

Representation	Officer's Response	Policy	Secondary policy	Author	Organisation name	Representation ID	Type of representor
I live on Trinity Way in East Acton and am struggling to find and interpret the information around the impact to me locally. Can you help? What will happen to trinity way park and burghley tower? And the school?	Draft Site allocation AC10 published at Reg 18 which included Haddon Court and Burghley Tower was not carried through into Reg 19 on deliverability grounds. Policy A1 in the supporting text at Para 4.1.28 says that: "Further Green Infrastructure enhancements are supported, including enhancing the functional use of green space adjacent to Haddon Court in East Acton."	Policy A1: Acton Spatial Strategy		William Mitchell		41	Individual
I have attempted to go through the new Local Plan to ascertain what the Council proposals are for the 4 acres of land which was fenced off by a developer sometime ago? The said land is contained within the Twyford Avenue Sports Ground, and contains tennis courts, and a five-a-side football pitch. The 4 acres was deemed to be community open space, and was further protected by a SPD. You will be aware there is a severe shortage of open space in this part of Acton. Please advise if the new Local Plan is not about to allow the developers to concrete over these precious 4 acres?	No change is proposed to the planning status of this site. The whole site (including the former tennis courts and bowling green) continues to be designated as Community Open Space which affords it protection from inappropriate development. Currently Community Open Space is defined in the glossary supporting the existing Local Plan which can be found here: Development (or Core) Strategy (DPD) Ealing Council Local variation policy G4 of the emerging Local Plan outlines the effect of this designation on the determination of planning applications, notably that any proposals for development on such sites must be led by the purposes of these sites as open space for recreation, nature etc, and the need to ensure that any development preserves the openness of these sites.	Policy A1: Acton Spatial Strategy		Peter Gallagher		46	Individual
The 4 acres adjoining Twyford Sports field belong to Shanley Homes, a property developer and inappropriately neglected by them. This is probably intentional so that they can make out a case that the open space is not needed. Open space is recognised as inadequate in this part of Acton and will become even more inadequate when the Steyne road Estate is completed. I have attempted to go through the new Local Plan to ascertain what the Council proposals are for the 4 acres of land which was fenced off by a developer sometime ago? The said land is contained within the Twyford Avenue Sports Ground, and contains tennis courts, and a five-a-side football pitch. The 4 acres was deemed to be community open space, and was further protected by a SPD. You will be aware there is a severe shortage of open space in this part of Acton. Please advise if the new Local Plan is not about to allow the developers to concrete over these precious 4 acres?	No change is proposed to the planning status of this site. The whole site (including the former tennis courts and bowling green) continues to be designated as Community Open Space which affords it protection from inappropriate development. Currently Community Open Space is defined in the glossary supporting the existing Local Plan which can be found here: Development (or Core) Strategy (DPD) Ealing Council Local variation policy G4 of the emerging Local Plan outlines the effect of this designation on the determination of planning applications, notably that any proposals for development on such sites must be led by the purposes of these sites as open space for recreation, nature etc, and the need to ensure that any development preserves the openness of these sites.	Policy A1: Acton Spatial Strategy		Clara Lowy		68	Individual

I object to trinity way green being used for anything other than the necessary open green space that it is. And as a wildlife corridor it is very valuable.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council's Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Phil Camera		83	Individual

Green space is recognised as deficient in Acton. This will become even more acute with the expansion of the Steyne Road estate. In the Ealing plan there appears to be no mention of the 4 acres adjacent to Wasps sports ground. What are the plans for these neglected 4 Acre open space?	No change is proposed to the planning status of this site (Twyford Avenue Sports Ground). The site continues to be designated as Community Open Space which affords it protection from inappropriate development. Currently Community Open Space is defined in the glossary supporting the existing Local Plan which can be found here: Development (or Core) Strategy (DPD) Ealing Council Local variation policy G4 of the emerging Local Plan outlines the effect of this designation on the determination of planning applications, notably that any proposals for development on such sites must be led by the purposes of these sites as open space for recreation, nature etc, and the need to ensure that any development preserves the openness of these sites.	Policy A1: Acton Spatial Strategy		Clara Lowy		89	Individual

I am writing to strongly object to the removal of the green spaces outlined below. These are hugely important to the local community, as a resident of Trinity Way. We do not have gardens, and there are several apartment buildings surrounding us. Removing this green space would be very detrimental to the community. I would advocate for improving the standard of the apartments that already exist, rather than building over priced apartments that people cannot afford to live in. Please consider the local residents that already live here!	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Danielle Howden		90	Individual

I am a resident of Trinity Way. I am writing to you in regards to Regulation 19 and the potential reclassification of Trinity Way Park and the surrounding green space alongside Haddon Court and Burghley Tower. If the park is declassified as MOL, it could be used for more building / redevelopment. The park is an important space for Trinity Way residents due to how densely populated this area is, particularly as none of us have gardens. The park is an important asset for wildlife and forms an eco-corridor from Acton Park. The mature trees are vital in combating air pollution. We need more big trees, not fewer! I would therefore urge you to reconsider the reclassification of this very valuable and much loved green space and retain the protected rights it currently has.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Heather Barker		91	Individual

I am writing to express my strong opposition to the proposed reclassification of our local park (Trinity Way) area for potential future building and development. As a concerned member of the community, I firmly believe that preserving our green spaces is crucial for the well-being and sustainability of our neighborhood. Our local park serves as a sanctuary for residents to connect with nature, engage in recreational activities, and foster a sense of community. It provides valuable green space that promotes physical and mental health, offering a respite from the urban environment and serving as a habitat for local wildlife. Allowing development in the park area would not only diminish its recreational and environmental benefits but also have detrimental effects on the quality of life for residents. Increased traffic, noise pollution, and loss of greenery would degrade the aesthetic appeal of our neighborhood and diminish the overall quality of life for residents. Furthermore, reclassifying the park area for development sets a dangerous precedent for the future of our community. Once green spaces are lost to development, they are often gone forever, depriving future generations of the opportunity to enjoy the benefits of nature in an increasingly urbanized world. I urge you to consider the long-term implications of reclassifying our local park area and to prioritize the preservation of green spaces for the benefit of current and future generations. Instead of sacrificing our park for short-term gains, let us work together to explore alternative solutions that promote sustainable development while preserving our natural heritage. Thank you for considering my concerns. I trust that you will make the right decision for the well-being of our community and the environment.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		William Mitchell		92	Individual

I am writing to express my strong objection to the proposed change in the classification of Metropolitan Open Land (MOL) regarding the Trinity Way Open Space, specifically part of MOL23. The Trinity Way Open Space serves as a vital green lung within our community, providing not only recreational opportunities but also contributing to the ecological health of our surroundings. Any alteration to its MOL classification would not only undermine the integrity of the area but also potentially lead to irreversible consequences for both the environment and the well-being of residents. Preserving our Metropolitan Open Land is crucial in maintaining a balance between urban development and environmental sustainability. It is imperative that we prioritize the protection of such spaces for the benefit of current and future generations. Therefore, I urge the council to reconsider the proposed change and keep Trinity Way Open Space as part of MOL23. It is essential to safeguard our green spaces and ensure their preservation for the greater good of the community. Thank you for considering my objection. I trust that you will take the necessary steps to protect our Metropolitan Open Land.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Rowan Burton		93	Individual

As a local resident and daily user of the wonderful open green space Trinity Way, I am sending my support to keep it into the Metropolitan Open Land 23 to ensure its future. The vast majority of residents in this area do not have acces to their own garden and taking Trinity Way away would decrease our quality of life immensely and increase the already high air pollution in our community. The park is enjoyed daily by hundreds of people, including children, who have their own enclosed playground, dog walkers, youth who play sports, families who like to picnic there, and many more! This area is very densely populated and Trinity way is a breath of fresh air in a neighbourhood already polluted by the Westway. Please do not take away Trinity Way's MOL designation!	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Lisa Mortini		94	Individual

As the resident at Granta Court W3, I'm writing to express my strong request to keep the trinity way park as part of MOL 23. This small green place is so important for my family and I assume my neighbors would feel the same.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council's Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Yu Xu		95	Individual

I am writing to express my concern that Trinity Way park will no longer have statutory protection as part of MOL 23. I request you kindly reconsider as this park is a much loved community asset of great importance to the local neighbourhood.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Chris Ledger		96	Individual

MOL 20 is currently private land that no one can access. Which was on your original plan to declassify but now now. Why not declassify that and keep our park? You are going to take away so much from us. I am so deeply saddened by this. We have just got a puppy and it is so lovely to be able to walk her there! Please I beg you to reconsider!	The earlier whole parcel revisions proposed to the status of MOL 20 at Regulation 18 are now not being pursued as explained in the stage 2 Green Belt and MOL review. Less substantial boundary revisions are now proposed for this parcel instead. As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant	SP2.2 Climate action		Rowan Burton		97	Individual

I would like to strongly object to the proposed change of classification of Trinity Way Open Space from being part of MOL23. Keeping Trinity Way Park as part of our Metropolitan Open Land (MOL23) is essential to preserve an extremely important green space. This area has a really positive, beneficial effect in terms of recreational opportunities for local residents and also for significant environmental benefits. If the classification of this space was changed it could lead to irreversible consequences, at a time when we should be doing all we can to protect our natural environment. Green space is essential for a whole range of reasons, including air quality, reducing rainwater runoff etc. This is especially important in an area that is already densely populated. I implore Ealing Council to reject any changes to the classification of Trinity Way, and hope that you will take the necessary steps to protect our Metropolitan Open Space, thank you.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Mike Burton		98	Individual

I am writing you to prevent Trinity Open space from construction and development. There are enough commercial development in our area. We need to preserve this space to ensure that the community spends their time practicing sport and recreation activities, meeting friends and playing with their dogs. Thank you for consideration	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Anna Russo		99	Individual

I am a resident of Granta Court W3 and it has been brought to my attention that Ealing Council are proposing to reclassify the green space around trinity way. This green space is an essential part of the community and provides families in the area an essential area to congregate. I would be very much apposed to any reclassification of this space.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Michael Murray		100	Individual

I'm here to express my concern with any plans to change Trinity Open Space. I live at Granta Court and it would be a shame to see the park being turn into commercial spaces which we don't frankly need. We don't have enough parks as it is and see this proposal is appalling.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Stefan Kovacevic		101	Individual

I have recently learned that Ealing Council are planning to reclassify the land within Trinity Way Park, including the green areas which wrap around Haddon and Burghley Tower (section highlighted in orange). I am writing to express my support for keeping the Trinity Way Park protected as part of MOL23. The park is an important space for Trinity Way residents due to how densely populated this area is, particularly as none of us have gardens. The park is an important asset for wildlife and forms an eco-corridor from Acton Park. The mature trees are vital in combating air pollution. We need more big trees, not fewer! It is essential that this park remains for all the local residents and wildlife.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Natalie Ellery		103	Individual

I'm writing you preven Trinity open space from construction and development there enough commercial development in our area. We need to preserve nature. Keep the beautiful floral and Laundry of this place our children and teenagers spent their time there on sport and recreation activities distracted from smoking and drugs We need green London Thank you consideration	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council's Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Fartuun Farah/Aziza Mahamud		104	Individual

I would like to express my views on the future plans to build in the green spaces around Trinity Way, East Acton. I have been working for the NHS for 10 years now. A central London location, with easy access to the hospital during my on calls was my drive to move to Acton. Despite the proximity to the M40, the green spaces around outweighed the negatives of noise and pollution. Hence the decision to move here. My partner and I are very active and love outdoors exercise. The parks around us are extremely valuable for our mental and physical health. I consider this will be case for our children and future generations. Regrettably with the outlined future plans we are seriously considering to move outside London, where we can have more green spaces and a peaceful environment. Furthermore, the lack of infrastructure nearby and lack of schools, for the amount of people that live in this area is no longer adequate. A special consideration should be placed into this aspect of living rather than just building, without any further community support. As much as I endorse construction and finding new solutions to house the growing population, I have to oppose my views on this occasion.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Ana Rita Gameiro Costa		105	Individual

I am writing to formally highlight my disapproval of the reclassification of the land within the Trinity Way Open space. This area is fundamental to residents in the surrounding earlier. It provides green space where there is a limited amount in a densely housed area. It provides a space for children to play in both the play park and basketball courts. It provides a space for those with dogs to easily walk them close to their homes. This area of nature must be preserved from both a social and environmental perspective.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Huw Atkin- Jones		106	Individual

I would like to strongly object to the proposed change of classification of Trinity Way Open Space from being part of MOL23. Keeping Trinity Way Park as part of our Metropolitan Open Land (MOL23) is essential to preserve an extremely important green space. This area has a really positive, beneficial effect in terms of recreational opportunities for local residents and also for significant environmental benefits. If the classification of this space was changed it could lead to irreversible consequences, at a time when we should be doing all we can to protect our natural environment. Green space is essential for a whole range of reasons, including air quality, reducing rainwater runoff etc. This is especially important in an area that is already densely populated. Many residences don't have any or very limited outside space. There is a proven link between being able to access open areas and health and mental well being. I implore Ealing Council to reject any changes to the classification of Trinity Way, and hope that you will take the necessary steps to protect our Metropolitan Open Space, thank you.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council's Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Margaret Burton		108	Individual

As there is currently a plan to remove Trinity way open space from MOL23 I would like to let you know that this is raising my concern. As parents of a 4 years old we are frequently using Trinity Open space to spend some quality time as a family. This is particularly important in an area that has seen an increase in population density in past few years with most of the people not having access to a private garden. The open space is a welcome "breath of fresh air" in an area presenting so many developments and so close to the A40. For that reason we really hope that all efforts will be put in place to ensure that the current space is preserved as a green open space for the benefit of the community.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Frederic Esclassan and Geoffrey Williams		109	Individual

I have noted that Ealing Council is planning to reclassify the land within Trinity Way Park, including the green areas which wrap around Haddon and Burghley Tower. As a home owner living by the park, I am writing to support Trinity Way Park as part of MOL23 (virtually the same protected rights as designated greenbelt land).	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council's Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Arash Jafari		111	Individual

I am writing you to prevent Trinity Open space from construction and development There are enough commercial development in our area. We need to preserve nature. Keep the beautiful flora and fauna of this place Our children and teenagers spent their time there on sport and recreation activities distracted from smoking and drugs We need green London Thank you for consideration	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Ikram Haji		115	Individual

Thank you for the opportunity to comment on the Ealing draft Local Plan (regulation 19) and agreeing for an extension to enable a co-ordinated response in consultation with other parts of the NHS. . Further to our meeting earlier this month we have prepared this response in consultation with the North West London Integrated Care Board and local NHS Trusts. However, as agreed with yourselves we will be responding further in relation to the infrastructure requirements and site allocations in the draft Plan. This is due to ongoing work to identify the likely impact of the growth set out in the local plan on the NHS and amendments to the site allocations since the Regulation 18 publication. The NWL NHS is developing its estates strategy and undertaking further work on infrastructure requirements in Ealing. We look forward to continued discussions with yourselves over the coming weeks to enable this work to be reflected in revisions to the local plan prior to the Council’s submission to the Secretary of State. At this stage we have specific comments on the draft Plan which are set out below. This include the detailed amendments to policies we set out in our response to the Regulation 18 consultation document which disappointingly have not been incorporated in the latest document. A copy of our earlier response is appended for ease of reference and would ask for the proposed amendments within this response are reviewed and incorporated within the version submitted to the Secretary of State. We have used red italics to reflect proposed additions, and strike through text to indicated proposed deletions to the text within the	Noted.	General		Mary Manuel	NHS London	116	Statutory Body

I am writing to express my deep concern regarding the potential changes to the protective status of Trinity way Open space/Park. As a resident and frequent visitor to the park, I strongly believe in the importance of maintaining its current protected status for the well-being of our community and the environment. Trinity Way open space/park serves as a vital green space in our area, offering recreational opportunities, promoting biodiversity, and providing a tranquil retreat from the urban hustle and bustle. The park not only enhances our quality of life but also contributes to the health and vitality of our local ecosystem. I understand that there may be proposals to alter the protective status of the park, which could potentially open it up to development or other activities that may compromise its natural beauty and ecological integrity. As custodians of our environment, it is imperative that we prioritise the preservation of our green spaces for future generations to enjoy. I urge the council to consider the long-term implications of any decisions regarding the status of Trinity way. Preserving its protected status aligns with the principles of sustainable development and reflects our commitment to safeguarding our natural heritage. Furthermore, I encourage the council to engage with the local community and stakeholders to explore alternative solutions that ensure the continued protection and enhancement of Trinity way Park/Open space. By working together, we can find innovative approaches to balance conservation efforts with the needs of our evolving society. In conclusion, I respectfully urge the council to maintain the current protective status and uphold its importance as a cherished green space for our community. Thank you for considering my concerns, and I look forward to your positive response.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Jennifer Houghton		117	Individual

It has come to our attention that our fabulous park is under threat for even more unneeded development. Trinity Way is a much used and needed green space for many people , in the area where there is so much re development. Why would getting rid of this space be a good idea apart from greed? Dog walkers ,families having picnics and playing games together, solace for those with mental health challenges a meeting place where many friendships have come about , fabulous trees and away from the hustle and bustle. We do not need any more developments...I believe this area is at saturation where this is concerned with many empty flats etc. Please leave this lovely park alone for our pleasure and enjoyment.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Leslie Weedon		118	Individual

Save Ealing Parks represents a large community of Ealing residents, mostly within and around Hanger Hill Ward, who are concerned about the potential loss of our green spaces resulting from Ealing’s Draft Local Plan. Save Ealing Parks objects to the following items in the Reg 19 Local Plan, and asserts that these items do not satisfy the Local Plan soundness tests: - MOL20: the proposal to de-designate as MOL part of Barclays Sports Ground - 21EA: allowing residential development on Barclays Sports Ground (presently designated as MOL20) - Policy ENA - Enabling Residential Development To make Local Plan compliant with the soundness test, we propose that: - MOL20: the site should retain MOL status in its entirety - 21EA: enabling residential development on the site should be removed from the Local Plan - Policy ENA - Enabling Residential Development should be removed. We explain the reasons for this in this document. They include: - site 21EA ranks in the bottom 15% (approx.) of all infrastructure projects by priority, according to Infrastructure Delivery Plan. It means there are no exceptional reasons for de-designating part of the MOL of Barclays Sports Ground and allowing the “enabling residential development” on it for the sake of this low-priority project. Therefore, proposals re EA21 and MOL20 are inconsistent with national policy (NPPF protection of MOL) and not justified - see Section 1. - The astonishingly high budget of £55 million to be raised from	Noted. The council is only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land that does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, including hockey. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet.	21EA Former Barclays Sports Ground	Policy ENA: Enabling Development – Ealing LPA – local policy	Dmitry Tonkonog	Save Ealing P	120	Community Interest Group

We have no comments to make at this stage except that London Underground Infrastructure Protection needs to be consulted as Statutory Consultees on any planning application within London Underground zone of interest as per TOWN AND COUNTRY PLANNING, ENGLAND-The Town and Country Planning (Development Management Procedure) (England) Order 2015 issued on 16th April 2015. Also, where there are intended works in the Highway, we would need to be notified of these so that we can ensure there is no damage to them. This response is made as Railway Infrastructure Manager under the “Town and Country Planning (Development Management Procedure) Order 2015”. It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.	Noted.	General		Tom Li	TfL	121	Statutory Body

I would like to raise my objection to the de-designation of part of Barclays Sports Ground as MOL, I also object to allowing residential development on Barclays Sports Ground to the proposal to develop residential area on Barclays sport ground. This proposal would not bring any benefit to the environment that has already stretched to the limits. We now live in a time that we have to think about the future of our children over developments in London has to stop. These developments are only profit driven on the sole purpose of these developments in such crowded areas would bring misery and more pollution to the north circular boundaries. How far would you go to destroy the environment. NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. You should be fighting to turn Barclays Sports Ground into a Regional park. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the "Distance to nearest infant/primary school" criterion - but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to "Vehicular access to the site", however, Park View Rd is a school road already with severe traffic problems during school runs. Please listen to our concerns it would actually benefit all of us including you and your next generations to come.	Noted. The council is only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt" category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons.	21EA Former Barclays Sports Ground		Amir Ghorghy		122	Individual

I am writing you to prevent Trinity Open space at W3 from construction and development on mol 23 as part of the Reg 19 consultation. There are enough commercial development in our area. We need to preserve nature. Keep the beautiful flora and fauna of this place where Our children and teenagers spent their time there on sport and recreation activities. The area is well loved by dog walkers and is an open green area that London much needed. Thank you for consideration.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Fiona Tam		126	Individual

Ealing Council – Local Plan (REG 19), Integrated Impact Assessment (IIA) and the Evidence Base for the Local Plan Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 28th February 2024. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have no comments to make on the REG 19, Integrated Impact Assessment and the Evidence Base for your Local Plan. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.	Noted.	General		Sharon Jenkins	Natural England	130	Statutory Body
Ealing - 01EA: Several redevelopment proposals have been submitted for this site in the past, each one with slight variations but all included high-rise blocks. Thankfully they have all been rejected so far. Please do not continue to designate this area suitable for high-rise development. It is out of keeping with its surroundings, will overshadow Haven Green and will become faceless and canyon-like despite your suggestions to the contrary. A walk through Dickens Yard is bleak and soul-less. We do not want more of the same. You will not attract more retail. With more people shopping online there is already evidence of Ealing shops closing.	Noted. This is a key strategic site in the Ealing Metropolitan Town Centre and creates an opportunity to improve the offer afforded by the centre including office, commercial, leisure as well as retail opportunities.	01EA Broadway Connection & Arcadia Shopping Centre		Jennifer White		136	Individual
Ealing - 02EA: We have already lost some well-known shops from the Shopping Centre. Thank goodness for Marks & Spencer, Boots, Robert Dyas, Timpsons and Tesco (although I have their home delivery). Your suggestion : 'Ensure the layout reintegrates the site into the existing street network by adopting a more open and permeable approach than the existing introverted character of the shopping centre that incorporates a street-based building typology and improved natural lighting' is complete madness. What makes the shopping centre so attractive is that it's away from the noise and dirt of the traffic, having the shops open onto a square with seating makes it a very social space. Don't think of changing it please.	Noted, particularly the point regarding protecting the existing 'town square' which provides an important focus and gathering point for activities that help animate the centre. But it is imperative that access to and permeability through the Centre is enhanced, particularly on the southern edge of the centre where the access ramps do provide an alien presence in residential streets.	02EA Ealing Broadway Shopping Centre & Crystal House		Jennifer White		136	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Their lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London’s housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: “by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence.” However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: “New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs.” Ealing Council is actively considering a non-immediate Article 4, which means once it is ‘made’ it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Alex Nieora	Perivale Com	137	Community Interest Group

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Their lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Aleksy Woodhouse		138	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Their lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London’s housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: “by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence.” However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: “New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs.” Ealing Council is actively considering a non-immediate Article 4, which means once it is ‘made’ it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Jacek Jasek		139	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Their lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Joanne O'Malley		140	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Their lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Janathan Jeyaratnam		142	Individual

• What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Their lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. • What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London’s housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: “by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence.” However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: “New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs.” Ealing Council is actively considering a non-immediate Article 4, which means once it is ‘made’ it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Bambi Sidibe- Cisse		143	Individual

What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Their lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Husein Mawani		144	Individual
I am trying to find information on what is planned. However I am finding this very inaccessible to reach. I have been working my way through the 518 pages here {link to Local Plan R19 document}. However there seems to be a lot of information on aims and why Ealing want to do certain things but I cannot find any information on exactly what Ealing plans to do to reach these goals. Please can you direct me to where I might find that.	Noted.	General		Tom Holloway		145	Individual
I live on Trinity Way in East Acton and am struggling to find and interpret the information around the impact to me locally. Can you help? What will happen to trinity way park and burghley tower? And the school?	Draft Site allocation AC10 published at Reg 18 which included Haddon Court and Burghley Tower was not carried through into Reg 19 on deliverability grounds. At Poilcy A1 in the supporting text at Para 4.1.28 says that: "Further Green Infrastructure enhancements are supported, including enhancing the functional use of green space adjacent to Haddon Court in East Acton."	Policy A1: Acton Spatial Strategy		Ashwini Sinha		146	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Dustin Zambon		147	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Their lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London’s housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: “by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence.” However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: “New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs.” Ealing Council is actively considering a non-immediate Article 4, which means once it is ‘made’ it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Luke Preston		148	Individual

What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Their lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Manjinder Flora		149	Individual

What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Their lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Sapna Mistry		150	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Tina Singh		151	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Their lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Solmaz Sabet		152	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. A66We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London’s housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: “by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence.” However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: “New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs.” Ealing Council is actively considering a non-immediate Article 4, which means once it is ‘made’ it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Sylwester Michalewicz		153	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Nemanja Granatir		154	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Melba Navarrete		155	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Their lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London’s housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: “by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence.” However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: “New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs.” Ealing Council is actively considering a non-immediate Article 4, which means once it is ‘made’ it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Samuel Goodenough		156	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London’s housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: “by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence.” However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: “New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs.” Ealing Council is actively considering a non-immediate Article 4, which means once it is ‘made’ it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Marco Roma		157	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. A71We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London’s housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: “by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence.” However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: “New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs.” Ealing Council is actively considering a non-immediate Article 4, which means once it is ‘made’ it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Amr Badran		158	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late-night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. A73 We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London’s housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: “by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence.” However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: “New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs.” Ealing Council is actively considering a non-immediate Article 4, which means once it is ‘made’ it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Nen Nenchev		160	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town center centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10-minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Denitsa Yordanova		161	Individual

I have the following points to raise about the published Local Plan by Ealing Council. 1. The published version is premature and needs to go through further drafts to digest the very long reports on which the plan is based as well as making the Plan more holistic / coherent in how these different reports / evidence base fits together. 2. In terms of housing targets - there needs to be proper evaluation of what has been done in the past before targets for the future are formulated. There needs to be greater justification for the high rate of building / kinds of buildings envisaged. Building is an enormous contributor to adding carbon and the negative impact on climate change. 3. The housing targets feeds into the lack of explanation of how the infrastructure in Ealing will cope with the additional development envisaged for Ealing. Where will the money come from for the extra infrastructure and public services needed for the added development. 4. Need more green spaces, trees as well as protecting what is already present. This is important for climate changes as well as mental/physical health. 5. Why are buildings under 21 stories NOT classified as tall? Ealing Broadway will become like Croydon which is facing the serious threat of de-population because of tall buildings in it's town centre. This will be yet another disaster from Ealing Council, I am sorry to say. Ealing needs to protect its heritage and plan a town centre which attracts rather than repels. This needs some actual thinking and	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council's ambitions and plans for each of the seven towns that make up the borough. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. The Local Plan is also based on an extensive technical evidence base. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19). It is imperative that the council has an up to date Local Plan and there are potentially severe consequences of failing to have one. In terms of the specific points raised, housing targets are set by the London Plan and Ealing's Local Plan must be in general conformity with it. It is also a requirement of the Government's new housing requirements and Ealing's Local Plan must be in conformity with national planning policy. The council has produced a comprehensive Infrastructure Delivery Plan (and schedule) which sets out the council's aspirations, with partners and key stakeholders, for planned new infrastructure over the plan period. A high level borough wide summary is set out in Table SS1 and delivery schedules are set out in each of the seven Town Plans. The Local Plan also supports the council's ambitions to take action on climate change and is committed to maintaining, enhancing and expanding the network of green infrastructure including creating	General		Saira Malik		162	Individual
I am trying my best here to read some of these documents & I need some clarification due to how tiny some of the numbers are & what certain initials stand for. I am looking at Allies & Morrison-Tall Buildings-Appendix Guidance for study sites Part 1. Just one example. ACO 1-Indicative capacities-is it 377 ? & what does GEA stand for ? I had to print it off & get out a magnifying glass. And what are the numbers in the columns in Block A & B ? Are any of these documents available in libraries with perhaps larger print. I feel that you are excluding numerous Ealing residents from the Reg 19 consultation given its complexity & the fact it is actually difficult to read.	Noted, the representor was directed to the zoom button.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Susan New	Ealing Transp	163	Individual

* What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Their lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. * What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Bianca Mawani		164	Individual

