

Matter 6: Tall Buildings.

Issue [Focus – Policies DAA, D9]

Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan in relation **to ... tall buildings.**

Questions 2a to 2i

EM Response

Ealing Matters made detailed comments on the tall buildings strategy in our Representation 8: Policy D9 Tall Buildings London Plan – Ealing LPA – local variation. The inspectors will have read these, and so we do not need to restate our submission here.

However, while the Council has proposed some minor modifications to the plan which address some of what we say, we do not think it has addressed all our points adequately and we look forward to discussing our outstanding concerns at the examination.

In addition, while some of the minor amendments the Council proposes are to be welcomed, they carry a number of points which need correction:

SMM130. LBE proposes to amend par 5.13 to read: ‘The primary purpose of strategic growth policies and development management policy is to deliver character-led and contextual growth across the Borough. This strongly accords with the strategic lead of the London Plan which sets the clear presumption that tall buildings should be confined to specified locations ~~sites~~ and appropriate ~~maximum~~ heights.”

EM Comment: This wording does not reflect the London Plan which states at Para 3.9.2: ‘Boroughs should determine and identify locations where tall buildings may be an appropriate form of development by undertaking the steps below:

1. ... undertake a sieving exercise by assessing potential visual and cumulative impacts to consider whether there are locations where tall buildings could have a role in contributing to the emerging character and vision for a place
2. in these locations, determine the maximum height that could be acceptable’

SMM130 does not do this. The policy needs to be amended to ensure that maximum height that could be acceptable are indicated’.

SMM131 LBE proposes to Amend Table DMP1 to correct transcription errors as follows:

Town: Acton / Area: A2 / Tall Building(m): ~~49 21~~ / Storeys: ~~14 6~~

Town: Acton / Area: A4 / Tall Building(m): ~~49 21~~ / Storeys: ~~14 6~~

Town: Ealing / Area: E14 / Tall Building(m): ~~73.5~~ **45.5** / Storeys: ~~21 13~~

Town: Southall / Area: S6 / Tall Building(m): ~~24.5~~ **21** / Storeys: ~~7 6~~

EM Comment: These amendments need to be reflected in the new plan. However, SMM131 proposes that for Area E14 (central Ealing) the tall building threshold should be set at 13 storeys. This does not accord with The Allies and Morrison Tall Buildings Strategy (EB45) which finds that the prevailing height of buildings in the area to be 4.4 storeys and proposes that the threshold height for tall buildings should be 9 storeys (31.5 m). No reason is offered as to why this is the case and the threshold for a tall building for Area E14 should be set at 9 storeys in accordance with A&M’s recommendations.

Supplementary Questions:

3. Does appeal decision Ref: APP/A5270/W/24/3347877 for Waitrose, 2 Alexandria Road, Ealing W13 0NL have any implications on the soundness of the Council's evidence underpinning Policy D9 and the policy requirements and capacities of the proposed site allocations? Please qualify your response.
4. Are any modifications needed to the Plan for soundness

EM Response

Ealing's Tall Building strategy was drawn up by consultants Allies and Morrison who carefully followed the methodology of the London Plan. Chapter 4 of the Plan and the site allocations indicate that, as it stands, the tall building strategy can be applied to the Borough sites (both those with consented schemes and those not at that stage) without impinging on the Borough's ability to provide the new homes it is required to provide under the existing London Plan.

Since this Local Plan is being examined in the context of the present London Plan, and not the December 2024 NPPF, there is no reason why the present plan needs to be modified in the light, for example, of the Waitrose development (Ref: APP/A5270/W/24/3347877).

This appeal in any case was a one-off inquiry into a particular site and there is no reason why the decision should affect the borough wide approach to tall buildings which Allies and Morrison prepared. As the Inspector says in para 29 of his decision letter 'I do not consider that the proposal at issue here is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to the new Local Plan.' In paragraph 30 of his letter, he does go on to suggest that the changing policy environment surrounding tall buildings is unlikely to leave the approach to managing tall buildings intact. But while this may be true, any future changes to the strategy need to be viewed in the round and across the borough as a whole. They should not be influenced by a single appeal decision. This is not a basis for good planning.

Ealing Matters has of course not seen JLP's case for raising this question (we are in truth struggling their motives for doing so and can only imagine they wish to squeeze even more onto this site than the appeal allows them) nor the Council's response to it. We would like to reserve the opportunity to understand their positions and respond more fully to what either of them say.