern for the Plan?

Policy PV3, states in very general terms that plan making authorities 'should designate and develop ambitious local policies for each … town centre … to accommodate sustainable economic growth and housing in line with the strategic principles in Part A'. But this is a policy that lacks all consideration of the purposes our Metropolitan Centres should be serving, and no concern at all about the monumental changes they are now subjected to.

This is an important question in a Metropolitan Centre like Ealing which has always been the heart of the Ealing community. Ealing is a centre that in the last 20 years has experienced enormous changes since it provided the kind of functions p 270 of the plan describes. It's catchment no longer extends to other boroughs and beyond – it can barely attract the community living nearby. The high-order comparison goods retailing has all gone, leaving what

is in effect a cluster of coffee shops and supermarkets. The last post office is due to close after Christmas. Leisure and cultural activities have closed, office developments have stalled as has most C3 residential development. The only new projects coming forward seem to be LSPBSL or PBSA developments often on what were once prime retail sites. To what extent these comply with the requirements of Policy MBUL2 seems must be questionable, but the absence of any policy framework makes it impossible to assess.

A laissez faire acceptance of these changes has served the Ealing community poorly. The Metropolitan Centre lacks a clear vision for managing the changes it has experienced. Its population growth has stagnated and it has grown shabby and rather run down. There has been a decline in higher paying jobs and the loss of visitor attractions means Ealing is becoming a dormitory town. Policy PV3 puts the onus on the LPA to respond, but this is not enough. The Plan needs to recognise the magnitude of the changes to the city that its Metropolitan Centres are experiencing and must respond to them.

As Chapter 8 of the NPPF requires, a Policy similar to that of Policy SD8 in the last plan, or better still Policy 2.15 Town Centres in the 2015 FALP. Beyond this continuing changes in our Metropolitan Centres must be monitored and reported on, and policy adjustments made in the light of the ongoing changes they are subjected to.

Annex E Brownfield First Opportunity Areas strategic growth visions. Southall.

It is not at all clear what the status of the strategic growth vision for Southall is. Who prepared it and who they consulted about it is not explained. It is not a vision that many people who live in Southall would share

We have found a number of errors in the strategic vision. Residential development in the Green Quarter following the opening of the Elizabeth Line has ground almost to a halt for example. Other major concerns experienced by the Southall community, including the failure to upgrade transport networks in response to residential construction and the consequent population growth, failure during the Elizabeth Line's planning to integrate the station with local transport services, the very high density of high rise residential developments which have been built in total disregard of policies in the Southall Opportunity Area Planning Framework and which are wholly alien to the population, whether from a South Asian background or elsewhere, a loss of important community assets even as the population has grown and a failure to improve green spaces. The proliferation of data centres with no proper local consultation has become a new serious concern that also needs to be documented.

There is little here the people of Southall would recognise as a vision for Southall's future. For many of them it repeats their previous experiences when non-Southall people have been allowed to speak for them in ways that would not be acceptable elsewhere in London.

If it is to be included in the new plan this vision needs to be re-written in its entirety in consultation with the Southall communityk