



Central Ealing Neighbourhood Development Plan 2017 - 2026

Submission version documents

Appendix L to Consultation statement

Reg 14 consultation:

analysis of comments received and consequential alterations made

This document sets out all the detailed comments received in reply to the public consultation carried out between 22 February and 18 April 2016, together with the responses in terms of changes made to the draft Plan.

The report deals with each policy and recommended action in turn, which are set out in four parts as follows:

- Statement of the policy or recommended action as proposed in the consultation
- A. Replies to the Survey Monkey questionnaire, showing a summary of all input, the detailed replies to the questionnaire and the considered response to each
- B. Comments received other than through the questionnaire (letters, emails and web site comments), also with considered responses
- C. Action taken: revisions to the policies made as a result of comments received. In this section, new text is indicated in red type, and deletions and shown by ~~scoring through~~ text removed.

Subsequent input from LBE and from the 'health check' conducted by Mr Martin Lee (contained separately in the bundle of documents submitted) has also been reflected in the final version of the policies contained in the submission version.

August 2016

Ref	Policy/Comment	Response
E1	New retail frontages New and proposed retail frontages in the town centre will be designated as 'primary' or 'secondary' in accordance with Ealing Local Policy 4B. The introduction of non-retail units may be permitted within these new shopping frontages subject to an active street level frontage being maintained and the use being complementary to the functioning of the retail area.	
A. Survey Monkey questionnaire replies		
All	Agree: 26 (92.9%) Disagree: 2 (7.1%) Total 28 No answer 8	
1	But do we really need so much retail frontage?	This is committed as part of Ealing's core strategy
7	The key is to maintain a sense of identity for Ealing through its "local" retail offer	(Points 7 & 8) Noted. Planning controls are limited to what can be done within the restrictions of permitted development rules, which the policy has tried to do. Shop front policy is dealt with under HBE1.
8	The type of 'complementary' use is important. While a bank can be useful, an amusement arcade isn't, and one, or even several, quality estate agents may be welcome, but a concentration of letting agencies isn't. In addition, it is not only non-retail uses that should be 'suitable', as a proliferation of poor quality A1 uses, including pound shops, repetitive convenience stores and charity shops are all detrimental. Attention should be paid to quality standards for shop fronts too	
9	Don't have enough information	
12	More small retail as in Richmond and Chiswick	As points 7/8 above
13	New shopping frontages to conform to Ealing's Shop Front Design policies also	Noted and new recommendation added.
22	Suggest some wording from Richmond Policy DM TC3 Non-retail-'proposed use retains a "shop-like" appearance' ' they will not create an unbroken run of three or more non-shop units.'	Noted and new wording added.
28	Good to see an organic mix - might be community organisations, etc	Noted
29	Don't be rigid in defining retail frontage requirements as the nature of retail and town centres is changing quickly. May need other activities eg dentists and community activity to ensure that centre remains vibrant if volume of retail reduces.	Reworded to clarify what would be allowed under the policy.
B. Other comments received		
B	Difficult to see what this policy adds to existing approach	
H	British Land supports the recognition within draft Policy E1 that there should be greater flexibility permitted within new shopping frontages, subject to a number of appropriate considerations. We would ask that such an approach be extended to all retail frontages within the neighbourhood area, as they can help to deliver a wider range of goods and services to the local population, thereby helping make the centre more attractive and encourage people to stay longer.	As 29 above. Flexibility for existing secondary frontages is already allowed under Ealing Local Policy 4B. Primary frontages should remain protected.
P	5.1.5 Policy E1. Non-retail units should not be permitted within 'primary' frontages. This is an unacceptable	Revised policy wording has clarified this.

	weakening of adopted Ealing Plan policies. For ‘secondary’ frontages – which generally offer greater opportunities for small and/or independent businesses – the scope can be widened as long as the usage is complementary to the retail priorities of the area (e.g. would exclude ‘Adult Gaming Centres’).	
C. Action taken		
<p><i>Policy re-worded as follows:</i></p> <p>Policy E1 New retail frontages</p> <p>All new and proposed retail frontages in the town centre will be designated as “primary” or “secondary”. In accordance with Ealing Local Policy 4B, the introduction of non-retail units will not be permitted within primary frontages, but may be permitted within those new shopping frontages designated as secondary, provided that [an active street level frontage being maintained and the use being complementary to the functioning of the retail area].</p> <p>a. an active street level frontage is maintained and the uses are complementary to the functioning of the retail area by providing a direct service to the public meeting community needs;</p> <p>b. it will not create an unbroken run of three or more non-shop units;.</p> <p>c. it will not result in an over-concentration of such uses in the frontage.</p> <p><i>New explanatory paragraph 5.1.7 inserted:</i></p> <p>Complementary uses meeting community needs are defined as dentists, clinics or health centres, veterinary surgeries, gyms, fitness studios, facilities which would enable the public better access to police services or other community use directly serving the public (often D1 uses), or are financial or professional services, cafés or restaurants (A2-A3 uses).</p> <p>An over-concentration of a particular use occurs when the numbers and size of that type of use begin to dominate a street or area and the consequential effects of their operations including the numbers of people attracted begins to have a detrimental effect on the local environment and residential amenity.</p>		

No	Policy/Comment	Response
E2	Diversity of retail provision. In considering applications for change of use in central Ealing, particular attention will be paid to the need for a diverse retail offer which reflects the individual character of the town centre, the broad character of recreational activity and the social environment generally. Decisions will take into account the need to avoid over-concentration of licensed uses such as gambling and sale of alcohol where this use may erode local amenity, including the need for control of opening hours and types of premises.	
A Survey Monkey questionnaire replies		
All	Agree: 29 (93.6%) Disagree: 2 (6.4%)	Total 31 No answer 5
7.	This is vital	General thrust of responses noted as supportive of policy, but many suggestions cannot be accommodated within planning legislation e.g. type of premises within a use class and blanket ban on new licences.
8	Clustering of in particular gambling premises has been a prevalent problem in recent years.	
12	No return to the late night club/pub licensing which existed before LBE had powers to control alcohol licensing	
14	I am concerned about the overconcentration of licensed uses in the past. There is another issue arising from the proliferation of restaurants in the town centre which could lead to another type of "monoculture" squeezing out other retail offers.	
16	There should be no further licences given to betting shops or gambling facilities as we already have sufficient.	As 14 above
17	Please bear in mind that some well-behaved night life is desirable in the town centre; and that well-run licensed premises make a considerable contribution. Night life is being lost all over London. Provided that there is alcohol related violence and nuisance is prevented, late night premises should still have a place.	Noted
22	Also suggest -from Richmond-certain changes of use will no longer be allowed due to existing concentrations of A3 & A4.The areas should be specified. Suggest Haven Green, Bond Street & Dickens Yard (the latter is due to have nearly 50% A3/A4)	This is probably too prescriptive and it should be sufficiently covered by new definition of concentration of uses
23	Ealing sorely needs a quality department store or shops. Currently there is no incentive to shop here, apart from at a few independent small shops near Ealing Green	This can only be a commercial decision and cannot be controlled by planning uses
28	Our involvement with street pastors has made us especially sensitive to this need - without wanting to deny folk a good time in Ealing.	Noted
29	Agreed prevent leisure economy takeover. However as above, not just classic retail. Define what you don't want, not what you do want.	Noted
34	This should be extended to include money lending (except financial institutions such as banks).	These <i>sui generis</i> classes have been added.
B .Other comments received		

B.	Points on amenity are considered to repeat DM Policy 4C. Difficult to see how diversity provisions would be implemented in practice.	Definition of concentration of uses has been added.
C. Action taken		
<p><i>Re-worded as follows:</i></p> <p>E2 Diversity of retail provision</p> <p>In considering applications for change of use in central Ealing, particular attention will be paid to the need for a diverse retail offer which reflects the individual historic character of the town centre, the broad character of recreational activity and the social environment generally. Changes of use will not be allowed where there are existing over-concentrations of certain uses or where the proposed use, including the need for control of opening hours and types of premises, may erode local amenity.</p> <p>Decisions will take into account the need to avoid an over-concentration of licensed uses such as gambling and sale of alcohol where this use may erode local amenity, including the need for control of opening hours and types of premises. Applications for new <i>sui generis</i> class uses for money lenders, amusement arcades and casinos will be refused.</p> <p><i>Add new explanatory paragraph:</i></p> <p>An over-concentration of uses is as defined in paragraph 5.1.7 above.</p>		

No	Policy/Comment	Response
E3	Mixed use development. Major or strategic development should incorporate a mix of uses consistent with supporting the local distinctiveness, vitality, function and character of Ealing town centre. The retention or re-provision of floor space suitable for a range of social, cultural and community uses sufficient to meet the needs of the increasing population will therefore be required in accordance with the priorities identified in Policy CC3. Where development increases commercial or residential floor space by more than 30% gross external floor area, additional floor space accessible to and suitable for these activities should be provided within the development at a level adequate to meet reasonable demand as evidenced by local consultation	
A. Survey Monkey questionnaire replies		
All	Agree: 28 (93.3%) Disagree: 2 (6.7%) Total 30 No answer 6	
4	I don't see why this additional space necessarily has to be within the development. This policy could lead to a multitude of disconnected and underused social/cultural spaces.	Good point but difficult to ensure joined up approach
12	Essential that local population should have adequate medical and educational facilities for increasing population	Is 'strategic' so cannot be prescribed in neighbourhood plan.
14	Strongly agree with the need to provide community, social and cultural uses in the town centre to cater for the needs of the steadily increasing population in the area.	
16	There needs to be ready access for disabled people. We need a variety of commercial premises. At present we have too many shops selling cheap clothes, mobile phones and cheap restaurants.	As Policy E2
22	The term mixed use is a rather vague term & usually just means flats & shops. There should be an interim report produced by the Council that shows exactly how many flats are proposed for Central Ealing and developers asked to include more community, nursery & health facilities to accommodate the increased population of Central Ealing.	Again, cannot be prescribed -
24	The principle of providing mixed use development is supported. The policy wording in relation to provision of additional floor space is, however, imprecise and overly prescriptive.	Wording changed.
25	We need a much stronger cultural centre with a decent cinema, theatre and other sites for cultural activities	Noted.
28	Oversubscription of our church halls and end of community use in town hall shows this to be a priority. This is also many small service businesses like tai chi classes or other community lessons, which add value and economic rigour	Noted
B. Other comments received		
B	Local consultation is not an adequate basis for determining need; evidence required	Evidence is given in support of policies E4 and CC1.
H	We object to the requirement within draft Policy E3 that development which increases the amount of floor space by 30% must provide space for social, cultural and community activities. The viability of regenerating sites in town centres is often marginal and it is already difficult to deliver good quality schemes that meet the residential and commercial needs identified within the Neighbourhood Plan. Requiring all such development proposals to provide space for these other uses,	The 30% element has been deleted.

	which generate little or no income, will prevent development from coming forward altogether.	
I	This policy seeks additional social / cultural / community uses in strategic and major schemes increasing commercial or residential floorspace by more than 30% at a level adequate to meet reasonable demand as evidenced by local consultation. We would query the sound basis for this policy as we are not aware of any evidence supporting the 30% threshold to trigger the provision of social / cultural / community uses and local consultation is not considered a sound basis for determining the quantum of that use that should be provided within the scheme. Any requirement should be evidenced by need.	As reply to H above.
P	The promotion of mixed-use development is supported but implementation of the Policy would be assisted if the precise nature of, and demand/need for, social, cultural and community uses could be identified, specified and justified. If this is not possible, the 30% 'trigger' for the incorporation of such uses in developments may prove to be unworkable.	Noted. See response to B & H above.
C. Action taken		
<p><i>E3 Policy reworded as follows:</i></p> <p>Major or strategic development should incorporate a mix of uses consistent with supporting the local distinctiveness, vitality, function and character of Ealing town centre. The retention or re-provision of floor space suitable for a range of social, cultural and community uses sufficient to meet the needs of the increasing population will therefore be required in accordance with the priorities identified in Policy CC3 and with Policy E4. Mixed use should also include provision for a range of employment opportunities.</p> <p>Where development increases commercial or residential floor space by more than 30% gross external floor area, Development will be supported which provides additional floor space accessible to and suitable for these activities should be provided within the development at a level adequate to meet reasonable demand as evidenced by local consultation.</p> <p><i>Delete sub-heading before para 5.1.13 [Employment and Commuting]</i></p>		