• What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Their lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. • What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London’s housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: “by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence.” However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: “New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs.” Ealing Council is actively considering a non-immediate Article 4, which means once it is ‘made’ it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Mohammed Elkadery		165	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Bushra Benserghin		166	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London’s housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: “by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence.” However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: “New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs.” Ealing Council is actively considering a non-immediate Article 4, which means once it is ‘made’ it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Surendra Yeju		167	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Agata Michalewicz		169	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London’s housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: “by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence.” However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: “New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs.” Ealing Council is actively considering a non-immediate Article 4, which means once it is ‘made’ it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Laila Benserghin		170	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Susan Ilchi		171	Individual

My feedback relates to: Ealing – 21EA Former Barclays Sports Ground. I would like this to become the home of Ealing Hockey Club. This club has gone from strength to strength, even winning Club of the Year at the 2023 Ealing Sports Awards. My daughter has developed as a player, and flourished as a person, as a direct result of her involvement there - it is a fabulous resource for the borough. But despite playing several teams in youth and adult leagues, Ealing Hockey Club has no pitches, changing rooms or clubhouse of its own, having to rely instead on constantly borrowing school facilities for training and matches. 21EA is designated for leisure use, and would seem the perfect size for 2 competition standard Astro pitches, a clubhouse and changing facilities to help Ealing Hockey Club grow even bigger and better, with all the benefits that would bring to the borough. Please consider my representation.	Noted. Support welcomed. The council’s Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine’s via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Catherine Mistry		172	Individual

I am writing to give my full support to the securing of the former Barclays Sports Ground (21EA) for Ealing Hockey Club. This land will enable the following and much more for Ealing Hockey Club: * To be the only Hockey Club in Ealing and to have a permanent home * To enable the construction of a clubhouse, with changing facilities to comply with national standards * To enable 2 number competitive astro pitches * To enable the securing of Ealing Hockey Club as a recognised National Talent Centre for Hockey * To enable the construction of a safe, secure environment for the continued Hockey development * To offer facilities to neighbouring schools, academies, social groups * To be a home for West London Hockey Charitable Foundation * To be the home of Ealing Hockey that will bring generations, communities and active visitors to Ealing Situated between x2 Schools the Barclays site and land would be best suited for a Ealing Hockey Club. Ealing already has a growing stock of new residential properties, like in Park Royale, Royale Oak, Acton Gardens sites. But the private uptake has slowed, it is now the time to focus on what Ealing Hockey does for mental health and physical betterment. Futhtermore, although a Ealing Regional Park would be nice, Ealing is already blessed with many open spaces. Ealing Hockey Club actively promotes interactions between different schools kids, communities and social backgrounds, a Regional Park does not. Ealing lacks a Club Hockey nitch, a permanent home for	Noted. Support welcomed. The council’s Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine’s via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground			Raymond Choi	173	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Manley Charles		174	Individual

* What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. Yesterday Sunday 17th March I left home with my two little girls to go to Perivale park and to my shock was turned away at the end of my street (Calder Avenue) by armed policeman - they had machine guns and were looking for someone armed in the HMO house 27 Conway Crescent! My children were terrified. A month ago a teenager was cut up by another teenager with a matchety and run into the local shop which was quickly covered in a pool of blood! The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. * What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Anna Paszek		175	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		Angie Castro		176	Individual

I have lived in Ealing for over 30 years. Page 212 of this pdf (Local_Plan_Reg19_Chapter_4_Town_Plans_and_Development_Sites (ealing.gov.uk){Link} <and the proposal for a ‘playing field’ and a ‘leisure-led scheme’. I’d like to make the proposal more specific. “To build two astro pitches for hockey, and have a clubhouse and changing rooms for Ealing Hockey Club”. Such a development would make a huge difference to Ealing. Firstly, hockey is a sport – so it ticks all the boxes of sports, i.e. getting exercise, etc. It’s a team sport, so add in the benefits of socialising, teamwork, etc, etc. But hockey is so different to other teams sports. With hockey, people often can compete on equal terms almost regardless of age, gender, strength. Let me give you two examples: Example 1: I’m 62 years old and play for Ealing Hockey Club’s Mens Team whose players range from 14 years to, well, 62 years old (and we got promoted this year!). And last year, in one game for Ealing’s Mens team, I was playing in the same team as both my sons (they were aged 17 and 22) - it was a Dad Dream come true, one which I knew just could not have happened in sports such as rugby. Example 2: Ealing Hockey Club has weekly Social Hockey sessions all year round, and at a recent session, a woman arrived who hadn’t picked up a stick for 20 years, but her son was now playing so she joined in... and even after a 20 year gap, she played on more than equal terms with most of the Social players. With Hockey, these sort of things can happen so much more than with many other team sports. So Hockey is a great team sport - and played by all ethnicities too. The Former Barclays Sports Ground location is also great. Close to	Noted. Support welcomed. The council’s Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine’s via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Jon Moon		179	Individual

I am writing having looked through the public consultation and in particular wanted to comment in relation to Ealing site 21EA, the Former Barclay Sports Ground, where the plan outlines the site's suitability for outdoor leisure facilities that there is a need for in the borough. I would like to propose that this site would be ideal for leisure facilities and as a permanent base for Ealing Hockey Club that currently does not have any facilities of its own. Ealing Hockey Club is expanding and is well placed to become a National Talent Centre, but for the fact it lacks facilities. The Former Barclay Ground is of a size that would easily accommodate 2 competition level 2G astroturf pitches, a club house and changing facilities sufficient to meet England Hockey League requirements, with minimal impact on the surrounding area. I would strongly support the local plan being updated to include the above hockey facility as its primary supported use for this site.	Noted. Support welcomed. The council’s Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine’s via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Ed Parker		180	Individual

- What does LBE plan to do to stop and reverse the proliferation of Homes of Multiple Occupation (HMOs) in Perivale, and in particular in the Medway Village area of Perivale? Why is Ealing Council paying social landlords 30-40% above the market rate to subsidise social tenants with serious mental health, drug dealing, and criminal backgrounds and placing them in overcrowded HMOs next to family homes and primary schools where they are making life a living hell for residents? Please note there is now a group of 500 members of the Medway Village area who are very, very angry at the assaults, attempted murders, late night noise, dumping, drug dealing, and the constant day in day out visits from police and emergency services. Our lives have been made a nightmare by LBE policies relating to HMOs. The group is in the process of formalising and intends to bring legal action. It is imperative that LBE listens to these residents who have not been heard and implements policies in the local plan to stop the proliferation of HMOs. - What EXACTLY will LBE Ealing be doing to create more of a real town centre centrally located in Perivale with retail outlets and how exactly will this be achieved? In what time frame? Please note we are not interested in hearing about "10 minute towns" in your response, which is, at best, meaningless jargon at worst semantics associated with restrictions on movement. We want to know exactly what LBE will be doing to ensure that industrial land or other land uses can be repurposed as retail use land. We want to know how LBE will actively entice retailers to locate to Horsenden Lane South to create a central united Perivale town.	Houses in Multiple Occupation (HMOs) are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Notwithstanding this, a number of the concerns raised are not planning specific matters and they have been addressed or responded to by colleagues working within other areas of the Council. In the first instance please refer to that information, which has been shared widely with the Medway Village community. Further to this, there have also been regular updates to residents on the Medway Village on progress and action in relation to the matters raised. Those wider Council services (and non-Council	SP4.3 Genuinely affordable homes		surendra yejju		181	Individual

Re MOL23: I am very glad to see that the Council has reconsidered declassification as MOL for Acton Park, the playing fields and the allotments. I would like to express my deep concern for the future of the park in Trinity Way. That green area is very very important to the local residents. The idea that it could be unprotected from development concerns me a lot. I have lived in Third Ave since 1987. The area has changed enormously in that time. The number of new residential properties has increased hugely. We need every inch of green open space for all the new residents, most of whom do not have their own garden. We live a 10 minute walk from the park and we have used it to play with our children and now our grandchildren. We have used it to walk our dog. It has been our local green space far more than Acton Park that is a bus ride away. The playground in Acton Park is very well designed but it gets extraordinarily crowded and at times, feels dangerous for little children. Please please please reconsider your plans for Trinity Way Open Space and leave it as it is for local residents to enjoy.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council's Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Amanda Webb		182	Individual
Re MOL23 reclassification: As Secretary of Acton Gardening Association, I am writing to say that we are very pleased that the Council has reconsidered declassification of the land that we garden. There are approximately 150 ploholders who get immeasurable benefit from the allotments and we are glad that we can carry on growing vegetables and flowers with that threat removed. We would like to know why Trinity Way Open Space is still up for reclassification. It is a vital green oasis in our built up corner of the borough. Most of our members live in W3 and we use the park on a regular basis. Acton Park is a bus ride away from here.	Noted. Regards Trinity Way, see response to earlier representation.	SP2.2 Climate action		Amanda Webb	Acton Garden	183	Community Interest Group

As independent residents of Ealing we support the MOL be used to install two hockey pitches and a clubhouse. In summary to: approve the use for Leisure purposes with the following alterations: * 2 competition standard 2G astro pitches. * Club House * Changing facilities to comply with England Hockey League Rules To be the home for Ealing Hockey Club, Ealing HC National Talent Centre {and} West London Hockey Charitable Foundation.	Noted. Support welcomed. The council’s Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine’s via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Antony Fry		184	Individual
I am requesting a meeting on behalf of the Ealing Hockey Club, The Ealing HC National Talent Centre and the West London Hockey Charitable Foundation. As a Club and its associated bodies, we support the Council's aims and ambitions with an amendment (in particular to 21EA, Former Barclay Sports Ground). The borough needs 2x International standard 2G hockey pitches with Club House and Changing Facilities. The pitches and clubhouse will turbocharge our growth. Formed in 2013, we’ve achieved so much – see next page – but we rely on hiring pitches from local schools, and this constrains our growth. The ‘waterless’ Pitch will not just be our home venue (and it's England Hockey-accredited National Training Centre - I will share more when we meet). It will also be a training pitch for cricket, football, netball and tennis. Local schools will use it too. The site is within walking distance of the Piccadilly, Central, District and Elizabeth lines as well as the National Rail and many bus routes. (Many Club children travel unaccompanied to our current sessions - a testament to the warm, friendly, and safe space we’ve created.) The site will enable all of Ealing’s seven towns to be easily served by the Club. In two reports - in 2018 and again in 2022 (“Playing Field Studies”) - Sport England identified us as a Club that needs our pitch and clubhouse. Notts Sport Ltd has since done a feasibility report on Project Pitch, looking at quality, material and construction. Established in 1984, Notts Sport is a world-leading specialist in artificial sports surfaces and is the supplier of choice for schools	Noted. Support welcomed. The council’s Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine’s via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Jeff Moores	Ealing Hocke	185	Community Interest Group

{Provided a link to a youtube video on closing railways in London. See: https://www.youtube.com/watch?v=XsnAsgNHWco&t=256s lasting about 20 mins. Issues raised include: - The closure of railway stations and relying more on local buses / walking to nearby stations - Currently the country spending lots of money on transport - Country has no money, will get worse with population increase - Advocating for closing WLO - Case for Chiltern line extension to Old Oak Common - Case to increase platform size in Greenford and Hanger Lane You may consider this relevant to local plans.	Noted. The Local Plan supports the delivery of strategic rail infrastructure including the proposed West London Orbital Railway, the Brentford to Southall line and the catalytic benefits of the Elizabeth Line stations and future High Speed 2 station. Regretably extensions to the Chiltern Line and proposals to extend platforms at Greenford and Hangar Lane are not included.	SP4.1 Good Growth		Peter Smith		186	Individual
I was looking at your Local plan regulation, specifically the Chapter 4 (Town plans) and I would like to comment on the planning of the Former Barclays Sport Ground (Ealing - 21EA). It was lovely to see that some of the things the plan would like to achieve is to improve the air quality, to tackle climate crisis and to provide recreational spaces among other things, but then I was thinking that having an initiative that will bring Ealing on the leadership in the battle for equality we females have every day will be amazing. Around Ealing we can find several spaces for football and rugby but for sports oriented to girls no too much, that is why I think a public Hockey pitch will be fantastic as at the moment we only rely on the ones associated to Schools as St Augustine's and St Benedict's pitches. I believe, for the area the former Barclays Sport Ground has, 2 astro pitches + a club house with changing facilities will fit and hopefully we can make it the home for Ealing Hockey Club and The West London Charitable foundation. Thank you so much for taking the time to read my email and I wish you all the best.	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Cristina Nossa		189	Individual

I have only recently moved to {home address}, so was not aware of the local plan until I saw it in my local library. I was absolutely horrified to see that you are suggesting building houses in Greenford Broadway car park. All the properties that are separated from the car park only by a fence at the bottom of our gardens along that stretch of Stanhope Park Road are bungalows. We would be completely overlooked by houses, lose all our privacy and light in our gardens if you built houses in the car park. Also, this is the only public car park in this area. I know you want everybody to walk or cycle or take public transport, but that really isn't realistic. How are the elderly, disabled, pregnant women or mothers with small toddlers going to get their heavy shopping home if there's nowhere to park? They will simply go shopping elsewhere where they can park. This is a really tough time for local shops. Already this year three (Boots, Wenzells and ShoeZone) have closed on the Broadway. You will finally kill off our small businesses and destroy our high street if you go ahead with this plan.	This a is a key site in the heart of Greenford Town Centre and the Local Plan proposes to: "Capitalise on the site’s proximity to the town centre and Ravenor Park by introducing mixed-use development that provides new homes alongside retail, commercial or co-working space." In terms of scale, height and massing the site allocation proposes that: "Heights are to range up to a maximum of 6 storeys (21m) across the site with a medium to high-density flatted development that supports taller buildings in the centre and on the eastern edge of the site, stepping down toward adjacent lower rise building." To help animate this backland site it is also proposes a new central public space or square that connects all the pedestrian routes through the site, with appropriate green space and tree planting. Any future proposals will be the subject of extensive public and stakeholder consultation before the preparation of any detailed plans for the area.	02GR Greenford Broadway Car Park		Maria Isabel Cunha		190	Individual

We'd like to have a meeting to better understand the impact of the new Local Plan on our area and how it would impact our development of a Neighbourhood Plan.	The key policy for the Ealing Common area is Policy E4 which says: "The strong local character and facilities of.....Ealing Common will be maintained and strengthened by: (i) Reinforcing neighbourhood centres at Northfields and South Ealing. (ii) Character-led growth and improvement of local social infrastructure, shopping, and facilities. (iii) Improvements to existing active travel and green infrastructure networks. As the boundary of the proposed neighbourhood area is mainly composed of residential properties within a conservation area, the scope for any future development will be limited and as defined by the policy and principles of the appraisal and management plan for the conservation area, will be character led. No development sites (or site allocations) are proposed for this area. The new local plan will not impact on your ability to develop a neighbourhood plan, it mainly sets out the context in which that plan would be developed, much as the London Plan does. Most of our overall supply targets are already set out by the London Plan, and so the local plan is more a case of detail and implementation. Where there are significant new policies these are mostly thematic, for example the climate change policies, and are unlikely to constrain any neighbourhood objectives.	Policy E4: Southern Ealing and Ealing Common		Iain Forsyth	Rothschild O	191	Community Interest Group
Following the reading of the town's plans for Ealing, it came to my attention that the Former Barclays Sports Ground is no longer in use. This playing field could be used as play pitches for our hockey teams in Ealing. It seems two standard 2G astro pitches would fit in there. In order to make it a proper place for training and playing, it would require changing facilities as required by the England Hockey League Rules. A Club House would be a great addition. The changes will make the place the home for the Ealing Hockey Club, Ealing HC National Talent Centre, West London Hockey Charitable Foundation.	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Jose A. Corbacho		192	Individual
We would like to object to below plans: 1. Tall building with a maximum height of 10 storeys - Northolt is a village community which has a conservation zone (albeit Ealing Council does not consider it as such with recent development approved), please refer to your own policy D9 of the consultation which clearly shows buildings in Northolt a maximum of 6 storeys.	Noted. Only one site in Northolt is considered to be appropriate for a tall building (01NO) and this recognises the fact that this is a key strategic site in the town centre adjacent to Northolt Station with a correspondingly high PTAL of 4.	Policy N1: Northolt Spatial Strategy		Zivio Mascarenhas		193	Individual

Thank you for your e-mail of 28th February 2024 inviting National Highways to comment on the above consultation and indicating that a response is required by 10th April 2024. On behalf of the Secretary of State for Transport, National Highways is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) as laid down in DfT Circular 01/2022: The Strategic Road Network and The Delivery of Sustainable Development (“the Circular”). We are a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. National Highways is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour. In response to your Reg 19 Consultation, I would like to draw your attention to National Highways document ‘The Strategic Road Network, Planning for the Future: A guide to working with National Highways on planning matters’ (October 2023). This document sets out how National Highways intends to work with local planning <u>authorities and developers to support the preparation of sound</u>	Responding to the point asking for a detailed transport evidence base: modelling the entire borough transport network would be a very significant piece of work which Ealing has not had the budget for, in the context of 40%+ cuts to LIP funding from TfL since Covid. In addition, National Highways would want the modelling to capture the Strategic Road Network, particularly the M4, M40 and M25, which are all entirely outside Ealing. The modelling would also lack specifics of site quanta which would render it too high-level, with too many potential development scenarios to accurately judge tipping points in a particular part of the borough. Ealing has recently completed, in partnership with TfL, a piece of strategic transport modelling for Northolt, which explored the impacts of the Local Plan development scenario on the Northolt transport network. It is proposed to undertake a similar modelling exercise for Southall, to take account of the significant development proposals for Southall, including the Green Quarter. As part of the forthcoming Transport Strategy (still in draft), there will be a more substantial evidence base (though not up-to-date modelling for the whole borough) and the Strategy will specifically address the expected development in each town, noting expected transport pressures and schemes to mitigate them. Response to the point about generating traffic at source: the Local Plan complies with the London Plan on car parking provision, so it does not replicate the policies in question. Development will be car-free whenever PTAL levels permit, and will follow London Plan policy in all cases, including limited provision of parking at sites with the lowest PTAL. Responses to the Local Plan from TfL have	SP4.1 Good Growth		Sammantha Rose	National High	195	Statutory Body
We would like to object to below plans: 2. Northolt Driving Range - myself and other residents have previously objected to the change from green belt status	Noted. The land south of Rowdell Road has changed significantly since it was originally designated Green Belt many decades ago and it currently makes no contribution towards Green Belt purposes. There is an opportunity to make better and more efficient use of the land to provide an employment-led, mixed use scheme, which incorporates improvements to active travel and the canal towpath. There is a well-documented need for more industrial space in London, as demand is increasing and diversifying, putting additional pressure on the affordability of industrial space, particularly for smaller businesses and business start-ups.	04NO Northolt Driving Range		Zivio Mascarenhas		193	Individual

We would like to object to below plans: 3. Infrastructure changes - roads and pavements have been changed despite residents objecting. How does the pavement increase by 6 metres thereby restricting road access to vehicles allow for connectivity between the north and south of Northolt? - this has created more congestion and increase in traffic.	The recent changes to roads and pavements in Northolt are part of the Visions for Northolt programme, which is funded by the Levelling Up Fund from national government. The Council has been delivering the Visions for Northolt programme, which aims to improve connectivity for walking and cycling journeys through and around Northolt. Some of these measures include reallocating space away from private cars, to provide more space for walking and cycling, as well as buses. Mandeville Road has seen some carriageway widening and improvements to right turns, to help with congestion. Residents were overall supportive of these measures, which have not had any measurable negative impact on congestion levels. Data from July 2024 shows a 2% decrease in numbers of vehicles on Mandeville Road, compared with before the improvements were made.	Policy N1: Northolt Spatial Strategy		Zivio Mascarenhas		193	Individual
I am not sure whether the New Local Plan is legally compliant, but I do believe that it is not sound, at least in one particular MOL 23 removal and consequent boundary change. On you Map 37 the green area in Trinity Way has been shown as one of areas from which its MOL status will be removed and, therefore, the area will become available as a new construction site. Could you please explain why this decision has been made? Which consideration had been taken into account to make it? The green space is small and the only green area nearby which protects its habitants from the intensive traffic along A40 with its highly polluted air. The closest park with public general and free access is Acton Park which is in about 20 minutes or more walk. Across the New Local Plan, the Council couldn't stop talking about its sincere wish to improve the air quality in Acton and all the Borough of Ealing. Still, you decided to deprive the Trinity Way community of its only green space which help them – literally – to breath. I find this part of the New Local Plan very unfair and not properly thought through. I think that my presence at the hearing session may help to persuade the decision makers to re-consider their decision about removal of MOL23 status from the Trinity Way green space.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council's Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Maria Kochetkova		197	Individual

I would like to support the proposals to enable to the barclays sports ground to be used for Ealing Hockey Club. My 7 year old daughter is one of many local children who would love to benefit from new pitches and a clubhouse. We have been living in Ealing for 11 years and intend to stay here for the long term, and we know that sports are vital to the community and the health and happiness of our children.	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Lauren Parker		201	Individual
I am writing to support the proposal for the former Barclays Sports Ground to be used for community sports, notably for Ealing Hockey Club to be able to build their own pitches and club house. EHC has become remarkably successful, notably in the junior ranks with victories at London Youth Games and in recent cup competitions and notable numbers of junior talent playing for London County. In addition it runs a leadership and coaching course for juniors that is inspirational and supports Duke of Edinburgh awards. Hockey is a truly diverse sport with representation of all elements of Ealing society and is a club that Ealing should be justifiably proud of. The club is hampered by a dependency on private schools to provide the necessary astroturf pitches. The club's flexibility, size, and financial wellbeing are severely impacted by this set up. Were EHC to have its own grounds and clubhouse it will be able expand further, offering great sports opportunities across the borough.	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Robbie King		202	Individual
We would like to pledge out support for proposals to convert the disused former Barclays sport ground to be used as a community sports facility. We would particularly like to see it established as a "home" for Ealing hockey club. The hockey club has been recognised on numerous occasions in the Ealing sports awards, including Sports Club of the year 2023 and yet the club needs to hire facilities from local schools. The chance to build a dedicated clubhouse (with facilities) and pitches would be really appreciated by volunteers, coaches, athletes and parents alike.	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Dr Teresa Szyszko and Mr Kevin Walls		203	Individual

I am writing to support the proposal that the former Barclays Sports Ground referred to above be assigned as the home of Ealing Hockey Club, which would include the building of a clubhouse and creation of at least two hockey Astro turf pitches. Ealing Hockey Club is a young and vibrant club with a range of teams playing across a number of leagues. Despite this it doesn't have its own clubhouse or pitches and has to use local schools' Astro turf facilities to do training and run matches. Because of this and the fact that other local sports eg: cricket and tennis etc already have their own clubs and pitches, Ealing Hockey Club is in real need of its own Astro turf pitches and a clubhouse. Ealing Hockey Club is the ideal candidate to occupy the former Barclays Sports Ground with the added benefit that it would create a safe and social centre for young people, while at the same time establishing Ealing borough as a centre for excellence in another team sport, encouraging fitness and wellbeing.	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Joan Moon		204	Individual
I would like to support the potential development of the Former Barclays Sports Ground for Sports Use, including provision for a new home of Ealing Hockey Club. The land is between 2 schools, The addition of 2 pitches and a club House for Ealing Hockey Club beside it, we would have a Home for the Hockey Club. It would then have the potential to become a Home for a Hockey National Talent Centre and West London Hockey Charitable Foundation. There are no Hockey pitches in Ealing that aren't part of private school grounds. To have a County Hockey Club in Ealing would be so much more preferable to being dependant on other schools. Ada Lovelace School, next door, has almost no sport Facilities due to the size of the site. So by turning these former Sports Grounds into a Sports Centre with Hockey Pitches for all to use would be a huge benefit to the people of Ealing.	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Katie Mulholland		205	Individual

I trust this email finds you in good health. I am writing to convey my wholehearted agreement with and unwavering support for the proposal to repurpose the old Barclays Sports Ground into a central location for community sports facilities, with a special emphasis on developing pitches and a clubhouse for the Ealing Hockey Club. As a member of our community, parent of a local school student and hockey player, I sincerely believe that investing in sports infrastructure is crucial for promoting social cohesion, encouraging healthy lifestyles, and providing our youth with positive outlets. Transforming the Barclays Sports Ground into a bustling hub for sporting events that benefit people of all ages and backgrounds presents a unique opportunity to fulfil these needs. The Ealing Hockey Club has long been a vital component of our neighbourhood, offering individuals the opportunity to engage in their favourite sport while fostering friendship and cooperation. However, the club has faced challenges in accessing adequate facilities, hindering its ability to expand and serve its members effectively. By providing the space and resources necessary to establish their own pitches, changing rooms, and clubhouse, we can empower the Ealing Hockey Club to flourish and reach a wider audience, thereby developing future local, national, and international players for Great Britain. Furthermore, the development of community sports facilities at the Barclays Sports Ground aligns perfectly with the community's principles of accessibility and inclusivity. By making the area available for use by local sports organisations, specifically Ealing Hockey Club and schools, we can ensure that everyone in our community, regardless of background or ability, has the opportunity to participate in physical activities. As a parent and a longstanding community member at Ealing, I applaud everyone's efforts in	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Boby Jose and Julie Jacob		206	Individual
I fully support the idea of restoring the Barclays Sports ground into a sports facility again. It would be wonderful to see the derelict building restored and the green space being used for sport. I would personally love this to be used by Ealing Hockey club. Both my girls play for them and it is a great club and it would be fantastic for them to have their own ground and facilities as most other Ealing sports clubs already do.	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Jessica Borthwick		207	Individual

Additional site allocation for gypsy and traveller pitch provision at Down Barns Farm UB5 6RB I am against this proposal for the following reasons 1 The government has encouraged all small farms to diversify to help with falling farm incomes and the area considered by Ealing Council for the above proposal has been diversified into two commercial business lets to help with the farm income 2 The income from these two business`s accounts for 55 % of the whole farm turnover and the loss of this site will put considerable pressure on the cash flow and could lead to the farms closure. 3 This farm and stable yard is the last remaining working farm in Ealing and must NOT be lost for future generations	Noted. Ealing Council would not want to lose the farm and understands its significance and importance. However, any decisions about the future of the farm must be seen in the wider context of the freeholder's ambitions to close not just the lorry repair/maintenance yard but to build a sizeable development on the entire farm. These proposals have been resisted by the council primarily because the land continues to be protected primarily as Green Belt with the exception of the proposed release of site 09NO.	09NO Kingdom Workshop, Sharvel Road		Toby Dalton	Tenant of Do	209	Individual
I have looked at this but there are hundreds of pages and I have read a lot but I seem to be able to find loads of information on aims and why these aims but nothing on what is actually planned to be done to achieve these aims. For example where can I find how Ealing intend's to reduce traffic in and through the borough? There has been talk of these 20 min neighbourhoods like what were trialled in Oxford is this something Ealing has in its plans?	Ealing's proposals to reduce traffic in and through the borough are present in various documents: the previous Transport Strategy 2019-22, the current Climate and Ecological Emergency Strategy, and the 20-minute neighbourhood plans which are being produced for each of the seven towns. The new Transport Strategy, which will be published next year, will build on these plans with further details on transport and active travel policies. The 20-minute neighbourhood plans show our ambitions for prioritising walking and cycling in each town centre, using routes which will better connect residential areas, high streets, new developments, amenities and services.	SP2.2 Climate action		Tom Holloway		212	Individual
Could you please tell me where the Unity Development Plan is located? The Unitary Development Plan is a hard copy ground plan drawn to scale that shows the land designation within the borough of Ealing. Such as Virgin Land and Brownfield Land etc . It was held in Local Libraries. Can you please tell me where the UDP can be seen ? Thank you for your help with this matter and I look forward to your reply.	The Unitary Development Plan (UDP) was adopted in 2004 under the old local making system. Since then there have been several iterations of the Local Plan and copies can be found on the council's web pages and in local libraries. The Council is currently preparing a new version which, subject to an independent examination, is expected to be adopted in 2025.	General		Caroline Banks		219	Individual
I have consulted the plans below (vision for 7 towns) for the redevelopment of the Barclays Sports Ground to be used for community sports facilities, and would just like to add my support for this {link to Local Plan R19 on council web pages}. As I understand Ealing Hockey Club has expressed an intention to build a hockey pitch and club house, which is a great use of the space (to get the community playing hockey). I am a resident of ealing {address}.	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Dominic Pullen		220	Individual

