

**Neighbourhood Planning (General) Regulations 2012
Part 5 Neighbourhood Development Plans**

Regulation 14: Pre-submission Consultation & Publicity

**Extended Consultation Period:
5 August 2016 – 31 October 2016**

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Feedback Contributors

1. Affinity Sutton Group - Dean Gardens
2. BDP – Dean Gardens Consultancy
3. Cushman & Wakefield - Royal Mail Sorting Office
4. Dron & Wright Property Consultants – Ealing Fire Station
5. Peter Eversden MBE - London Forum of Amenity & Civic Societies
6. James Guest – Ealing Fields Residents' Association
7. Highways England Co. Ltd
8. Historic England – Heritage Assets
9. Kevin Raftery – local resident
10. London Borough of Ealing – Regeneration & Housing
11. Natural England – Natural Environment & Conservation
12. Network Rail
13. Savills (UK) Ltd – Thames Water
14. Theatres Trust – Cultural Facilities
15. TFL Planning
16. TFL Property – commercial (LBE Development Site EAL12)

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1. Affinity Sutton Group re Dean Gardens

- a) Dean Gardens is *the* key public open space in West Ealing warranting a policy of its own as a key area for future consideration
- b) Feels more research & consultation should take place before deciding on a specific development plan
- c) Have been actively involved in commissioning a feasibility study and are keen to remain a positive partner in facilitating an agreeable solution
- d) Need to fully consider recommendations from feasibility study before committing to specific policy

2. BDP – Dean Gardens

- a) Supports an active frontage
- b) Proposes realignment of paths
- c) Proposes reduction in ground floor café footprint
- d) No comments on funding or possible residential component

3. Cushman & Wakefield - Royal Mail Sorting Office

- a) Stressed protection of Royal mail core business activities
- b) No current plans to relocate delivery office which is of strategic importance
- c) No principle objection to location becoming a 'reserved site' for redevelopment provided that a suitable alternative site could be funded & provided
- d) Suggested alteration to Neighbourhood Plan wording to include 'reserved site'
- e) No comments on heritage value of building

4. Dron & Wright Property Consultants Ealing Fire Station (LFEPA)

- a) Noted inclusion in local heritage listing appendix
- b) Believes Policy 14 is inconsistent with National Planning Framework for non-designated heritage asset
- c) Proposes amendment to Policy 14 requiring scale of any harm to be balanced against benefits of development

5. Peter Eversden MBE - London Forum of Amenity & Civic Societies (page 1/3)

- a) All Policies, Page 20: All policies should start with a positive strategic aim. Suggested example for additional wording at the start of Policy 1.1 : *'Provide the required quantity of new housing'* and high quality office space...
- b) Policy 1.2 (a), Page 20: Suggested addition of 'and tenures' after 'types' in line 5
- c) Policy 1.2 (c,e,f), Page 20: Suggested additional wording at end of paragraph 'and develop transport of sufficient capacity and frequency'

5. Peter Eversden MBE - London Forum of Amenity & Civic Societies (page 2/3)

- d) Policy 2.1, Page 20: Suggested wording additions/changes....
 - (i) Commence paragraph with ‘Seek the development of extra housing by 2026 to meet assessed needs and the delivery of office space to provide job opportunities and support to retail outlets’
 - (ii) Commence second sentence with ‘Supplement the introduction’
 - (iii) Split third sentence to read ‘Improve cycle ways. Create a balance’
- e) Numbering of Land Use Policies from page 31 onwards should be differentiated from the policies shown on page 20
- f) Possible inclusion of new Policy 7.7 on 3.6 (page 23) showing where tall buildings are and are not appropriate

5. Peter Eversden MBE - London Forum of Amenity & Civic Societies (page 3/3)

- g) Plan should include expectation of housing density to be in accordance with the matrix Table 3.2 in London Plan Policy 3.4
- h) Do we have Assets of Community Value that we would like to have registered?
- i) Policy 15, Page 48: Could add aspiration for a more uniform appearance and compatible design of shop fronts

6. James Guest – Ealing Fields Residents' Association

- a) Policies 1 & 2 (pages 31-32): Tighten use of the word surrounding' regarding height of any new development so that it applies specifically to adjoining or neighbouring low rise residential properties
- b) Policy 13 (page 45): Consider inclusion of proximity rule to constrain growth of off licences & betting shops through the introduction of Supplementary Planning Guidance
- c) Include Development Site EAL 11 (Majestic Wine Site & Garage) in Neighbourhood Plan to include height restrictions on any new development
- d) Include new wording to require adequate outdoor amenity space on all new residential developments