No	Policy/Comment	Response
E4	<p>Encouraging new business. Proposals that support or facilitate the provision of space for new or small businesses will be encouraged. In particular:</p> <p>i 'affordable' office / workshop space, including space suitable for social enterprises, will be supported and additional provision will be sought in suitable locations as part of the mix of uses required by policy E3, subject to other planning policies in particular those that seek to protect residential amenity;</p> <p>ii proposals to upgrade or redevelop existing employment buildings to create flexible spaces designed for start-up and incubator businesses will be encouraged, provided that</p> <p>- there is no adverse impact on the amenity of surrounding areas;</p> <p>- access by public transport, cycle and on foot is maintained or enhanced.</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 30 (100%) Disagree: 0 Total 30	No answer 6
16	It is vital to maintain the open spaces and protect the heritage of Haven Green	Covered by other policies
22	There are numerous empty spaces and offices above shops that could be used for affordable work space. In other areas of the country councils have used building site portakabins as cheap office space & we have numerous, currently empty, plots that could be used.	Noted.
29	Refer to incubators and start-ups as well as social enterprises, links to the University. 'access by public transportis enhanced' (delete maintained)	Reference in sub-para ii covers 1 st point. 2 nd point: difficult to make a policy. 3 rd point: removing 'maintained' could make the test unnecessarily harder
B. Other comments received		
B	E4 ii Suggest '...development of flexible spaces...'. These need not be confined to existing employment uses.	Accepted.
H	<p>We object to the requirement to provide "affordable" office/workshop space as part of mixed use developments. By requiring rents to be artificially reduced will undermine the viability of many worthwhile schemes, which will deliver the very commercial space that the Neighbourhood Plan otherwise seeks to secure.</p> <p>Furthermore, whilst some flexibility to enable commercial space to be sub-divided to cater for small businesses can sometimes be warranted, providing subsidies to the rent payable is not.</p> <p>Unlike with affordable housing, that helps to meet the social needs within the local population, there is no comparable in respect of businesses. How would the neighbourhood forum or the Borough Council decide which businesses warranted help and which did not? Furthermore, when a business becomes successful, would they be forced to leave the premises and again, who would decide this? Such interference would act as a disincentive for a business to improve its turnover.</p> <p>Ealing contains a range of business accommodation at different rents and those less able to pay when starting off, would locate within older, secondary property. There is not</p>	There is no need for development to provide space to a uniform standard or price. The objection deals with suggestions which are not in the policy, which does not propose subsidies but seeks to encourage support for smaller businesses, incubator and accelerator units in line with London Plan Policy 4.10 and para 4.53.

	a need to try and use the planning system to skew the market.	
I	Part (i) of the policy may need to be re-considered in light of any changes to Policy E3 as per our comments above [E3].	The wording is consistent with the revised E3.

C. Action taken

Policy reworded to read:

E4 Encouraging new business.

Proposals that support or facilitate the provision of space for new or small businesses will be encouraged. In particular:

- i 'affordable' office / workshop space, including space suitable for social enterprises, will be supported and additional provision will be sought in suitable locations as part of the mix of uses required by policy E3, subject to other planning policies in particular those that seek to protect residential amenity;
- ii proposals ~~to upgrade or redevelop existing employment buildings to create~~ **for the development of** flexible spaces designed for start-up and incubator businesses will be **supported encouraged**, provided that there is no adverse impact on the amenity of surrounding areas, and access by public transport, cycle and on foot is maintained or enhanced.

.....

No	Policy/Comment	Response
HBE1	Quality of Design Development other than minor works or extensions will be required to respect the character and quality of the area's historic architecture and achieve the highest standard of sustainable urban design and construction.	
A. Survey Monkey questionnaire replies		
All	Agree: 29 (90.6%) Disagree: 3 (9.4%) Total	32 No answer 4
7	The issue will be defining "quality of Ealing's heritage".... A subjective assessment	
10	Fewer high rises	Noted
12	Planning should work closely with existing conservation area advisory panels	Agreed. Sentence added to para 5.2.5
15	Older buildings which are environmentally important should be always be preserved. For example No 1a Haven Green, and the Carphone Warehouse building in the Broadway	Agreed in principle but not always possible
16	We already have consented to too many tall buildings of low architectural merit	Council have consented
17	I suspect this is not consistent with the current plans for the 9-42 Broadway and CinemaWorks sites!	Noted
19	If only Ealing Council felt the same way - they are consistently ignoring the wishes, clearly stated, of local residents	Noted and agreed
22	Richmond actually has policies re new shopfronts, A boards & advertising instead of just guidance. The Central Ealing NDP should adopt similar policies in light of the fact that we do not even have shopfront guidance as part of the Ealing Council Local Plan. The Richmond policies protect the architectural heritage of the Borough of Richmond.	Agreed. A shopfront guide has been drafted but not implemented. A Recommendation has been added to cover this.
25	This plan needs to be much stronger in its policy on any high rise buildings and any development which affects the character of Ealing as a largely Edwardian/Late Victorian built environment	Noted but not possible to ban completely
29	This suggests pastiche historic will be acceptable or preferred. "High quality design" will always respect character, but not mimic. All works will be high quality. Your wording suggests that it will be acceptable for sheds and extensions to be low quality. That does the plan a dis-service.	Wording amended, and reference to excluding minor works removed.
B. Other comments received		
B	a All development should be covered including minor and extensions. b. Suggest consistent wording; 'should' c 'Respect' seems to indicate match or comply with which would be contrary to London Plan and Local Plan suggest existing form of complement which reflects the need to optimise densities. 5.2.5 Suggest 'special architectural and design interest' to match CAA legislation	a & b accepted e 'Respect' is used as OED: 'Avoid harming or interfering with' and as in London Plan para 7.21, but 'complement' added. 5.2.5: accept
C	HBE1 focuses on the quality of larger scale developments, and promotes the Government's good design agenda, clearly set out in the NPPF. However, we note that many smaller scale	Words 'other than minor works or extension' deleted.

	developments including shopfronts and advertisements detract from the streetscape of Central Ealing. As such we encourage you to consider if there would be benefits from having additional policies covering minor works to ensure that these enhance, rather than detract from the streetscape. A recommendation could be to update the Council's guidance on shopfronts (including signage)	See response to 22 above.
P	We strongly disagree with the separation of 'minor works' (judgementally) from major schemes (implicitly) – the whole is the sum of its parts. For example, many detrimental impacts are apparent in poorly designed shopfronts (often without planning permission or enforcement of refusal). We consider that Policy HBE1 should be re-written as 'All developments will be required.....' Reference should also be made in this Policy and/or elsewhere in 5.2 to the urgent need for the (long-overdue) Revised Shopfront Design Guidance and how to ensure that landlords and operators are engaged. Progress on this could begin the work of the Design Review panel (even now).	As C above.
C. Action taken		
<p><i>Policy reworded to read (with the addition of a clause transferred from HBE2):</i></p> <p>HBE1 Quality of Design</p> <p>Development other than minor works or extensions will be required to should</p> <ul style="list-style-type: none"> i. respect and complement the special character and design interest of the area's historic architecture and achieve the highest standard of sustainable urban design and construction; ii. in Conservation Areas, be of the highest design quality, avoid dramatic contrasts in scale and massing with nearby buildings typical of the Conservation Area, and make a positive contribution to the character of the area while conforming to the provisions of the relevant CA management plan. <p>Amend para 5.2.5 2nd sentence (line 3) to read: "The special architectural and design nature interest of Central Ealing..."</p>		

No	Policy/Comment	Response
HBE2	<p>Protecting the streetscape Development will be required to:</p> <p>i respect the character and scale of existing landscapes or streetscapes and not dominate them;</p> <p>ii. protect key views, in particular of church spires/towers, Pitzhanger Manor, Town Hall south façade, other heritage buildings and Conservation</p> <p>iii. where it is directly abutting or fronting Conservation Areas (except for the Office Corridor), be no more than 4 –6 storeys on existing street frontages; be of the highest design quality, avoid dramatic contrasts in scale and massing with nearby buildings typical of the Conservation Area, and make a positive contribution to the character of the area while conforming to the provisions of the relevant Conservation Area management plan;</p> <p>iv. be assessed for the impact of the proposals on its “Zone of Influence”.</p> <p>Planning permission will normally be refused for development which does not meet these criteria.</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 28 (87.5%) Disagree: 4 (12.5%)	Total 32 No answer 4
7	Again, it is inevitable that subjectivity will creep into this	Noted
9	This is v important to maintaining Ealing’s character but how to ensure Ealing Planning really do support this ???	The Local Plan is intended to achieve this
12	Green Open Spaces and trees are a key feature of the borough of Ealing and must at all cost be protected	Agreed
13	Define what "zone of influence" means Define "character" ie Victorian/Edwardian, low rise, suburban (not city centre)	Agreed to clarify text
14	The character of Ealing town centre should be preserved as far as possible by requiring new development to preserve or enhance the character of the conservation areas.	Noted – already required under CA management plans in theory
16	Planning permission should be refused for towers and buildings which overwhelm the views around the town centre. The green nature of Haven Green needs to be protected. We must not allow further encroachment on the green space of buses, bicycle stands etc.	Agreed
17	Again, is this totally consistent with the plans for 9-42 Broadway and CinemaWorks?	May not be, but not relevant
19	Again, this is a forlorn hope. Ealing Council JUST DOES NOT LISTEN. (And yes, I'm shouting!)	Noted
23	New buildings in Ealing have spoiled the visual aspects of nearby historic buildings, e.g. Christ the Saviour Church is subsumed by Dickens Yard and no longer stands out. As it is a significant building, designed by Sir Gilbert Scott, it should have pride of place.	Noted and agreed – one reason why the Local Plan is important
24	The introduction of a height cap is overly prescriptive and does not create good design. Design should respond to context and be appropriate to the site in terms of scale	Wording now changed
25	See previous comment. I don’t think this is strong enough.	
29	Overemphasis on conservation of built historic and views of historic. Propose that settings, vistas and aspects are to be assessed and valued whatever their historic value.	Wording changed
B. Other comments received		

	<p>conflicts with Paragraph 4.10 on "Building Heights" of the draft plan, which states that it is "recognised that it is rarely appropriate to specify a maximum height for any proposed new building." It goes on to explain that developers and others involved in the planning process need to assess the development potential of a particular site with respect to heights, bulk, scale and massing of buildings nearby. This is the right approach and the restrictive approach in draft Policy HBE2 should be changed accordingly.</p>	
<p>P</p>	<p>The criteria for the acceptance of taller buildings is weak and should be strengthened. We suggest that the text incorporates a statement along the following lines: 'The challenge in Ealing is to consider what it is that makes Ealing's Centre distinctive and to understand that its historic environment and heritage assets are inseparable from its special qualities. Any redevelopment, particularly that which incorporates buildings taller than their immediate surroundings, must embrace these qualities. Parts of the Centre have already been radically and detrimentally transformed such that its sense of identity has been eroded and the pedestrian and shopping experience made less attractive.'</p> <p>HBE2 ii amend to: 'Protect key views, in particular of church 'frontages, towers and spires', Pitshanger Manor, Town Hall south, west and east facades, other heritage assets including views both within and from Conservation Areas'.</p> <p>5.2.10 Additional criteria should be added derived from the Inspector's report - and Secretary of State's decision - in the Arcadia Inquiry. We propose: 'The CGI's should establish that, notwithstanding claims of 'high architectural quality', proposed schemes are of a height, bulk, materials and design which avoids insensitive contrasts with nearby buildings and are not over-dominant and obtrusive when viewed from within and beyond the Centre and throughout adjoining Conservation Areas'.' The feasibility of recommended actions 5 and 6, particularly those related to relocation of bus stops etc, should be established in dialogue with Ealing Council and TfL.</p> <p>5.2.11 We are unclear what the 'zone of influence' adds to existing policy without definition of appropriate development.</p> <p>5.2.12 We propose modifications along the following lines: 'New buildings or groups of buildings which might replace individual buildings.....more dominant, and consequently destroy the grain of established frontages. Sensitive design in terms of scale, form, bulk and materials can avoid this.....'</p>	

C. Action taken

Policy re-worded to read:

HBE2 Protecting the streetscape-townscape

Development will be required to:

- i respect the character and scale and historic grain of existing landscapes or streetscapes and not dominate them;
- ii protect **or enhance** key views, in particular of the following listed buildings: Christ Church and Ealing Town Hall from East and West; Pitzhanger Manor from Ealing Green and Walpole Park; and the Polish Church from all vantage points;
- iii. where it is directly abutting or fronting Conservation Areas (except for the Office Corridor), restrict the height of frontages to be consistent with those opposite or adjacent to the site; ~~be no more than 4–6 storeys on existing street frontages.~~
- ~~iv. *be of the highest design quality, avoid dramatic contrasts in scale and massing with nearby buildings typical of the Conservation Area, and make a positive contribution to the character of the area while conforming to the provisions of the relevant Conservation Area management plan.*~~
- ~~iv.~~ be assessed for the impact of the proposals on its "Zone of Influence".