I fully support the proposals for Ealing Hockey Club (EHC) to have their own space for training & club house. EHC is integral to our community, for youth sports and adults, and its new location will create a more inclusive environment & wider accessibility across Ealing demographics. Moving from a private school grounds to having its own community space, will provide them greater flexibility to run more sessions & engage with more communities - from all different backgrounds. I wish them the best of luck in this venture.	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Janine Walsh		221	Individual
I believe this area needs to be used for community sports facilities. And specifically it would make so much sense for it to become the "home" of Ealing Hockey Club. I've been so impressed with the club ever since my daughter started playing 8 years ago. They do so much with young people and adults too, but they're dependent on the goodwill of two schools, borrowing their pitches to play, and have nowhere to offer "match teas" after competing against opposing teams. A bit of an embarrassment for our borough when players from across London come to visit!! Please register my support for allowing hockey pitches and a clubhouse there.	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Suresh Mistry		223	Individual
I hope you're well. I'm emailing to show my agreement and support for proposals for the former Barclays Sports Ground to be used for community sports facilities, in particular for Ealing Hockey Club to build their own pitches and clubhouse. I play for the club and since moving to London 6 months ago, the club has made me feel welcomed and part of the community. This is because of the regular pub trips after training. A club house would increase this community and inclusive culture at the club. Having a club house creates a space for socialising and for families and friends to come together over a shared interest. This can be the heart and soul of a community. Looking forward to hearing what the result is.	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Jen Smith		224	Individual

I am writing in support of the currently disused Barclays Sports Ground to be used for community sports facilities. More specifically to provide a community hub and pitches for hockey. Hockey is a game enjoyed equally by girls and boys, a game that you would therefore think was widely played. However it is not, the lack of facilities and hockey pitches in the borough is restricting participation and the demographic that currently play the game. I believe that there are only 4 grounds in the borough with accessible hockey pitches. My background in youth sport is primarily in youth rugby, along with other positions I have managed a minis / youth rugby team for the past 10 years. Last year there were 50 youth players in our age group squad, with 21 different schools represented from all backgrounds and demographics. Rugby clubs and facilities in the borough are outstanding, which encourages participation from all walks of life, and the more that enjoy participating the more word spreads. Success breeds success. Unlike the majority of sports, a lack of facilities and a lack of awareness is restricting youth involvement in the sport of hockey. A hockey club, with a club house and facilities at Barclays Sports Ground would change that, encouraging greater participation in the sport to a much wider audience and demographic. I would therefore wholeheartedly support a community sports facility at Barclays Sports Ground, with accessible hockey pitches and a clubhouse for all to enjoy.	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		John and Grainne Sheffer		225	Individual
I would be grateful if you could send me details of the Yeading Lane Estate. This Estate is boarded by Yeading lane to the east, the Hayes bypass to the west and Maple Road to the south. The main estate roads comprises Radcliffe Way, Canberra Drive and Broomcroft Avenue. I would be grateful for a copy of the site development plan and details of any major changes to the site such as additional buildings, road changes etc. I am particularly interested in any proposed changes to Yeading Lane/Kingshill Avenue junction and the White hart Roundabout interchange.	Policy N3 sets out proposals for the creation of a new neighbourhood centre at the White Hart Roundabout including the possibility of reconfiguring this important road junction. Yeading Lane itself is a proposed development site in the Local Plan 06NO at Page 334. The indicative timeframe for delivery is 6-10 years so there is no extant planning permission for any redevelopment. It is expected that initial plans for the future regeneration of the area will be the subject of further detailed public and stakeholder engagement.	06NO Yeading Lane I		Dennis O'Farrell		226	Individual

1. Preface At 516 pages long this Local Plan (LP) guidance for Councillors in determining Planning Applications is unwieldy and unhelpful. Charles Dickens epic 'Tale of Two Cities' is slightly longer at 540 pages. The 'West Ealing Centre Neighbourhood Plan' is a mere 51 pages long. There is far, far too much repetition in the LP. Add in the 1,000+ pages in the 'NPPF' and the 600 pages of 'The London Plan', Councillors will have to wrestle with some 2,116 pages in order to determine planning permission. The LP reads like an election manifesto which is grossly inappropriate and offensive. 2. Introduction The Leader of the Council has stated publicly that in future residents would be in the driving seat for developing Ealing. To stretch this metaphor somewhat my perception is that it's a driver-less vehicle travelling at the universal Ealing funeral road pace of 20mph. The elephant in the room, however, is the housing target by 2039 of 41,571 new homes. The GLA population prediction for Ealing is 81,117 new residents by 2040. That will give us a 2040 population figure of 477,257 somewhat greater than Coventry - England's 9th largest city. If this growth is to be enabled by the Elizabeth Line (EL) then without major upgrades in frequency of rush hour trains and Ealing EL train station platforms becoming safe for all passengers – this population growth will stall. Do the current residents in Ealing want this growth? Have they ever been asked? 3. GLA Housing Target Why is this so high when compared to most other London boroughs? The massive population increase is very different to other neighbouring boroughs. Hounslow's is 45,617 and Harrow's is 15,966. Kingston even has a population reduction by 2040!	Noted. Responding to a few of the points: - The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. - Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). A Five Year Housing Supply and accompanying Housing Trajectory demonstrates housing delivery over the plan period although it is accepted that they are ambitious and challenging. - Both the NPPF and the London Plan require Local plans to include planning for growth. - It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on design, heritage and culture. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. Neither the Mayor of London nor Historic England have raised objections to this approach. - The preferred spatial option was part of the evidence base and examined different alternative approaches. It is specifically referenced at Pra 3.61 of the Reg 19 Local Plan.	General		Eric Leach	West Ealing N	227	Community Interest Group

The list was compiled by the Ealing Matters campaign group. As I agree with it entirely, I'm sending it verbatim. 1. The Plan itself is verbose and repetitive. It is simply impenetrable to the vast majority of Ealing residents unfamiliar with planning jargon or issues. 2. Ealing's housing target of more than 40,000 homes over the next 15 years is excessive and undeliverable. But if it were to be delivered, it would create unmanageable population growth of more than 80,000 people (more than the population of Guildford) according to GLA projections. 3. The infrastructure plans to support this very high growth rate are sketchy at best. 4. The plan's proposals for wholesale redevelopment of relatively new and serviceable buildings will exacerbate climate change. 5. Valuable areas of MOL are to be lost. A new policy of 'enabling development' will justify developing them in the Council's interests. 6. There are no policies to protect the Borough's heritage. 7. Tall building heights, especially in Ealing and Acton, are excessive and unjustified. 8. There is no vision or strategy for the near total redevelopment of Ealing Metropolitan Town Centre that the Plan envisages. 9. The Plan's 82 individual development sites have the potential to have considerable impact on the Borough and the proposals for them are totally insufficient. 10. Ealing's proposals for monitoring the plan are no more adequate now than they have been over the past 10 years.	Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy. The case for enabling development exists entirely independently of Policy ENA, which serves to limit and define the scope of enabling schemes. The Council welcomes detailed feedback on the monitoring	General		Colin Lomas		230	Individual

We have concerns that arise from the fact that Policy D9 is not clearly written and is not unambiguous, which means that it fails to meet the test in NPPF Para 16 (d) and is therefore unsound. Table DMP1 of the Plan provides thresholds for what the Borough considers to be tall buildings across 59 different zones in the Borough. The thresholds range from 6 storeys in many parts of the Borough to 21 storeys in Ealing Town Centre. The justificatory text explains that the policy ‘builds upon comprehensive evidence developed in line with the London Plan’. Although this is not specified, this evidence is understood to relate to a series of reports by Allies and Morrison which culminated in a final report dated December 2023, posted in the evidence base on the New Plan website with all the other Regulation 19 documents. It is worth noting that the Allies and Morrison reports appear to be the only evidence speaking to this part of the Plan. The Central Ealing Residents’ Association (CERA) is primarily concerned with Ealing Town Centre as this is the area represented by CERA. Ealing Town Centre is covered by Zone D which according to Allies and Morrison has a prevailing average height of 4.4 storeys with guidance for prospective tall buildings of 9-21 storeys in height. There is a huge difference between the average existing height of Town Centre buildings of 4.4 storeys and the 9-21 storeys suggested as being appropriate for prospective tall buildings. No explanation or justification is provided for this very large difference although Allies and Morrison do explain that Ealing Town Centre is sensitive to a full representation of conservation areas, heritage buildings, areas of consistently low building scale and open space. The very tall buildings	There was a transcription error in the Tall Buildings study at R19. The study has now been updated and Table DMP1 will be corrected. TB boundaries will be added to the interactive policies map.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Stuart Morley	Central Ealing	231	Community Interest Group

In response to your request for reactions to the latest local plan consultation: 1. It is difficult to know where to start because the presentation of this new 'local plan' is extremely confusing and, at over 500 pages, almost impossible for an informed but truth-seeking local resident to comprehend. 2. However, some facts do 'stick out' clearly. Reg19 proposed over 40,000 new homes to be built, but fails completely to identify where, how and when. Plus there is no indication as to where the supporting infrastructure necessary to support the inevitable increase in population is to come from - schools, doctors, transport, roads etc. Worse, where is the land for these houses to be built? Plus I cannot find any indication of the environmental impact of such a huge building programme. Our water and electricity supplies are already at breaking point, as is our drainage system, as Ealing Council has admitted. So where is the extra capacity to come from? While recognising the need for more housing, especially so-called affordable housing, this is fantasy time simply to make the overall plan 'look good'. It doesn't. 3. I cannot see any reference to environmental protection. Ealing rightly prides itself on its parks and trees and therefore its contribution to keeping the borough as healthy and 'green' as possible. The plan seems to open up the possibility of destroying, or at least severely diminishing, this important element in urban living. 4. Ealing has an appalling record vis-a-vis 'tall buildings'. It has repeatedly attempted to impose huge tower blocks in the centre of Ealing, with little regard for the heritage that these towers would destroy. Local residents have repeatedly opposed these plans, and previous Inspector-led enquiries have thrown these plans out.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council's ambitions and plans for each of the seven towns that make up the borough. Housing targets are set by the London Plan and Ealing's Local Plan must be in general conformity with it. It is also a requirement of the Government's new housing requirements and Ealing's Local Plan must be in conformity with national planning policy. The council has produced a comprehensive Infrastructure Delivery Plan (and schedule) which sets out the council's aspirations, with partners and key stakeholders, for planned new infrastructure over the plan period. A high level borough wide summary is set out in Table SS1 and delivery schedules are set out in each of the seven Town Plans. The Local Plan also supports the council's ambitions to take action on climate change and is committed to maintaining, enhancing and expanding the network of green infrastructure including creating ten new parks, maximising opportunities for urban greening and net gain in biodiversity. Finally, a tall building is classified as a building not less than 6 storeys or 18 metres measured from the ground to the floor level of the uppermost storey and Policy D9 sets out how this policy will be implemented.	General		Tony Palmer		232	Individual

I understand that Trinity Park may be subject to reclassification. It is absolutely vital that Trinity Park continues to be part of MOL23. There have been a substantial number of new flats constructed along the A40 corridor and none of these have access to a garden space - this is the only place that many children get a chance to play and run around in. It is not appropriate to grant planning for all these new residential blocks and then remove the only spot of outdoor space that is nearby. Acton Park is about half a mile away and too far for little children and elderly / physically challenged people to get to. Have consultations been carried out with vulnerable groups? The impact on air quality needs to be considered also - we need to protect as many trees and green spaces as possible - the pollution from the constant traffic on the A40 is not insubstantial. Trinity Park is also an important space for local wildlife and much work has been done over recent years to improve the space in this regard. I implore you to continue to protect Trinity Park for the future.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council's Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	Policy A1: Acton Spatial Strategy		Maura Kelly		233	Individual

NPPF Para 20. Requires that: ‘Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat). NPPF Para 34 requires that: ‘ Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).’ London Plan Policy D1.B states that: ‘In preparing Development Plans, boroughs should plan to meet borough-wide growth requirements, including their overall housing targets, by: 2.assessing the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth; New Local Plan-Evidence Base-Infrastructure Delivery Plan-Part One-comments Introduction- comments 1.1 Given this quote is from the above document I feel that is important to comment on it & question some of the assumptions	Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. Priorities and funding opportunities will change over time so the IDP only provides a snapshot in time.	SP4.1 Good Growth		Susan New		234	Individual

We wish to support all the points of criticism raised by Ealing Matters on the attachment below as the council's plan is far too complex and seems to be suggesting an unrealistic increase in the population of our borough without a sufficient expansion of facilities and infrastructure. Please keep us informed about how you intend to proceed after the closing date. Many thanks.	Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy. The case for enabling development exists entirely independently of Policy ENA, which serves to limit and define the scope of enabling schemes. The Council welcomes detailed feedback on the monitoring	General		Michael and Lety Tiley		236	Individual

Having reviewed the plans I believe the planned over development of Ealing is shocking. The roads , schools , doctors etc are already at breaking point. The pollution levels are grim. How can you plan for to ruin this wonderful borough for next generations! Shame on you.	Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Mike Kingsbury		237	Individual

I am writing to object to the local plan. I fully agree with the objections summarised by Ealing Matters. I have several grounds for objection. The plan is long and hard to digest for local residents. However it is also overly vague about the infrastructure needed to support various plans. The borough is already crowded and its facilities are strained -- particularly access to healthcare, and transport. Meanwhile the plans for 20-minute towns are completely unrealistic and verging on Stalinist. I strongly object to the plans for high buildings, and to the stealthy redefinition of high buildings as "not high". These tower blocks are likely to become the slums of the future, and will in no way contribute to the borough. I feel that the proposed target of 40,000 new homes (and therefore 80,000 new residents) is completely unreasonable given the how dense the population is already. Please rethink this inadequate plan and propose something that will enhance the area, not damage it.	Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy. The case for enabling development exists entirely independently of Policy ENA, which serves to limit and define the scope of enabling schemes. The Council welcomes detailed feedback on the monitoring	General		Elizabeth Howard		238	Individual

I have been a resident of Ealing for 23 years and seen many changes as the borough has entered the 21st century. I have reviewed the 2024 infrastructure report and the local plan, with particular interest as to the provision of sports facilities. Please add my voice in support of the Ealing Hockey Club’s proposed use of site 21EA, the former Barclay’s sports ground. As I understand it, they also seek your approval to amend the site’s use for leisure purposes: to include competition-standard hockey pitches (with artificial turf rather than sand), and to redevelop the club house, including changing facilities that meet the standards of the English Hockey League. The emphasis on competition-standard facilities is not least because over the past decade, the club has put forward credible sides that have won prizes and/or promotion at both youth and adult levels. The quality of the club has been recognised in the Ealing Sports Awards. These facilities would serve as the home to not only the Ealing Hockey Club but also the EHC’s National Talent Centre and the West London Hockey Charitable Foundation, which has received wide support. I’m particularly pleased to make this representation because of the inclusive nature of hockey as a sport. It is accessible to players of any size, age, gender, or economic background, and brings them together in a collegiate and cooperative fashion. Bridging generational and other societal divides is a keen interest of mine, and I’m impressed to learn that EHC’s men’s team has active players as young as 15 and as old as 62. In short, please approve the proposals made by Ealing Hockey Club et al to reinvigorate the former Barclays sports ground. This will be a welcome addition to the richness and diversity of sport in Ealing, with its commensurate positive impact on health and culture in the borough.	Noted. Support welcomed. The council’s Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine’s via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Philip Hellyer		239	Individual

National Gas Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Gas Transmission National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK’s four gas distribution networks where pressure is reduced for public use. Utilities Design Guidance The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure. National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around underground gas transmission pipelines and other National Gas Transmission assets. Therefore, to ensure that Design Policy DAA is consistent with national policy we would request the inclusion of a policy strand such as: “x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including	Noted. The proposed addition can't really be said to concern either design or amenity. To the extent that extant infrastructure remains necessary to support development in the borough, i.e. that it is still in use, then scope for refusal exists in both the local plan and london plan good growth policies.	Policy DAA: Design and Amenity – Ealing LPA – local policy		Matt Verlander or Kam Lliddar	National Gas	240	Statutory Body

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Grid Electricity Transmission National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently. National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid’s core regulated businesses. Please also consult with NGV separately from NGET. Utilities Design Guidance The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET. NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines							
	Noted. The proposed addition can't really be said to concern either design or amenity. To the extent that extant infrastructure remains necessary to support development in the borough, i.e. that it is still in use, then scope for refusal exists in both the local plan and london plan good growth policies.	Policy DAA: Design and Amenity – Ealing LPA – local policy		Matt Verlander or Tiffany Bate	National Grid	241	Statutory Body

I wish to support Ealing Matters' concerns about the Local Plan: * Frankly the Plan is impenetrable. This means that most Ealing residents are excluded from this consultation. * If the Council were to deliver its housing target of more than 40,000 homes over 15 years, this would create unmanageable population growth of more than 80,000 people. Your plans to support this additional population are weak. * The proposals to redevelop relatively new buildings, which are currently adequate, will aggravate climate change. * The plan proposes disposing of important areas of MOL, justified by a new "enabling development" policy. * Where are the policies to protect heritage? There are none. * There is no justification for the proposed tall building heights, which are excessive. * The Plan envisages redeveloping Ealing Metropolitan town centre but has no strategy for this. * Proposals for monitoring the Plan remain inadequate.	Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy. The case for enabling development exists entirely independently of Policy ENA, which serves to limit and define the scope of enabling schemes. The Council welcomes detailed feedback on the monitoring	General		Penny Wark		242	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: High Rise Buildings - Hanwell has a village look and feel currently. Hanwell contains several conservation areas that are beautiful and valued by locals. High rise buildings will ruin the character completely and more flats will overpopulate the area. Hanwell has had new flats built recently that are standing empty, one example is the previous Wickes site, now Hanwell Square Flats, Boston Rd, London W7 3SH. No design guidance of the planned high rise developments buildings. No mention of sustainability for these sites.	Noted. The Local Plan expects a lower quantum of residential led development within Hanwell reflecting fewer development opportunities than say Ealing or Southall. This is reflected in the number of development sites (8) of which half are considered to be potentially appropriate for a tall building (mostly in the district town centre). As specified in Policy H2 future development will be character led.	Policy H1: Hanwell Spatial Strategy		Jackie Fullbrook		243	Individual

I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 01HA Ealing hospital frontage: The site is not suitable for a tall building. It is directly in front of the hospital without adequate space between the hospital and the proposed development site, causing privacy and light reductions. Unsuitable living conditions for a twelve storey building directly next to the Uxbridge Road. Climate change caused by the construction and the number of people living in a twelve story building.	Noted. Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study. Heights are to range up to a maximum of 12 storeys (42m) stepping down from the recently redeveloped high rise high density residential development at St Bernard's Gate. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	01HA Land to the front of Ealing Hospital		Jackie Fullbrook		243	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 02HA Grays Garage: Grays is a thriving business providing a valuable service to locals, constantly busy. Jobs will be lost with no permanent employment provided. No infrastructure provided for the expanding population living in 6-storey blocks on the busy Uxbridge Road, and no parking. No plans to mitigate climate change caused by the construction and the number of people living there. No requirements for sustainable building or the use of recycled resources. The area currently has character with the cottages located next to this site.	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to the heritage aspects of the adjoining St Mark's Church & Canal Conservation Area to the south and the Hanwell Clock Tower Conservation Area to the north-east. It is proposed that a mixed-use development that provides residential, commercial space and public open space should come forward therefore ensuring some employment opportunities in the future.	02HA Gray's Garage		Jackie Fullbrook		243	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 03HA George Street Car Park: Parking in Hanwell is required, this is the only car park we have. A car park is an important local amenity for children, the elderly and disabled. This will destroy the local character of the Clock Tower Conservation Area. It is a square of mainly low rise cottages and the proposed 6-storey building is located in the middle.	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to heritage aspects of the adjoining St Hanwell Clock Tower Conservation Area to the east. The design principles for the site seek to ensure that the height of any development proposals takes into consideration the 2 storey terraced cottages fronting the site, with scale and massing responding sensitively to the low-rise surrounding housing. They should reflect the fine-grained character of neighbouring streets. A mews style development is proposed to reflect existing adjacent residential development, with tree planting and soft landscaping to improve the public realm. The site also benefits from a relatively good public transport accessibility level.	03HA George Street Car Park		Jackie Fullbrook		243	Individual

I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 04HA Lidl and Discount Store Site: Lidl and Poundstrecher are thriving businesses that are a valuable service to the local community. There is no community service provision, ie medical, educational or recreation. No plans to mitigate climate change caused by the construction and the number of people living there. No requirements for sustainable building or the use of recycled resources.	It is intended that a supermarket will be reprovided on the site. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	04HA Site of Lidl and discount store		Jackie Fullbrook		243	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 05HA Marshall site and area: This is an 8-storey building, once again ruining the low-rise character of Hanwell on the edge of the Clock Tower Conservation Area, and is on the busy, congested Uxbridge Road. No provision for children, the elderly and disabled. No plans to mitigate climate change caused by the construction. No requirements for sustainable building or the use of recycled resources.	Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study. It is proposed that a new community space on the southern part of the site is provided. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	05HA Marshall Site, Gold's Gym & Garages on Montague Avenue		Jackie Fullbrook		243	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 06HA Tile Deposit: No provisions detailed for medical, educational, and recreational needs, or for children, the elderly and disabled. No mitigation for climate change.	It is proposed that affordable and assisted housing be reprovided alongside the provision of new residential and community uses. In addition, Chris Payne House will be retained. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	06HA Tile Depot & Lambourn Close		Jackie Fullbrook		243	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 07HA Copley Close: This is a long thin space and not suitable for a building of 7 storeys. The plan says there is a problem of parking on pavements but no mitigation plans. No plans for health facilities.	This site is part of a larger estate regeneration project, much of which has already been completed and is subject to a masterplan. The allocation already notes that cars are parked along the length of Copley Close with many parked on pavements. It also notes that the public realm is poor quality and pedestrians and cyclists are not prioritised. Future development will seek to tackle these issues. Key infrastructure requirements for the site include the need for health facilities.	07HA Copley Close Estate		Jackie Fullbrook		243	Individual

I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 08HA High Lane: No mention of employment provision. The people who were there previously will not be able to afford to go back and live there. Over-reliance on the Brent River Park and no other provision. No sustainable building requirements or provisions for the wildlife lost.	Affordable and assisted housing will be reprovided alongside the provision of new residential and community uses. This means that any existing residents who wish to remain at High Lane will be offered a home. Given the residential character of the neighbourhood, large-scale industrial or commercial development is not considered appropriate. The allocation also proposes to create green, pedestrian and cycle links to Mayfield Local Park and the Brent River Park. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	08HA High Lane Housing Estate		Jackie Fullbrook		243	Individual
2.5 Health and Social Care General comments based on the statement: 'Integrated Care System (ICS) are partnerships of organisations that come together to plan and deliver joined up health and care services. The Integrated Care Board (ICB) is a statutory NHS organisation responsible for developing a plan for meeting the health needs of the population, managing the NHS budget and arranging for the provision of health services in the ICS area. Within each ICS, place-based partnerships will lead the detailed design and delivery of integrated services across their localities and neighbourhoods. The partnerships will involve the NHS, local councils, community and voluntary organisations.' The report mentions that there is a need to find additional physical capacity at existing facilities and new facilities to keep up with the level of demand for healthcare services in the borough but fails to mention how the borough will cope with the over 40,000 new units proposed for 2041. A new large healthcare facility was promised in Ealing in the last Local Plan but never materialised & neither did a clinic in Cherington Road Hanwell. The report states that new sites are unaffordable to the NHS but the Council continually underestimates the S106 health contribution from developers given that that Child Yield is still based on the Wandsworth model i.e. underestimates & also rather paltry amounts have actually been collected so far. It is very difficult to track down the amounts collected as 10 years worth of S106 contributions are still being collated, tracked down & collected. The report into secondary care seems to be missing detail re major	The council has been working closely with NHS partners to establish and plan for the health and wellbeing needs of the borough. This includes the preparation of the first ever Ealing Local Plan Health Study and the consideration of health under the Infrastructure Delivery Plan (IDP). The IDP identifies several health infrastructure needs, many of which are assigned the highest possible priority in the overall infrastructure prioritisation exercise. The primary responsibility for delivering health infrastructure lies with the NHS and the North West London Integrated Care Board (ICB). The council will continue to positively engage with NHS partners and will also seek to secure the appropriate planning contributions from new developments. Evidence shows that clinical care is an important but, overall, relatively small component of health and wellbeing. As outlined in Local Plan policy 'SP3.3 Healthy lives', the council is seeking to positively address the wide range of health and wellbeing determinants. Ealing Hospital is in Hanwell under the revised town boundaries. Development Site 01HA not only seeks to reprovide affordable, key worker and assisted housing but to provide additional residential units and the council is in discussion with the health authority (who is the landowner) to ensure that more affordable housing is provided for staff working on the hospital campus. It is also important to note that the planning system can be rightly	SP4.1 Good Growth		Susan New		234	Individual

2.6 Transport Quote: ‘Accessible and sustainable transport is essential to delivering Ealing Council’s aim to make the borough a great place to live, work and spend time in. The London Plan 2021 promotes an integrated strategic approach to transport which supports this priority, and states that borough development plans should support walking, cycling and public transport through policies that encourage mode shift from private vehicles. The Ealing Council Transport Strategy (2019) (ECTS) sets out the borough’s transport priorities, including a focus on high-quality, safe provision for cyclists, enhanced public transport and promoting sustainable and good growth, in accordance with the Mayor’s Transport Strategy (2018) (MTS), focusing on the initial period of 2019-2022. The three core objectives of the ECTS are: mode shift away from private cars; reducing the environmental footprint of transport; and improving road safety.’ Accessible is used in its widest terms here in that it uses accessible in that it is physically there & not that it is accessible to all. Personally PRMs, as we are known as, would put the priorities in a different order public transport, walking & then cycling. Arup has just presented this evidence base as a desk top exercise & not the actual reality of getting around in the borough giving that we no longer have health services nearby or even a variety of shops.	Noted. Policy support is reiterated for improving the accessibility of public transport, including station step-free access.	SP4.1 Good Growth		Susan New		234	Individual

The Elizabeth Line: Having been part of the campaign with Transport for All to get all Elizabeth Line stations accessible- in reality they are not. They might have lifts but actually getting to the stations can be very difficult and the public realm at the borough stations is woefully inadequate, inaccessible and for some inexplicable reason one has to plod further to one of these stations that someone on a cycle. The trains are as long as intercity trains but there is no help at the stations unlike at intercity stations. One often has to wait or alight in the rain as there are no canopies & so many people choose to use other lines which might take longer but are easier to use. There is also the platform to train height that has never been resolved for people who are not in wheelchairs & this has factor has caused accidents & falls. And then if one does actual decide to use this line & change to another line there is the major problem of the length of the interchanges which are not for the less mobile or faint hearted. There are not 10 trains an hour from certain borough stations & often there are delays anyway & there are going to be many more until the western section problems are sorted out with Network Rail. The line is often overcrowded & like many stations run by TfL it is not guaranteed the lifts will be working anyway.	Noted. The issues raised relate to Elizabeth Line operations and stations, which are Transport for London and Network Rail matters.	SP4.1 Good Growth		Susan New		234	Individual
The London Overground: is actually very difficult to get to from most areas of the borough & it would be easier to access with a hopper bus service. At certain times it also suffers from massive overcrowding as people who work at the Chiswick Business Park use this line as they live in trendier parts of London like Hackney. GWR- GWR trains do NOT stop at Ealing Broadway-they appear to on the GWR map but if one buys a GWR ticket it will be for the Elizabeth Line to Ealing Broadway. By overemphasising the importance of the Elizabeth Line it has had a detrimental effect on bus services along the Uxbridge Road as there has been a mad assumption that people will use that Line to get to shops & services along the Uxbridge Road when in fact the only two stations near shopping areas are Ealing Broadway & Southall & even the latter is quite far away from the main area.	Noted. Ealing continues to support improvements to bus services along the Uxbridge Road, and to work with Transport for London to ensure all residents are able to access convenient bus services.	SP4.1 Good Growth		Susan New		234	Individual

