

Written statements relating to Ealing Local Plan regulation 22 examination hearing sessions in block 1

– Cllr Jon Ball, Deputy Leader of the Liberal Democrat Group and opposition spokesperson on housing, development, the local plan and licensing

Matter 1 – Procedural and legal requirements

I am concerned regarding an historic lack of appropriate information on supporting infrastructure. Infrastructure Funding Statement (IFS) and Section 106 commitments are required to be published on an annual basis as outlined in secondary legislation. Following representations on this point at Reg 19 the 2023/2024 IFS was published but the last IFS before that was published in 2020, so there is a long period from which the section 106 contributions are unpublished. When this is considered with the significantly delayed implementation of Community Infrastructure Levy (CIL), most recent scheduled for early this year but not yet implemented to my knowledge, it can be seen as an active mechanism to distract and confuse engagement rather than promote open and transparent consultation.

It should be noted that Brent, Hounslow, Harrow, Hillingdon and Southwark Councils have all published infrastructure statements annually on their websites as required.

Matter 3 – Vision, objectives and spatial strategy

Policy SP1: A vision for Ealing

While it is strongly agreed that development should be sensitive to the characteristics of the different parts of the borough and especially that there has historically been too much focus on Central Ealing, and that more emphasis and engagement needs to be given to residents across the seven towns. It should be noted that the “seven towns” chosen as the basis for this plan are a somewhat arbitrary division of the borough. As examples West Ealing, Northfields and West Twyford could validly argue they are separate towns to Ealing, while North Acton and Bedford Park could equally argue the same with regard to Acton. The smaller towns like Perivale and Hanwell have a more cohesive identity than the larger ones.

As the borough embraces both urban and suburban aspects together with significant industrial space, office and residential the weaving together of these themes in a meaningful way seems substantially absent in the plan.

While 20-minute neighbourhoods are an admirable aspiration, the plan is unclear with respect to how it envisages that they will be achieved. If it is by closing roads to motor vehicles as in the highly unpopular Low Traffic Neighbourhoods in the borough, which were almost all subsequently removed, then this would be harmful to the quality of life of many local residents and businesses who need to use their cars and vans. If at the

other extreme there is little done to encourage 20-minute neighbourhoods then they become a vacuous aspiration which need not feature in this plan.

Matter 4 - Housing

Policy HOU: Affordable Housing

Ealing is in the midst of a housing crisis. As the demand for housing soars and the cost of living continues to punish most residents, especially in the form of rapidly increasing private rents, the evidence points to a need for a substantial increase in truly affordable homes so that the presumption is in favour of them with the fast track rate in policy HOU.C set to 50% affordable rather than 40% affordable. It is true that some developers would choose to go down the viability tested route instead if a larger figure was adopted but council officers and their expert consultants should robustly argue the viability case.

Since the submission of the Reg 19 version of the plan, the situation has only intensified, with the Council having to provide temporary accommodation at huge cost for large numbers of people who have become homeless, especially as private landlords have pulled out of the market. A larger affordable housing proportion in new developments across the borough as a whole is thus even more necessary.