Planning permission will normally be refused for development which does not meet these criteria.

No	Policy/Comment	Response
HBE3	<p>Taller buildings</p> <p>i Tall buildings (ie those taller than their immediate surroundings) will only be permitted if they are of the highest architectural and sustainable urban design and do not have an adverse impact on Conservation Areas and their setting or on heritage assets.</p> <p>ii. Redevelopment within the Office Corridor involving new building or changes to the height or bulk of existing buildings will be expected to contribute to the visual and architectural character of the corridor, and cause no unacceptable harm to the character and amenity of occupiers and users of properties in the vicinity of development sites or adjacent public realm by reason of overshadowing, sense of confinement, loss of privacy or harmful impact upon microclimate.</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 27 (90%) Disagree: 3 (10%)	Total 30 No answer 6
6	Due to concerns with press comment about current developments in Town Centre	Meaning unclear
7	Absolutely	Noted
9	I fear that the horse has already bolted on this with the Dicken`s Yard and Arcadia developments.	Noted
12	Already new"Office"buildings in height and scale seem to overwhelm central Ealing	Noted
14	New tall buildings can be extremely damaging upon the character of the conservation areas if they are out of keeping or overbearing. Recent examples of this include the Apex House development and the final phases of Dickens Yard which are looming behind the town hall.	Noted
15	Tall buildings should only be permitted in the Office Corridor.	Agreed in principle but this would not be compliant with LBE strategic policy
16	Taller buildings should not overwhelm our conservation areas	Noted
17	I have concerns about the bulk of buildings proposed at 9-42 Broadway	So have some of us!
18	No more high rise buildings	See above
19	as before	
23	The "Office Corridor" on the Uxbridge Road has developed into a mess of high buildings with no design merits or harmony. In particular the Apex building (also known as The Arc Tower) looks too industrial for flats, and is far too high at 21 storeys, shading the flats and houses behind it.	Agreed
24	The definition of 'adverse impacts' needs to be more precise. This should be consistent with the NPPF definition of substantial harm.	Wording reviewed. NPPF does not define adverse impact. Para 131 says account should be taken of “the desirability of sustaining and enhancing the significance of heritage assets”, Para 132 says “when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation.”
25	Needs to be stronger	Meaning unclear

B. Other comments received		
B	3i Mention of 'heritage assets' is disproportionate as it departs from the concept of heritage significance and proportionate weighting of value and impact that is carefully established in policy and guidance	As 24 above. The balance required is in NPPF para 138 and London Plan Policy 7.7 which the policy adheres to.
C	HBE3 ii makes reference to 'no unacceptable harm'. It is unclear what this means, as it is not the same as 'no harm', but there is no criteria saying what would be considered acceptable or not.	See 24 above. Changed to 'no significant' harm.
I	The policy and its supporting text (paras 5.2.15 and 5.2.16) should acknowledge that the principle of taller buildings should be acceptable where these have been identified within site specific allocations, subject to assessment of detailed design and impact on character and appearance of conservation areas and settings of heritage assets. Site EAL3 Arcadia is considered in principle an appropriate location for a tall building within the Development Sites DPD and the Draft Arcadia Site SPD identifies the appropriate zone within the site for that tall building. Only identifying the "Office Corridor" as an appropriate location for taller buildings is not consistent with the Council's Local Plan and in our view Policy HBE3 should be expanded to include site allocations for tall buildings. This point goes back to the heart of the issue that the Neighbourhood Plan should be in general conformity with the Development Plan.	
P	4.10 to 4.12 Building Heights - Map 9 (Drawing 013) needs to be completely redrawn to make it both accurate and readable. Many of the building heights specified are wrong, others are missing e.g. Dickens Yard. Paragraph 4.12 is misleading and incorrect and should be deleted. There is no location within the Plan suitable for a 'cluster of tall buildings', nor do Plan Policies propose this. 5.2.16 Taller buildings and the 'Office Corridor'. The text/policy should incorporate endorsement of the Uxbridge Road 'boulevard' concept and require new buildings to be set back so that landscaped areas fronting the Uxbridge Road are maintained and created. Reference should be made to the importance of retaining an unobstructed view above the tree line/canopy from both Walpole Park and Haven Green towards the town centre. Mention should be made of the harm to this view and many others caused by 'The Apex' tower (easily illustrated by photos). The text of the Plan should state and establish that one of the main justifications for allowing a building of this height here was the scale of the former (but less high) 'Westel House' building on the site, which had been given 'landmark' status in Ealing's Development Plan. It should be stated that no other location along the Corridor is designated suitable for a 'landmark' building.	The map was mistitled; it should refer to the height of frontages, not heights within larger sites. Agreed – has been removed. Dealt with in supporting text

C. Action taken

Policy reworded to read:

HBE 3 Taller buildings

i Tall buildings (ie those taller than their immediate surroundings) will only be permitted if they are of the highest architectural and sustainable urban design and do not have an adverse impact on Conservation Areas and their setting or on heritage assets.

ii **Subject to the provisions of Policy HBE2, it may be appropriate to accommodate building of greater height within the core of a development site as long as the impact on key views, bulk and massing of the scheme can be justified within the context of the Conservation Area management plan.**

iii. Redevelopment within the Office Corridor involving new building or changes to the height or bulk of existing buildings will be expected to contribute to the visual and architectural character of the corridor, and cause no ~~unacceptable~~ **significant** harm to the character and amenity of occupiers and users of properties in the vicinity of development sites or adjacent public realm by reason of overshadowing, sense of confinement, loss of privacy or harmful impact upon microclimate.

No	Policy/Comment	Response
HBE4	<p>Public Open Space</p> <p>Development which encroaches on Public Open Space will not be supported. In particular:</p> <p>i. development will be required to avoid damaging intrusion by ensuring that the impact of tall buildings visible from Public Open Spaces, in terms of their bulk, massing, height or overshadowing, is minimised through careful siting and design;</p> <p>ii. Haven Green common land will be designated as Local Green Space. Development abutting this or Ealing Green common land will not be permitted if it involves new building or structures more than 4m high within 6.6m of the boundary;</p> <p>iii. new building or structures or permanent enclosure will be permitted on Walpole Park only where necessary for protecting or preserving the turf, trees, shrubs, plants and grass, or preventing accidents. Installation of essential public utility equipment will be allowed only where it is documented that it cannot be practically located elsewhere.:</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 30 (93.8%) Disagree: 2 (6.2%)	Total 32 No answer 4
8	Protection of Ealing's green spaces is fundamental to its character.	Agreed
9	The Council must be stopped from `appropriating` common land for their purposes.	Agreed
12	Ealing Common is often ignored as a valuable community asset much used but poorly maintained and neglected in Green Space Planning.	Noted but outside the plan area
14	Fully support the need to protect Haven Green from encroachment and its restoration to a quiet place of enjoyment free of traffic, in particular buses.	Noted
16	This stipulation MUST be complied with.	Noted
17	I am concerned about further encroachments at Haven Green in pursuit of transport objectives.	Noted
18	By having no more high rise development.	See HBE3 response 15 above
19	this is so important, particularly as Ealing turns into skyscraper heaven.	Noted
23	Haven Green is a special place and should not be encroached upon.	Noted
24	This policy is too prescriptive and should be applied flexibly on a site by site basis. There may be circumstances where encroachment on POS is necessary to enable development and deliver planning benefits.	Reject. All local POS in the NP is also common land, to which stricter rules apply.
25	Needs to be stronger. Minimising impact is not enough. Why have the impact in the first place ?	Accepted, but consider on advice that "avoided" would be too prescriptive
29	Insufficient emphasis on need to increase public land provision to meet increasing population and visitor numbers. Also need to resist increase in private "public" space.	Noted but very difficult to achieve in practice

30	Very disappointed at the increased incursion upon Haven Green by buses using the area as a prolonged parking space and by the enclosure of part of The Green for Crossrail building works.	Noted
B. Other comments received		
B	<p>Difficult to see what this adds to existing policies.</p> <p>4 ii This is not supported, no justification is offered as to why the status of Haven Green as common land should in any way restrict the development of land outside of this boundary. Local Green Space designation would not materially change its management and is inconsistent with the otherwise rational framework for the management of open space in LBE.</p> <p>4 iii This is unduly restrictive and it is difficult to see what it adds to the management of this space or understanding of its urban or architectural significance.</p> <p>5.2.25 Haven Green is already subject to normal planning procedures due to its Public Open Space designation and Local Plan policies including 2.18</p>	<p>Policy 4 ii applies Ealing DM Policy 7D para E7.D.5. LGS is a NPPF category (paras 76-77) which the Local Plan fails to recognise. Designation would add protection equal to that afforded by Green Belt status (NPPF para 78). Policy has been restricted to Haven Green and its special needs detailed.</p> <p>4 iii "permanent" moved to the start to clarify.</p> <p>As above.</p>
F	Natural England welcomes Objective 8, Policy HBE4 Public Open Space and Objective 15, Policy PR2 Landscaping, as it is important that housing growth is supported by adequate provisions of green space, which residents can access for recreation purposes. The provision of green space, formed from a network of key open spaces, green corridors and landscape features offers the potential to deliver multiple benefits for both people and wildlife providing opportunities for biodiversity enhancement and access to nature.	Noted and agreed
P	5.2.21 'land use category' not 'category'. We are unclear why designation of Haven Green as local green space adds to the ability of the local planning authority to protect it from encroachment e.g. via enforcement powers.	Change accepted. See response to B above.
C. Action taken		
<p><i>Re-word as follows:</i></p> <p>HBE4 Public Open Space</p> <p>Development which encroaches on Public Open Space will not be supported. In particular:</p> <ul style="list-style-type: none"> i. development will be required to avoid damaging intrusion by ensuring that the impact of tall buildings visible from Public Open Spaces, in terms of their bulk, massing, height or overshadowing, is minimised through careful siting and design; ii. Haven Green common land will be designated as Local Green Space. Development abutting this or Ealing Green common land will not be permitted if it involves new building or structures more than 4m high within 6.6m of the boundary; iii. permanent new building or structures or enclosure will be permitted on Walpole Park only where necessary for protecting or preserving the turf, trees, shrubs, plants and grass, or preventing accidents. Installation of essential public utility equipment will be allowed only where it is documented that it cannot be practically located elsewhere. 		