Public transport-Bus: The first bus service to be reduced after the Elizabeth Line finally came west was the 427 which has led to massive overcrowding on the so called Super Loop SL8-formally the 607 express bus -& the 207. Not just overcrowding on the buses but at bus stops too & there needs to be a massive rethink of stops as well. So called rationalisation has led to numerous bus routes stopping at just one stop with nobody knowing where the buses will actually stop & if the Countdown system is actually there but not working by the time you have tried to look up when your bus might arrive one has missed it because it arrived behind another bus & overtook that the one in front. I know the bus stop guidance off by heart & I know it is worked out re buses per stop & it is obvious that many stops along the Uxbridge Road have too many buses stopping at just one stop. {Images of Bus stop G Acton Old Town Hall} It is not fair on the drivers as the buses get banked up & often they cannot pull into the kerb. There is also the problem of street clutter & it can even be trees with overhanging branches or trunk growth. In the case of Ealing Broadway opposite the Town Hall there are so many temporary fast food outlets parked on the pavement that a person just the over day could not get his lightweight scooter properly lined up with the ramp because of one of these obstructions & so the scooter was kindly hauled onto the bus by a strong passenger. Tfl relies on its passengers to be helpful & kind as they shuffle around trying to accommodate people with shopper trolleys, the disabled & people with buggies or suitcases. Ealing still has the badly designed Enviro400 chugging about but the Boris Routemaster was probably the worst designed bus ever whereas the bendy bus could even accommodate 4 wheelchair users. If there is	Noted. These matters have been raised with Transport for London, with a view to improving bus stop and service provision, particularly along the Uxbridge Road.	SP4.1 Good Growth		Susan New		234	Individual

Walking, cycling and micromobility: As I disabled person who once cycled I cannot really comment on the cycling infrastructure only in that it has caused me to become fearful of using crossings & I cannot face a floating bus stop. As a cyclist I used to stop at traffic lights & would even walk my bike along public footpaths. Now I have to face numerous cyclists on the pavement including electric ones & electric scooters & even children slightly oblivious to other pavement users as they speed along on their scooters. Electric hire bikes & scooters are left everywhere blocking pavements & if one has sight loss it must be a nightmare. Also these electric forms of travel can hardly be termed active travel and I did attend an online forum re the so called ‘Active Travel’ plan & it was unanimously decided that ‘active travel’ was a discriminatory term. Also the use of micromobility is hardly going to affect the module shift as the people who use them are unlikely to be car owners anyway-on observation only-age group 16-25 & without helmets which is a major worry too. And as regards to bike lanes it would appear that they are, by the admittance of the cyclists, not often used. We seem to have a lot of ‘weekend’ cyclists but the 30 or so cycle hoops at my local tube station-Northfields-remain empty & all the people I know who are keen cyclists also own a car & in some cases –two. Walking-my lack of mobility prevents my doing major walks & I have had to stop even walking in my local park due to runners, cyclists & dog walkers getting in the way. Most of Ealing pavements are in a terrible state but as I often look down as I am walking on my crutches I am very careful but I have known people who have had	Noted. Transport for London is reviewing all existing bus stop bypasses, to ensure they maintain pedestrian safety and are designed to the appropriate standards. Neither of the two bus stop bypasses in Ealing require any design changes, but their use in other schemes is being carefully considered.	SP4.1 Good Growth		Susan New		234	Individual

Policy SP1: For most people Ealing is Ealing i.e. the whole borough as in LBE but some of the documentation refers to Ealing as in LBE and sometimes Ealing as a separate town. It even differs in the evidence base. It has to be consistent and it is not. So it should read London Borough of Ealing. It does not appear to be a vision other than the usual list of developments sites for residential use and a wishy-washy idea of 20 minute towns. Having participated in the Core Strategy consultation in 2011 all that seems to be different is that we have gone from corridors & neighbourhoods to a series of towns and the inevitable mention of the Local Plan being aspirational. Well all that has happened in the ensuing ten years of the Core Strategy being adopted is that a vast number of tower blocks have appeared towering over the skyline and various other ‘aspirational’ ideas have fallen by the wayside like an Office Quarter in Ealing’s Metropolitan Centre which now appears to be a hotel/ university quarter as the HQs that were there have now de-camped to other areas of London.170,000 sq.feet of office space which was supposed to be an HQ is just an empty plot as is the proposed hotel almost opposite it. The same is true of Ealing Broadway being a ‘high quality retail destination’-it was joke in 2011 & is even more so now that Primark seems to be our flagship store. M & S doesn’t count as it is mainly a food store. No cinema other than a community led one, no refurbishment of the Town Hall and certainly no new health centre. Also the Plan seems to be based on the Shaping Ealing survey & only 2% of the population bothered to fill it in. I assume mainly the sad face/smiley face sections-hardly an evidence base. Also only1400 replied re Reg18-hardly representative of the whole of the Borough. A. Of all the towns mentioned Southall is the only one that retains	Noted. Regards "Ealing" the Local Plan does not include all of the London Borough of Ealing as the OPDC has responsibility for local plan making for an area in the NE of the borough atound Park Roal and North Acton. Regards the offer of Ealing Broadway this is obviously a matter of perception. A report into the business health of 1,000 retail centres across the UK has seen Ealing Broadway including its shopping centre rise in recent years and is now ranked at number 64. Compiled by Newmark Retail, its annual Vitality Rankings for 2024 looks at various factors to determine its ranking including retail unit vacancy rate, space being adapted for other uses, shopper spend per annum and footfall figures. See: https://www.nmrk.com/insights/market-report/newmark-retail-vitality-rankings-2024 In 2022 Ealing Broadway was ranked at number 73 while in 2019 it came in at 173. The designation for the Ealing Metropolitan Town Centre is derrived from the London Plan and Ealing's Local Plan sets out a spatial policy for the town centre at Policy E2. This takes a holistic as well as a character led approach recognising the differrent attributes and characteristics of indivudual parts of the centre. Regards the 7 towns, again this is a matter of perception but the approach taken seeks to build on the strong local identity and unique character of each town and identifies a set of priorities and opportunities. The Local Plan aims to maximise the role and	Policy SP1: A Vision for Ealing		Susan New		244	Individual

Policies and lack of them B. Just one example-Northfield Avenue is heavily congested, nobody drives at 20 mph and the NOx tube has gone & nobody cares. C. Not applicable or workable in the whole of LBE. D. It hasn't happened yet and so I don't see how it will in the future. G. New pools where? Acton Pool is not accessible to the disabled. H. According to the heat map my suburban terraced house is in a high heat zone. Why –I have no idea why. I. We need new health infrastructure everywhere not just in Acton & Southall. Most GPs are oversubscribed and LBE only has one hospital & it does not have an A & E, maternity or paediatrics. And according to the development site there the Council wants to build residential on the car park-the only place for expansion. J.The HIA has been ignored in many new developments & so why will things change. Green walls removed. Soulless podium gardens. Balcones counted as amenity space. Cemeteries put down as nearby green space to make up for green space deficiencies. Small parks used in plans as access to green space when they have been removed from the Sites DPD because they are deficient already. Etc Etc. As SP 2- to quote Arup re reduction in vehicle usage 'could negatively affect people with disabilities and the elderly population who are generally more reliant on private vehicles compared to public transportation' it is important to produce other policies to make LBE more inclusive. General policies that are missing. Transport should be accessible to all. The Council has ignored not only accessible transport design	Noted. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	SP3.3 Healthy lives		Susan New		245	Individual

I am very concerned to hear that you are putting through a local plan, which I know nothing about. Have you communicated with residents on this ? Have there been leaflets through our door ? If I knew what the plans were then I would be happy to support / not support them, but without understanding them how can I comment ? I am in agreement with the concerns from Ealing Matters Thank you.	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the	General		Helen Smith		247	Individual

CPRE London is a membership-based charity with 2500 members across London, concerned with the protection and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners. Thank you for the opportunity to provide comments on this important consultation. Six sites proposed for MOL in the Regulation 18 documents should now be designated at MOL. See sites outlined in blue in the image below. These were assessed by the council as per a document entitled 'Potential new MOL designation NEW1' also labelled Appendix 3 (also attached to this letter). These are important sites and deserving of the MOL designation or, at a minimum, Local Green Space designation, to ensure they are protected into the future so they are not vulnerable to development, and can deliver the parks and sports facilities residents need, as well as contribute to the wider climate objectives which are central to the Local Plan by hosting SUDS and nature habitat. {Map showing location of proposed new MOL sites} {Appendix 3 documenting new MOL sites with maps, illustrations and assessment criteria}	The Green Belt and Metropolitan Open Land (MOL) Review Stage 1 report assessed six non-MOL sites for potential MOL designation. Each site was assessed against the London Plan's MOL criteria. None of the sites were found to meet these criteria. Assigning the wrong policy designations to sites can do more harm than good. There are alternative local designations such as Public Open Space and Community Open Space which demonstrate sites are locally important. Such designations are effective and robust safeguards against the threat of inappropriate development.	SP2.2 Climate action		Alice Roberts	Campaign for	248	Community Interest Group
Street parks / green space per person. We note the council has a major task to support the delivery of new housing and we strongly support this objective. It is vital that, as housing density is set to increase, residents have access to nearby green spaces as well as larger green spaces, nature and sports pitches further afield. Access should be articulated per person to ensure it is meaningful and well located. The council should adopt a policy which actively promotes changes to streets so they can become safe places for recreation and play, in Areas of Deficiency, while also retaining access for emergency services and utility vehicles.	Noted. Improving access to the network of open space in the borough remains a key objective of the Local Plan, and is supported through a number of policy principles including 20 minute neighbourhoods and Active Travel. Further modifications are also proposed to policies SP2, SP3, DAA and S5 would promote the concept of Active Environments as well. Forming part of Ealing's Development Plan the London Plan provides clear direction through policy G4 around the significance of deficiency in informing planning decisions. Pending the preparation of a revised Green Infrastructure Strategy it has not been possible to prepare revised deficiency mapping. Once completed, revised mapping will be published as part of the Council's Authorities Monitoring Report. The AMR recognises that access can be expressed in terms of physical proximity to open space and in terms of the quantity of open space per head of population by geographical area (i.e. by ward), and the intention would be to continue to report against both measures.	SP2.2 Climate action		Alice Roberts	Campaign for	248	Community Interest Group

Water management policy is paramount. It is increasingly worrying that housing densification, while necessary, is set to put unprecedented pressure on water management in Ealing and across London. The council must adopt policies to reduce water stress and manage run-off flooding and pollution, including land-use and development policies which: [NOTE a number of these policies would also help to moderate air temperature and create habitat for nature.] -Protect front and back gardens from further conversion for parking -Promote reinstatement of natural surfaces in front gardens -Promote introduction of SUDS planters in front and back gardens if the reinstatement of a permeable surface is not possible -Enable land / 'grey space' to be used for on-street rain gardens / SUDS -Enable the creation of wetland SUDS in green spaces – and the council should create site allocations, clearly identified in the Local Plan -Promote use of grey and rainwater in existing and new developments -Promote reduced demand on water -Enable road drains to link to SUDS so road run-off is filtered -Promote the restoration and daylighting of rivers.	Forming part of Ealing’s Development Plan the London Plan also contains policies (SI 12 & SI 13) aimed at guiding development in a way which minimises flood risk and incorporates sustainable drainage principles. The London Plan forms part of Ealing's Development Plan, and the Council has made a conscious effort to avoid repeating provisions contained in this document in Ealing's Local Plan. This is deemed to be unnecessary and potentially unhelpful, and future development proposals will continue to be tested against SI 13, H2, G5 and other London Plan policies (i.e. G5), which are considered to provide good policy provision already for managing proposals involving the hard standing of gardens, changes to the green cover and to secure appropriate urban greening measures. Recognising the impact of climate change on water supply, London Plan policy SI 5 guides developments in a way which seek to minimise water use and manage pressure on water infrastructure. The Infrastructure delivery Plan (IDP) has dedicated sections on water supply, wastewater, and flood prevention. Flood prevention and mitigation within Ealing is the joint responsibility of the Lead Local Flood Authority (LLFA), Thames Water, and the Environment Agency (EA). Ealing Council engaged with all key stakeholders as part of the preparation of the IDP and will continue to do so going forward.	SP2.2 Climate action		Alice Roberts	Campaign for	248	Community Interest Group

Brent River Park and Warren Farm. There is a major opportunity to promote a clearer identity for the Brent River Park in the Local Plan. We support the idea for a new Regional Park and hope the council will work with the Brent River Canal Society who can help with expertise and strong local support for improvements for residents, visitors and nature. Warren Farm – we support the designation of the site as Local Nature Reserve and hope the council will propose it and other sites for SSSI or SINC status as appropriate, with Metropolitan importance where appropriate. Nature Management Areas and New National Nature Reserves. The Local Plan presents an important opportunity to identify sites to deliver on the London Mayor’s habitat creation targets and to identify sites which must be safeguarded for future surface water flood management. We strongly urge the council to consider the Brent River Canal Society proposals to create nature management areas and more generally to identify specific sites / ‘Site Allocations for Nature’ and for water management.	Support noted. In respect of Warren Farm as currently adopted the SINC designation (EaBI12) extends along the edge of the site only. The emerging SINC review proposes extending the SINC designation to cover the majority of Warren Farm, but omitting original buildings and existing areas of hardstanding. As a planning designation NCMA have not been identified or mapped since 2004. These were omitted from the 2012/2013 plan because ultimately their function and influence was more limited in a planning context. At the time the SINC network was extensively expanded, and so the designation became more redundant as many of the these areas were subsumed by an enlarged SINC network. Further extensions proposed as part of this latest local plan strengthens this decision further, and the majority of areas once designated as NCMA have now been absorbed into the SINC network. SINCS are a well established planning designation and arguably are a more effective planning tool. The SINC network doesn't operate in isolation either, with many areas including the Brent River Park being covered by a raft of other open space designations.	SP2.2 Climate action		Alice Roberts	Campaign for	248	Community Interest Group

Green Belt / MOL deletion. We are concerned that a number of the deletions are unjustified and in many cases would be extremely damaging to neighbouring protected land and/or would leave the site vulnerable to inappropriate development which would impact negatively on sensitive sites like riverside. ANNEX 1 Comments here are referenced to this document Microsoft Word - EPM 6 Atlas of Map Changes (ealing.gov.uk). Map 3 - GB2 and 3. We strongly object to the removal of the protection from the sites along the A40. We cannot see these are justified. Roads form part of Green Belt and are not removed simply because they are roads. Also this is an incredibly important part of a green chain. Its removal would also split the Green Belt in two which would leave the remaining sites more vulnerable / less defensible. Map 4. GB 4 and 5. We strongly object to these removals which we do not believe are justified. - Removals of GB protection along A40. This land forms an important Green Belt function and is a green corridor for nature's recovery and connects wider, larger pieces of Green Belt land. - 'Recycling site' and 'driving range' as marked on map: both of these sites form important, large areas of Green Belt connected to wider Green Belt and can and should be restored to provide sites for nature's recovery and/or sustainable water management. - Residential gardens at Ferrymead Avenue – this is very worrying as the site is next to the canal. Even if the site is private gardens, it should still be protected from development as it is part of an important waterside green chain and needs protection. Map 5 GB5 Broadmead Road. We strongly object to the removal of	Comments noted. GB/MOL boundary corrections reflect the current reality and use of sites. Ensuring GB and MOL sites have correct, up-to-date, and defensible boundaries is important as incorrect boundaries can undermine the integrity of the wider GB or MOL parcel. Designating areas that do not meet GB/MOL criteria to create theoretical and artificial green links is problematic. Similarly for private residential gardens having GB/MOL designation. Allotments do not require MOL designation for protection. Community Open Space designation is more appropriate and offers protection from development. In terms of MOL2, we only propose to remove the MOL designation from the eastern part of the site which is primarily in residential use. That part of the site does not meet the criteria for MOL designation and makes no contribution towards MOL objectives.	SP2.2 Climate action		Alice Roberts	Campaign for	248	Community Interest Group

Housing estate redevelopments - Where earmarked for demolition, consideration should be given to whether the estate could be redeveloped effectively with infill which should reduce the carbon footprint - All estate redevelopment / infill should ensure retention of and improved access to green and amenity open space, particularly when considered 'per person' where densification is envisaged - 'Grey space' should be targeted for infill – hardstanding, roads and car parks should be a priority to chime with transport objectives to reduce car use and ownership - Management of increased water use and water run-off should be a top priority to tackle water stress, pollution and flooding, by incorporating grey and rain water recycling and SUDS / rain gardens / SUDS planters.	Noted. Policy WLC 'Whole Life Cycle Carbon Approach' introduces locally the requirement for applicants to undertake an optioneering exercise as part of the Whole Life Cycle Carbon Assessment. The requirement to prepare Whole Life Cycle Assessment for referable applications is currently a feature of London Plan policy SI 2. Local Policy WLC extends this requirement to all major developments. The optioneering exercise seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option. The findings of this optioneering exercise should be considered alongside other planning considerations to determine the most appropriate option, including consideration of a retrofit first approach, and different building forms (heights). The 'options' considered should include reuse/refurb options, alongside any new build options (encompassing both replacement and infill options) if pursued. Directing built development to previously developed land remains an established feature of good planning practice and policy. This principle has shaped policy writing and is reinforced through various policies of the emerging Local Plan. Forming part of Ealing's Development Plan the London Plan also contains policies (SI 12 & SI 13) aimed at guiding development in a way which minimises flood risk and incorporates sustainable drainage principles. Recognising the impact of climate change on water supply, London Plan policy SI 5 guides developments in a way which seek to minimise water use and manage pressure on water infrastructure.	SP2.2 Climate action		Alice Roberts	Campaign for	248	Community Interest Group
We have strong objections to a number of the Site Allocations, mainly on the basis that they would constitute inappropriate development on protected land, without justification. The comments relate to this document Ealing_local_plan_report. AC10 - Haddon Court & Burghley Tower. We strongly object to this site being included for development as there is no clear justification for releasing this parcel of MOL. We do not see how 'existing use could be re-provided as part of the development' as stated in the assessment of the site's suitability for development. There are no special circumstances proven here.	AC10 has been withdrawn as a development site.	SP2.2 Climate action		Alice Roberts	Campaign for	248	Community Interest Group

19EA – Gurnell Leisure Centre. We strongly object to the removal of the MOL designation and to the inclusion of this as a site for development as there will clearly be a major impact on MOL. Though the site assessment states there is no impact because the designation will be removed, that is clearly an incorrect assessment / a circular argument. There is no clear justification for removing the designation and there will be extensive harm to this protected land and adjacent sites.	The existing Gurnell Leisure Centre (GLC) is innapropriate development on MOL, yet was a much needed and used facility for local people. There is a well-documented need to provide a new sports and leisure facility to replace the old one which was built in the 1970s and is now past its expected lifespan. An Alternative Sites Assessment (ASA) was undertaken to establish if the proposal could be delivered on an alternative site with either: (i) a greater degree of benefits, or (ii) a lesser degree of harm, than that of the existing GLC site. The ASA demonstrated that there are no other sites or combination of sites within the borough that are more suitable to deliver a new leisure centre and / or the requisite enabling residential development. Some level of enabling development will be necessary in order to provide a modern sports and leisure centre. In line with the new Local Plan’s enabling development policy, the quantum of any residential enabling development should be limited to the amount necessary to financially secure the delivery of the replacement leisure centre and open space improvements.	19EA Gurnell Leisure Centre		Alice Roberts	Campaign for	248	Community Interest Group

21EA Barclays Sports Ground. We strongly object to this site being allocated for development. It would be inappropriate development on MOL. The site is MOL 20 Park View Road sports ground. This Site Allocation listing incorrectly states there will be no impact on the MOL because the MOL designation will be removed. But, as Map 35 in the Atlas of Change shows, MOL 20 Park View Road sports ground will in fact remain as MOL, except one small piece is proposed for de-designation (though we do not accept that the de-designation of that small is justified in any event). This needs to be corrected in the assessment of Site 21EA's suitability for development.	Noted. The council is only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land that does not meet the criteria for MOL designation. The former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, including hockey. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. The main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt" category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled.	21EA Former Barclays Sports Ground		Alice Roberts	Campaign for	248	Community Interest Group
23EA Actonians Sports Ground. We strongly object to the inclusion of this site for development. It is protected MOL. There is no clear justification for the removal of protection from this site. No special circumstances have been shown to exist. It should be retained as MOL to ensure it is protected into the future. If the intention is for it to be retained as open space, then at a minimum it should be Local Green Space but, given the designations give the same strong protection, there seems no clear reason to remove the MOL protection.	Our proposals to reconfigure the site will not result in the loss of open space or sports provision. On the contrary, the proposals aim to improve the sports provision on the site and the overall appearance of the site. Some residential enabling development is likely to be necessary to achieve these goals.	23EA Old Actonians Sports Ground		Alice Roberts	Campaign for	248	Community Interest Group
EA30 Twyford Abbey – development on site MOL site has, as we understand, already been permitted, against much opposition, pointing to the importance of the site for nature conservation. The site allocation should reflect the need to protect the remainder of the site into the future and the MOL designation should remain in place for this purpose.	EA30 has been withdrawn as a development site.	SP2.2 Climate action		Alice Roberts	Campaign for	248	Community Interest Group

04GR Westway Cross – this site should only be developed on the current built footprint. The site is protected land and there is no clear justification for removing the protection.	Noted.	04GR Westway Cross		Alice Roberts	Campaign for	248	Community Interest Group
06GR Smiths Farm – this site is clearly part of the wider Green Belt and is inappropriate for development. The land is used as a depot and is open land, not developed. It is an important part of the wider open land and allowing it to be developed would cut out a central piece of land in the wider ‘parcel’.	The part of the site proposed for GB de-designation features a range of industrial uses, in addition to a used car dealership. It has been used for commercial purposes for the last 25 years. The most recent uses include a lorry park, workshops, storage, and plant yards. The existing use and appearance of the site create a noticeable break in the Green Belt between Northala Fields to the west and Smith’s Farm and Marnham Fields to the east. It also creates severance between the Green Belt parcels as there is no connecting route through the site. The use of the site has changed considerably since its initial designation as Green Belt. The existing use of the site makes no contribution to its Green Belt designation. On the contrary, it has a detrimental impact on the green link between Northala Fields to the west and Smith’s Farm and Marnham Fields to the east. The quality of the landscape is poor, with little greenness. The proposed re-development of the site should include improvements to the Green Belt and improved permeability and a through route for pedestrians and cyclists between Marnham Fields and Northala Fields. In the absence of the proposals going ahead, the site is likely to remain in its current inappropriate use, adversely affecting the quality and accessibility of the wider Green Belt parcel that also includes Northala Fields and Marnham Fields.	06GR Smiths Farm		Alice Roberts	Campaign for	248	Community Interest Group
NO04 - Islip Manor Housing Estate. This site is Green Belt and so inappropriate for development and the assessment states it is no longer viable as a development so this should be retained as Green Belt. It is clearly aligned with wider Green Belt. There are also mature trees and what is likely to be a SINC and these aspects should be protected and preserved.	NO04 has been withdrawn as a development site.	SP2.2 Climate action		Alice Roberts	Campaign for	248	Community Interest Group

NO15 West London Shooting Ground. We agree with the assessment that development on this site would comprise inappropriate development on Green Belt.	NO15 has been largely withdrawn as a development site with a new smaller site at Kingdom Workshop, Sharvel Road (09NO).	09NO Kingdom Workshop, Sharvel Road		Alice Roberts	Campaign for	248	Community Interest Group
02PE - Land on the South Side of Western Avenue. This site is protected land and it is not clear what justification is given for its removal from protection or for development.	The site forms a small island surrounded by built developments and the busy A40. It makes no contribution towards MOL objectives.	02PE Land on the South Side of Western Avenue		Alice Roberts	Campaign for	248	Community Interest Group
04PE - Alperton Lane South and Metroline Depot. We strongly object to this deletion as the site is extremely important as part of a green chain / habitat corridor and for managing the River Brent waters. As such, this should be retained as safeguarded as protected land.	Noted.	04PE Alperton Lane South and Metroline Depot		Alice Roberts	Campaign for	248	Community Interest Group
16SO - Warren Farm and Imperial College Land. This site should be designated in its entirety as a nature reserve with appropriate level SINC and/or SSSI status.	Noted.	16SO Warren Farm and Imperial College Land		Alice Roberts	Campaign for	248	Community Interest Group
04NO - Northolt Driving Range. There is no clear justification given for releasing this piece of Green Belt. It clearly performs the functions of Green Belt and is connected to wider areas of Green Belt which would be compromised if the designation was to be removed.	The land south of Rowdell Road has changed significantly since it was originally designated Green Belt many decades ago and it currently makes no contribution towards Green Belt purposes. There is an opportunity to make better and more efficient use of the land to provide an employment-led, mixed-use scheme, which incorporates improvements to active travel and the canal towpath. There is a well-documented need for more industrial space in London, as demand is increasing and diversifying, putting additional pressure on the affordability of industrial space, particularly for smaller businesses and business start-ups. The borough's need for additional industrial land, the lack of alternative sites suitable and available for industrial use, and the site's location adjacent to well-established Strategic Industrial Land, with good strategic road connectivity constitute the exceptional circumstances for changing its Green Belt designation. The former golf driving range site is proposed to be designated Locally Significant Industrial Site (LSIS).	04NO Northolt Driving Range		Alice Roberts	Campaign for	248	Community Interest Group

Northolt 06NO - Existing open green space and trees should be retained to ensure local residents have access to green space and to ensure surface water and air temperature can be managed effectively – and more generally this is a clear opportunity to create a corridor of green space to connect with other green spaces and create a green chain /corridor to support nature’s recovery.	Noted.	06NO Yeading Lane I		Alice Roberts	Campaign for	248	Community Interest Group
Northolt 07NO - Existing open green space and trees should be retained to ensure local residents have access to green space and to ensure surface water and air temperature can be managed effectively – and more generally this is a clear opportunity to create a corridor of green space to connect with other green spaces and create a green chain /corridor to support nature’s recovery.	Noted.	07NO Yeading Lane II		Alice Roberts	Campaign for	248	Community Interest Group
Northolt 08NO – Existing open green space and trees should be retained to ensure local residents have access to green space and to ensure surface water and air temperature can be managed effectively – and more generally this is a clear opportunity to create a corridor of green space to connect with other green spaces and create a green chain /corridor to support nature’s recovery.	Noted.	08NO Grange Court		Alice Roberts	Campaign for	248	Community Interest Group
Northolt 10NO – Existing open green space and trees should be retained to ensure local residents have access to green space and to ensure surface water and air temperature can be managed effectively – and more generally this is a clear opportunity to create a corridor of green space to connect with other green spaces and create a green chain /corridor to support nature’s recovery.	Noted.	10NO Airways Estate		Alice Roberts	Campaign for	248	Community Interest Group
08HA High Lane Housing Estate – Existing open green space and trees should be retained to ensure local residents have access to green space and to ensure surface water and air temperature can be managed effectively.	Noted.	08HA High Lane Housing Estate		Alice Roberts	Campaign for	248	Community Interest Group
05NO Medlar Farm Estates - Existing open green space and trees should be retained to ensure local residents have access to green space and to ensure surface water and air temperature can be managed effectively.	Noted.	05NO Medlar Farm Estate		Alice Roberts	Campaign for	248	Community Interest Group

I agree with the points made by Ealing Matters. The plan does not reflect the views of the residents.	Noted. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy. The case for enabling development exists entirely independently of Policy ENA, which serves to limit and define the scope of enabling schemes. The Council welcomes detailed feedback on the monitoring	General		Richard Jones		250	Individual
I would like to object to the number of high rise buildings in the local plan which I understand will house thousands of people. * are they for low rents *is the local infrastructure able to support these new people? Where are the new surgeries, hospitals and increased transport... I don't think this plan has been thought through and I object to it.	The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Angie and Mike Harris		251	Individual

