

Planning Policy,
Regeneration and Property,
Perceval House,
4th Floor SW,
14-16 Uxbridge Road,
Ealing
W5 2HL

17 November 2016

Dear Sir/Madam,

Representations to the London Borough of Ealing - Central Ealing Neighbourhood Plan

On behalf of our client, Muse Developments Limited, GL Hearn is pleased to submit representations to the London Borough of Ealing (LBE) on the emerging Central Ealing Neighbourhood Plan which has been produced by the Central Ealing Neighbourhood Forum (CENF) and published for consultation until 18 November 2016.

Representations

The purpose of a Neighbourhood Plan is to provide additional level of detail appropriate to guide new development in a local area, i.e. a designated Neighbourhood Area, and should be in general conformity with the National Planning Policy Framework (NPPF) (2012) and the statutory development plan which includes the London Plan (2016), LB Ealing Development (or Core) Strategy 2026 DPD (2012), Development Sites DPD (2013) and Development Management DPD (2013).

Whilst we are broadly supportive of the aspirations of the emerging Central Ealing Neighbourhood Plan we would comment that several policies, including Policies CENP3 (Perceval House & Car Park), HBE3 (Building Heights) and Policy T3 (Servicing) are considered to be too prescriptive by imposing detailed design parameters (i.e. in terms of height, layout, scale and use) and do not reflect current guidance contained in the NPPF and/or wider best practice. In particular, Paragraph 58 of the NPPF states that:

"Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions should aim to ensure that developments:

[...]

- respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation [...]." (Our emphasis)

Furthermore, Paragraph 59 of the NPPF states that *"[...] design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally"*. Paragraph 60 further highlights that *"[p]lanning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles."*

Policies CENP3, HBE3 and T3 should therefore be reconsidered to reflect the NPPF's approach to policy formulation and to align the emerging Neighbourhood Plan with adopted policies contained in the statutory development plan. Greater emphasis should be placed on good design, local needs, flexibility and, most important, innovation in design to ensure that the Neighbourhood Plan does not undermine strategic objectives of the statutory development plan.

Conclusions

On behalf of Muse Developments Limited, we are grateful for the opportunity to comment on the Central Ealing Neighbourhood Plan and request that our comments and suggestions are considered within the forthcoming examination.

Should you require any further clarification, please do not hesitate to contact us.

Yours faithfully,

A handwritten signature in black ink that reads "GL Hearn". The letters are cursive and somewhat stylized, with the "G" and "L" being particularly prominent.

GL Hearn