No	Policy/Comment	Response
T1	Sustainable Transport Where appropriate, development should include proposals suitable to its scale and location which enhance the attractiveness of walking, cycling and public transport within the town centre. Particular attention should be paid to the need to reduce generation of road traffic and help reduce both air and noise pollution.	
A. Survey Monkey questionnaire replies		
All	Agree: 29 (87.9%) Disagree: 4 (12.1%) Total	33 No answer 3
1	Not practical. The barrier of the railway creates choke points (The Broadway/Springbridge rd) for traffic trying to traverse north/south.	Noted, but this policy is mainly aimed at the need to check traffic increases.
6	Preference for pedestrians could have been stressed at this point with inclusion of needs of disabled/wheelchair users rather than all the way down the page	As above.
7	However weaning people from their cars is all but impossible	Agreed
11	I do not live in the area, but transport, particularly road traffic and resultant air pollution, affect me and others well beyond the area of the NDP. (I live in Hanwell.)	Noted
16	We have now allowed too much consideration to be given to the cyclists to the detriment of pedestrians especially the elderly. The law forbidding cycling on footpaths and pavements should be policed and upheld.	Policy aims to strike a balance. Law enforcement is for police.
22	Road traffic will only be reduced if the use of bus transport is made easier. Every Central Ealing bus stop must have Countdown indicators, be fully accessible (Tfl Accessible Bus Stop guidance) and in many case have an enlarged shelter.	Ditto
29	Delete "where appropriate". Reference making Ealing a vibrant and exciting place (liveable) through sustainable transport and outdoor activity	Noted, but not all development will have an impact on traffic..
36	There should be a reference to improving interchange between buses and trains particularly at Ealing Broadway to reduce the need to cross busy roads.	Covered by Policy T5
B. Other comments received		
A	Add at end: "... and to encourage the use of the two most sustainable modes of cycling and walking." Consider moves to encourage UWL students to cycle rather than using shuttle bus service.	This point already covered by the first sentence. Second point is outside plan scope.
F	Natural England supports Objective 9, Policy T1 Sustainable Transport, Objective 12, Policy T4 Cycle Paths and Objective 14, Policy PR1 Improving public realm. Enhancing existing and creating new pedestrian and cycle paths is important to encourage sustainable travel and can have a positive effect on health and wellbeing of residents.	Now included in text under Policy PR1
G	TfL is pleased that the growth of the borough has been taken into account and appreciates that the stress this has put on public transport capacity and infrastructure has been acknowledged. Public transport capacity improvements should be sought when the actual level of trips expected would be likely to cause additional stress or capacity issues on the existing public transport network.	Noted
C. Action taken		
None		

No	Policy/Comment	Response
T2	<p>Parking</p> <p>Development should aim to provide a balanced amount of off-street secure public parking for both cars and cycles which will allow</p> <p>i. sufficient space for local businesses and for people with reduced mobility;</p> <p>ii. where appropriate, easy access from the edge of the Town Centre, to reduce the volume of traffic entering and crossing the centre.</p> <p>Any change of use must take into account its impact on parking and the mix of retail uses as well as on any Conservation Area.</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 29 (96.7%) Disagree: 1 (3.3%)	Total 30 No answer 6
13	Not sure of either the meaning or relevance of the last paragraph	Noted
16	Our problem lies in the location of the railway bridges which will always make for difficulties in travel across the town centre from North to South.	Noted
18	But residents should be able to park anywhere in Ealing for (say) 1 hour as well as indefinitely in their own parking area	Interesting idea but outside plan scope.
22	If it is a large development there should be (Accessible London-London Plan) public parking for disabled people	Already a London Plan requirement
25	why can't parts of Ealing centre be designated as traffic free ? There is still too much bowing to the pressure of car drivers and owners.	Not practical
29	Item 2 suggest "park and walk" for outskirts, pushing problem to streets other Wards. This is OK if you say that this is subject to the adjoining neighbourhood plan being completed and showing integration to this plan. Don't just displace the problem those less prepared/weaker.	Noted
B. Other comments received		
G	As T1. • TfL would want to ensure that the approach to parking is compliant with policy 6.13 in the London Plan. To minimise highway and traffic impacts, a more restraint based approach to car parking should apply to developments in the vicinity of parts of the highway network which are congested or suffering from capacity problems.	Noted
Action taken		
n/a		

No	Policy/Comment	Response
T3	Servicing Major or Strategic development should provide rear or basement servicing, with particular care to avoid potentially dangerous access points. Where on-street loading cannot be avoided, plans should include provision for strictly controlled pavement insets with limited hours of operation.	
A. Survey Monkey questionnaire replies		
All	Agree: 30 (93.8%) Disagree: 2 (6.2%) Total 32 No answer 4	
16	We should have a 20mph speed limit throughout central Ealing as they have in Islington.	Outside plan scope [and no clear justification]n.
22	Excellent idea. This was in the UDP.	Agreed
24	This policy is too prescriptive. Servicing arrangements need to be considered on a site by site basis, in response to site constraints.	The policy relates to new development, which by definition will be site specific
25	Yes but - delivery vehicles cause real problems in designated cycle lanes	Agreed
28	Especially concerned with safety for cyclists and pedestrians, with deliveries necessarily blocking safe lanes	Ditto
36	Where necessary there should be a ban on loading and unloading during morning and evening peak times.	Agreed – already covered
B. Other comments received		
B	This approach is overly prescriptive and will not be possible in all circumstances. 5.3.15 This was identified and addressed in the Mini Holland plans of 2013. The Council is now in the process of securing final approvals and funding to address this.	Wording is intended to recognise that there will be exceptions. Minor changes have slightly relaxed this. Second point welcomed.
G	TfL recommends a reference to London Plan policies 6.14 and 6.15; Freight. Additionally, the inclusion of a reference to the need for Construction Logistics Plans (CLP) and Delivery and Servicing Plans (DSP) is recommended. TfL would usually expect these to be secured by condition or a section 106 agreement.	These policies do not seem relevant to Central Ealing
C. Action taken		
<i>Policy reworded to read</i> T3 Servicing Major or Strategic Development should where possible provide rear or basement servicing, taking particular care to avoid potentially dangerous access points. Where on-street loading cannot be avoided, plans should include where practical provision for pavement insets with strictly enforced limited hours of operation.		

No	Policy/Comment	Response
T4	<p>Cycle paths Major or Strategic development should assist in the provision of dedicated and segregated cycle paths into and through the town, with special care being taken to avoid conflicts at bus stops and pedestrian crossings. Except where shared facilities are specified and signposted, priorities should be applied to give preference first to pedestrians, then cyclists and then motor vehicles, with appropriate surface treatments to indicate where priorities exist.</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 25 (83.3%) Disagree: 5 (16.75)	Total 30 No answer 6
7	I do not believe that Ealing has the space to do this	Noted – aim is to achieve better balance between all road users.
8	But needs to be balanced with the fact that the Uxbridge Road is a major through route for vehicles and already subject to regular delays and congestion; traffic must be kept moving.	Agreed - as above
12	Pavements in the town centre are so poorly maintained that this is a great hazard to pedestrians who are often forced to share them with cyclists	Noted but outside plan scope.
16	No. Priority must be given to pedestrians. At present cyclists are encouraged to break the law by riding on pavements and footpaths, causing danger to pedestrians, children and mothers with pushchairs	Noted.
22	Shared facilities-a recent study by the RNIB has shown that blind & partially sighted people avoid 'shared space' & 'shared paths' which means, in some areas, an inability to use the public realm.	As above.
25	But this is still not enough. Most cycle lanes in Ealing peter out or stop abruptly - this is really dangerous. This objective is not strong enough	Agreed but beyond plan scope.
29	Refer to bike riders not cyclists. Too specific to bikes. Include provision of links for pedestrians along well designed and lit routes, direct and adjoining traffic calmed. Be careful to be inclusive for all vulnerable modes, and avoid language that sets one vulnerable mode against another	Meaning unclear 'Bike riders' could be taken as including only bicyclists and not other forms of cycles.
B. Other comments received		
B	Objective 12. The aims of this policy have already been achieved through the Mini Holland plans of 2013	The policy is consistent with Mini Holland, which is an aspiration still to be achieved.
F	Natural England supports Objective 9, Policy T1 Sustainable Transport, Objective 12, Policy T4 Cycle Paths and Objective 14, Policy PR1 Improving public realm. Enhancing existing and creating new pedestrian and cycle paths is important to encourage sustainable travel and can have a positive effect on health and wellbeing of residents.	Noted.
G	TfL welcomes the commitment to creating a cycle friendly area of Ealing and the reference to the London Cycle Design Standards (LCDS). TfL recommends that a further reference is made to Cycling Level of Service (CLoS)	Noted.

	Assessments (Chapter 2 in the LCDS). These will help to provide a clear picture of the most important safety issues for cycling to/from sites and will inform potential improvements that could be made to provide safer access for cyclists.	
P	Add: 'Where new cycle paths are proposed close to residential premises, measures to ensure the protection of residential and pedestrian amenity and safety must first be implemented.'	Agreed
C. Action taken		
<p>New last sentence added.</p> <p>T4 Cycle paths</p> <p>Major or Strategic development should assist in the provision of dedicated and segregated cycle paths into and through the town, with special care being taken to avoid conflicts at bus stops and pedestrian crossings.</p> <p>Except where shared facilities are specified and signposted, priorities should be applied to give preference first to pedestrians, then cyclists and then motor vehicles, with appropriate surface treatments to indicate where priorities exist.</p> <p>Where new cycle paths are proposed close to residential premises, measures to ensure the protection of residential and pedestrian amenity and safety must first be implemented.</p>		

No	Policy/Comment	Response	
T5	Public transport Development in connection with public transport proposals will be supported which enhances the areas around bus stops and the approaches to Ealing Broadway station, such as improved shelters, surfacing, accessibility for disabled people and the protection of public open space.		
A. Survey Monkey questionnaire replies			
All	Agree: 31 (100%) Disagree: 0 Total 31	No answer 5	
11	I do not live in the area, but transport, particularly road traffic and resultant air pollution, affect me and others well beyond the area of the NDP. (I live in Hanwell.)	Most of these comments are specific to Ealing Broadway station, where plans are approved and already being implemented, so cannot be part of plan. Some may be appropriate for a recommendation.	
13	Perhaps this is the place to mention interconnectivity between buses and tubes		
15	The bus stops and bus stands should be placed on a platform over the railway line, as has been done at Hammersmith.		
16	We have great difficulty in finding safe places for car drivers and taxis to drop off the elderly, those with luggage and wheelchair users when these groups need access to the railway station. the plans do not include satisfactory "set down points"		
17	Please ensure that these developments do not encroach on Haven Green		
18	Provision should be made for drop off/pick up at the station		
19	Joined up thinking is essential around the station. What chance?		See changed text (as proposed in B below)
22	I have already mentioned the current inadequacies of many of the bus stops.		
25	Again, there should be much greater emphasis on improving Ealing Broadway Station. The enormous increase in users after the opening of Crossrail will cause accidents. Many other cross rail stations are getting real improvements to their buildings and associated access points. Why is Ealing losing out ?		See RA6
30	The LBE signposting of TfL bus services is inadequate outside Ealing Broadway Station in that it rarely records the impending departures of bus routes E10, 297, 65 and 112 because drivers rightly turn off their engines while taking tea and convenience breaks in this area.		Noted. This is a matter for a request to TfL
36	There should be a reference to improving interchange between buses and trains particularly at Ealing Broadway to reduce the need to cross busy roads.		
B. Other comments received			
B	Objective 13. The aims of this policy have already been achieved, including £7.3m of Crossrail Complementary Measures funding. T5 Current wording is unclear, suggest 'Development will be supported which enhances the areas around bus stops and the approaches to Ealing Broadway station, such as improved shelters, surfacing, accessibility for disabled people and the protection of public open space.'	The policy concerns future development in the vicinity of the station. The suggested revised wording has been accepted.	