I write to express my objection to the amount of tower blocks being proposed in the borough. I believe it will have a negative impact on existing residents already living here and will be detrimental to facilities and services that Ealing Council can provide along with other essential services such as doctors dentists etc	The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Laura Boyle		252	Individual
I am writing today regarding my concerns and objection of the considered plan of A residential Gypsy and Traveller site at the above location. We have major concerns of the welfare of our horses as the proposed site would be in a close proximity to our horses stables and adjoining fields as the business there now is not open 24/7 and closes of an evening at 6pm. All of our horses have passports and fall under the Animal Welfare Act therefore we have a duty of care to ensure our horses are housed and cared for properly and if the proposed site goes ahead this would affect our duty of care as we would not be complying to requirements of the stabled horse's as their needs could not be met due to the implications the proposed site will cause, therefore this would force the closure of the stables. Your proposed plan states “ explore the potential to work with the neighbouring farm to allow pasture for horses if appropriate” This would not be an option. It would be catastrophic to loose the proposed site, so on behalf of all at Down Barns Farm we ask you to please look for an alternative site.	Noted. Ealing Council would not want to lose the farm and understands its significance and importance. However, any decisions about the future of the farm must be seen in the wider context of the freeholder's ambitions to close not just the lorry repair/maintenacance yard but to build a sizeable development on the entire farm. These proposals have been resisted by the council primarily because the land continues to be protected primarily as Green Belt with the exception of the proposed release of site 09NO.	09NO Kingdom Workshop, Sharvel Road		Julie Middleton	Down Barns Farm	253	Individual

There is a need for affordable and genuinely affordable i.e. units. The latter of which we have very little considering how much deprivation there is in LBE & also low paid workers and key workers. And as someone who was brought up on a council estate in late 40s that was well built (still there unlike the S.Acton Estate) and consisted of houses, flats and bungalows all interspersed with other housing I feel such housing is lacking in Ealing. There are a few left over from this period of building in the Borough but not many. I have also noticed that in other London Boroughs a certain amount of retrofitting has been going on in social housing and what I would call – just general tarting up. Brunswick Square- to quote “The Brunswick Centre was a rain-streaked, litter-strewn concrete monstrosity that seemed destined for the bulldozer. Then someone gave it a lick of paint.” {Image of Brunswick Square?} {Name redacted} on a rebirth offering hope for some of Britain's ugliest buildings. In LBE it is just demolish demolish demolish.	Noted.	SP4.3 Genuinely affordable homes		Susan New		254	Individual
I want to raise objections to the local plan. The borough cannot support the huge increase in housing being proposed. The building of more high rise flats is contrary to previous decisions and will permanently change the nature of the borough into a high rise council. This is not in keeping with the existing character of the borough and is not environmentally sustainable. Net zero plans are patently not realisable with this huge amount of building and materials and ongoing resource requirements. Additionally the housing is not affordable which is where the requirement is. Wealthy investors, many from abroad will push the prices of the developments way beyond the means of young people in Ealing. I strongly oppose this ill thought through proposal.	Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Policy SP 4.3 sets objectives for delivering more genuinely affordable housing.	General		Shona Milne		255	Individual

Lack of compliance with LPG requirement for joined-up Future Cycle Network The Mayor’s London Plan Guidance (LPG) document “Sustainable Transport, Walking and Cycling LPG”, November 2022, sets out a requirement that: “3.1.4 Development Plans should highlight future plans for cycling, including through a map of a joined-up future cycle network of strategic routes and local links. This should clearly distinguish between existing continuous and safe cycle connections that are already of adequate quality; existing cycle connections that need upgrading or improving; and future cycle connections that will need to be provided to address gaps in the network. The identification of existing cycle routes should carefully consider the quality of the cycle experience; where historic routes (e.g. the discontinued London Cycle Network) are not fit for purpose, and cannot be improved, alternatives should be identified.” A diagrammatic indication of future “active travel routes” can be seen on plan SS3, at page 91 in the Regulation 19 Local Plan. This is insufficiently detailed to show the full future cycle network, but more detailed maps can be found at the Spatial Strategy plans on pages 105, 155, 233, 273, 309, 353 and 383. These include “Primary Active Travel Routes”, “Secondary Active Travel Routes” and “Green Links”. The same information is shown in the seven Town Regeneration Framework documents published with the Local Plan. There are a number of differences between the two versions. An example is Mattock Lane, which is shown as a Secondary Active Travel Route on the Spatial	The Cycle Network Plan, which is submitted as a suggested addition to the Local Plan evidence base, answers the requirement for a joined-up future cycle network to show Ealing's ambitions for core strategic routes and local links. Subsequent discussions with Ealing Cycling Campaign have resulted in close alignment on the finalised Cycle Network Plan. Each town's spatial strategy in the Local Plan will have a list of suggested modifications, which will replace the current legend ('Primary Active Travel Route', 'Secondary Active Travel Route' and 'Green Links') with the routes shown in the Cycle Network Plan, so that the spatial strategies are fully aligned with the proposed cycle network.	SP2.2 Climate action		Peter and Angela Mynors	Ealing Cycling	256	Community Interest Group

In order to check the LPG requirement for a “joined-up future cycle network”, ECC have produced a composite plan for the whole borough, as shown on attachment ECC/LP2024/1. As can be seen, the Primary Active Travel Route network is not continuous. For example: ☐ The route alongside the A40 in Acton does not continue on the Ealing map; ☐ There are various routes in Hanwell that do not continue into adjacent towns; ☐ The route along Northfield Avenue doesn't continue south. The maps do not meet the LPG requirement to "clearly distinguish between existing continuous and safe cycle connections that are already of adequate quality; existing cycle connections that need upgrading or improving; and future cycle connections that will need to be provided to address gaps in the network." Where sections of historic routes (e.g. the discontinued London Cycle Network) are not fit for purpose, and cannot be improved, alternatives have not been identified. In parallel with the Local Plan, the council has produced a draft Cycle Network Plan (CNP) on which comments are being sought by 6 April 2024. This contains many differences from the network shown in the Local Plan. The Strategic Links shown on the draft CNP include a number of links that are identified as Green Links in the Local Plan, and which are not available for 24 hours a day and therefore fail to meet the LPG requirement (para 3.1.5) that future cycling infrastructure should “serve those who cycle at night”. The Mayor’s latest Cycling Action Plan – 2 published in June 2023	The Cycle Network Plan, which is submitted as a suggested addition to the Local Plan evidence base, answers the requirement for a joined-up future cycle network to show Ealing's ambitions for core strategic routes and local links. Subsequent discussions with Ealing Cycling Campaign have resulted in close alignment on the finalised Cycle Network Plan. Each town's spatial strategy in the Local Plan will have a list of suggested modifications, which will replace the current legend ('Primary Active Travel Route', 'Secondary Active Travel Route' and 'Green Links') with the routes shown in the Cycle Network Plan, so that the spatial strategies are fully aligned with the proposed cycle network.	SP2.2 Climate action		Peter and Angela Mynors	Ealing Cycling	256	Community Interest Group

Failure to meet LPG Quality and Alignment requirements The LPG includes the requirement that: "3.12: ...Routes should meet TfL's New Cycle Route Quality Criteria." https://content.tfl.gov.uk/cycle-route-quality-criteria-technical-note-v1.pdf This document includes the following criteria: "Criteria 1: ...The design of new cycle routes should only mix people cycling with motorised traffic where there are fewer than 500 motor vehicles per hour (vph – two-way) at peak times, and preferably fewer than 200vph." and "Criteria 3: ...Where new routes are designed for people cycling to be separated from other traffic, the width of the lane or track should be provided to a preferred minimum of 2.2m for one-way cycle lanes or tracks, and 3.0m for two-way cycle lanes or tracks... An absolute minimum of 1.5m for one-way cycle lanes or tracks, and 2.0m for two- way cycle lanes or tracks applies." Some of the proposed Primary Active Travel Routes carry well over 500 motor vehicles per hour at peak times, but have sections that are too narrow to install protected cycle lanes of the required width. Examples of these include: • South Ealing Road • Northfield Avenue • Greenford Avenue Unless the council can reduce motor traffic to substantially less than the present volume (which seems unlikely given there are no plans for this in the Local Plan), it will need to find alternative alignments for the relevant sections of these routes. The LPG says: "3.1.2 Where further study is required to confirm a specific alignment, options under consideration should be shown." The Local Plan shows no	The Cycle Network Plan, which is submitted as a suggested addition to the Local Plan evidence base, answers the requirement for a joined-up future cycle network to show Ealing's ambitions for core strategic routes and local links. Subsequent discussions with Ealing Cycling Campaign have resulted in close alignment on the finalised Cycle Network Plan. Each town's spatial strategy in the Local Plan will have a list of suggested modifications, which will replace the current legend ('Primary Active Travel Route', 'Secondary Active Travel Route' and 'Green Links') with the routes shown in the Cycle Network Plan, so that the spatial strategies are fully aligned with the proposed cycle network. The Core routes shown on the Cycle Network Plan indicate Ealing's ambition to deliver LTN 1/20 compliant cycle routes. However, in places the actual positioning of the route will vary, and may follow a nearby parallel route if the physical constraints on the core road are too significant to overcome. The Other Key routes shown on the Cycle Network Plan indicate roads on which it is not considered feasible to achieve LTN 1/20 compliant cycle provision, but on which it is still an ambition to provide upgrades and improvements, as they are key connecting routes.	SP2.2 Climate action		Peter and Angela Mynors	Ealing Cycling	256	Community Interest Group

Failure to include Additional Land Requirements The LPG states that: “3.1.6 Development Plans should safeguard and, where appropriate, identify land to improve the network of strategic cycle routes and local cycle links.” For some of the proposed Primary Active Travel Routes, the only way to install a cycle route of the required quality would be through the acquisition of land. Examples of such locations are: • East of the Lido Junction (the junction between the A4020 and Northfield Avenue), on the south side of the A4020). Land is required to enable enough width to meet the Cycle Network Quality Criteria. • Land to the rear of Central Chambers is required for off-street servicing, to enable the proposed south-north cycle route past Ealing Broadway Station. • Land alongside Windmill Lane. • Land alongside Horsenden Lane North. None of this land has been identified in the Local Plan. {Suggested modification:} As part of the council's detailed look at the feasibility of the proposed Cycle Network, it should identify locations where land will be required for widening or to provide rear servicing necessary to complete the cycle network (such as at Station Broadway, Windmill Lane etc.) Such locations should be identified on the Spatial Strategy plans, to meet the requirement of para 3.1.6 of the LPG. Regarding the Lido junction in West Ealing, in ECC’s response to the 2007 Local Plan we suggested that land should be safeguarded on the south side of the A4020 to enable the widening of the	Noted. Land acquisition is an expensive and resource intensive process and it is therefore considered to be not expedient to safeguard the specific land parcels identified at this point in time.	SP2.2 Climate action		Peter and Angela Mynors	Ealing Cycling	256	Community Interest Group

Failure to co-ordinate links to Neighbouring Boroughs The LPG sets out a requirement that: "3.1.4 Planning authorities should coordinate with those around them to ensure cycle routes directly connect across administrative boundaries to form a cohesive network, as part of cross-boundary working requirements (highlighting these connections as relevant)." The attached document ECC/LP2024/1 includes at sheet 3 the proposed Ealing Local Plan Primary Active Travel Routes, together with the most recent publicly available cycle networks from neighbouring boroughs. There are a number of places where these don't connect: {listed under separate rows} {Suggested modification:} Where there are discontinuities between the cycle networks in Ealing and neighbouring boroughs, the council should liaise with the neighbouring boroughs with a view to agreeing cross-boundary routes before the Cycle Network is finalised. If agreement cannot be reached before the EIP the relevant connections should be highlighted in the Local Plan, as required at para 3.1.4 of the LPG. (Appendix: ECC/LP2024/1 includes at sheet 3 the proposed Ealing Local Plan Primary Active Travel Routes, together with the most recent publicly available cycle networks from neighbouring boroughs}	Ealing has coordinated with its neighbouring boroughs during the development of the Cycle Network Plan. Some neighbouring boroughs are currently developing their own cycle route maps, and are taking Ealing's into account; others are not at this stage, but are aware of our ambitions. Most of the routes listed below are connected across the borough boundary on the ground, with continuing cycle provision, with some given different labels (e.g. Core route) by each borough.	SP2.2 Climate action		Peter and Angela Mynors	Ealing Cycling	256	Community Interest Group
Hillingdon (Proposed Cycle Routes LIP 2019-2041) • Seva Drive, over canal into Minet Country Park (not continued in Hillingdon) • West End Road (not continued in Ealing) These cross-boundary connections are not highlighted in the Local Plan.	• ~~S~~eva Drive: Minet Country Park is a destination and does not require directly connecting routes. Hillingdon have an existing route west from Beaconsfield Rd that crosses the Parkway by a subway. In their recently consulted-on draft Cycling Strategy they propose a route to connect to this existing route, and run it south to connect the park to the former Nestle factory. • ~~W~~est End Road: West End Road is shown as a Core cycling route on the Cycle Network Plan.	SP2.2 Climate action		Peter and Angela Mynors	Ealing Cycling	256	Community Interest Group

Harrow (Strategic Cycle Network 2019) • Field End Road (not continued in Ealing) • Route through Grove Farm to Wood End Road (not continued in Harrow) These cross-boundary connections are not highlighted in the Local Plan.	• Field End Road: There is a narrow bridge at the border, making a connecting route difficult. There is a minor route on Eastcote Lane on the Ealing side. • Grove Farm: There is a parallel path on the Harrow side, and we welcome discussion about the feasibility of making this a cycle route.	SP2.2 Climate action		Peter and Angela Mynors	Ealing Cycling	256	Community Interest Group
Brent (Local Plan 2019-2024) • Route along Whitton Avenue East (not continued in Brent) • Manor Farm / Alperton Lane (not continued in Ealing) These cross-boundary connections are not highlighted in the Local Plan.	LB Brent are currently working on an updated Cycle Network Plan which will take account of Ealing's route proposals. The canal towpath route is shown through both boroughs, in agreement with Brent officers. • Whitton Avenue East: Whitton Avenue East is shown as an Other Key Route in the Cycle Network Plan, indicating that we aim to provide improvements wherever possible to this route, though it is not feasible to reach LTN 1/20 standard. • Alperton Lane: Alperton Lane and Manor Farm Road are shown as Other Key Routes in the Cycle Network Plan, indicating that we aim to provide improvements wherever possible to this route, though it is not feasible to reach LTN 1/20 standard. The onward connection via the A40 subway is shown.	SP2.2 Climate action		Peter and Angela Mynors	Ealing Cycling	256	Community Interest Group
Hammersmith and Fulham (Recommended Cycling Routes 2024) • Agnes Road (not continued in Hammersmith and Fulham) These cross-boundary connections are not highlighted in the Local Plan.	• Agnes Road: Agnes Road is shown as a Neighbourhood route on the Cycle Network Plan. We are discussing with Hammersmith & Fulham officers regarding the continuation of this route into Hammersmith & Fulham.	Policy SP2: Tackling the climate crisis		Peter and Angela Mynors	Ealing Cycling	256	Community Interest Group

Hounslow (Cycle Network 2018 draft) • Bollo Lane (not continued in Hounslow) • South Ealing Road (not continued in Hounslow) • Northfield Avenue (not continued in Hounslow) • Merrick Road / Norwood Road (not continued in Hounslow) • North Hyde Lane (not continued in Ealing) • Western Road (not continued in Hounslow) These cross-boundary connections are not highlighted in the Local Plan.	Ealing and Hounslow officers have discussed the whole borough boundary length in terms of deliverable cycle routes to ensure that ambitions are understood even where routes are not shown on both boroughs’ strategies. Hounslow are bringing forward an updated cycle route plan which takes account of Ealing's Cycle Network Plan. •Bollo Lane: All roads nearby are busy and narrow, not conducive to cycling. Bollo Lane will be complex to bring up to an acceptable standard, with the potential added complexity of level crossing closures due to the West London Orbital link. But it remains a key link across the boundary, and is shown as an Other Key Route on the Cycle Network Plan. •South Ealing Road South Ealing Road is shown partly as a Core route, with the route diverting onto parallel roads to the east, down to the Hounslow boundary. •Northfield Avenue Northfield Avenue is shown as an Other Key Route on the Cycle Network Plan. •Merrick Road / Norwood Road Shown as a Core Cycling Route on the Cycle Network Plan. •North Hyde Lane The connection from North Hyde Lane across the towpath into	SP2.2 Climate action		Peter and Angela Mynors	Ealing Cycling	256	Community Interest Group

Unsound grouping of Walking and Cycling routes as 'Active Travel Routes' Ealing's Local Plan shows walking and cycling routes combined as Primary and Secondary Active Travel Routes. The plan's glossary defines Active Travel as "modes of travel that involve a level of activity, including trips made by walking, cycling, wheelchair, mobility scooters, adapted cycles, e-cycles, scooters, as well as cycle sharing schemes." However no definition is included in the Glossary for "Active Travel Route" nor "Green Link", both of which terms appear on the Spatial Strategy plans. Grouping walking and cycling together on the same routes goes against the requirements of the LPG, which has separate guidance for assessing where walking and cycling routes should run. For walking: "2.1.1 Development Plans... should include a map of locations that require an improved pedestrian environment... These routes and locations should be identified based on existing and potential levels of walking density and footway crowding; and an assessment of key trip attractors, significant points of severance and areas of road danger." For cycling a completely different assessment is required: "3.1.2 Development Plans should identify strategic cycle routes based on the corridors in TfL's Strategic Cycling Analysis and the National Cycle Network..." These two different assessments will result, in the main, in different routes and areas being identified. Walking and cycling should not be grouped together under the same heading. The Local Plan is unsound in this respect.	The Cycle Network Plan, which is submitted as a suggested addition to the Local Plan evidence base, answers the requirement for a joined-up future cycle network to show Ealing's ambitions for core strategic routes and local links. Subsequent discussions with Ealing Cycling Campaign have resulted in close alignment on the finalised Cycle Network Plan. Each town's spatial strategy in the Local Plan will have a list of suggested modifications, which will replace the current legend ('Primary Active Travel Route', 'Secondary Active Travel Route' and 'Green Links') with the routes shown in the Cycle Network Plan, so that the spatial strategies are fully aligned with the proposed cycle network.	SP2.2 Climate action		Peter and Angela Mynors	Ealing Cycling	256	Community Interest Group

I attend St Nicholas Church in Perivale and we are subjected to having Double Yellow Lines with blips surrounding our place of worship, that prevents us from being able to allow disabled people to be dropped at our kerb entrance in wheelchairs or those with walking aids i.e. sticks etc. We run a food bank and a homeless shelter and unloading food and equipment also causes us problems. We asked for help from the council but they are unwilling to help us, is it because we are Christian? It feels like it is. The council leaders notes make no mention of our faith see: Creating and sustaining communities - Around Ealing {link} So I ask what about the Christian community's in Ealing? Please be more inclusive and considerate to facilitate our worship especially at St Nicholas in Federal Road, Perivale. We need help to resolve our access problem and complying with Cannon Law to provide for funerals weddings etc.	Noted. Although this is an operational matter and beyond the scope of the Local Plan, meetings were arranged between the representor and the relevant service, in this case the Highways Dept to try and seek either a resolution or discuss possible options going forward.	Policy P1: Perivale Spatial Strategy		Phil Rynhart		258	Individual

LB Hounslow response to Ealing’s Local Plan, Final Proposals (Regulation 19 consultation) Thank you for consulting LB Hounslow (LBH) on the Regulation 19 draft of the New Local Plan for LB Ealing (LBE). We are also grateful for the opportunity to discuss the plan with Ealing officers at a duty to cooperate meeting on Friday 5th April 2024, and for the 1 week extension to provide our comments. Having reviewed the Regulation 19 draft Local Plan document and supporting evidence base documents LBH have the following comments to make. Overall Spatial Strategy We support the spatial approach to the New Local Plan based around the core themes of ‘Tackling the Climate Crisis (as set out Policy SP2), Fighting Inequality (SP3), and Creating Good Jobs and Growth (SP4), and the place interventions which flow from these. LBH note the high 10 year housing target set for LBE by the London Plan and the need to maximise the delivery of genuinely affordable, good quality homes for residents. LBH also note LBE’s policy position on maintaining the existing supply of industrial land on designated and undesignated sites and adding to this where possible, growing the size and range of the employment offer and the potential for mixed commercial development in town centres, and delivering affordable workspace to serve broader social or economic purposes and support SMEs.	Noted. Support welcomed.	General		Duncan Mckane	Hounslow Co	259	Statutory Body

Traffic and Cumulative Highways Impacts LBH note that no Highways Impact Assessment or Strategic Transport Study has been completed to support the Regulation 19 consultation draft plan. Having reviewed the draft plan, and the LB Ealing Five Year Housing Land Supply Position Statement and Housing Trajectory (November 2023), LBH note the significant anticipated housing and mixed-use delivery in the Southall area, as well as high levels of delivery in the Ealing and Acton areas, over the plan period. LBH note many sites in these locations are allocated to have no/low levels of car parking, and that town centres should be supported by sustainable and active travel options. LBH note the findings of Ealing’s IDP Part 1: Infrastructure Baseline Report (2024, p.47) relating to the potential for increased congestion impacts over the plan period. LBH also note the measures set out in the IDP Part 2: Infrastructure Delivery Schedule which have been proposed to address these impacts. LBH would be keen to understand how these measures would help to address potential additional congestion impacts on key roads which cross the boundary, namely at Hayes Road/ Western Road/Southall Lane, South Ealing Road, Syon Lane/Windmill Lane, and Lionel Road North. We would therefore be particularly interested to see any further work on the potential cumulative impact on the transport network relating to anticipated housing and mixed-use delivery in these areas should statutory bodies request that LBE undertake this.	Ealing has not had sufficient funding to complete a Strategic Transport Study to support the development of the Local Plan. Modelling the whole borough transport network would be a very significant piece of work which Ealing has not had the budget for, in the context of 40%+ cuts to LIP funding from TfL since Covid. However, as part of the forthcoming Transport Strategy (still in draft), there will be a more substantial evidence base (though not up-to-date modelling for the whole borough) and the Strategy will specifically address the expected development in each town, noting expected transport pressures and proposed mitigations. Ealing has recently completed, in partnership with TfL, a piece of strategic transport modelling for Northolt, which explored the impacts of the Local Plan development scenario on the Northolt transport network. It is proposed to undertake a similar modelling exercise for Southall as soon as possible, to take account of the significant development proposals for Southall, including the Green Quarter. This will be discussed with LBH in more detail as it relates to connections across the boundary, particularly Western Road. We welcome cooperation and alignment with LBH on transport matters and will be keen to see the completed Local Transport Impact Assessment when complete.	General		Duncan Mckane	Hounslow Co	259	Statutory Body

Brentford-Southall Rail Link LBH previously raised the issue of sufficient policy support for the Brentford-Southall Rail Link in the draft Regulation 18 version of the Ealing New Local Plan (please see representation submitted November 30th 2022). LBH note the changes to policy SP4: Creating Good Jobs and Growth, G., (i) to include explicit support for the Brentford to Southall line as part of the strategic infrastructure enhancing east-west and north-south connectivity. We also note the mention of the scheme in supporting text at paragraphs 2.20 and 3.52, and the inclusion of the project as a rail infrastructure scheme in Table 221: Borough wide infrastructure schemes. We welcome these amendments which provide a sufficient level of support and commitment for this key transport infrastructure scheme in LBE's emerging policy. This change will help LBH and LBE to better coordinate cross-boundary infrastructure improvements which will ultimately improve connectivity and sustainable transport movements between both boroughs. LBH will continue to share information relating to the Brentford-Southall Rail Link with LBE as the project develops, and would be happy to agree positions in a statement of common ground to this effect.		SP4.1 Good Growth		Duncan Mckane	Hounslow Co	259	Statutory Body
Ealing Regional Park LBH note the new proposals for a new 'Ealing Regional Park' in the draft Local Plan, specifically in Policy SP2: Tackling the Climate Crisis, G., (vi) and Policy E1: Ealing Spatial Strategy, G. At our most recent duty to cooperate meeting, LBE officers suggested that while the project is still at an early stage (feasibility and design), it may be appropriate to cooperate further on the potential delivery of a regional park extending across the borough boundary and along the Brent River Valley. It is considered that any future cooperation on this matter should be informed by input from other teams in the Council (notably our Parks and Green Infrastructure Team), but LBH are happy to continue discussions under the duty to cooperate and possibly agree positions within a statement of common ground on this matter if deemed appropriate.	Ealing has recently completed, in partnership with TfL, a piece of str	SP2.2 Climate action		Duncan Mckane	Hounslow Co	259	Statutory Body

11SO The Green Quarter (Southall Gasworks) LBH note the extant outline permission for a significant mixed-use scheme including residential, employment uses, a school and health centre, and that a new masterplan is to be agreed for the site to guide delivery of this key regeneration site. Given the location and scale of this site close to the borough boundary, and the potential for traffic and transport impacts in the borough, LBH transport planners wish to be involved in any future scoping of Transport Assessments relating to the site.		11SO The Green Quarter (Southall Gasworks)		Duncan Mckane	Hounslow Co	259	Statutory Body
16SO Warren Farm and Imperial College Land LBH note the allocation of this site on MOL land near the shared boundary for an outdoor sports facility and nature reserve. We have no further comments on this site allocation at present but wish to be consulted on future planning applications at an early stage as this may have impacts across the borough boundary.	Response to the point about generating traffic at source: the Local P	16SO Warren Farm and Imperial College Land		Duncan Mckane	Hounslow Co	259	Statutory Body
23EA Old Actonians Sports Ground LBH note the allocation of the open space site near the shared boundary for enabling residential development with retention of green space to support improved leisure/sports facilities (primary use). We have no further comments on this site allocation but would wish to kept informed of any response by TfL especially in relation to any impact on the A406.	Noted.	23EA Old Actonians Sports Ground		Duncan Mckane	Hounslow Co	259	Statutory Body

LOCAL PLAN H1 C Tackling the climate crisis. There is no mention of sustainable building, and building is what the spatial policy concentrates on. Much of what is written here is not a well-thought out plan, with concrete suggestions. Rather it is a list of intentions. Whether they will be fulfilled or not remains to be seen. (iv)What is the new Brent Valley Park? The plans - apart from widening the towpath and I can't see how that can be done - don't mean anything. D The plan for Hanwell does not show us any realistic plan for conserving or enhancing heritage assets throughout the development sites - or anywhere else. E (i)How are they going to expand 'the offer and critical mass of services and employment in Hanwell'? Where are they going to concentrate - on retail, on workspace, in offices - there is nothing here to even give us a clue. (iii) Integrated development of the area around Ealing Hospital - the land around the hospital has already been developed so I guess they mean the development of the hospital car park. A 12-storey building on the car park immediately in front of the hospital is simply over development, especially if it is supposed to deliver 'mixed and commercial uses'. Table H1 This puts down many ideas for infrastructure but nothing really planned as can be seen from the Delivery Phasing column which is mainly TBC. Have they even been discussed with the Providers? Probably not deliverable. 4.4.41 'Housing and mixed development' - what does this mean? <u>Nothing is specified and there is no explanation of 'mixed</u>	Noted. Policies in the plan must be read as a whole including those contained in the London Plan, which is an integral part of Ealing's local development plan. This includes, for example, policies on design, sustainability, heritage, flood risk and measures to support active travel and Healthy Streets. Policy WLC in Chapter 5 deals with the need for whole life cycle carbon approach. It seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option. The findings of this optioneering exercise should be considered alongside other planning considerations to determine the most appropriate option, including consideration of a retrofit first approach. The 'options' considered should include reuse/refurbish options, alongside any new build options if pursued. All options evaluated should be capable of comparison reflecting the same best practice standards. Proposals for a new new regional park are set out at Policy SP2.2 G (vi) and detailed plans are currently being drawn up by the council and more information will emerge in due course. New development in Hanwell must respond positively to Hanwell's character and identity and seek to enhance it. Policies on heritage are set out in detail in both the London Plan and elsewhere in Ealing's local plan. Mixed use development is development for a variety of activities on single sites or across wider areas such as town centres.	Policy H1: Hanwell Spatial Strategy		Janet Sacks		260	Individual
01HA Ealing hospital frontage: Disagree that the site is suitable for a tall building. It is directly in front of the hospital, right by where the ambulances go to a&e, and there is no space between the hospital and the proposed development site, which will permanently cut off light from the hospital. There may well be privacy issues too. There is no infrastructure for well-being for people living in a 12-storey building on the busy, polluted Uxbridge Road. There are no plans to mitigate climate change caused by the construction and the number of people living there. No requirements for sustainable building or the use of recycled resources.	Noted. Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study. Heights are to range up to a maximum of 12 storeys (42m) stepping down from the recently redeveloped high rise high density residential development at St Bernard's Gate. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	01HA Land to the front of Ealing Hospital		Janet Sacks		260	Individual

