

Planning Department
Ealing Council



by email only to planpol@ealing.gov.uk

Dear Ealing Council

3 November 2016

Central Ealing Neighbourhood Plan

Ealing Cycling Campaign (ECC) has reviewed the submitted Plan, and our comments are below. In addition we comment on the catchment area for any referendum which takes place.

Comments on the submitted Plan

ECC were pleased to see the support in principle the Plan gives to cycling. We note that one of the four Aims of the Plan is:

*3.6 **Transport & the Public Realm:** Have a network of attractive streets and public spaces which encourage pedestrian use and cycling and which move the balance away from the dominance of cars.*

In the light of the foregoing we were disappointed by the lack of any proposals in the Plan for how such a network to encourage cycling should be provided. An example is the generally negative approach taken to cycling in the context of Haven Green. As a minimum ECC would expect the Plan to contain a policy aiming for traffic-free routes for cyclists and pedestrians linking the four corners of Haven Green.

Instead, the Plan's proposals for Haven Green include the removal of all cycle parking (5.2.33), notwithstanding the fact that there has been cycle parking on the site of the Cycle Hub for over 60 years. The Plan includes at Appendix 3 a proposal to convert the BBC car park to two or three bus stands. This would preclude the proposed cycle parking on this site for which planning consent is being sought by the council under reference 162075FUL, which will enable the removal of the temporary cycle parking on common land to the south of the diagonal road. Some cycle parking is included on the AECOM plans but this is dispersed and has limited potential for future expansion. This contrasts with the council's proposal which is better located in relation to the station, is covered and has good potential for future expansion. Mention is made at 5.5.7 of possible cycle parking in an undercroft below the BBC car park, but this does not feature in the AECOM plans.

ECC would expect the Plan to mention at 4.16 the major improvements to Haven Green recently undertaken by the council, including construction of the Cycle Hub

and the substantial improvement in conditions for people waiting for buses on the diagonal road. Both these uses are well compatible with Haven Green as an open space. The ambience for users contrasts favourably with the sterile urban environment experienced by bus passengers at comparable interchanges such as the surface level bus station at Hammersmith, and by cyclists at many indoor cycle parking facilities at stations. The Cycle Hub has already resulted in the removal of the cluttered scene shown in the photograph on page 52 of the Plan.

Mention is made at 5.3.3 and 5.3.6, and possibly elsewhere, of bus travel as a “sustainable” mode grouped with cycling. However at 5.3.9 it is stated:

“...the Ealing Broadway/Haven Green area has been identified as one of five key sources for NOx concentrations in Ealing, the highest of the five. Of this, 52% comes from buses.”

Until buses are wholly powered by energy from renewable sources and are pollution-free, they should not be grouped in the Plan with cycling as “sustainable”. At present cycling and walking are the only modes that are close to being sustainable; bus travel is an order of magnitude less so, even if it is relatively space-efficient compared with car travel.

In this context we would mention that the area covered by CENF includes the Ealing campus of West London University. At present WLU provide a subsidised shuttle bus service to Ealing Broadway and Brentford that discourages users from choosing the more sustainable modes walking and cycling, and instead engenders a dependency culture. At other UK universities, students adopt the cycling habit in large numbers at this formative stage in their lives. Once the advantages have been discovered, they are remembered for life. The Plan should include specific reference to the need for WLU students to be encouraged to adopt cycling as a primary transport mode.


Every time a bus traveller can be persuaded to travel instead by bicycle there will be a reduction in pollution, public subsidy, congestion and demand for bus stop space.

Proposed referendum – voting area

We understand from CENF that there will be a referendum on the plan. On 20 February 2013 ECC wrote to the council (a copy of the letter is attached) pointing out the lack of publicity given to the plan, including the choice of geographical area to be covered. We suggested that a more appropriate area might be a 1.5km diameter circle centred on the Broadway/High Street intersection. However the area within which people are interested in the town centre is much wider than this. Many of ECC’s members are regular users of the town centre. Because cycling enables people to travel to the town centre from further afield in a given time than other modes, the spread of ECC members with an interest in the Plan is likely to be above average.

In view of the above ECC believe that the result of any referendum result will not be very meaningful. An outer London centre's zone of interest has no clear boundary like the parish boundary of a rural village. We also wonder how the referendum will capture the views of the many people who work in Ealing town centre but live outside the immediate area, and of borough-wide organisations such as ECC.

Yours sincerely,

A solid black rectangular box redacting the signature of P L B Mynors.

P L B Mynors FICE FCIHT MTPS
Council Liaison Member

cc Colin McKenzie, LBE
Steve Barton, LBE

Steve Barton
Perceval House
4th Floor Planning Policy
14-16 Uxbridge Road
London W5 2HL



by email only to bartons@ealing.gov.uk

Dear Mr Barton

20 February 2013

Neighbourhood Planning Forum for Central Ealing application

We have recently been made aware of the above application by a cyclist who attended this month's Ealing Broadway Ward Forum. It was unfortunate that the Ward Forum took place at the identical time to the monthly Ealing Cycling Campaign (ECC) meeting, but fortunate that the message was passed back to us.

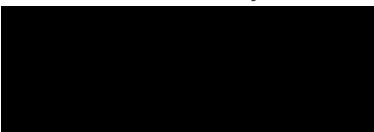
ECC are not aware of having been invited to participate in or indeed comment on this proposal. It does not appear on the council's consultation web page, nor in the latest edition of the council's "Around Ealing" publication, nor have we noticed mention of it in the Ealing Gazette. It is therefore unsurprising that the council received no formal written comments on the consultation that is reported to have taken place in September 2012 to define the area to be included.

If the council are minded to accept the proposal, we have an important detailed point on the constitution wording which we ask you to consider, as below. Subject to that, it is the intention of ECC to apply for membership as a community organisation which operates throughout the Area, if the proposal is accepted. We believe that cycling has a huge potential role as a transport mode in Ealing. Between 2001 and 2011 the proportion of people cycling to work from Ealing Broadway and Walpole wards increased by 60%. Nevertheless levels of cycling here are still far lower than in areas of comparable urban density in northern Europe, so we are losing the potential benefits of a convenient, healthy, and non-polluting form of transport that does not need a massive public subsidy.

Detailed comment

The proposed area covered excludes wholly residential streets with two exceptions, Mattock Lane and Craven Avenue. Membership of the Forum is to be open to "individuals who live or who have an interest in the Area" but a third of the committee is to be formed by "residents of the Area". We suggest that it would be better if the residents on the committee were drawn from a more representative catchment – say from within a circle of 1.5km diameter centred on the Broadway/High Street intersection (which would still just include Mattock Lane and Craven Avenue). It is difficult to see why a resident of the west end of Mattock Lane has any greater interest in Central Ealing than, say, a resident of The Grove.

Yours sincerely



P L B Mynors FICE FCIHT TPS
Council Liaison Member
Ealing Cycling Campaign

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Registered in England and Wales number 1766411
Registered address: 2 Newhams Row, London SE1 3UZ