C. Action taken

Text changed to read:

T5 Public transport

Development ~~in connection with public transport proposals~~ will be supported which enhances the areas around bus stops and the approaches to Ealing Broadway station, such as improved shelters, surfacing, accessibility for disabled people and the protection of public open space.

No	Policy/Comment	Response
PR1	Improving public realm Development will be supported which seeks to secure improvements to public realm, including i. widening and improvements to the surfaces of pedestrian routes and footways; ii. enhancements to the setting and appearance of heritage assets within and outside Conservation Areas.	
A. Survey Monkey questionnaire replies		
All	Agree: 28 (93.6%) Disagree: 2 (6.4%)	Total 31 No answer 5
12	As above we would consider pedestrian surfaces dangerous particularly to the elderly and disabled	Noted
14	There needs to be more public seating on the north side of New Broadway – recent pavement improvements resulted in the removal of all seats which can be helpful for the elderly and those with limited or restricted mobility.	Noted but too specific for policy.
15	But not such as results in the destruction of existing buildings.	Noted
22	The public realm would be greatly improved by abiding to national policies re street clutter & A boards. Perhaps part of this policy should re-iterate national guidelines.	Agreed, but felt not appropriate to repeat existing policy
29	Too specific to geometry of footways, and heritage Refer to good public realm being required to ensure space, good surface, and good environments (vistas, signage, lighting, calmed motor-traffic) in all areas and routes where vulnerable modes are being encouraged.	Noted but too vague
30	In such a large bus interchange and waiting area there should be availability of public WCs.	Noted but too specific unless agreed location can be found.
B. Other comments received		
B	Objective 14. The aims of this policy have already been achieved through Vision for Uxbridge Road set out in the Mini Holland plans of 2013. '...within and outside Conservation Areas.' is redundant, suggest delete	The policy is consistent with Mini Holland, which is an aspiration still to be achieved. Altered wording accepted.
F	Natural England supports Objective 9, Policy T1 Sustainable Transport, Objective 12, Policy T4 Cycle Paths and Objective 14, Policy PR1 Improving public realm. Enhancing existing and creating new pedestrian and cycle paths is important to encourage sustainable travel and can have a positive effect on health and wellbeing of residents.	Noted
P	'Improving the Public Realm' seems unambitious and vague. It needs to set out the complete range of environmental and public realm benefits sought (not just new paving of unspecified quality) and also identify locations where such provision should be given priority.	In order to include this, more details would be needed of specific ideas.
C. Action taken		
PR1 Improving public realm Development will be supported which seeks to secure improvements to public realm, including i. widening and improvements to the surfaces of pedestrian routes and footways; ii. enhancements to the setting and appearance of heritage assets within and outside Conservation Areas..		

No	Policy/Comment	Response
PR2	Landscaping Development which introduces significant and durable green landscaping which contributes to greening of public space will be supported if it makes appropriate provision for maintenance.	
A. Survey Monkey questionnaire replies		
All	Agree: 31(100%) Disagree: 0	Total 31 No answer 5
6	Please add Friars' Place Green, Acton W3 Royal Town Planning Institute's Planning Aid London Branch Ref: CHG/Cahill/MC/pa 20141111	Not in the Neighbourhood Area
12	Maintenance of public space is a problem in central Ealing and could get worse without better care and supervision by the council	Not within plan scope
14	This is particularly important in the Uxbridge Road "office corridor" where the impact of tall office and other buildings can be ameliorated by extensive landscaping in front of the road.	Agreed. In local plan
16	We have recently lost many trees through disease etc and these need to be replaced	Not within plan scope
30	Areas on The Green beside bus shelters should be totally fenced off so as to avoid heavy and prolonged bus passenger standing waiting on newly improved grass areas.	This has been done, but would be unnecessary if. Recommendation 5 b were implemented.
B. Other comments received		
	<i>None received</i>	
C. Action taken		
	<i>None</i>	

No	Policy/Comment	Response
PR3	<p>Improving permeability Development should maximise the opportunities for pedestrian permeability of the town centre, and in particular to i. provide traffic-free through routes; ii. avoid unnecessary signage and clutter in public areas; contribute to the extension of a consistent standard of public signposting such as Legible London, with an emphasis on directions to places such as museums, galleries and other places of cultural and other interest.</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 29 (96.7%) Disagree: 1 (3.3%)	Total 30 No answer 6
4	Agree with ii but not i. Without traffic there is no commerce	Noted
6	Please add The Drive, Friary Park estate and Emanuel Avenue, Acton London W3. Current solicitor Matt Gilks of Dutton Gregory LLP of Winchester representing the Environmental Law Foundation Royal Town Planning Institute's Planning Aid London Branch Ref: CHG/Cahill/MC/pa 20150211	Not in the Neighbourhood Area
8	See comment at T4 in relation to through traffic.	
12	Difficult to envisage a traffic free route through central Ealing	Agreed
13	"Legible London" merely adds to street clutter. We have yet to see a single person use them in Ealing.	Noted
16	The signage outside the station has improved, but I have been asked for directions to the shops, buses etc on several occasions recently	Noted
18	But don't do this if it gums up other traffic routes	Agreed; may need to reflect in wording
25	Yes . See comment above	
29	Don't be so destination focused. People travelling on foot or bike may be passing through or going to meet friends for example. Very rarely are they going to "galleries". Encourage sustainable transport for utility trips. Make Ealing vibrant, liveable and healthy.	Noted: wording amended
B. Other comments received		
P	'Improving Permeability' could usefully incorporate a reference to the desirability of a pedestrian link from the Uxbridge Road 'Office Corridor' to Mattock Lane/Walpole Park. This could be mentioned again when policies for development of sites along the Corridor are put forward.	Existing Local Plan policy already provides for this
C. Action taken		
<p>Wording in sub-para ii changed, with policy to read: PR2 Improving permeability Development should maximise the opportunities for pedestrian permeability of the town centre, and in particular to i. provide traffic-free through routes; ii. avoid unnecessary signage and clutter in public areas; contribute to the extension of a consistent standard of public signposting such as Legible London, with an emphasis on directions to places such as museums, galleries and other places of cultural and other interest.</p>		

No	Policy/Comment	Response
CC1	<p>Social infrastructure</p> <p>As provided in Policy E3, major or strategic development will be expected to provide space for additional leisure, healthcare and education services.</p> <p>Mixed use development will be encouraged which provides for</p> <p>i facilities for recreation, arts and culture;</p> <p>ii social infrastructure to provide additional healthcare, education or leisure services.</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 29 (96.7%) Disagree: 1 (3.3%) Total 30 No answer 6	
12	An essential planning need for the "new" borough. All hospitals providing services to existing Ealing residents are already overcrowded and inadequately staffed	Provision of new 'hospital' facilities not proposed for plan area. This is for CCG policy
13	Perhaps mention Metropolitan Centre here - doesn't seem to appear anywhere else.	Mentioned in intro para 2.3, 5.4.4, etc
14	Strongly agree with the need to provide a space for arts and culture.	Noted
16	We must not neglect social housing. Ealing has lost many units of social housing over recent years. We need accommodation for people who will work unsocial hours in our public and service industries.	Noted, but not a social infrastructure policy
24	This policy is too prescriptive and does not take account of different site conditions. It may not be suitable or viable to provide community uses on site. Going forward this will be a Regulation 123 list item following adoption of LB Ealing local CIL.	Noted and has been reflected in rewording.
25	This must be insisted on	Noted
26	Absolutely agree	Noted
B. Other comments received		
B	Reference to policy approach in E3 is not supported	See revised E3 and below.
H	<p>We object to Policy CC1, which states that major or strategic development "will be expected to provide space for additional leisure, healthcare and education services". This Policy is therefore setting out another list of uses demanded, that goes even further than the social, cultural, and community uses required under Policy E3. This is both unrealistic, unreasonable and lacks the necessary justification.</p> <p>Such uses are often unable to pay a commercial rent and the requirement to include them as part of much needed, office, retail or residential development (as sought elsewhere within the draft Neighbourhood Plan) will undermine the viability of redevelopment schemes and often prevent worthwhile schemes from coming forward. The Policy as drafted currently, suggests a lack of understanding of how difficult it is to make town centre redevelopment schemes work.</p>	<p>Social infrastructure is essential to support a growing population, in line with the London Mayor's Social Infrastructure SPG. Development which fails to provide adequate space for the services needed to meet the demands that the development creates is not sustainable. The Plan seeks to ensure there is a balance between desirable commercial development and social need, particularly in an area where there is little or no 'brown field' space for new infrastructure.</p>

	<p>Both healthcare and education are funded by taxation and it is neither reasonable nor appropriate to shift the burden onto the development industry. The draft Policy also fails to recognise that contributions for wider social infrastructure are covered under the Community Infrastructure Levy.</p>	<p>This is explicitly recognised in Recommendation 10.</p>
<p>C. Action taken</p>		
<p><i>Policy clarified to take account of objections, to read:</i></p> <p>CC1 Social infrastructure</p> <p>Major or strategic development will be expected to provide space for assist in finding space for the provision of social infrastructure. additional leisure, healthcare and education services. Mixed use development will be encouraged supported which provides</p> <ul style="list-style-type: none"> i. facilities for recreation, arts and culture; ii. social infrastructure to provide additional space for healthcare, education and leisure services.. <p><i>New text added after 5.4.12:</i></p> <p>The London Mayor’s policies encourage town centre partners to “c resist loss of infrastructure and maximise the usage of existing facilities d identify locations, sites or buildings, and financial contributions for new provisions including as part of mixed use development with housing.”</p> <p><i>[with footnote to identify source: Town Centres Supplementary Planning Guidance Implementation Framework July 2014]</i></p>		

No	Policy/Comment	Response
CC2	<p>Community space Provision of new facilities for community and related uses will be encouraged. The following are priority needs for the area:</p> <p>i. an arts and community leisure facility providing a multi-purpose venue sufficient to accommodate a 250+ seat auditorium/sports hall with a minimum of two indoor sports courts, gym and dance facilities, changing rooms, storage, meeting rooms and associated administration and disabled parking facilities;</p> <p>ii. a community building suitable for use for primary health care, with associated disabled parking spaces;</p> <p>iii. community space with associated storage and parking spaces suitable for use by organised youth and educational groups and/or older, vulnerable or other disadvantaged members of the local community;</p> <p>iv. connectivity and accessibility in and around the Town Centre, with information services and similar facilities including wayfinding, particularly to publicise places of local interest.</p> <p>Loss of existing space allocated for community use (typically some D1 or D2 uses) will only be supported where equivalent alternative provision is made</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 31 (100%) Disagree: 0 Total 31	No answer 5
2	To better protect cultural facilities and to reflect Para 70 of the NPPF, The Theatres Trust recommends this policy be renamed 'Community and Cultural Facilities'; and the final paragraph is reworded to say: Loss of existing space allocated or used for community or cultural purposes (typically D1, D2 or some Sui Generis uses) will only be supported where an equivalent replacement or alternative provision is made.	Noted and suggested rewording adopted.
4	Though support for existing facilities should also be included in the plans, for example Open Ealing and Questors theatre.	Preserving the status quo does not need to be explicitly mentioned.
10	Particularly in favour of an arts performance space	Noted
12	A very clear and well-presented argument to describe the future needs of Ealing	Noted
13	iv seems to be covered elsewhere	Some rewording; duplication removed
17	It is important that good sites are found for community uses. I note in this context that the old YMCA building is proposed for demolition under the CinemaWorks plan; and that inadequate community spaces are provided in that plan and in the 9-42 Broadway plan.	Noted
25	and the cinema ??	Noted
26	Very important	Noted
28	The rise in demand on our church spaces for community use testifies to the need for this. We are unable to meet demand, especially for storage and turn users away regularly.	Noted
B. Other comments received		
B	The policy should be clear whether it intends a hierarchy for these projects.	Implementation priorities are in the Delivery section. This is cross-referred.