02HA Gray's Garage: The jobs that exist will be taken away and no other permanent employment provided. Once again there is no infrastructure provided for the expanding population living in 6-storey blocks on the busy Uxbridge Road, and no parking. No plans to mitigate climate change caused by the construction and the number of people living there. No requirements for sustainable building or the use of recycled resources. The area has a certain character with the cottages there.	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to the heritage aspects of the adjoining St Mark's Church & Canal Conservation Area to the south and the Hanwell Clock Tower Conservation Area to the north-east. It is proposed that a mixed-use development that provides residential, commercial space and public open space should come forward therefore ensuring some employment opportunities in the future. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments. Key infrastructure requirements for the site are listed.	02HA Gray's Garage		Janet Sacks		260	Individual
03HA George Street car park: Parking is being removed for businesses in the local area and also the disabled. There is no other area for parking in Hanwell. It is an important local amenity. This is destroying the local character of the Clock Tower Conservation Area. It is a square of mainly low rise cottages and the proposed 6-storey building is in the middle.	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to heritage aspects of the adjoining St Hanwell Clock Tower Conservation Area to the east. The design principles for the site seek to ensure that the height of any development proposals takes into consideration the 2 storey terraced cottages fronting the site, with scale and massing responding sensitively to the low-rise surrounding housing. They should reflect the fine-grained character of neighbouring streets. A mews style development is proposed to reflect existing adjacent residential development, with tree planting and soft landscaping to improve the public realm. The site also benefits from a relatively good public transport accessibility level.	03HA George Street Car Park		Janet Sacks		260	Individual
04HA Lidl and discount store site: There is no community service provision, ie medical, educational or recreation. No plans to mitigate climate change caused by the construction and the number of people living there. No requirements for sustainable building or the use of recycled resources.	Noted. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments. Key infrastructure requirements for the site are listed.	04HA Site of Lidl and discount store		Janet Sacks		260	Individual
05HA Marshall site and area: This is an 8-storey building, once again ruining the low-rise character of Hanwell on the edge of the Clock Tower Conservation Area, and is on the busy, congested Uxbridge Road. No provision for children, the elderly and disabled. No plans to mitigate climate change caused by the construction. No requirements for sustainable building or the use of recycled resources.	Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study. It is proposed that a new community space on the southern part of the site is provided. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	05HA Marshall Site, Gold's Gym & Garages on Montague Avenue		Janet Sacks		260	Individual

06HA Tile Deposit: Once again, this development is taking away long term employment in Hanwell. No provisions detailed for medical, educational, and recreational needs, or for children, the elderly and disabled. No mitigation for climate change.	It is proposed that affordable and assisted housing be reprovided alongside the provision of new residential and community uses. In addition, Chris Payne House will be retained. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	06HA Tile Depot & Lambourn Close		Janet Sacks		260	Individual
07HA Copley Close: This is a long thin space and not suitable for a building of 7 storeys. The plan says there is a problem of parking on pavements but no mitigation plans. No plans for health facilities.	This site is part of a larger estate regeneration project, much of which has already been completed and is subject to a masterplan. The allocation already notes that cars are parked along the length of Copley Close with many parked on pavements. It also notes that the public realm is poor quality and B168nd pedestrians and cyclists are not prioritised. Future development will seek to tackle these issues. Key infrastructure requirements for the site include the need for health facilities.	07HA Copley Close Estate		Janet Sacks		260	Individual
08HA High Lane: No mention of employment provision. The people who were there previously will not be able to afford to go back and live there. Over-reliance on the Brent River Park and no other provision. No sustainable building requirements or provisions for the wildlife lost, eg swift blocks or any planting.	Affordable and assisted housing will be reprovided alongside the provision of new residential and community uses. This means that any existing residents who wish to remain at High Lane will be offered a home. Given the residential character of the neighbourhood, large-scale industrial or commercial development is not considered appropriate. The allocation also proposes to create green, pedestrian and cycle links to Mayfield Local Park and the Brent River Park. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	08HA High Lane Housing Estate		Janet Sacks		260	Individual

4.4.3 Inaccurate as Hanwell is mentioned in the Domesday Book and has existed ever since. 4.4.8 - 4.4.10 The plan only aims are 20 minute neighbourhoods and affordable housing, but there is no employment plan for residents. The housing is all by private contractors and sold privately. No plans for infrastructure, such as community centres, GPs and schools/further education centres. No provision for extra electricity generation, waste disposal and clean water. (The Brent River is already polluted by sewage outlets). No plan for flood relief and Gurnell, which is the main flood plain for the Brent River, is designated for development. H1 A Economic development: there are no details on what we develop and how it will be done. D Social: the design of buildings does not address inequality , which is one of the Plan's aims. 4.4.32 Social: No specific housing for low-income people, older people or people with special needs. Environment: The plan talks about improving connections and there has been no consultation about connection, no connection with people living in the area and no overall plan. 4.4.38 The plan says it demonstrates infrastructure schemes but have forgotten doctors, schools, community centres and recreation which should all be within 20 minutes walk. Specific areas The layout of the Plan is confusing and there is no clear indication of the type of construction that is going to take place. Tall building heights are excessive and unjustified as Hanwell is meant to be a low	Noted. The Domesday Book was completed in the 11th century, and therefore the description at paragraph 4.4.3 is considered to be accurate. Creating good jobs and growth is one of three core themes underpinning the Local Plan, and is articulated through various policies namely SP4, various town based policies, E3, E4 & E5. The Infrastructure Delivery Plan (IDP) forms a key element of the Local Plan's evidence base, setting out the infrastructure that will be required to support the planned growth across the borough. Local Policy HOU 'Affordable Housing' establishes clear targets/paramaters aimed at securing the right quantum and type of affordable housing to meet the identified need. Forming part of Ealing's Development Plan the London Plan establishes clear requirements for supported and specialised accommodation, including for older persons. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The scope of each allocation reflects the unique circumstances of each site and opportunity. The allocations do not operate in isolation of other policies. As explained in the plan the development sites form the adopted policy for each of these specific sites and will not restate all relevant development plan policies; however all proposals are expected to accord with the development plan as a whole, as well as any local placemaking	Policy H1: Hanwell Spatial Strategy		Beryl Pankhurst	Hanwell Villa	261	Individual

H2 Economic: Destruction of open space only for housing and buildings are not sustainable ie not passive housing (Pasivhaus) encompassing energy efficiency, comfort and affordability. Social: No infrastructure plans for care in the community. 12-storey construction blocks on main roads which have constant traffic jams and subjects children to damaging pollution. Environment: No plans for sustainable production of energy and issues already noted above, along with loss of wild life (critical now) from the the Brent River Park due to overuse and sewage disposal. (v) Local festivals - these already result in environmental degradation such as the Hootie on Brent Meadow. 4.4.1 'Opportunities for housing and mixed development'. No specifics or explanation of terms. 4.4.44 'Dense walkable and integrated urban environment' does not address problems that exist between bikes, scooters and walkers, and transport concentration causing noise and air pollution eg Hanwell Broadway. 4.4.51 'Flood risk' - there are no details of mitigation.	Noted. In respect of wider sustainability measurement tools, the Council is currently choosing not to mandate the use of a specific methodology and is open to the use of different methods including BREEAM, Passivhaus and HQM. The Local Plan contains a suite of policies aimed at addressing building performance from the perspective of energy use, detailed in chapter 5 of the plan. These apply across the LPA area, including in Hanwell. This is informed by the latest evidence, namely 'Delivering Net Zero'. As revised three separate energy policies are proposed (see chapter 4), the first encompassing operational energy, the second embodied carbon, and the third covering the whole life cycle approach which brings the first two together. The Local Plan establishes a revised SINC network. In addition policies SP2.2 and G6 establish a framework for managing development to secure the best outcome for nature. This includes a locally tailored approach for implementing BNG, building from the mandatory provisions. The preparation of this Local Plan has been informed by a Level 1 and Level 2 Strategic Flood Risk Assessment. Completed in January 2024, Ealing's level 2 SFRA has entailed undertaking a site-specific assessment of the individual allocations (including in Hanwell) to provide the information needed to undertake the Sequential and Exception Tests, and the exercise identifies mitigation measures. As per national guidance the application of the Sequential and	Policy H2: Hanwell District Centre		Beryl Pankhurst	Hanwell Villa	261	Individual
01HA Ealing Hospital Frontage: Economic: The plan does not give any details. They are only offering a construction site. Social: Housing. No infrastructure for well-being for people living in a 12-storey building on the busy, polluted Uxbridge Road. There is no space between the hospital and the proposed development site on the hospital car park. Environment: No plans to mitigate climate change caused by the construction and the number of people living there. No requirements for sustainable building or the use of recycled resources.	Noted. Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study. Heights are to range up to a maximum of 12 storeys (42m) stepping down from the recently redeveloped high rise high density residential development at St Bernard's Gate. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments. Key infrastructure requirements for the site are listed.	01HA Land to the front of Ealing Hospital		Beryl Pankhurst	Hanwell Villa	261	Individual

02HA Gray's Garage: Economic: the jobs that exist will be taken away and no other permanent employment provided. Social: No infrastructure provided for the expanding population living in 6-storey blocks on the busy Uxbridge Road, and no parking. Environment: As above. {No plans to mitigate climate change caused by the construction and the number of people living there. No requirements for sustainable building or the use of recycled resources.}	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to the heritage aspects of the adjoining St Mark's Church & Canal Conservation Area to the south and the Hanwell Clock Tower Conservation Area to the north-east. It is proposed that a mixed-use development that provides residential, commercial space and public open space should come forward therefore ensuring some employment opportunities in the future. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments. Key infrastructure requirements for the site are listed.	02HA Gray's Garage		Beryl Pankhurst	Hanwell Villa	261	Individual
03HA George Street: Economic: Parking is being removed for businesses in the local area and the disabled. There is no other area for parking in Hanwell. Social: No infrastructure. Environment: This is destroying the local ambience of the Clock Tower Conservation Area. It is a square of mainly low rise housing round the edge and the proposed 6-storey building is in the centre. The plan says that flood risk mitigation is necessary, but give no details.	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to heritage aspects of the adjoining St Hanwell Clock Tower Conservation Area to the east. The design principles for the site seek to ensure that the height of any development proposals takes into consideration the 2 storey terraced cottages fronting the site, with scale and massing responding sensitively to the low-rise surrounding housing. They should reflect the fine-grained character of neighbouring streets. A mews style development is proposed to reflect existing adjacent residential development, with tree planting and soft landscaping to improve the public realm. The site also benefits from a relatively good public transport accessibility level.	03HA George Street Car Park		Beryl Pankhurst	Hanwell Villa	261	Individual
04HA Lidl and discount store site: Social: There is no community service provision, ie medical, educational or recreation. Economic and Environment: Points as for proposed development above.	Noted. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments. Key infrastructure requirements for the site are listed.	04HA Site of Lidl and discount store		Beryl Pankhurst	Hanwell Villa	261	Individual
05HA Marshall site and area: Economic, Social, Environment: as above Social/Environment: This is an 8-storey building, once again ruining the low-rise ambience of Hanwell on the edge of the Clock Tower Conservation Area, and is on the busy, congested Uxbridge Road. No provision for children, the elderly and disabled.	Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study. It is proposed that a new community space on the southern part of the site is provided. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments. Key infrastructure requirements for the site are listed.	05HA Marshall Site, Gold's Gym & Garages on Montague Avenue		Beryl Pankhurst	Hanwell Villa	261	Individual

06HA Tile Deposit: Economic: Once again, this development is taking away long term employment in Hanwell. Social: No provisions detailed for medical, educational, and recreational needs. Environment: No mitigation for climate change.	It is proposed that affordable and assisted housing be reprovided alongside the provision of new residential and community uses. In addition, Chris Payne House will be retained. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	06HA Tile Depot & Lambourn Close		Beryl Pankhurst	Hanwell Villa	261	Individual
07HA Copley Close: Economic: No plans for health facilities. Social: The plan says there is a problem of parking on pavements but no mitigation plans. Environment: As points detailed above. No provision in plan for children. No planting.	This site is part of a larger estate regeneration project, much of which has already been completed and is subject to a masterplan. The allocation already notes that cars are parked along the length of Copley Close with many parked on pavements. It also notes that the public realm is poor quality a+B168nd pedestrians and cyclists are not prioritised. Future development will seek to tackle these issues. Key infrastructure requirements for the site include the need for health facilities.	07HA Copley Close Estate		Beryl Pankhurst	Hanwell Villa	261	Individual
08HA High Lane: Economic: No mention of employment provision. The people who were there previously will not be able to afford to go back and live there. Social: Over-reliance on the Brent River Park and no other provision. Environment: No sustainable building requirements or provisions for the wildlife lost, eg swift blocks or any planting.	Affordable and assisted housing will be reprovided alongside the provision of new residential and community uses. This means that any existing residents who wish to remain at High Lane will be offered a home. Given the residential character of the neighbourhood, large-scale industrial or commercial development is not considered appropriate. The allocation also proposes to create green, pedestrian and cycle links to Mayfield Local Park and the Brent River Park. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	08HA High Lane Housing Estate		Beryl Pankhurst	Hanwell Villa	261	Individual

This is the response to Ealing Council's draft local plan from the Five Roads Forum residents group covering Arden, Broughton, Denmark, Hartington and Hastings roads in West Ealing. Five Roads Forum was set up in 1999 as a pilot Home Zone to improve the quality of residential life in Ealing. It is a non-party political community association representing local people in the area south of the mainline GWR railway and east of Drayton Green Road, including Hastings Road, Hartington Road, Broughton Road, Denmark Road and Arden Road. Membership of 5RF is open to all residents living in the area as described above and currently stands at over 140 people from circa 300 dwellings in the above streets. We are concerned that Ealing Council has put out for consultation Reg 19 of a draft plan running to over a thousand pages and affecting all aspects of life in Ealing with only a few weeks for residents to comment. The concern is that Ealing Council will then use the draft local plan as a blueprint for the future without sufficient consultation on controversial proposals such as building large tower blocks and abolishing Green Belt land. The draft plan identified over 100 potential building sites within the borough – with nine sites in the Ealing town centre area (which includes West Ealing) as being as high as 21 storeys (73.5 metres). This is a huge number of very tall buildings in an area which has never as yet, seen a 21 storey building and is currently a reasonably pleasant suburban area. This is about to change as the council has recently passed several plans for 21 storey buildings in Ealing and the concern is the draft plan will increase this trend making Ealing look and feel like a high-rise, totally urban city.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. The plan has also been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19). It is imperative that the council has an up to date Local Plan and there are potentially severe consequences of failing to have one. The preparation of the plan has followed all of the prescribed processes. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. Furthermore, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	Policy E2: Ealing Metropolita n Town Centre		Caroline Evans and Hugh Comerford	Five Roads Fo	263	Community Interest Group

Ealing Fields Residents' Association (EFRA) is a large residents' association with a subscription membership of some 500 members across around thirty streets which are centred on Northfields station and our community library. There are over 2000 households that live in our area which is entirely within the Northfield Ward (part of 'Ealing Town' as defined by the Council in the Local Plan). EFRA was created in the mid-1970s when local people were galvanised to establish a representative body to oppose a planning application to convert a local cinema into a night club. The residents' association has several detailed comments about the Local Plan (LP/Plan) as it affects our area, as well as general comments/observations about overarching elements in the Plan. We trust that the Planning Inspectorate, when reviewing Ealing's LP, will give weight to the comments of EFRA as we are a democratically constituted body that is recognised by the Council as broadly representative of those that live and work in our local community. Criteria for evaluating the LP: We understand that the criteria for evaluating the LP is whether it is "sound", i.e. is it positively prepared, justified, effective, and consistent with national policy. However, the Plan is dense, difficult to read and understand, and not at all user-friendly for lay people who are not Planning professionals. We have seen a summary of the comments the organisation Ealing Matters intends to submit, and largely agree with their concerns. We make additional general comments at paragraph b below.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. To clarify, the Wickes site (24EA) is not in principle suitable for a tall building. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19). It is imperative that the council has an up to date Local Plan and there are potentially severe consequences of failing to have one. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet	General		Roger Jarman	Ealing Fields	264	Community Interest Group

Policy HOU: I doubt if any of these policies will be achieved based on the past history of building developments in LBE. Ealing has not produced an AMR since 2015 based on 2013/2014 figures and so the Council has no idea of current housing need. It is obvious that we need more homes but the Council does not seem to be building the right homes for the needs of the current population, in the right place or at the right height, and has failed to build the infrastructure that can cope with such an increase in population. The 2011 Localism Act also removed the requirement to publish/submit reports annually, which were previously known as Annual Monitoring Reports. Now renamed Authority Monitoring Reports, this is the Council's first AMR since September 2015, which covered the reporting year 2013/14. Finally, this AMR is published as an 'Interim Report' as the data relating to housing policy is yet to be fully migrated from the Greater London Authority's (GLA) data source. A further AMR Final Report will therefore be published within the next six months, which will also include monitoring year 2019/20 and contain the Five Year Housing Land Supply and Trajectory. Well we have an Interim report but the completion of the final AMR report is still pending. An easy to read comprehensive AMR should form the basis of working out what actually are the housing needs within the Borough & whether or not affordable housing is being built. New Local Plan. Appendix 1. Monitoring Framework states that key policies must be monitored but the last Local Plan was only monitored for 3 years.	Noted. A 5YHS and Housing Trajectory was published in November 2023. A further update, including the most recent monitoring period 2023-24, will be published in early 2025.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Susan New		254	Individual

Policy H10 of the London plan states that boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs; however, Ealing does not currently set a prescribed unit mix and never has or has identified the possible number of units to be built on a development sites anywhere in the borough. 4.10.2 of H10 also states It should be noted that in terms of delivering mixed and inclusive communities, a neighbourhood may currently have an over-concentration of a particular size of unit and a new development could help redress the balance. There is already a concentration of studios and 1 and 2 bed units within the vicinity of Perceval House-Dickens Yard-632 out of 698 units, Filmworks-197 out of 206 units, Westel House 113 out of 131 ,Squash Courts-no 3 bed units at all and this is the pattern throughout the borough except in estate regeneration plans. Other examples of major developments-Greenford Quay-1950 units out of 2118, GSK/Sunblest-1803 out of 1965,Quayside-1727 out of 1997,Woolworth’s site. W.Ealing-112 out of 120, BHS site 125 out of 136 units, Homebase Acton-33 out of 333 and so on and so forth and the balance is never redressed. Throughout the borough the proportion of 3 bed units being built averages out at about only 15%. This is despite the Borough has a lower proportion of one person households and couples than the rest of London, but a larger proportion of families (around 25.6%) than the average for London (18.2%). Ealing has a target of 34% which obviously has not been met. In a London Assembly meeting from May 2020 a question was raised re overcrowding – Andrew Boff AM: Mr Mayor, on 9 April [2020] Karen Buck [MP for Westminster North] retweeted figures from the	Policy HOU is clear that housing mix is identified through the SHMA. This will be updated to reflect the new terminology 'LHNA/Local Housing Needs Assesment'.	SP4.3 Genuinely affordable homes		Susan New		254	Individual

Policies E1 & E2 seem somewhat repetitive –the dreaded phrase ‘active travel’, offices, knowledge-based industries, affordable housing etc etc A. I don’t recognise the statement-‘Ealing plays a central role in the borough’s economy, providing a wide range of commercial, retail, and civic amenities, as well as hosting a large portion of the borough’s knowledge intensive jobs’. It used to especially when the BBC occupied many premises in Ealing & there were ancillary services connected to the media industry. We also had a functioning Town Hall, Council Offices and even high retail and department stores. And exactly what are these knowledge intensive jobs-other than those connected to the University or the Ealing Studios. Major companies decamped to other parts of London & the Chiswick Park Business Centre continued to expand as did Sky in Brentford. It was if Ealing Council believed that the Elizabeth Line would magically bring companies & the creative industries back to the Borough but instead many decided to go to East London. Housing affordability is an issue but, as an example, the developers of Dickens Yard paid the Council a paltry sum to not provide affordable units. The Cinema Site could also have had genuine affordable housing and I doubt if it will appear in any development in the centre of Ealing near Ealing Broadway station. The policy also includes too wider an area as it was easier to comprehend when various areas were just considered neighbourhoods & so their identity was different to the Metropolitan area. B. Although parts of Ealing are pedestrian friendly –most are not. <u>The Uxbridge Road is a main arterial road that includes New</u>	Regards A, Ealing town has the highest concentration of knowledge intensive employment in the borough, with nearly 4,500 jobs in financial and professional services. As the recent extant permission for the Broadway Connection site there remains strong demand. Regards B, a balance needs to be struck between animating spaces (eg pavement cafes) and providing safe and clear access. The management of street clutter is clearly important and is a matter for enforcement and licencing, where appropriate. Regards C, it is true that any uses have been permitted within the office quarter but office and other commercial activities do still predominate. The extant permission for Ealing Town Hall includes refurbishment and retention of civic and community functions. Regards D, noted.	Policy E1: Ealing Spatial Strategy		Susan New		265	Individual
We are writing to express our support for proposals for the former Barclays Sports Ground to be used for community sport, leisure and recreational facilities. In particular, we support the development of the former Barclays Sports Ground for hockey provision, allowing Ealing Hockey Club to build their own pitches and clubhouse. Our children have been playing at Ealing Hockey Club since 2016. The club has provided them not only with the opportunity to practice a sport they enjoy, but also with opportunities to volunteer and develop leadership skills. Over the years, we have witnessed the commitment, hard work and motivation of members of the committee, coaches and team managers. These are compelling reasons for us to support Ealing Hockey Club's aspiration to have their own pitches and clubhouse.	Noted. Support welcomed. The council’s Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine’s via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Marcela Davalos Tournaire		266	Individual

These paragraphs are all interlinked as they seem to be part of the ‘Active Travel Plan’. The public transport connections might be there but as someone who has not driven a car or had access to a car for 32 years my experiences of actually using local public transport has not been ,in the main, good ones. The Elizabeth Line is often just an overcrowded sardine can & if one wants to uses it via interchanges to other lines it is a nightmare. Most buses are overcrowded-not helped by the removal of the 427 bus route & very few bus stops are actually accessible. I was a great supporter of the tram & in some ways the bendy bus was not that dissimilar to using a tram. Ealing still has Enviro400 buses chugging along the Uxbridge Road & the SL8 Super Loop is just another name for the 607 & not really my idea of an express bus as it has to go through major bottle necks on the way from Uxbridge to Shepherd’s Bush. However since the SL8 goes to Westfield where there is a wide variety of shops & also cinemas it is regularly used which also means there is no reason to shop in Ealing. 20 minute neighbourhoods. If only! I think if one of the many consultants who have contributed to this plan actually asked people in the street if they could do all their shopping within one 20 minute neighbourhood they would say –no. They could probably do it using a car but bike panniers can only hold so much. And then there are the PRMs plus other people with shopper trolleys who would dearly like a 20 minute neighbourhood but they are no longer there-they did exist in the 80s & 90s but not now. And what we do not need is a cycle lane & already it has been dropped as an idea in West Ealing. As a pedestrian it is scarier enough now as there is a lot of going through red lights which makes using a crossing quite hazardous as	Noted. Regards 20 minute neighbourhoods, the plan aims to give people more choices about how they want to travel in their local community without a car if they want or need to. The key aim is to create complete and connected places and this includes walking and cycling but also promoting better access to public transport.	Policy E1: Ealing Spatial Strategy		Susan New		265	Individual

Policy E2 just seems to be a repetition of Policy E1 with a few extras. A. We have had excellent connectivity for years but it has not helped the decline in the Ealing Metropolitan Centre as an employment centre & retail centre. Also connectivity via various tube lines is currently very problematic & will be for the next few years due to ageing stock & availability of stock on the Central Line & frequent delays on the Elizabeth Line due to track problems. And I don't actually think it is true that the seven towns see this area as a destination as many people would rather get into their cars & go to various retail parks out of Borough, places like Uxbridge & Kingston or if they are wealthy-Chiswick or Richmond. Last year I ventured to the Lombardy Retail Park in Hayes using 2 buses and it was absolutely packed with a full car park & I think I was one of the few people who had actually arrived by public transport. Kingston & Uxbridge both have a wide range of comparison goods & cinemas as well. Uxbridge also has the advantage of being able to shop under cover in two Malls. There is little cover in the Metropolitan Centre to be able to shop away from the elements whether heat or rain & even the Broadway Centre has removed some of its canopies in the square. I believe the evidence base shows the loss of office & retail space. However the last Town centre Health Check was done in 2021/2022 & obviously needs updating & Arup describes areas that seem to be at odds to what the actual population think of the areas. Just two places that have closed that are mentioned in the report are Amazon Fresh & Wilko. Numerous banks-where? It also describes West Ealing as being clean & safe but at recent forums residents of West Ealing have said that they find the area unsafe & dirty. The evidence base really needs to be updated because it is not <u>actually a true report & gives a false impression that there has not</u>	Noted. It is not surprising that there is considerable overlap between Policies E1 and E2 because EMTC is by far the largest town centre in borough and Ealing town. E1 sets a strategy for the whole town whilst E2 looks solely at EMTC. Regards A/B, the alleged decline of the centre is not accepted and is a matter of perception. A report into the business health of 1,000 retail centres across the UK has seen Ealing Broadway including its shopping centre rise in recent years and is now ranked at number 64. Compiled by Newmark Retail, its annual Vitality Rankings for 2024 looks at various factors to determine its ranking including retail unit vacancy rate, space being adapted for other uses, shopper spend per annum and footfall figures. See: https://www.nmrk.com/insights/market-report/newmark-retail-vitality-rankings-2024 In 2022 Ealing Broadway was ranked at number 73 while in 2019 it came in at 173. The policy is supported by technical evidence including a Town Centre Health Check. Regards C/D, noted.	Policy E2: Ealing Metropolita n Town Centre		Susan New		267	Individual
As an independent resident of Ealing I support the application for the installation to be used to install two hockey pitches and a clubhouse. In summary to Approve the use for Leisure purposes with the following alterations, 2 competition standard 2G astro pitches, a Club House with changing facilities complying with Changing facilities that comply England Hockey League Rules. And Ealing Hockey To be the home for Ealing Hockey Club, Ealing HC National Talent Centre West London Hockey Charitable Foundation.	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Marianne Fry		268	Individual

We write in support of The Former Barclays Sports Field to be used for Ealing Hockey Club and feel Ealing Council Approve the use for Leisure purposes with the following alterations: 2 competition standard 2G astro pitches. Club House. Changing facilities to comply with England Hockey League Rules. To be the home for • Ealing Hockey Club • Ealing HC National Talent Centre • West London Hockey Charitable Foundation	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Dymphna Kerr		269	Individual
* I object to the de-designation of part of Barclays Sports Ground as MOL (MOL20) * I object to allowing residential development on Barclays Sports Ground (21EA) * I support the representations made by Ealing Matters, Save Ealing Parks and CPRE * Barclays Sports Ground should become part of the proposed Regional Park * The proposed development budget of between £22 million and £87 million is not justified * NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. * The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the "Distance to nearest infant/primary school" criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to "Vehicular access to the site", however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Mohammad Alzarrad		271	Individual

I object to the de-designation of part of Barclays Sports Ground as MOL (MOL20) * I object to allowing residential development on Barclays Sports Ground (21EA) * I support the representations made by Ealing Matters, Save Ealing Parks and CPRE	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt" category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet.	21EA Former Barclays Sports Ground		Clive Kendall		273	Individual