7. Highways England Co. Ltd

- a) Responsibility for Strategic Road Network (SRN)
- b) No concerns over safe operation of SRN identified within Neighbourhood Plan

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8. Historic England

- a) Proposes rewording of Policy 1 (Royal Mail Sorting Office) to prevent misunderstanding & confusion over terms 'redevelopment' & 'setting'
- b) Proposes expansion of Para 2.5 to highlight and illustrate key characteristics of the area.
(Remove duplication in Para 2.7)
- c) Policy 6.4: Proposes more detail on meaning of 'improving pedestrian links'
- d) Suggestions for additional CIL usage including shop front improvements

9. Kevin Raftery (Local resident)

- a) Create a new car park in West Ealing to cope with increase in housing capacity and future expansion of CPZ south of high street
- b) Policy 7: Amend Dean Gardens proposals to provide better 24 hour surveillance

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10. London Borough of Ealing – Regeneration & Housing (page 1/10)

- a) Include better maps of site allocations with ‘red-line’ site boundaries
- b) Consider including summaries of key information for each site allocation. e.g. Site ownership, area, usage, PTAL
- c) Para 5, Bullet 1 (Vision Page 26): Clarify parking proposals and provide evidence
- d) Para 5, Bullet 6 (Vision Page 26): What gaps in public transport? Evidence required

10. London Borough of Ealing – Regeneration & Housing (page 2/10)

- e) Policy 1 (i), (Page 30, Royal Mail Sorting Office): Suggested deletion of word 'local'
- f) Policy 1 (ii), (Page 30, Royal Mail Sorting Office): Suggested alternative wording 'The scheme responds appropriately to the new Crossrail station'
- g) Policy 2 (i), (Page 32, 1-4 Manor Rd): Replace 'in keeping' with 'respond successfully'
- h) Policy 2 (i), (Page 32, 1-4 Manor Rd): Concerned that height restrictions are inappropriate and may not conform with wording of Local Development Plan
- i) Policy 3 (ii), (Page 33, 51-57 Manor Road): Suggested alternative wording 'The scheme responds appropriately to the new Crossrail station'

10. London Borough of Ealing – Regeneration & Housing (page 3/10)

- j) Policy 4 (iii), (Page 34, 1-5 Lancing Rd): Suggested alternative wording ‘Development should effectively resolve the transition between Thornberry House and the retained terrace to the north’
- k) Policy 5, (Page 35, Land at rear of 162 Uxbridge Rd): Concern over impact of proposal on new development to rear of 160 Uxbridge Rd
- l) Policy 5, (i) & (ii), (Page 35, Land at rear of 162 Uxbridge Rd): Suggested alternative wording combining (i) & (ii) ‘ The scheme creates an appropriate connection and improved public realm between the station and the Broadway, comprising active frontage retail or commercial use on the ground floor and residential above’

10. London Borough of Ealing – Regeneration & Housing (page 4/10)

- m) Policy 6, (Page 36, Corner Drayton Green Rd / Broadway):
Boundary indicated on Proposals Map does not match description of '2-3 Drayton Green Road'
- n) Policy 6, (Page 36, Corner Drayton Green Rd / Broadway):
Important corner building – how can demolition be justified?
- o) Policy 6, 5.23,(Page 36, Corner Drayton Green Rd / Broadway):
How is existing corner building not in keeping with scale of buildings, particularly along Uxbridge Road?

10. London Borough of Ealing – Regeneration & Housing (page 5/10)

- p) Policy 6, (Page 36, Corner Drayton Green Rd / Broadway):
Consider opportunities for widening road & pavement width

- q) Policy 6, (Page 36, Corner Drayton Green Rd / Broadway):
Combine points (i) & (ii). Suggested alternative wording ‘ The scheme creates an appropriate connection and improved public realm between the station and the Broadway, comprising active frontage retail or commercial use on the ground floor and residential above’

10. London Borough of Ealing – Regeneration & Housing (page 6/10)

- r) Policy 7, (Pages 37-39, Dean Gardens): Will support further initiative on the reduction of antisocial behaviour but objects to proposal on the following grounds:
- (i) Lack of evidence that anti-social behaviour will be reduced through the introduction of an active frontage
 - (ii) Scheme will have a negative effect on local residents
 - (iii) Loss of valuable Public Open Space
 - (iv) Park already well funded with existing S106 money
- s) Policy 8, (Page 40, 1-19 Broadway & Leeland Terrace): Policy unclear and needs clarification