	<p>In order for the plan to set these priorities in policy there should be clear evidence of public involvement in their selection as well as any mandate that accrues from the referendum.</p>	<p>Supporting evidence is clarified in the explanatory text</p>
<p>C. Action taken</p>		
<p><i>Policy clarified to take account of objections, to read:</i></p> <p>CC2 Community and Cultural Facilities</p> <p>Provision of new facilities for community and related uses will be encouraged supported. The following are priority needs for the area:</p> <ul style="list-style-type: none"> i. an arts and community leisure facility providing a multi-purpose venue sufficient to accommodate a 250+ seat auditorium/sports hall with a minimum of two indoor sports courts, gym and dance facilities, changing rooms, storage, meeting rooms and associated administration and disabled parking facilities; ii. a community building suitable for use for primary health care, with associated disabled parking spaces; iii. community space with associated storage and parking spaces suitable for use by organised youth and educational groups and/or older, vulnerable or other disadvantaged members of the local community. iv. connectivity and accessibility in and around the Town Centre, with information services and similar facilities including wayfinding, particularly to publicise places of local interest. <p>Loss of existing space allocated or used for community or cultural purposes (typically D1, D2 or some Sui Generis uses) will only be supported where an equivalent replacement or alternative provision is made.</p>		

No	Policy/Comment	Response
CC3	<p>Cultural quarter</p> <p>Development within the cultural quarter should have regard to Policy E3 (Town Centre uses) and preserve and enhance its special character and objectives. In particular, it should</p> <p>i. enhance the quarter as a key centre for the arts serving Ealing and the wider West London sub-region; and</p> <p>ii. complement existing provision in the Town Centre to ensure a balanced offering across the whole range of cultural and arts activities.</p> <p>Applications for new development or change of use will be carefully considered to ensure the number and nature of A4 & A5 food and drink outlets, licensed drinking establishments and amusement arcades remain subsidiary to the main cultural activities of the quarter and do not result in the excessive concentration of uses such as takeaway food restaurants.</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 31 (100%) Disagree: 0 Total 31	No answer 5
6	There is a need to avoid over-concentration of licensed premises for gambling and the sale of alcohol but there should be some flexibility regarding takeaway food restaurants given the increased numbers of people employed in the new offices	We probably don't agree with suggestion re. takeaways.
12	Ealing has a precious resource in cinema, theatre and music. These cultural activities must be positively encouraged and to the forefront of all future planning	Noted
13	Define the "special character"	To consider
14	Agree with the need to avoid proliferation of A4 & A5 outlets, betting shops, amusement arcades and takeaway outlets.	Noted
16	This seems to be a pious vision rather than a realistic idea.	Disagree – it is aspirational but could be deliverable with vision.
17	Please see my remarks regarding the importance of maintaining night life above. Ealing centre would be boring and possibly more dangerous without the presence of some night life, albeit that it needs to be well regulated - and policed, if possible.	Noted
18	But do not move the Ealing Central Library. It should be a CENTRAL library	Outside plan scope
20	Central Ealing is too reliant on Coffee shops and other food and drink outlets. There are so few units actually selling things. That's why people got to Westfield and Kingston to actually shop.	Covered elsewhere
22	As already mentioned. Over concentration should actually be site specific. In a few years' time we'll will just have restaurant 'quarters'.	Unclear
26	Vital	Noted
30	Religious and spiritual activities should surely be included alongside art and recreational facilities.	Covered elsewhere
B. Other comments received		
B	What specifically is the 'special character and objectives', and where is it set out?	This has been clarified in the supporting text.
C. Action taken		
	n/a	

No	Policy/Comment	Response
RA1	<p>Visitor centre Establish a visitor centre in or near Ealing Broadway station, possibly including space for a police counter, to i publicise local attractions and events ii offer a central booking service to hotels, restaurants and other services iii provide travel advice and ticket sales in conjunction with Network Rail/TfL.</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 23 (76.7%) Disagree: 7 (23.3%) Total 30	No answer 6
4	No police counter as this sends the wrong message about the safety of the area!	There is also support for strong police and TfL presence – although these are outside plan scope.
6	The information available on social media this seems rather outdated and a real waste of public money.	
7	I am not convinced this is achievable or even needed - I see this as a low level aspiration	
9	Don't see benefit of this, in fact, would seem to duplicate services/ online offerings.	
12	The most important suggestion is to have a constant police presence in Central Ealing and this could certainly be best located at the Broadway station	
16	Not a priority when resources are so limited	
17	Not sure who will pay for this one - and would the police counter be open outside of shopping hours?	
19	I think this is less important than previous recommended actions	
23	This would be a great asset to the area. There are many foreign visitors in Ealing who would benefit from this service, as well as local people.	
25	I dont know if this is really a priority. So many other things seem much more important	
30	It is nothing short of scandalous that there is no TfL supervisory presence at such a major transport interchange.	
B. Other comments received		
	None	

No	Policy/Comment	Response
RA2	Start up and small business hub Develop the work of the West Ealing Hub Working Group to examine the feasibility of establishing a hub or co-working space in central Ealing, in particular to work with UWL and Ealing Studios to identify potential opportunities for start-up and incubator space in business areas where Ealing has particular strengths, eg film, media and research activities; to examine where “pop-up” spaces could be used in empty shops or other premises with business rates and other concessions.	
A. Survey Monkey questionnaire replies		
All	Agree: 30 (100%) Disagree: 0 Total 30	No answer 6
7	However, I do not believe that Ealing Studios is at all interested	Noted
22	Not sure if there is much space left in the studios for 'start up's	Not suggested that this should be within studios.
28	church space could be part of this, if partnered correctly	Noted
29	Good	
Other comments received		
	<i>None</i>	

No	Policy/Comment	Response
RA3	<p>Design Review Panel</p> <p>Re-constitute a Design Review Panel to advise the LBE Planning Committee on all planning applications which are</p> <ul style="list-style-type: none"> - “major” or “strategic” applications - significant infrastructure or public realm proposals - schemes affecting conservation areas or listed buildings - in its own judgement, publicly controversial 	
A. Survey Monkey questionnaire replies		
All	Agree: 28 (93.3%) Disagree: 2 (6.7%)	Total 30 No answer 6
7	The current Planning Committee (and most of its predecessors) is not fit for purpose and needs some help like this.	All noted but beyond plan scope.
9	Strongly support. Interested residents are all but ignored in the current system.	
12	We are fortunate that Ealing Civic Society exists as a dedicated and responsible group concerned to protect the public realm and planning officers should work closely with them and also take note of the significant role now given in law to this neighbourhood forum	
16	We need to strengthen our reviews of proposed developments so that the planning committee is well informed and doesn't make ill considered decisions	
22	Absolutely.	
25	Yes the Planning Committee does not seem very well informed on most issues.	
29	Essential	
B. Other comments received		
	None	

No	Policy/Comment	Response
RA4	Craven Road and Craven Avenue Recognise the special character of Craven Road and Craven Avenue as deserving of Conservation Area status by – including it in the current Town Centre CA or making other appropriate special measures to give it equivalent status; - providing the area with the same protection as an already established CA in the event of any development on adjoining sites	
A. Survey Monkey questionnaire replies		
All	Agree: 25 (89.3%) Disagree: 3 (10.7%)	Total 28 No answer 8
4	What is the special character of these roads?	Covered in para 4.20 to 4.28
7	This is not strategic in the context of Ealing as a whole.	The NP is concerned with local application of policy, not strategic matters
9	I am not aware of the merits of these particular roads in respect of meeting criteria for CA status; however, I am supportive of such moves in general, where merited, to prevent / reduce /slow the further erosion of Ealing's heritage assets.	As 4 above, otherwise noted
14	Both these roads probably should have been included in the original Haven Green conservation area and it would be sensible for an early study to be carried out for its extension to encompass them as part of the Council's conservation area review process.	This is recommended in 5.2.13
23	As one who lives in Craven Avenue I thoroughly recommend this action to protect it from further encroachment by new buildings.	Noted
24	This designation needs to be justified in accordance with NPPF paragraph 127 and the area's special architectural or historic interest,	As point 14 above
B. Other comments received		
P	5.2.13 has words missing and is badly phrased. We suggest the last sentence is deleted and replaced with: Craven Road and Craven Avenue are close to the Town Centre Conservation Area. Developments visible from these predominantly residential streets should cause no harm to visual amenity e.g. by reason of excessive/obtrusive height, scale, mass or poor design.	This section has been redrafted

No	Policy/Comment	Response
RA5	<p>Protecting green spaces</p> <p>(a) Protect and enhance green spaces in the town centre by establishing a specially planned programme for enhancement of open spaces to:</p> <p>i. encourage biodiversity by improving opportunities for wildlife;</p> <p>ii. replace trees under stress or affected by disease.</p> <p>(b) (In conjunction with Recommended Action 6.) Protect and enhance Haven Green common land and Conservation Area by:</p> <p>i. removing and re-siting bus stops and stands from the diagonal road across the green (in conjunction with Recommendation 6);</p> <p>ii. restoring the parts of the roadway so released and redesignating it as common land, allowing the area of common land to be returned to at least its original total; iii transferring all cycle parking off common land/public open space.</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 26 (86.7%) Disagree: 4 (13.3%) Total 30 No answer 6	
7	Again this is too localised rather than strategic	Response as to RA4 point 7
13	Under iii " refusing all cycle parking or other structures on"	
16	we have allowed our green space to be overwhelmed by bus stops and cycling provisions. This is supposed to be common land which is there for the benefit and peaceful enjoyment of all.	Noted
17	Yes! Tallies with my earlier comments about Haven Green.	Noted
19	strongly agree!	Noted
23	Haven Green should be restored to its original state and not littered with bus stops and cycle parking.	Noted
26	Not sure	Noted
29	biii CONSIDER.....where practicable and workable. Don't shoot yourself in the foot.	
36	I would like the bus stops to be moved to the east side of Haven Green and the south bound traffic to be rerouted along the diagonal road from NW to SE. This would result in no loss of common land.	This would force 6 west and north-bound bus routes to travel south through The Broadway/Springbridge Road, adding to congestion contrary to other policies
B. Other comments received		
A	Defer bus stop moves until comprehensive redevelopment allows full alternative provision of cycle parking	
B	RA5 I The bus stops are sited on Highway land which has recently seen pavement widening to help meet the high demand for bus interchange. Bus stops have been sited on the diagonal road for a long time and are essential to meet the bus boarding and alighting activity in the area, which will be heavier once Crossrail is built. Removing the bus stops would therefore lead to insufficient bus stops to serve current need. Relocating the bus stops was explored as part of Ealing Council's August 2010 Interchange Study but there are no viable alternative places to site these	

	<p>stops without moving them to a significant distance from the station</p> <p>II This option was explored and discounted as part of the August 2010 study as it would not work (which was shared with all local groups)</p> <p>III The Council is in the process of delivering an alternative site for temporary cycle parking that would allow the cycle stands on Haven Green to be removed. Whilst cycle parking on Haven Green is under challenge, removing all cycle parking off all "public open space" would mean taking out around half of the cycle parking in the Borough.</p>	
	<p>Protection and enhancement of trees is also important as they form a fundamental part of the ecological network; providing connectivity and creating breeding and foraging habitat. Proposals may present opportunities to incorporate features such as the use of native species in landscape planting and we would welcome the delivery of priority habitats, as listed in Section 41 of the Natural Environment and Rural Communities Act 2006, contributing to national and local targets.</p>	