I would like to register my objection to the proposed planning permission with regards to Barclays Sports grounds as MOL. * I object to the de-designation of part of Barclays Sports Ground as MOL * I object to allowing residential development on Barclays Sports Ground * I support the representations by Ealing Matters, Save Ealing Parks and CPRE * Barclays Sports Ground should become part of the proposed Regional Park * The proposed development budget of between£22 million and £87 million is not justified * NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. * The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Mazin al Jumaily		274	Individual

I'm aware that Save Ealing Parks are rallying support to object to the de-designation of part of Barclays Sports Ground as MOL (MOL20) * I supported Save Ealing Parks' previous submissions to retain MOL areas such as Hanger Hill Park, Fox Wood Reservoir and (in part) Barclays Sports Ground. * However, I support allowing residential development on the former clubhouse of Barclays Sports Ground (21EA). It is a derelict and previously developed site adjoining other residential development and should be put into productive use. * I also think sensitive residential redevelopment of Barclays sports ground to include significant high quality MOL (playing fields for Ada Lovelace School) and high quality public park / open space with other public benefits (eg S106 funding towards a new Gurnell pool) would be appropriate.	Noted. Support welcomed.	21EA Former Barclays Sports Ground		David Reay		275	Individual
I'm an ealing resident. I live directly across the Hanger Lane from the Barclays ground. I object to the increased traffic, the pollution and loss of green space. I played at these grounds as a child as I went to the st Augustine school. I strongly object to this project. It will be terrible for residents and unsafe for kids with increased traffic. I object to the de-designation of part of Barclays Sports Ground as MOL. I object to allowing residential development on Barclays Sports Ground. I support the representations by Ealing Matters, Save Ealing Parks and CPRE. Should you need further info let me know.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt" category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet.	21EA Former Barclays Sports Ground		Noor Ali		276	Individual

I object to the de-designation of part of Barclays Sports Ground as MOL. I object to allowing residential development on Barclays Sports Ground. I support the representations by Ealing Matters, Save Ealing Parks and CPRE. Barclays Sports Ground should become part of the proposed Regional Park. The proposed development budget of between £22 million and £87 million is not justified NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Afia Saeed		277	Individual

I object to the de-designation of part of Barclays Sports Ground as MOL. I object to allowing residential development on Barclays Sports Ground. I support the representations by Ealing Matters, Save Ealing Parks and CPRE.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt" category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet.	21EA Former Barclays Sports Ground		K U		278	Individual

OBJECTION to de-designation of part of Barclays Sports Ground as MOL (MOL20) and related Reg 19 Consultation Objections. I write as Secretary of the ParkCrest Residents Association which is residents association that has been formally recognised by LB Ealing for over 20 years. We represent the interests particularly in planning matters of some 1500 residents in Park View Road and Hillcrest Road. Pursuant to Reg 19 Consultation Objections, we wish to object MOST STRONGLY to * the de-designation of part of Barclays Sports Ground as MOL (MOL20) * allowing residential development on Barclays Sports Ground (21EA) and to SUPPORT the representations made by Ealing Matters, Save Ealing Parks and CPRE. We also wish to strongly state our view that: * Barclays Sports Ground should become part of the proposed Regional Park. * The proposed development budget of between £22 million and £87 million is not justified. * NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. * The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion	The council is only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land and does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for many years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons.	21EA Former Barclays Sports Ground		Duncan McNair	ParkCrest Res	279	Community Interest Group

I am a resident of Park View road and I am writing to send my objections to the proposed development of the Barclays sports ground. Specifically, I object to: * I object to the de-designation of part of Barclays Sports Ground as MOL (MOL20) * I object to allowing residential development on Barclays Sports Ground (21EA) * NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. Furthermore, I support the representations made by Ealing Matters, Save Ealing Parks and CPRE.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt" category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet.	21EA Former Barclays Sports Ground		Westlee Wallace		280	Individual

Grounds into multi-million pound housing development. This should be retained as a “regional park”. people who have lived in Park View Road for decades do NOT WANT THEIR ENVIRONMENT SPOILT by thousands of people living there. They have saved up their hard earned money to buy in a QUIET AND picturesque environment. Why should this particular area be ruined by the influx of immigration? The council should look to build homes on the outskirts of EALING AND on brownfield sites: Hanwell or WEST EALING . How dare the council impose their authority when so many many objectors have written in. What about switching the idea to the PITSHANGAR LANE AREA. WHAT ABOUT THE PARK THERE ? It is quite disgraceful. If one if your councillors lived in park view road I’m sure they would be incensed! I know from experience how the planning department beers on the DEVELOPERS SIDE all the time. The council is a disgrace and AT THE MOMENT Is obstructing residents frim getting access to planning application documents.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet.	21EA Former Barclays Sports Ground		Ann Allan		281	Individual

Ealing Development Sites Paragraphs 4.2.50-4.2.60 I have read & re-read this document & it still appears to be very vague and the idea that I might try & access an Interactive Policy Map is a step too far. The links are bad enough. There is hardly any reference to the fact that the centre of Ealing-around the Broadway-contains CAs but tall buildings are proposed in & near these areas therefore not abiding by D9 of the London Plan that ‘proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings ‘. Dickens Yard already dwarfs the church as does the The Apiary, which towers over the NatWest building-both are listed buildings. Even young people value the heritage assets-it isn’t just nimbyism- and in March this year Scarlett Mullender took a walk around Ealing & posted a video: “As a member of Gen-Z, I am admittedly guilty of wasting hours of my day scouring social media for my next fix of content and recently wondered how much of the world around me I was oblivious to due to focusing on the pull of my phone screen. I decided to explore Ealing, having heard that the West London town centre contains a plethora of hidden statues and carvings atop seemingly mundane buildings. While shop units like Betfred and Caffè Nero line the streets like any other London town centre, what's above the buildings around Ealing Broadway is captivating - attributes most fast-paced, distracted commuters, including myself, would miss completely. Known as the 'Queen of the Suburbs', Ealing's name derives from Gillingas, the people associated with Gilla, an Anglo-Saxon settler. <u>It started to blossom as a fully functional town around the Victorian</u>	Noted. Each of the development sites lists relevant planning constraints including referencing conservation areas and heritage assets. Where appropriate, design principles also include reference to heritage impacts. Regards tall buildings, the London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and B177managing future growth. Regards the interactive policies map, this has proved to a be a popular tool and is strongly supported by the government as part of its digital planning agenda.	Policy E2: Ealing Metropolita n Town Centre		Susan New		282	Individual
Objection to the proposal.	Noted.	General		Mow Baker		283	Individual

Ealing Development Sites as in Ealing Town Centre Sites Table 2: These sites should be separate from the West Ealing Sites but for now will be treated as one area. The process of looking through these sites has not been made very easy due to the fact that the numbering system has changed since Reg18. Very confusing. There is now a massive danger in that developers will now withdraw applications that have been passed in this area & will put in new applications for very tall buildings-up to 21 storeys high given the zone threshold e.g. CP House & 52-58 Uxbridge Road. The sites document is also missing Dawley House 91-95 Uxbridge Road W5 which, although it has permission for a 12 storey hotel, is actually a plot of land that has been empty for at least 8 years now. Ealing Town Centre might be a Metropolitan Area but it is mainly built in the Edwardian vernacular and a more Jane Jacobs approach would be more suitable in that there are numerous empty flats above shops or flats used as offices that could be brought back into residential use therefore bringing back the original concept of the town centre with the flats occupied by residents. Co-living & student accommodation should be in a cluster in North Acton or, a rare event, an inter borough alliance where UWL accommodation is actually in Brentford as UWL has a shuttle bus service. Access to public transport should not be the main criteria, green space should be & the green spaces in Ealing Town Centre are already assigned as the green space for 100s of new flats. The sites document seems to rely on demolition not refurbishment or re-use. Not the greenest of policies. The Allies & Morrison report states that the location for tall buildings has a character & context led approach but in reality it would appear not to be as Ealing Town Centre has a considerable amount of buildings in good condition from the Edwardian era & the	Noted. Table 1 provides a summary of changes between Reg 18 and Reg 19.the The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Co living and stiudent accommodation whether in the form of completely new build or the conversion of existing buildings depends for the amenity of its residents upon access to excellent public transport connections and a wide range of local amenities.	Policy E2: Ealing Metropolita n Town Centre		Susan New		284	Individual

1. I strongly object to the de-designation of part of Barclays Sports Ground as MOL (MOL20) 2. I also object to allowing residential development on Barclays Sports Ground (21EA) 3. I fully support the representations made by Ealing Matters, Save Ealing Parks and CPRE 4. I believe that the case for Barclays Sports Ground becoming part of the proposed Regional Park is plain 5. The proposed development budget of between £22 million and £87 million is not justified 6. NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. 7. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. 8. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs. 9. In conclusion, the revised Draft Local Plan should properly take into consideration these factors and allocate the Barclays Sports Ground as part of the proposed sorely needed Regional Park.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground			Richard Mutton		285	Individual

* I object to the de-designation of part of Barclays Sports Ground as MOL * I object to allowing residential development on Barclays Sports Ground * I support the representations by Ealing Matters, Save Ealing Parks and CPRE * Barclays Sports Ground should become part of the proposed Regional Park * The proposed development budget of between £22 million and £87 million is not justified * NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. * The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs. * Ealing is the greenest borough in London which makes it very special, why you wish to destroy this is incomprehensible. * Push back against unrealistic demands for more housing, nobody wants population density to increase, it degrades the quality of life for everyone. There is a finite amount of space.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground			Tamsin Forbes	286	Individual

I object to allowing residential development on Barclays Sports Ground. Infrastructure is already collapsing – Hanger Lane is very often a river with leaking/overflowing water pipes causing frequent road surface damage and noisy nighttime road works. Outside Ada Lovelace school Park View Road is already congested and the quality of the neighbourhood negatively impacted with increased traffic congestion and noise. I object to dropping the MOL status of parts of Barclays Sports Ground. Ealing needs its green spaces, particularly close to the polluting Hanger Lane. This green space should become a small woodland/park to reduce air pollution and increase biodiversity in the area close to three schools, the Montessori Beaufort Road, St Augustines and Ada Lovelace. Hanger Hill Woods, opposite the sports ground, is neglected and has been decimated by the storms this winter. With fewer healthy trees standing in the lower parts, it is NO LONGER the pollution barrier that it used to be. More trees urgently need to be planted to make up for the diseased Dutch Elm and the many other fallen trees.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet.	21EA Former Barclays Sports Ground		Jenny Tueten		287	Individual

I am writing to express my concerns regarding the Ealing Local Plan Regulation 19 consultation process. While I appreciate the effort to engage the community, I believe there are valid reasons to request an extension to the deadline. My request is specifically in response to the proposed developments Acton – 06AC Acton Vale Industrial Park & Westgate House within the proposed new local plan. 1. Easter Period Impact: The consultation period coincided with the Easter holidays, which significantly reduced access to professional guidance for many residents. As a result, meaningful participation was hindered during this time. I kindly request an extension to allow for more comprehensive feedback. 2. Communication of the process with the local community has been extremely poor. There has been no direct communication with residents affected by the proposed development within the plan 3. Promised posting of a recording of the online meeting has not taken place meaning that access to the presentation that was made has not been provided as promised. 4. Tenants of units on Swainson Road that are directly affected by the proposal were not advised of any of the process until after the meeting on 21 March leaving them less than three weeks to make any representations. I hope that you will consider this request and look forward to hearing from you.	The consultation ran from February 28th to April 10th, spanning four weeks before the Easter holiday period, with the final two weeks extending into April to accommodate those who had time off. To promote participation, emails announcing the consultation and events were sent out weeks in advance, and Ealing Council's social media channels were also used to spread the word. We did also accept representations submitted after the deadline and all the recordings of the meetings were placed on the councils website during the consultation. But we recognise that consultations can always be improved. We appreciate that some people may engage later in the process, but, as with all consultations, it's not always possible to reach everyone in the borough.	General			Charlie Bateson		288	Individual

I am writing in response to the Ealing Local Plan (The Plan). I moved to Ealing 50 years ago and it has been my base since then. I am aware of many of the changes over that time, but believe that the Borough has maintained its character despite them. The changes mooted in this Plan throw that continuity into doubt, not only through the significant projected increase in the population, but by the lack of a commensurate increase in the infrastructure necessary to accommodate such growth. In my professional career I have had to generate a series of plans covering a wide range of proposals. It is not comfortable for me to say it, and I do so with respect to those who have worked hard on it, but apart from it being written in the most incomprehensible style, this Plan is unbalanced and needs considerable reworking to be sufficient for any reasoned discussions or decisions on its adoption. The Cost/Benefits within the Plan are unquantified and the Pros and Cons of the individual and overall developments on the environment, the infrastructure and the character of Ealing appear insufficiently considered. As such it is incomplete and not suitable for being taken forward. In general there needs to be more considered and better documented recognition of the impact of the proposed developments on the infrastructure and the environment, neither of which has been given a prominent role in the Plan. My specific comments are summarised in the following with elaborations, as necessary below:	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council's ambitions and plans for each of the seven towns that make up the borough. The Local Plan is also based on an extensive technical evidence base. A glossary of terms is provided at Appendix 2. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Ealing Common is a distinct neighbourhood with its own unique character that is a part of a broader network of town centres that stretch right along the Uxbridge Road and is a neighbourhood	General		Lee Horwich		289	Individual
The word usage in the Plan, in this day and age, needs to be more specific and/or defined. A few examples: Ealing 07EA – 'Given the site's close proximity to Walpole Park, explore the potential for new linkages to be created through the site to enhance legibility.' Please redefine 'legibility' or let me know what word was meant.	Legibility is an urban design concept essential in successful place making and is about ease of understanding often helped by landmarks and focal points, views, clear and easily navigable routes, gateways to particular areas, lighting, works of art and craft and signage and waymarkers.	07EA CP House		Lee Horwich		289	Individual

The word usage in the Plan, in this day and age, needs to be more specific and/or defined. A few examples: 15EA - ‘Ensure massing reflects existing grain and morphology . . .’. I think I understand what the writer is trying to say (then again I mightn’t), but if he/she was trying to say what I think they were, there are many simpler and more suitable words. Unnecessary elaboration or use of longer words does not demonstrate anything positive, much more likely the opposite. Please advise exactly what is meant. ‘Consider a mews typology . . .’ – totally unnecessary. What is the writer trying to describe that requires the word typology? What happened to proper descriptions and use of what to most people is a perfectly good language – English? ‘Deliver significant and co-ordinated improvements to the public realm.’ A meaningless statement, unless qualified. One of several similar statements, repeated ad nauseam throughout the Plan.	The terminologies employed are terms of art that are regularly used and understood by practitioners and in urban design. Reflecting ‘existing grain and morphology’ for example refers to the historical development and layout of buildings in the area in terms of the layout of roads, buildings, open and eclosed spaces, vistas etc reflecting changing in architectural style and local character and land uses over time. A ‘mews typology’ means types of buildings and groups that reflect or emulate mews buildings, such as stables or stores that would have been provide to serve a large, grand, town house, that are normally small-scale, mainly terrace forms, with an architectural style and a simple palette of external materials thar reflects their status as ancillary or subordinate buildings.	15EA Waitrose, West Ealing		Lee Horwich		289	Individual
Regarding Ealing Common. The Plan states: The strong local character and facilities of Southern Ealing and Ealing Common will be maintained and strengthened by: i) reinforcing neighbourhood centres at Northfields and South Ealing ii) character-led growth and improvement of local social infrastructure, shopping and facilities, iii) improvements to existing active travel and green infrastructure networks. The points 1) – iii) are a word salad and offer nothing to Ealing Common residents. Please state in plain English what, if anything is proposed for Ealing Common. I look forward to your responses. Please let me know if you have any questions.	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. Ealing Common is a distinct neighbourhood with its own unique character that is a part of a broader network of town centres that stretch right along the Uxbridge Road and is a neighbourhood centre. The Local Plan aims to reinforce its role and identity. Active travel refers to modes of travel that involve a level of activity, including trips made by walking, cycling, wheelchair, mobility scooters, adapted cycles, e-cycles, scooters, as well as cycle sharing schemes. Green infrastructure is the multifunctional, interdependent network of open and green spaces and green features (e.g. green roofs).	Policy E4: Southern Ealing and Ealing Common		Lee Horwich		289	Individual

My husband {redacted} and I {redacted}, residents at {redacted} and Ealing Council Tax payers, OBJECT in the strongest possible terms with the re-designation of part of Barclays Sports Ground as MOL (MOL20) and to allowing residential development on Barclays Sports Ground (21EA), We fully support the representations made by Ealing Matters, Save Ealing Parks and CPRE. The development would severely compromise the local infrastructure (road, water, sewage, drainage) and would remove much needed green space required to combat pollution from the north circular road. Moreover, increased traffic in the area would be of harm to students attending Ada Lovelace School and St Augustine’s School. The additional planned housing would also defeat the purpose of building a new high school in the area. Ada Lovelace is over-subscribed and already serves a very small catchment area, which would become even smaller if the new housing were erected. This would leave many residents that are currently at the boundary of the catchment area without adequate highschool facilities, as the capacity of the schools in the zone would be exceeded. Hence the development has wider implications that at the very local level. We believe that Barclays Sports Ground should become part of the proposed Regional Park. NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances, hence the re-designation should not go ahead.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. School capacities do change over time and any development would need to mitigate any adverse impacts regards the availability of school places as part of any planning obligations should development be consented. There are no physical vehicular access issues for this site. Traffic congestion associated with the ‘school	21EA Former Barclays Sports Ground		Tiziana Rossetto and Marco Morbidini		290	Individual

I object to the de-designation of part of Barclays Sports Ground as MOL. Additionally, I object to allowing residential development on Barclays Sports Ground. Furthermore, I support the representations by Ealing Matters, Save Ealing Parks and CPRE. Barclays Sports Ground should become part of the proposed Regional Park. The proposed development budget of between £22 million and £87 million is not justified. Moreover, NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt”	21EA Former Barclays Sports Ground		Nishka Malik	291	Individual

I am making representations on the Regulation 19 consultation about the Local Plan in a personal capacity as a local resident. I would like to register three main points: 1/ This exercise does not constitute ‘consultation’ of Ealing residents. The material presented here is excessive, hard to navigate and highly technical. Even the survey form requires residents to have a grasp of planning law. It completely disempowers local residents from decisions which have a very significant impact on their lives. I am angry and upset that the council considers this an appropriate way to treat residents. It adds to the general sense that the council is hand in glove with developers and doesn’t put residents first. 2/ This exercise does not provide reassurance about tall towers, which have been a source of great concern to residents for multiple reasons. It allows a proliferation of 21 storey towers in the central Ealing area, which is completely inappropriate. It does not address the discrepancy between the recommendation of 7-13 towers for various sites in West Ealing and the planning applications for much taller buildings. It does not address the very many issues raised by tall towers as a means to increase housing. For instance, it is simply not realistic to assume that hundreds of homes can be added with little or no parking provision as has been done for the development sites in West Ealing. 3/ This exercise is very vague on crucial elements. For example, it plans for a significant increase in the population of ‘Ealing’ but states that no work has been undertaken on the consequent increase in demand for school places or healthcare. It talks about the need for more genuinely affordable housing, but does not explain how the	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council’s ambitions and plans for each of the seven towns that make up the borough. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. The Local Plan is also based on an extensive technical evidence base. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19). The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	General		Catherine Hayes		292	Individual

I object to the de-designation of part of Barclays Sports Ground as MOL. Additionally, I object to allowing residential development on Barclays Sports Ground. Furthermore, I support the representations by Ealing Matters, Save Ealing Parks and CPRE. Barclays Sports Ground should become part of the proposed Regional Park. The proposed development budget of between £22 million and £87 million is not justified. Moreover, NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Dr Ayad Abdul-Ahad & Dr Rowayda Peters		293	Individual

I have learned about conversion of Barclays Sport Ground into residential development and would like to record my objections to it. * I object to the de-designation of part of Barclays Sports Ground as MOL * I object to allowing residential development on Barclays Sports Ground * I support the representations by Ealing Matters, Save Ealing Parks and CPRE * Council should develop the site into sport complex with opportunities to people to develop both physical and mental strength. The way development is happening around Ealing there are few opportunities available specially to young people. * The residential complex will create obstacles for young students of ADA who cycle to school.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt" category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. School capacities do change over time and any development would need to mitigate any adverse impacts regards the availability of school places as part of any planning obligations should development be consented. There are no physical vehicular access issues for this site. Traffic congestion associated with the 'school	21EA Former Barclays Sports Ground		Hamood Alvi		294	Individual
I object strongly to o this loss of open space. The housing development proposed will inevitably cause more traffic to filter into Hanger Lane.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled.	21EA Former Barclays Sports Ground		Ann Whitehead		295	Individual

* I object to the de-designation of part of Barclays Sports Ground as MOL * I object to allowing residential development on Barclays Sports Ground * I support the representations by Ealing Matters, Save Ealing Parks and CPRE	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled.	21EA Former Barclays Sports Ground		Simone Mozzone		296	Individual
I hope this message finds you well. As a local resident adjacent to the former Barclays sports ground on Park View Road in the Hanger Hill Ward and an active volunteer of the Ealing Hockey Club, I am writing to formally express my interest and to make a representation regarding the proposed development of a leisure facility that will significantly benefit the local community, enhance sports facilities, and support the growth of hockey in the region. I want to share my support for the development of a leisure facility with specific alterations tailored to not only meet but exceed the requirements and standards necessary for fostering local hockey talent, community engagement, and sports excellence. Below are the key points of my representation: 1.Approval for Leisure Use with Specific Alterations: I want to express my strong recommendation for the council's approval to designate the proposed site for leisure purposes, incorporating significant alterations to cater to the needs of local and national hockey talent and the broader community. 2.Development of Two Competition Standard 2G Astro Pitches: The inclusion of two competition-standard 2G astro pitches is crucial. These facilities will accommodate training and competitive matches, providing an essential platform for player development and the hosting of tournaments. 3.Club House Construction: A club house at the facility will serve as the central hub for players, coaches, supporters, and community members. It will facilitate social interaction, team meetings, strategy sessions, and community events, enhancing the cohesion and spirit of all involved. 4.Changing Facilities to Comply with England Hockey League Rules: To ensure our facility meets the highest standards and is eligible to	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Richard Maryniak		297	Individual

I object to the de-designation of part of Barclays Sports Ground as MOL. Additionally, I object to allowing residential development on Barclays Sports Ground. Furthermore, I support the representations by Ealing Matters, Save Ealing Parks and CPRE. Barclays Sports Ground should become part of the proposed Regional Park. The proposed development budget of between £22 million and £87 million is not justified. Moreover, NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Amina Baker		298	Individual

I would like to register my objection to the de-designation of part of Barclays Sports Ground as MOL. Additionally, I object to allowing residential development on Barclays Sports Ground. Furthermore, I support the representations by Ealing Matters, Save Ealing Parks and CPRE. Barclays Sports Ground should become part of the proposed Regional Park. The proposed development budget of between £22 million and £87 million is not justified. Moreover, NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Farwa Hasan		299	Individual

I object to the de-designation of part of Barclays Sports Ground as MOL. Additionally, I object to allowing residential development on Barclays Sports Ground. Furthermore, I support the representations by Ealing Matters, Save Ealing Parks and CPRE. Barclays Sports Ground should become part of the proposed Regional Park. The proposed development budget of between £22 million and £87 million is not justified. Moreover, NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Sudhen Bhayani	Amki Manag	300	Individual

I object to the de-designation of part of Barclays Sports Ground as MOL. Additionally, I object to allowing residential development on Barclays Sports Ground. Furthermore, I support the representations by Ealing Matters, Save Ealing Parks and CPRE. Barclays Sports Ground should become part of the proposed Regional Park. The proposed development budget of between £22 million and £87 million is not justified. Moreover, NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Soheila Hashemi		301	Individual

* I object to the de-designation of part of Barclays Sports Ground as MOL (MOL20). * I object to allowing residential development on Barclays Sports Ground (21EA). * I support the representations made by Beechcroft House Management, Ealing Matters, Save Ealing Parks and CPRE. * Allowing residential development on 21EA is not sound and not deliverable, given the unrealistically high proposed budget and the lack of space to implement a development fitting that budget. * The budget for 21EA being proposed to be raised from residential development is not justified and not sound, because the corresponding facilities proposed in Infrastructure Delivery Plan seem to need a significantly smaller budget. * NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. * Site Selection Report on Site 21EA exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely to fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs. * The views from Beechcroft House towards Barclays Sports Ground should be protected as part of the openness purposes of MOL. Because of that, and to stay in compliance with NPPF rules on	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground			Samir Sumaidaie Mahmood	302	Individual
* I object to the de-designation of part of Barclays Sports Ground as MOL * I object to allowing residential development on Barclays Sports Ground * I support the representations by Ealing Matters, Save Ealing Parks and CPRE	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled.	21EA Former Barclays Sports Ground			Sinan Abdulrhmin	303	Individual

I would like to state that I object to the de-designation of part of Barclays Sports Ground as MOL and I object to allowing residential development on Barclays Sports Ground. I support the representations by Ealing Matters, Save Ealing Parks and CPRE. Barclays Sports Ground should become part of the proposed Regional Park. I object because the proposed development budget of between £22 million and £87 million is not justified and NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. In addition the Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Dimitra Manousou		304	Individual
I am writing to support the proposal for Ealing Hockey Club to have their own community sports facility at the former Barclays Sports Ground. I have been a part of this club for 10 years and have seen first-hand how the club has supported the local community. In my personal experience, Ealing Hockey Club has allowed me to grow not only as a hockey player but also as a leader and part of this close-knit community. Ealing's own pitches and clubhouse would allow the club to expand and allow for more to experience the same benefits that I have gained from this very special club, from primary-aged children all the way up to seniors who play with me at social nights. I hope you consider this when making the decision to grant planning permission.	Noted. Support welcomed. The council’s Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine’s via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Sophie Constable		305	Individual

SP 2. 1 A: I can find no definition in the Local Plan (LP) Glossary as to what ‘new growth’ actually means. If it means 1,000s of new flats and 10,000s of more residents, it is almost certain that current Ealing residents would not welcome additional competition for water, energy, transport, healthcare, culture, sports law and order and other public services. ‘...benefits of new growth’ are not demonstrated or proven. Unsound policy.	The NPPF says that significant weight should be placed on the need to support economic growth taking into account both local business needs and wider opportunities for development. This is reflected in the presumption and the need to identify in local plans specific, developable sites or broad locations for growth. The Local Plan also incorporates the concept of ‘Good Growth,’ which underpins the London Plan. This is focussed on ensuring that future growth within London and its boroughs is socially and economically inclusive and environmentally sustainable. Therefore, the objective of Ealing’s Local Plan is to help deliver these strategic drivers at a local level, while ensuring that Ealing’s unique character is respected and celebrated, and that the borough’s economic role to the wider London region is maximised. Our approach to accommodating growth is important so no town is left behind.	SP2.1 Inclusive economy		Eric Leach		306	Individual
SP 2. 1 B: ‘Retaining vital public assets and buildings...’ There is a clear recent history of this policy not being applied egs Ealing Town Hall, Gurnell Leisure Centre and the W13 Singapore Road multi-storey car park. At Development Site 11EA there is no reference to retaining/rebuilding the existing public asset West Ealing Community Library. This approach is inconsistent with this policy. Unsound policy.	Noted. With regard site allocation 11EA the draft plan does say under key infrastructure requirements that any future development should reprovide the library. However, to ensure absolute clarity it is suggested that the proposed use be amended for the avoidance of any doubt.	11EA Sainsbury’s & Library, West Ealing		Eric Leach		306	Individual
SP 2. 1 B: ‘Retaining vital public assets and buildings...’ There is a clear recent history of this policy not being applied egs Ealing Town Hall, Gurnell Leisure Centre and the W13 Singapore Road multi-storey car park. At Development Site 11EA there is no reference to retaining/rebuilding the existing public asset West Ealing Community Library. This approach is inconsistent with this policy. Unsound policy.	Noted. In the case of Ealing Town Hall the extant planning permission includes community use agreements and enables substantial refurbishment and upgrading of civic and community facilities. In the case of Gurnell the existing leisure centre was no longer fit for purpose and it is proposed that it be replaced with an improved leisure and swimming offering (see 19EA). In the case of the Singapore Road car park it is arguable as to whether this fits this definition and in any case the regeneration of the Green Man Lane estate brought forward a number of new and enhanced community facilities. The West Ealing library is dealt with separately.	SP2.1 Inclusive economy		Eric Leach		306	Individual

