

Ealing Local Plan Examination Response to Inspector's Matters - Matter 6

**Design and Amenity, Tall Buildings, and the Historic
Environment**

Four Counties Training Ltd

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1.0 **Matter 6 – Design and Amenity, Tall Buildings, and the Historic Environment**

Issue: Is the Plan justified, effective and consistent with national policy and in general conformity with the London Plan in relation to design, the historic environment, and tall buildings?

- 1.1 Four Counties Training Ltd, hereon referred to as FCT are committed to bringing forward a proposal for the demolition and redevelopment of Shaftesbury House and Oak House, at 49-51 Uxbridge Road. This site is allocated in the adopted Development Sites DPD for office-led redevelopment forming part of allocation EAL8. The emerging Local Plan proposes to retain the allocation, under proposed site allocation O6EA.
- 1.2 FCT has previously submitted representations in relation to Ealing's Regulation 18 Draft Local Plan in January 2023 and Ealing's Regulation 19 Draft Local Plan in April 2024. We provide below our responses to the Inspector's questions regarding Matter 6 – Design and Amenity, Tall Buildings, and the Historic Environment.

Questions

Question 2: In terms of the local variation to Policy D9 of the London Plan:

B) what is the evidence justifying it? Are the proposed parameters with the available evidence?

- 1.3 FCT supports the tall buildings policy (Policy D9 – Ealing Local Plan variation) and the defined building heights set out in Table DMP1, within Ealing's Regulation 19 Draft Local Plan. It is agreed that the definition of a tall building varies in different areas of the borough, based upon rigorous assessment. Site allocation O6EA falls into area E14, as set out in Table DMP1 of the policy, which identifies suitable building heights of 21 storeys, or 73.5m in height.
- 1.4 The Tall Buildings Strategy (TBS) (December 2023) (Ref. EB44) assesses appropriate locations for tall buildings within the Borough. The criteria for assessing suitable locations for tall buildings includes areas of intensification, areas with existing tall buildings, town centres, areas with good access to public transport and sustainable neighbourhoods. Site allocation O6EA lies within the Ealing Town Centre. The TBS defines Ealing Town Centre as an area of high suitability for tall buildings, noting that "*prevailing heights are generally taller in this area including the recent development of Dickens Yard.*" Further, the TBS reviews the appropriate locations for tall buildings in different parts of the Borough and identifies a range from Zones. Ealing Town Centre is classified as Zone D for which the guidance for prospective tall building heights is 9-21 storeys, or 31.5 – 73.5m in height. The tall building height for Area E14, defined under Policy D9, are therefore justified and based on the evidence available in the TBS.

Question 2c: does the character led approach of the Plan to determining building heights strike an appropriate balance with the 'Good Growth' and appropriate densification principles of the London Plan?

- 1.5 FCT supports the current wording of the Tall Buildings policy (Policy D9 – Ealing Local Plan variation) and Table DMP1 in the draft Regulation 19 Ealing Local Plan. It is considered that buildings heights of up to 21 storeys, or 73.5m in height, is appropriate in Ealing Town Centre, defined as Area E14 and strikes a balance with the 'good growth' and appropriate densification principles of the London Plan.
- 1.6 As a town centre location, building heights of up to 21 storeys will maximise the potential for growth in this important service centre in the borough. London Plan Policy GG2 'Making the best use of land' encourages *'the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling'*. On this basis the current wording of Policy D9 accords with the aims of the London Plan and is justified within this wider policy context.

Question 2c: are any modifications needed to the variation to Policy D9 for soundness?

- 1.7 No. It is noted that, in the Schedule of Suggested Minor Modifications (dated 15.11.2024), amendment no. SMM130 seeks to amend Table DMP1 to state that the defined buildings heights in Area E14 are 13 storeys or 45.5m in height. The reason for this change is stated as being a correction, however, it is not considered that this constitutes a justified correction. As outlined above, the TBS evidence is that this area can support building heights that are much greater than 13 storeys and there is no subsequent evidence available to suggest that 13 storeys is a more acceptable height.
- 1.8 Policy D9 should be based upon evidence set out within the TBS and therefore this correction is unjustified and should not be accepted. On this basis, we do not consider that the defined height of a tall building in Ealing Town Centre (Area E14) should be amended to 13 storeys. This would be contradictory to the evidence within the TBS which confirms that this location is appropriate for 9-21 storeys.