No	Policy/Comment	Response
RA6	<p>Ealing Broadway station interchange</p> <p>In conjunction with Recommendation 1b, improve the transport interchange facilities serving Ealing Broadway station by</p> <p>i. re-siting bus stops and stands from the diagonal road across the green to the area to the south outside the common land (“the BBC car park”) through adaptation of the reserve scheme proposed by Steer Davis Gleave and Urban Studio (Tribal Group);</p> <p>ii. seeking further ways of moving bus terminal points away from the Haven Green area; transferring cycle parking from common land green space to the undercroft of the BBC car park, with access as both ends so as to serve to the town centre visitors as well as station passengers.</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 26 (92.9%) Disagree: 2 (7.1%)	Total 28 No answer 8
4	Include a dropping off point in new car parking facilities	Most of these suggestions are constrained by already agreed plans for station.
7	Whereas this whole area is strategic	
8	This would have major environmental/aesthetic benefits.	
9	Strong support for this to improve Haven Green`s rapidly eroding aspects.	
14	Strongly agree with the need to remove cycles, buses and other traffic from Haven Green.	
15	See my comment on item 13	
16	This is a sensible recommendation.	
18	but surely we could integrate buses with trains better by (say) using siding space better	
22	Also cycle storage in the Springbridge Road car park.	
25	Yes but there are still fundamental problems with the rail station.	
29	Public viewing of cycle parking is important to encouraging use. Maybe overflow or secure parking in BBC?	
30	I have mentioned these points earlier including the observation that it is nothing short of scandalous that there is no TfL supervisory presence at such a major transport interchange...and no WCs provided.	
36	Nice idea but there is insufficient room on "the BBC car park" for all the bus stands and north bound buses. The only terminating route which could be moved from Haven Green is 112 which could turn in High St / Bond St.	
B. Other comments received		
A	As RA5	
B	<p>Paras 5.3.7 - 9 - These paragraphs do not address the policy and refer exclusively to public transport modes.</p> <p>6.i This cannot be realistically delivered. This is made clear in the August 2010 Interchange report (paragraphs 6.33 to 6.37). The study placed this option on “reserve” with the recommendation that “This option has potential for significant interchange and bus operation benefits but would require further investigation of property acquisition costs and acceptability before progressing to detailed design and the development of a full TfL business case”. Further investigation of the option led to additional concerns around space and turning space for buses, safety for bus users in the confined</p>	

	<p>space, further approvals needed (and unlikely to be granted) from Network Rail, a lack of support from TfL buses, impacts on Haven Green as access into the site could result in loss of mature trees, junction and local road impacts (especially on exiting onto Springbridge Road) and discussions with the land owners who were unwilling to sell the land and with a CPO process likely to be unsuccessful, leaving this option as now “rejected”.</p> <p>6.ii The August 2010 study explored all possible options for moving bus terminal points away from Haven Green.</p> <p>6.iii It is against good practice to site cycle parking in a hidden undercroft area. There is clear evidence to show this leads to anti-social behaviour, increases in cycle theft and personal security issues. The option is not supported by the local Police. The Council has no powers, funding or clear delivery mechanism to facilitate this option.</p>	
H	<p>TfL’s item of specific interest is the suggestion of transferring bus stops and stands on Haven Green diagonal road to the area to the south outside the common land. Such a move is likely to require a new road to be built. As for whether or not the suggested re-siting would be of benefit or a drawback for buses would be down to its design and capacity. Before any recommended action on this topic can be supported by TfL, further discussion will be required with TfL London Buses and Ealing transport officers to agree a potential way forward. Any recommended improvements to this area will need to demonstrate that they deliver benefits to bus passengers and operations. This should take into account journey times and the actual space requirements. The proposal in the draft Plan may not achieve this and cannot be supported at the present time. Contact details within TfL London Buses can be provided to enable you to take forward discussions on this issue. As identified, this area has very high passenger numbers and is an important interchange between buses, the town centre and rail services. This role would increase in importance once Crossrail starts in 2019 as buses spread the catchment to much of the surrounding area.</p>	

No	Policy/Comment	Response
RA7	Ealing Green/The Grove road junction Implement improvements in the road layout and signalling arrangements so as to improve traffic flow and in particular reduce tailbacks into High Street.	
A. Survey Monkey questionnaire replies		
All	Agree: 30 (96.8%) Disagree: 1 (3.2%)	Total 31 No answer 5
7	This is detail not strategy	Agreed, but still a good policy.
8	Consider removing the traffic lights and reintroducing the roundabout as has been suggested for many years! Tailbacks are not only from the High Street but also along St Mary's Road. In conjunction with reopening access to the car park from north Windsor Road which would reduce traffic at this junction.	Noted
14	These traffic signals were originally introduced I understand to assist with the movement of the 65 buses through the area but in practice they have led to delays to all traffic. Reinstatement of the original roundabout at this junction, together with appropriate pedestrian crossings, would seem to be one solution.	As above
16	Difficult to achieve	
18	The red lights in many parts of the borough actively prevent this. For instance there should be a roundabout at the junction of Ealing Green and The Grove, not traffic lights. Also Residents in The Grove should have two-way access to their road - this could be accomplished by having wireless operated bollards at the west end of the road	Noted
29	Though I have not seen any significant tailbacks. More important to reduce vehicle use, and remove traffic lights.	Noted
B. Other comments received		
	None	

No	Policy/Comment	Response
RA8	<p>Electric car charging points</p> <p>Ensure there are more electric car charging points in the centre, through</p> <p>i. providing facilities in the Springbridge Road MCP, at a ratio of two charging points per 100 car spaces;</p> <p>ii. requiring privately run public parking spaces with more than 50 spaces to provide a minimum number of points at the same ratio;</p> <p>iii. requiring all future residential developments with 25 or more spaces to provide points at the same ratio, with a minimum of one.</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 24 (88.9%) Disagree: 3 (11.1%)	Total 27 No answer 9
4	Too soon	
8	Already included in London/local plan requirements?	
9	Can't comment on these ratios because I am ignorant of the current and projected rise in use of electric cars.	
19	again not as important as some of the other points. Not very green, am I?	
24	(ii) This policy cannot be retrospectively and needs to be considered on its merits during the planning process.	
29	Add in encouraging LBE to champion electric charging for residents in their homes/adjacent/nearby.	
B. Other comments received		
B	<p>8.i Springbridge car park will shortly have restricted opening hours which would severely limits the accessibility of any EVCP. Takeup and use of EVCP has been very low to date and losing car parking spaces that generate key revenue for the Council in this location is not favoured as there are better and more accessible options.</p> <p>8.ii It is unclear how private companies could be persuaded to comply with this.</p> <p>8.iii It is unclear what this adds to the existing policy framework. The London Plan states in Policy 6.13 D "Developments must: a) ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles..."</p>	<p>Opening hours are easily adjusted and within the power of LBE</p> <p>Wording altered to read 'persuading...' See TfL comment.</p>
G	TfL appreciates the desire to reduce generation of road traffic and encourage sustainable methods of transport that do not heavily contribute to the current NOx emissions or noise pollution levels, this complies with Mayoral aims. Supporting this desire, TfL welcomes the reference to the need for additional electric vehicle charging points (EVCPs) in the area. All developments should at least meet the minimum standards for EVCPs outlined by Policy 6.13 'Parking' in the London Plan.	Noted

No	Policy/Comment	Response
RA9	Public realm improvements Ensure there is a regular programme of street improvement works which meet the needs of both pedestrians and businesses, with adequate provision for loading bays and off-street.	
A. Survey Monkey questionnaire replies		
All	Agree: 28 (93.3%) Disagree: 2 (6.7%) Total 30 No answer 6	
8	Unclear what this means.	Noted
13	add "including assessments of street clutter"	Noted
18	The Grove Road pavements, outside an old peoples home, are disgraceful.	Noted
22	York stone is an unnecessary expense & in fact the basic paving is more durable & so any new pavement improvements should not continue the current obsession with York paving.	Noted
29	Street quality is vital to improving active travel for health.	Noted
B. Other comments received		
B	This is an integral part of the Local Implementation Plan, which is a valuable source of information for the draft Plan.	Noted.

No	Policy/Comment	Response
RA10	<p>Community infrastructure Include in the Ealing Infrastructure Delivery Schedule provision for space for community related needs, including i. a primary healthcare Health & Welfare centre in a site with good public transport access, in conjunction with the CCG; ii. other space for community based activities and organisations such as youth and educational groups, and older vulnerable or other disadvantaged members of the local population.</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 29 (96.7%) Disagree: 1 (3.3%)	Total 30 No answer 6
	[No comments received]	
B. Other comments received		
	None	

No	Policy/Comment	Response
RA11	<p>Performance arts Promote central Ealing as a regional centre of arts and culture to attract regular audiences throughout the year, as well as to seasonal activities such as the Ealing Festivals, and in particular i. provide support through inclusion in the Ealing Infrastructure Delivery Schedule and the provision of S106 funds for the provision of a multipurpose arts-related auditorium within the Cultural Quarter; ii. actively support other developments that bring arts and music facilities to the town centre.</p>	
A. Survey Monkey questionnaire replies		
All	Agree: 28 (93.3%) Disagree: 2 (6.7%)	Total 30 No answer 6
4	As noted above, include support for existing venues/facilities	
13	Again mention its Metropolitan status	
17	Absolutely, but I suggest that the Ealing Summer Festival be moved to the Common as it has become too large for Walpole Park.	Not within plan scope.
25	These last two see repetitive - see above	
26	Most important and urgent	
29	Excellent	
30	And to note and encourage existing religious events in the area such as Good Friday well attended Procession of Witness from Haven Green to Christ Church.	Noted, but not within plan scope.
B. Other comments received		
	None	

No	Policy/Comment	Response
RA12	<p>Film museum</p> <p>Work with Ealing Studios and the London School of Film, Media and Design to realise the objective of establishing a Museum of Film to</p> <ul style="list-style-type: none"> - maintain an archive of the local contribution to the film industry; - celebrate the history, achievements and present activity of Ealing; - provide a resource centre for the study of film and the digital media 	
A. Survey Monkey questionnaire replies		
All	Agree: 30 (96.8%) Disagree: 1 (3.2%)	Total 31 No answer 5
3	But should involve BFI	Good point; mention.
7	However - how will this sit alongside (eg) BFI etc? Also, Ealing Studios is hardly interested....	Noted
12	A very valuable and much needed resource	
14	A film museum was originally envisaged as part of the Ealing Studios redevelopment (final phase) and this should be honoured.	
16	Will need money!	See Delivery Plan
18	But why oh why is it taking so long to have a cinema in Ealing - a bureaucratic disgrace	Noted
22	However the most appropriate place for a Film Museum was/is the YMCA building in Bond Street. In 2008 before it was left to rot & bought by the Council in 2011 I did suggest this location for a Film Museum/book shop/cinema/cafe.	No longer a possibility
B. Other comments received		
	None	

No	Policy/Comment	Response
RA13	Public art Enhance the attraction of public open spaces in the town centre by promoting the provision of public art on both permanent and temporary sites, through planning obligations or other sponsorship.	
A. Survey Monkey questionnaire replies		
All	Agree: 27 (87.1%) Disagree: 4 (12.9%)	Total 31 No answer 5
12	A later addition if and when excess funding becomes available. More essential is the need for more public toilets.	Noted
22	A great idea but I hope it will be of the highest quality and inspirational.	Noted
29	Need to state objective. Emphasise that public art should seek to bring about community engagement and cohesion. Or another objective.	Noted
B. Other comments received		
	<i>None</i>	

No	Policy/Comment	Response
Sites Gen	Site specific policies <i>[Not included as a separate question in the Survey Monkey questionnaire]</i>	
B. General comments received		
B	(see also	
P	<p>We are unclear why these three site specific policies are set out in a format that shows them as 'site development proposals'. We suggest instead that the Plan be accompanied by a policies/proposals map that identifies all sites/locations/areas where specific policies apply, to include these three sites and/or others as considered appropriate. The Plan should explain why additional policy guidelines are needed, with a cross-reference to relevant Plan-wide policies.</p> <p>The development criteria for all three sites need greater clarity and justification particularly where land uses are specified or set-backs from highway frontages or building heights are proposed.</p>	

No	Policy/Comment	Response
CENF1	Carmelita House Retention of site for office use	
	A. Survey Monkey questionnaire replies	
	<i>[None - not included as a separate question in the Survey Monkey questionnaire]</i>	
	B. Other comments received	
X1	I am surprised that the plan's site specific policy CENF1 does not consider the possibility of the site EVER becoming a secondary entrance to Ealing Broadway station. I think that this total omission is a mistake. . Louis Lemieux London W5 2BJ (Noted but beyond our control - already rejected under Crossrail station rebuilding plan