10. London Borough of Ealing – Regeneration & Housing (page 7/10)

- t) Policy 9, (Page 41, 66-88 Broadway): Supports greater north-south permeability in accordance with EAL 15 Development Site proposals
- u) Policy 9, 5.23 (Page 41, 66-88 Broadway): Limiting development to 3 storeys does not conform with Local Development Plan
- v) Policy 9 (i) (Page 41, 66 88 Broadway): Suggested alternative wording 'A mixed use scheme, with active retail frontage; and'
- w) Policy 9 (iii) (Page 41, 66-88 Broadway): Similarity in size & massing not a good design criteria and does not conform with the Plan. Suggested ' responds successfully'

10. London Borough of Ealing – Regeneration & Housing (page 8/10)

- x) Policy 10 (Page 42, 57-119 Broadway & West Ealing House):
Duplication with Development Plan EAL 16. Main town centre usage already defined in NPPF
- y) Policy 10 (Page 42, 57-119 Broadway & West Ealing House):
Restrictions on loss of car parking not supported; Crossrail will enhance PTAL ratings
- z) Policy 11 (Page 43, Chignell Place): Pedestrianisation of Chignell Place already disregarded in Corridor 1c proposals. Proposal will restrict servicing/loading and offer minimal pedestrian benefit

10. London Borough of Ealing – Regeneration & Housing (page 9/10)

- aa) Policy 12, (Page 44, Jacob's Ladder): Policy not supported. Unclear why a mixed use development at 42-44 Felix Road would enhance permeability to Jacob's Ladder
- ab) Policy 12 (iii), (Page 44, Jacob's Ladder): Extant planning permission for southern part of Felix Road (P/2015/0072) – this area should be removed from the plan
- ac) Policy 13, (Page 45, Town Centre): Policy does not conform to Development Plan DPD Policy 4B in respect of primary & secondary shop frontages. Also covered by DM DVD Policies 4C & 7A
- ad) Policy 13, (Page 45, Town Centre): Proposals on loss of public car parking spaces not supported; Crossrail will enhance PTAL ratings

10. London Borough of Ealing – Regeneration & Housing (page 10/10)

- ae) Policy 13, Para 5.44 (Page 45, Town Centre): Policy/ intention unclear
- af) Policy 13, Para 5.46 (Page 45, Town Centre): Requires justification – does not agree with 2011 TFL Town Centre Study
- ag) Policy 14, (Pages 46-47, Local heritage Assets): Policy not supported – local listings should not be included in Neighbourhood Plan policy
- ah) Policy 15, (Page 48, Temporary Use of Vacant Premises): Suggested alternative wording ‘ Temporary permissions for community and other uses that will improve the vitality of the Broadway should be supported’. Conflicts with DM DPD 4B
- ai) Para 6, Bullet Point 4, Page 51: Should read ‘ Improving pedestrian and cycle links’

11. Natural England

Welcomes the strategic emphasis of the neighbourhood plan which seeks to promote a high quality sustainable natural environment wherever possible within this urban context

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12. Network Rail

The Neighbourhood Plan should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure

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13. Savills (UK) Ltd – Thames Water

Omission of an 'Infrastructure & Utilities' Policy:

Inclusion of an additional Policy on infrastructure with the following suggested wording:

' Developers will be required to demonstrate that there is adequate wastewater and water supply capacity both on and off site to serve the development and that it would not lead to problems for existing or new users. 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'

14. Theatres Trust – Cultural Facilities

- a) Supports aims & objectives within the neighbourhood plan to improve cultural facilities and in particular supports proposal in Clause 10 (page 42) for a new performance space
- b) Suggested strengthening policy wording to require inclusion of such a performing space
- c) Suggested that Policy 10 also includes brief details about the space including capacity, facilities and access from Broadway

15. TFL Planning – Transport Policy

- a) Policy on car parking must be consistent with approach set out in London Plan and Ealing Local Plan
- b) Plan should seek to encourage greater use of public transport facilities and cycle/pedestrian access in order to traffic reduce anticipated future increases in congestion and pollution levels
- c) TFL welcomes & supports proposed improvements to pedestrian access in West Ealing particularly between the new Crossrail station and the Broadway. Plan must integrate and build on any urban realm works connected with the new Crossrail station
- d) Stressed importance of Uxbridge Road and Broadway as part of the Strategic Road Network (SRN) and as an important bus route. These elements should be recognised and protected including use of bus priority lanes in both directions

16. TFL Property – 51-57 Manor Road

- a) Policy 3, (Page 3, 51-57 Manor Road): TFL, as partial land owner of this site, recognises and welcomes the neighbourhood plan proposals for a mixed development
- b) Such plans should retain a flexible approach towards the building line and footprint in order to ensure efficient use of the site and conformity with NPPF