No	Policy/Comment	Response
CENF2	BBC (Villiers House) car park Proposed use: Bus stops and stands for routes starting/terminating at Ealing Broadway station undercroft to be used for secure cycle parking	
	<i>[Not included as a separate question in the Survey Monkey questionnaire]</i>	
B. Other comments received		
B	(see also	
E	The proposed allocation of the BBC car park is not deliverable, because <ul style="list-style-type: none"> 1. The complexity of leaseholder ownership 2. Delivery is dependent on the agreement/funding and support from other organisations 3. The size of the site is too small and constrained 4. It is not certain whether the site is structurally suitable 5. The proposed allocation of the site conflicts with the land use allocation for the site set out in the Ealing Development Sites Development Plan Document (2013) 	The points are dealt with in the draft plan supporting text (submission version). In brief <ul style="list-style-type: none"> 1. The ownership structure did not inhibit LBE from including the site in its original DPD allocation, nor from approving the failed Glenkerrin scheme. Within the lifetime of the plan it could change again. 2. Funding will be applied for through the LIP and CIL delivery schedules. 3/4. Answered by the AECOM technical report 5. The DPD no longer applies as the site is outside the EAL5 plan area approved by LBE for 9 – 42 The Broadway (Arcadia).
O	We are pleased the Forum has tried to examine the way that Ealing is changing in response to the great changes in Ealing and beyond. The draft plan is a good start, however we are disappointed that it has not really begun to get to grips with pressures on the area around Haven Green as a result of its proximity to Ealing Broadway Station whose passenger numbers are set to grow dramatically. So far as Haven Green is concerned, far too many buses – both official and unofficial services - are stop on the diagonal road where they destroy the qualities of the Green. FoHG has long called for a proper plan for this area which safeguards Haven Green as an open area of Common land. We do not believe Crossrail's plans for the station come close to addressing the issues. Our first comment then, is to encourage the Forum to tackle this question as a priority next time around. We are pleased, all the same, that one of just three site related policies in the plan concerns the BBC car park which is a very important unbuilt area in a very key location adjacent to the Green whose qualities are being degraded by its use as a transport interchange. Something needs to be done to sort out this problem,	

	<p>and the BBC car park is potentially a very useful asset whose future must be very carefully planned. While mindful there are a number of options in the area that could fall out of the larger review of the interchange referred to above, one clear opportunity would be to use the car park as a part of the interchange, as a place for buses to stop and thereby take the pressure off the diagonal road. We also agree that the car park might also be a good site for cycle parking, and thus it is one way to overcome FoHG's current legal case against the Council which has sited cycle parking facilities on registered common land.</p> <p>The draft plan lists three constraints in developing the site. While we agree with these we think a fourth should be added which is the need to protect the mature trees (mainly plane trees) on the common land whose root systems will extend underneath the car park. Haven Green has recently lost the majestic row of horse chestnut trees that ran along the north side of the Green and it is vital that nothing must be done to endanger those on the south side.</p>	
P	<p>We wholeheartedly endorse the proposal and would only add that no development here should compromise the canopies or root systems of the mature trees along the southern side of Haven Green. (Note: we think Maxicorp has extended UWL's lease by c. two years beyond 2016).</p>	

No	Policy/Comment
CENF3	Perceval House and car park (EAL7) <i>[Not included as a separate question in the Survey Monkey questionnaire]</i>
B. Other comments received	
15	<p>Percival House is ugly and too large and overbearing for its site and should be demolished and the council offices moved to further down the Office Corridor.</p> <p>Noted. A plan already exist to demolish the present building and create new Council offices on the car park site.</p>
B	
P	<p>'within the site, heights should be no more than 8 storeys'. This seems to us to be about right, but the text contains no explanation of why 8 is preferable to say 6 or 7 or indeed 9 or 10. The wording in Section 13 'design considerations': 'to minimise adverse impact on neighbouring buildings' is inadequate. We suggest : 'to minimise adverse impact on neighbouring buildings and to ensure redevelopment of a height and scale that is not intrusive, dominant or overbearing when viewed from neighbouring residential buildings/areas and from key locations within and beyond the town centre.' The 'key locations' must be specified (elsewhere) in the Plan and should certainly include multiple viewpoints throughout adjoining Conservation Areas. Particular attention should be paid to viewpoints to the north, where most central Area and residential areas are on significantly rising ground.</p> <p>The final sentence of Section 13 should also be changed to: ' To protect local amenity, the eastern end of Craven Avenue should remain a cul-de-sac or, if access to the site is proposed (and in accordance with EAL7), this should be restricted to use by pedestrians and cyclists. Proposals should be accompanied by a fully costed.....(as written).....prior to commencement of development' .</p>

No	Policy/Comment	Response
Gen	General comments	
A. Survey Monkey questionnaire replies		
6	Once again your focus on the interests of pressure groups for cyclists have lead you to produce a questionnaire that failed to pay any real attention to the needs of disabled residents in the borough	Noted; all submitted views will be taken into account
29	<p>1 I am a stakeholder and Ealing Centre is vital and everyday part of my life.</p> <p>2 I would like to vote in a referendum, but I am not in the area. Why not say that all people submitting a questionnaire (or making some other application) should be allowed to vote.</p> <p>3 This Plan is isolated from the adjoining plan areas. This plan requires integration to adjoining areas especially for transport and access. It is the hub of Ealing and should actively ensure the production of adjacent and integrated Neighbourhood plans</p>	<p>1. Noted</p> <p>2. Not in our control</p> <p>3. These are largely deemed “strategic” issues and a matter for the superior plans (Borough or London).</p>
B. Other general comments		
X2 (by email)	<p>I’ve read thru’ the impressive CENP body of work. Thank you for your efforts.</p> <p>I suppose one needs to keep to broad brush policies but I would like to raise a minor but nonetheless material issue that blights our two town centres.</p> <p>The increasing number of agents sign boards, some erected on a semi permanent basis, are an unnecessary, unwelcome and negative imposition on the Public Realm. In a small but relevant exercise undertaken at Castle Hill Parade, The Avenue, West Ealing and the Southern end of Drayton Bridge Road, W13, at least 10 agents boards (representing 80% of those displayed) of the ‘Let or Sold By or Let and Managed By’ variety had been displayed, as such, for over 6 months.</p> <p>Planning Enforcement is taking action to remedy this specific abuse though it is clear that the Council doesn’t have the resources to proactively address the problem. My wider point is that many ‘10s’ of these boards, many outdated, festoon West Ealing centre - projecting a largely erroneous image of unwanted buildings or of a transitory community, merely as a way for an estate agent to gain a greater profile in a very competitive market.</p> <p>The advent and exponential growth of the internet and major websites hosting estate agents ‘particulars’ such as Rightmove, Zoopla, etc. in recent years means that potential takers of shop, office and other commercial premises no longer need to take to our streets in order to find accommodation.</p> <p>Likewise the majority of individuals and families trying to secure a home use these sites or the agents own websites to search for property.</p>	<p>Although this references mainly locations outside the plan area, the point is a very valid one which merits inclusion in the plan provisions.</p> <p>Propose a Recommended Action that LBE apply to the Secretary of State under Regulation 7 of the Town and Country Planning (Control of Advertisements) (Regulations) England 2007 for powers to restrict the display of estate agent boards in specific areas of the town centre without the express consent of the council. (Displaying boards without the required consent could lead to enforcement action that could result in a fine of up to £2,500.)</p> <p>These powers would be granted on the grounds that the numbers of boards being displayed were cluttering the facades of buildings and harming the appearance of streets in the borough, particularly in conservation areas.</p>

	Accordingly I would be pleased to learn whether your organisation would consider adding to Policies under Public Domain the recommendation that Estate Agents Boards will either (a) not be permitted or (b), would require planning consent for larger developments (Dickens Yard) for a relevant time period.	
C	<p><i>[Extract]</i> The Plan acknowledges the importance of Ealing’s exceptional architectural heritage and sets clear objectives (5-8) to protect these assets and their settings. We particularly welcome aspirations 5 and 6 of the Plan, which we believe are integral to achieving the other aspirations in the Plan.</p> <p>The threats that have been identified include the large scale of demolition proposed within the conservation area, and the negative impact of the replacement buildings. The HBE policies (HBE1-4) go some way to responding to this threat.</p> <p>In the interests of consistency we recommend including all heritage assets on Drawing 014. There are some listed structures in Walpole Park which have not been included, and Walpole Park itself is a Grade II registered Park and Garden of Special Historic Interest.</p> <p>Historic England welcomes the use of CIL revenues to set up a design review panel, for public realm improvements and to progress the assessment of Craven Avenue/Road area. We note that many of the issues identified in the 2007 Ealing Town Centre Conservation Area Management Plan (section 5.4) remain outstanding, and could form the basis for further investment to enhance part of the Neighbourhood Forum area through this Plan.</p>	
D	<p>Thames Water consider that there should be a section on ‘Infrastructure and Utilities’ in the Central Ealing Neighbourhood Plan which should make reference to the following:</p> <p>Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.</p> <p>Developers will be required to demonstrate that there is adequate wastewater and water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing wastewater and water infrastructure.</p> <p>We would therefore recommend that developers engage with Thames Water at the earliest opportunity to establish the following.</p>	<p>This recommendation seems to be designed for development on green field sites, of which there are none in the neighbourhood area. It is suggested this is more relevant to policy at the borough level.</p>

	<ul style="list-style-type: none"> • The developments demand for water supply and network infrastructure both on and off site and can it be met • The developments demand for sewage treatment and sewerage network infrastructure both on and off site and can it be met • The surface water drainage requirements and flood risk of the area and down stream and can it be met 	
E	<p>A general observation we have specific to the Arcadia Site...is that no consideration has been given within the DCENP to the site's allocation within the London Borough of Ealing's ("the Council") adopted Development Sites Development Plan Document, December 2013 (EAL3 Arcadia). This is an adopted Development Plan document that has been through the statutory consultation procedures, including an Examination in Public held by an Inspector appointed by the Secretary of State, which should be afforded significant weight in the preparation of emerging planning policies.</p>	
K	<p>ECS strongly supports the Vision and accompanying Aspirations, which reflect its own core objectives. We welcome the recognition that the town centre has a future role in serving the wider West London hinterland in a way which will enable its local economy to complement rather than compete with the more retail-oriented developments of Brent Cross and Shepherd's Bush (Westfield). We particularly agree with the aim of preserving and building on the special character which gave the Victorian and Edwardian town its title of "Queen of the Suburbs", to exploit these special characteristics in conjunction with developing the area's more recent strengths in the film and entertainment world and further education.</p> <p>We agree the importance of improved pedestrian movement within the town centre but highlight that traffic flow must not be compromised as routes through and around the centre are important and already congested through routes. We support the emphasis on the provision of a wider range of infrastructure and community facilities.</p> <p>We note that Historic England is generally supportive of the approach adopted and has offered helpful observations and ways to strengthen the plan to protect Ealing's heritage. However, we do not consider that the concept of a "zone of influence" (fifth bullet) is useful and should be omitted. We agree with the suggestion in the sixth bullet that harmful examples of tall buildings should be included, for example Villiers House at Ealing Broadway Station and the Apex development in Uxbridge Road which are highly visible from the town centre.</p>	

	<p>We agree that “no unacceptable harm” should ideally be clarified but since “harm” is essentially a subjective judgement it is difficult to do so in practice. Ideally, completely different words should be employed but we can offer no suggestion at this time.</p> <p>Finally, we endorse the proposal that the outstanding issues in the Ealing Town Centre Conservation Area Management Plan (pp 15, 16) should be primary candidates for CIL expenditure in particular improvement of backland sites and upper parts of retail heritage assets a number of which have become neglected over the years.</p>	
Q	<p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution’s Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p>	