SP2. 2 B SP2.2 B (i) The '20 -minute neighbourhood' is an interesting idea – but implementing it across Ealing's 21 square miles is impossible. Most Ealing residents need to work. Apart from some working from home 2/3 days /week, most Ealing residents' journey to work takes longer than 10 minutes. As does their journey home. How is it possible that any Council measures or workplace re-locations could bring about this 20 minute 'dream' by 2039 or ever? As for being 10 minutes travel to a sports or cultural venue? Where are the plans to build the 10s or hundreds of these which would be needed to realise the '20-minute' dream? Unsound policy SP2.2 B (iii) 'Improving public realm, which will ensure greener, healthier and safer neighbourhoods'. Where is the evidence that whatever public realm improvements (changes) are made will lead to healthier and safer neighbourhoods? Unsound policy SP2.2 B (v) 'Reducing the number of motor vehicle trips in and through Ealing'. How might this policy be implemented? What is the current number vehicle trips in and through Ealing? If the number was reduced by one would this constitute a sound policy? With 10,000s of new residents living in the 41,000 new homes by 3039, most of them will live in car parking sparse or no car parking tower blocks. The movement of goods and less mobile people into and out of these tower blocks will only be expedited by the use of a significantly increased number delivery vehicles and taxis, ubers and private cars. There are no plans for the Council or TfL to extend existing public bus services or create new public bus services to cater for the transport needs of the being constructed/ planned tower block clusters in Southall, Acton and Northolt. Unsound policy SP 2.2 C (ii) '...identifying sufficient sites and capacity for waste	On 20 munute neighbourhoods, the plan aims to give people more choices about how they want to travel in their local community without a car if they want or need to. More options can benefit physical and mental health and help to create a stronger sense of community, boost the local economy, and increase resilience to the effects of climate change. The quality of the public realm has a significant influence on quality of life because it affects people's sense of place, security and belonging, as well as having an influence on a range of health and social factors. For this reason, the public realm, and the buildings that frame those spaces, should be attractive, accessible, designed for people and contribute to the highest possible standards of comfort, good acoustic design, security and ease of movement. Higher levels of comfort should be sought in places where people will wish to sit, play, relax, meet, and dwell outside compared to other parts of the public realm that are primarily used for movement. The proposals to reduce traffic in and through the borough are evidenced in various documents: the previous Transport Strategy 2019-22, the current Climate and Ecological Emergency Strategy, and the 20-minute neighbourhood plans which are being produced for each of the seven towns. The new Transport Strategy, which will be published next year, will build on these plans with further details on transport and active travel policies. The 20-minute neighbourhood plans show our ambitions for prioritising walking and cycling in each town centre, using routes which will better connect residential areas, high streets, new developments,	SP2.2 Climate action		Eric Leach		306	Individual
SP2.3 A: The LP Glossary includes the following facilities as 'social infrastructure': '...colleges, universities, cultural, sports facilities, places of worship and policing...' The LP states 'safeguarding, improving and facilitating the restructuring of existing social facilities...' The Council has no control over virtually all these social infrastructure facilities. Unsound policy	Noted. The council works with key stakeholders to plan and deliver important infrastructure. Decisions taken through the planning system can have a significant impact on delivering and enhancing facilities as well as securing additional resources through planning obligations.	SP2.3 Thriving communitie s		Eric Leach		306	Individual

SP3.3 G: 'creation of a new outdoor swimming pool'. Where is the evidence that Ealing residents have asked for this. Where is the research on the size of the demand? Where is the evidence that such a facility would be economically viable? Unsound policy SP 3.3 I: 'Working closely with the NHS partners to identify need and opportunities for new health infrastructure and health services particularly within and around developments particularly within Acton and Southall'. This isn't a plan – it's an aspiration. With no quanta of housing quoted in Development Sites' profiles it's impossible to estimate the increased need for Primary Care. Such a real plan would compute these numbers and actively plan to extend existing GP surgeries and build new ones – with sites identified. Unsound policy	Noted. The addition of a Lido in the borough was included in the Majority Party manifesto which gives evidence of resident demand through a political mandate. Further work on location, demand and viability will come forward at a later date and the Lido scheme is currently being considered in the context of the wider Regional Park project. Regards health, the council works closely with the relevant providers and this is reflected in the joint Health Study which is part of the Local Plan evidence base and their involvement in compiling the Infrastructure Delivery Plan and Schedule.	SP3.3 Healthy lives		Eric Leach		306	Individual
• I object to the de-designation of part of Barclays Sports Ground as MOL (MOL20) • I object to allowing residential development on Barclays Sports Ground (21EA) • I support the representations made by Ealing Matters, Save Ealing Parks and CPRE It is ridiculous to build on sports fields as they are green and in short supply.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled.	21EA Former Barclays Sports Ground		Duncan Mackenzie Smith		307	Individual
I object to the de-designation of part of Barclays Sports Ground as MOL (MOL20). I do not believe the council has demonstrated any exceptional circumstances that justify altering Green Belt (and MOL) boundaries as required by NPPF article 140. I support the representations made by Ealing Matters, Save Ealing Parks and CPRE.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled.	21EA Former Barclays Sports Ground		Oliver James		308	Individual

As a local resident: · I object to the de-designation of part of Barclays Sports Ground as MOL (MOL20) · I object to allowing residential development on Barclays Sports Ground (21EA) · I support the representations made by Ealing Matters, Save Ealing Parks and CPRE · NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances · The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development will no doubt outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs. As a parent of children attending Montpelier Primary school and as a local resident, a large development in this crowded area is not sustainable. The site would be suitable for sports grounds and social activities for local residents to enjoy - it is unthinkable to add hundreds more families to the area without any additional public services.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. School capacities do change over time and any development would need to mitigate any adverse impacts regards the availability of school places as part of any planning obligations should development be consented. There are no physical vehicular access issues for this site. Traffic congestion associated with the ‘school	21EA Former Barclays Sports Ground			Laura Novello	309	Individual

I would like to object to plans to develop the Barclays Sports Ground. * I object to the de-designation of part of Barclays Sports Ground as MOL * I object to allowing residential development on Barclays Sports Ground * I support the representations by Ealing Matters, Save Ealing Parks and CPRE I would also highlight: * Barclays Sports Ground should become part of the proposed Regional Park * The proposed development budget of between£22 million and £87 million is not justified * NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. * The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs. As an Ealing resident and parent of children who attend St. Augustine Priory, I believe the plans are not in the best interests of ordinary Ealing residents.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground			Theo Hildebrand	310	Individual

I am writing to strongly object to allowing any residential development on Barclays Sports Ground. Furthermore I support the representations by Ealing Matters, Save Ealing Parks and CPRE I instead believe that Barclays Sports Ground should become part of the proposed Regional park and the funding for the scheme should be dropped and redirected to a more sustainable cause.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons.	21EA Former Barclays Sports Ground		Simone Milani Foglia		311	Individual

As a long standing resident of Ealing, I was extremely concerned to hear about the Barclays site development. Part of the charm and appeal of Ealing are the green spaces as reflected by the Ealing logo. This development will have the following detrimental effects: - increased pollution from cars adding to one of the busiest roads and junctions nearby -Hanger Lane gyratory and the A406 south. Having this so close to schools (namely ADA Lovelace, St. Augustine's and Montpelier Primary) will increase asthma risks and be a health hazard to children - increased risk of flooding during more frequent periods of heavy rainfall as the built up area impacts natural drainage. - increased traffic will clog the area further and cause concern to local residents, road rage, dangerous driving and inevitably impact house prices - current Ealing residents struggle with school places and having more residential complexes will put a greater strain on school places. This is unfair to our children and to parents who have to take their children to schools further afield thereby also adding to the pollution, traffic and environmental damage. Therefore: * I object to the de-designation of part of Barclays Sports Ground as MOL * I object to allowing residential development on Barclays Sports Ground * I support the representations by Ealing Matters, Save Ealing Parks and CPRE. I believe: * Barclays Sports Ground should become part of the proposed Regional Park	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground			Zainab Zarrad	312	Individual

I wish to object on these points 1 The de-designation of part of Barclay Sports Ground as MOL [MOL20] 2 Allowing residential development on Barclay Sports Ground [21EA] 3 Effect on the infrastructure with such a huge development ,nearby schools medical care. The Sports Ground should become part of the proposed Regional Park and a development budget of between £22 million and 87 million is not justified.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Anthony Roden		313	Individual

I am emailing in support of proposals for the former Barclays Sports Ground to be used for community sports facilities, in particular for Ealing Hockey Club to build their own pitches and clubhouse. Having been a player for this club throughout my high school years and beyond since its formation in 2013, I have benefitted hugely from the community of coaches and players at this club. The club has gone from strength to strength over the past decade and it has been a privilege to both witness and support their endeavours. Both my siblings have also played for this club and continue to do so, and it has subsequently changed my family dynamic and introduced an enormously positive outlet for the three of us from our studies. The club has brought a fantastic hockey club to the Ealing community where it was previously lacking any sports clubs, particularly for girls, and I believe this achievement should be recognised by the development of their own pitches and clubhouse. This would be truly well-deserved and encourage more young players in Ealing into the club. Experiencing the club as three young women, having such a positive sports community within easy access as we have grown up has undoubtedly led us toward better futures. This could be possible for many more young women and girls with Ealing's own pitches and clubhouse. Thank you for your consideration.	Noted. Support welcomed. The council's Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Jessica Constable		314	Individual
01-EA Broadway Connection: Not appropriate for a 21 storey building as it is in a CA & too near listed buildings that already are being dwarfed by inappropriate buildings. We also do not need any more office space as there is already land allocated for that purpose in the so-called Office Quarter & there are already empty offices along the Uxbridge Road anyway. It just needs less greed & a more thoughtful plan.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The council is keen to attract offices to this location to create employment opportunities and generate footfall that will help the viability and vitality of the town centre.	01EA Broadway Connection & Arcadia Shopping Centre		Susan New		284	Individual

02-EA was EAL 4-Ealing Broadway Shopping Centre: I will just repeat part of my submission for EAL4. The Ealing Broadway Shopping Centre is Locally Listed. Proposed allocation-I believe it is not suitable for residential as there is no space for a residential element in the Centre. I don't quite understand why this area is supposed to have poor permeability as it has more entrances than many other shopping centres. One can enter it from the High Street, Uxbridge Road and there are entrances on the south and west sides. It has suffered from lack of investment in the past but the new owners seem to want to improve the Centre. I believe the first improvements will be made along the High Street section of the development. In the Council's evidence during the Arcadia Inquiry it was said that the Council has decided that the Broadway Centre would cater for budget retail. However this was not the Council's decision, it was that of the owners at that time. The Broadway centre used to contain a department store –Bentalls, it was then taken over by Beales. Debenhams wanted to take over the Beales unit but they were out bid by Primark, hence budget shopping. Site Context -the Ealing Town Centre Conservation Area –Character Appraisal 2007 says 'the public spaces were designed with care. The main focus of the pedestrian areas is Town Square, a pedestrian piazza open to the sky' It is not a courtyard and does not feel like a private area. It has been the venue for various public events during the Jubilee and the Olympics. It does not feel isolated from the town centre. The M&S building is an example of a later replacement building and as it says in the Character Appraisal 'it displays a very horizontal emphasis both in its massing and its façade definition which puts it at odds with the vertical emphasis found elsewhere in the CA'	Noted. It should be noted that all of the department stores mentioned have all closed their high street stores. The idea of encouraging market stalls and antique sellers is something the council would support and it should be noted that the Centre does put on a number of well attended seasonal events to help animate the Town Square space.	02EA Ealing Broadway Shopping Centre & Crystal House		Susan New		284	Individual

03-EA-Sandringham Mews was EAL5 I will just repeat my submission for EAL5 but with the addendum that 12 storeys is absolutely inappropriate for this CA. The Co-Living application has been passed for this site at 3-8 storeys with 318 units. 'Site EAL5 Lamertons 23-45 High Street/7-11 New Broadway/Sandringham Mews W5 Proposed allocation-residential led, mixed use, community space. This whole site could have enormous potential to be actually part of the cultural quarter (we don't currently have one) and, as mixed use is a rather vague term, I am going to suggest actual uses for different parts of the site. Lamertons 23-45 High Street: {Image of the High Street} Given the proximity of Ealing Film Studios, the Film School and the Media College as well as the University an appropriate use of the upper floors would be studios for the creative sector of the community. If this was East London the spaces above the shops and cafes would have already been put to this use. Given that we have already lost all the ancillary sites that served the BBC when it was based in the London borough of Ealing this would be an opportunity to revive the creative industries in the borough. As can be seen from the photo the building is in good repair and of an appropriate height for the High Street. It would seem unnecessary to either pull the building down or build another storey. It is totally unsuitable, as suggested ,for student accommodation as it is not large enough to contain the facilities needed for integrated accommodation-communal kitchens, recreational areas etc etc. The shopfronts along this part of the High Street just need to abide by the shopfront guidance for the area. The latter has been ignored for many years. Sandringham Mews: Sometimes we have the odd, rather strange market in the Broadway Centre, usually consisting of extremely	Noted.	03EA Sandringham Mews		Susan New		284	Individual
04-EA-Eastern Gateway: Already passed at 6 storeys.	Noted.	04EA Eastern Gateway		Susan New		284	Individual
05-EA-Perceval House-passed at Council	Noted. The council is not taking forward the extant planning permission and is looking to fresh proposals includings retrofitting the existing council building and redevelopment of the rear)car park) of the site.	05EA Perceval House		Susan New		284	Individual

06-EA-Ironically the Police wanted the police station designated as a Development Site in 2012-the last Local Plan- but were told NO-this is the office quarter. The site is not suitable for a 21 storey building as it is sandwiched between the office blocks of what was Transworld Books & Dunhumpy-both companies have left the area-but their offices are in good condition and about 6-8 storeys high. Given the amount of empty office space around the site & the number of educational premises that have popped up near here another educational establishment would seem the most appropriate use.	Noted. Due to changes in environmental regulations and the needs of office users, there is high demand for Grade A accommodation but not older stock of lower grade.	06EA 49–69 Uxbridge Road		Susan New		284	Individual
07-EA- Application approved at 13 storeys.	Noted.	07EA CP House		Susan New		284	Individual
08-EA-Most of this site was passed anyway as 170,000 sq feet of office space-Revolution- but now appears to want to be changed to student accommodation with the tallest part being 11 storeys.	Noted.	08EA Craven House		Susan New		284	Individual
10-EA-11. EA –These are both supermarkets and are essential to what little is left of the supply of food shops in West Ealing. Lidl is essential as it provides cheap but good quality food & Sainsbury’s is one of the few supermarkets with a car park for people who want to do large shops when there is a large variety of goods to chose from. They are also both food shops near bus stops. Developers promise shops but they do not appear as on the old BHS site, which although the plan passed was for ground floor retail, it is now a gym. Lidl in Hanwell is also a development site. Where exactly will people do their food shopping & West Ealing was supposed to be for budget shopping but we are now down to about 4 shops-Lidl, Sainsbury’s, Savers & Boots. It is questionable whether or not the latter two will survive.	Noted.	10EA 59–65 Broadway, West Ealing (Lidl)		Susan New		284	Individual
10-EA-11. EA –These are both supermarkets and are essential to what little is left of the supply of food shops in West Ealing. Lidl is essential as it provides cheap but good quality food & Sainsbury’s is one of the few supermarkets with a car park for people who want to do large shops when there is a large variety of goods to chose from. They are also both food shops near bus stops. Developers promise shops but they do not appear as on the old BHS site, which although the plan passed was for ground floor retail, it is now a gym. Lidl in Hanwell is also a development site. Where exactly will people do their food shopping & West Ealing was supposed to be for budget shopping but we are now down to about 4 shops-Lidl, Sainsbury’s, Savers & Boots. It is questionable whether or not the latter two will survive.	Noted. The intention is that a supermarket will be reprovided and this is stated in the proposed use.	11EA Sainsbury’s & Library, West Ealing		Susan New		284	Individual

16-EA-Part of this site is now proposed as yet more student accommodation-just under 500 students but it would have been an ideal place for low rise residential housing instead of tall blocks-one of which will rise to 20 storeys whereas the zone threshold is 7 storeys.	Noted.	16EA West Ealing Station Approach		Susan New		284	Individual
24-EA-Wickes S.Ealing: No. We have already lost Wickes in Hanwell and residents, if they abide by the 20 minute city ideal, need to get to places like Wickes and so do work people & builders. It is just ridiculous-people will have to use cars to get further & further afield.	Noted.	24EA Wickes, South Ealing Road		Susan New		284	Individual
25-EA--Travis Perkins: No- the same is true as of Wickes. {We have already lost Wickes in Hanwell and residents, if they abide by the 20 minute city ideal, need to get to places like Wickes and so do work people & builders. It is just ridiculous-people will have to use cars to get further & further afield.}	Noted.	25EA Travis Perkins, Popes Lane		Susan New		284	Individual

Consultation Paragraphs 1.29-1.35 The NPPF 3.16 states that plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses..... However, as can be seen, from the drop in responses to ‘Shaping Ealing’ to those to reg.18, the community at large engagement with Reg 19 is bound to be minimal & therefore-not sound. In fact the Local Plan seems to have ignored the findings from various focus groups like ‘Haveyoursay’ on Active Travel & the West Ealing Liveable Neighbourhood. Re the latter focus groups we actually had to be involved either online or in person & I was one of the only two people who turned up for a meeting re accessibility in West Ealing. Also it will be interesting to see how many of the 1400 responses to Reg 18 have come from developers when it comes to the sessions with the Inspector. It is one thing to have a survey when one can just slide across from a sad to a happy face emoji to having to plough thorough endless documentation on a plan that will have an effect on the whole population of the Borough. It does not help having any amount workshops when in fact the main Local Plan document itself is 516 pages long padded out with photos of an idealised Borough & with an evidence base of 59 documents containing 100s of pages. The Council paid consultants just under one & a half million pounds to produce the evidence base & these companies have 100s of people working on the documentation. Just this one page alone has 3 links as if every home has multiple screens to view the stuff on and as for being available in other languages, I very much doubt if the whole evidence base has been translated into other languages.	Noted. The plan has been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19).	General		Susan New		316	Individual
I would like to express my support for the former Barclays Sports Ground to be used for community sports facilities, in particular for Ealing Hockey Club to build their own pitches and club. I have been playing for the club since year 4 and have seen the good it does for the community. Not only will this venture strengthen the basis of the club but allow it to expand across the wider Ealing area as we won’t be limited by renting out other pitches. This has been a long-held dream by everyone at Ealing Hockey Club and I truly hope it comes to fruition.	Noted. Support welcomed. The council’s Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine’s via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Maddy Constable		317	Individual

I object to the de-designation of part of Barclays Sports Ground as MOL (MOL20). * I object to allowing residential development on Barclays Sports Ground (21EA). * I support the representations made by Beechcroft House Management, Ealing Matters, Save Ealing Parks and CPRE. * Allowing residential development on 21EA is not sound and not deliverable, given the unrealistically high proposed budget and the lack of space to implement a development fitting that budget. * The budget for 21EA being proposed to be raised from residential development is not justified and not sound, because the corresponding facilities proposed in Infrastructure Delivery Plan seem to need a significantly smaller budget. * NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. * Site Selection Report on Site 21EA exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely to fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs. * The views from Beechcroft House towards Barclays Sports Ground should be protected as part of the openness purposes of MOL.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground			Baret Magarian	318	Individual

My name is {redacted} and I live at Thorn Tree Court, Park View Road, Ealing W5 {redacted}. I am writing to you as a local resident to express that: 1. I object to the de-designation of part of Barclays Sports Ground as MOL (MOL20) 2. I object to allowing residential development on Barclays Sports Ground (21EA) 3. I support the representations made by Ealing Matters, Save Ealing Parks and CPRE The proposed development budget of between £22 million and £87 million is not justified and Barclays Sports Ground should become part of the proposed Regional Park NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development will likely fall outside of the catchment area anyway. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Ola Forman	319	Individual

I object to the de-designation of part of Barclays Sports Ground as MOL. Additionally, I object to allowing residential development on Barclays Sports Ground. Furthermore, I support the representations by Ealing Matters, Save Ealing Parks and CPRE. Barclays Sports Ground should become part of the proposed Regional Park. The proposed development budget of between £22 million and £87 million is not justified. Moreover, NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Chanchal Samtani		320	Individual

I object to the de-designation of part of Barclays Sports Ground as MOL. Additionally, I object to allowing residential development on Barclays Sports Ground. Furthermore, I support the representations by Ealing Matters, Save Ealing Parks and CPRE. Barclays Sports Ground should become part of the proposed Regional Park. The proposed development budget of between £22 million and £87 million is not justified. Moreover, NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely to fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Vinay Samtani		321	Individual

I have read the proposals set out in Ealing council’s (EC) Local plan. I am a resident and have lived in and around Ealing for over 44 years. The proposals are a great disappointment. This unfortunately, but predictably, comes as no surprise based on past performance. This is not a Local Plan it is a “Vision” based on opinions, beliefs, ideals and a hubris of near fundamentalist stature. It just creates and opposes winners (those hardly affected), and losers (where changes are the most concentrated, extreme and invasive). It’s a rush to do something whatever the outcome. It is not justified as no alternatives are offered. Especially those where ‘moderation’ and a more careful, studied approach might end up giving a much better result for occupants both now and for generations to come. It cannot be effective because it doesn’t tackle real issues, rather concentrates on grandstanding in areas where a flag can be waved for political and environmental correctness. It is inconsistent with National Policy because it is not sustainable development. Over recent years EC have consistently failed with monitoring, upkeep, maintenance and repair in very many areas of their remit. Being inefficient and ineffectual is not sustainable. Simply put (EC) seem to be set on a path of social engineering rather than aiming for a better environment both for existing and future residents and businesses. Whatever happened to Regeneration? Where considerations of acceptable building sizes, density, genuine peripheral and connecting green spaces, necessary amenities and ease of connectivity were sacrosanct. We are being sold (railroaded and blitzed) into going from a pleasant human scale suburban-lifestyle setting to one of high density human infestation. Boxes in the sky	Noted.	General		Stephen Lewis		322	Individual

The measures listed in SP2.2B are unsound because they omit the installation of in pavement charging gullies. These are an established method of electric vehicle home charging for households without driveways and offer a reasonable alternative to parking in front gardens. The latter approach is costly and involves extensive hard surfacing, climate change risks and loss of urban greening. The list at SP2. B does include installing more on-street electric vehicle charge points, but these are of limited use to residents because (a) it is difficult for electric vehicle owners to tell in advance if the points are in use or not and (b) they are financially disadvantageous to residents: charging via the domestic electricity supply is considerably cheaper than on street because the household supply attracts a lower rate of VAT and the electricity companies may also offer cheaper household deals e.g. overnight. Charging gullies are an established method and the evidence for their successful use is accumulating all the time. It is therefore unjustifiable that they are omitted from a Local Plan with a 15 year time horizon. To make the Local Plan sound, the following should be added to the list of policies at SP2.2 B Making the best use of land and investing in sustainable connectivity by....: • <u>Installing in-pavement charging gullies in those parts of the borough where houses have no pre-existing driveways.</u> Policy SP2.2 Climate action: F. Building resilience and adapting to a changing environment is not legally compliant because the list of measures does not include London Plan policy S1 13: Sustainable Drainage, which states: “Development proposals for impermeable surfacing should normally be resisted unless they can be shown to	The London Plan forms part of Ealing's Development Plan, and the Council has made a conscious effort to avoid repeating provisions contained in this document in Ealing's Local Plan. This is deemed to be unnecessary and potentially unhelpful, and future development proposals will continue to be tested against SI 13, H2, G5 and other London Plan policies (i.e. G5), which are considered to provide good policy provision already for managing proposals involving the hard standing of gardens, changes to the green cover and to secure appropriate urban greening measures. The introduction of in pavement gullies has been considered previously by the council and no firm decision has been taken as yet although it is expected that the proposal will be the subject of trials in the future. Therefore the suggested amendment is not accepted.	SP2.2 Climate action		Christine Eborall	Ealing Front C	323	Community Interest Group

Policy: SP3.3 Healthy lives H Mitigating the effects of climate change, particularly the urban heat island effect, and improving the existing housing stock to limit impacts upon general health and particularly more vulnerable parts of the population. It is positive that the Policy focuses specifically on improving existing, as opposed to new, housing stock. But it is unsound because it does not include any reference to a major contributor to the urban heat island effect, especially in poorer communities – the paving over of front, and to a lesser extent back, gardens and elimination of all plants and green heat-absorbing surfaces. The paving over of front gardens is mentioned specifically in the Local Plan on Page 149 as an adverse effect of conversions into Houses of Multiple Occupation (HMOs), but only in consideration of loss of heritage and townscape. The heat island effect due to front garden paving is not mentioned in the Plan, and in this respect the Plan is unsound. To make the Local Plan sound, amend Policy: SP3.3 Healthy lives: H to read: Mitigating the effects of climate change, particularly the urban heat island effect, and improving the existing <u>stock of housing stock and associated garden space</u> to limit impacts upon general health and particularly more vulnerable parts of the population.	Noted. A suggested amendment is proposed.	SP3.3 Healthy lives		Christine Eborall	Ealing Front C	323	Community Interest Group

Policy D9. Tall Buildings-local variation: E.F.G. There are 58 sites allocated for tall buildings-so over just under half of the sites allocation. Ealing or LBE used to be called Queen of the Suburbs but now parts of it have become like Gotham City (probably suitable for some post apocalyptic filming) rather than the areas that used to be used for filming like the Forester’s pub & Walpole Park. {image of tall building cluster} In the tall buildings by area table 6 storeys is considered to be tall but residents know that these heights will be exceeded-they always are by the use of minor amendments. Arup states that ‘tall buildings on designated industrial sites will be subjected to agreed masterplans and based upon local impacts and sensitivity’. However various tall buildings are being currently planned in S.Acton and the masterplan seems to being produced by developers not by the Council. I thought the whole idea of a Masterplan was that it should be produced by the planning dept. Too many tall buildings are being planned for the Ealing Metropolitan Area which will destroy the Edwardian vernacular in many cases & Hanwell-especially the latter as it is a low rise village as such not even a town. Southall & Acton are almost beyond saving especially now that the Friary Park Estate looms into view. I also find figure DMP1 Areas very confusing as I am not actually sure what areas on North Acton have now gone into the OPDC area-the map is very vague. The Council has agreed to spend £150 million on buying up housing stock and this is one of their first acquisitions. ‘Council Leader Peter	Noted	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Susan New		324	Individual

I object to the de-designation of part of Barclays Sports Ground as MOL (MOL20). I object to allowing residential development on Barclays Sports Ground (21EA). I support the representations made by Beechcroft House Management, Ealing Matters, Save Ealing Parks and CPRE. Allowing residential development on 21EA is not sound and not deliverable, given the unrealistically high proposed budget and the lack of space to implement a development fitting that budget. The budget for 21EA being proposed to be raised from residential development is not justified and not sound, because the corresponding facilities proposed in Infrastructure Delivery Plan seem to need a significantly smaller budget. NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. Site Selection Report on Site 21EA exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely to fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs. The views from Beechcroft House towards Barclays Sports Ground should be protected as part of the openness purposes of MOL. Because of that, and to stay in compliance with NPPF rules on MOL protection, any development on 21EA, even if allowed, should not exceed the current size of the Clubhouse (2-3 storeys).	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground			Amy Clifford	325	Individual

I am writing to object strongly to the de-designation of part of Barclays Sports Ground as MOL (MOL20) and wholly support the representations made by Ealing Matters, Save Ealing Parks and CPRE. I object on the basis that this would allow for residential development in an already over-subscribed area and the proposed development budget of between £22m and £87m is totally not justified. Furthermore, the Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. as it gives top ranking to the “Distance to nearest infant/primary school” criterion. At present, the closest school (Montpelier) is oversubscribed and the development is likely to fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already (Ada Lovelace) with severe traffic problems during school runs, which pose safety issues for parents, students and teachers alike. It is a dreadful proposal and I am totally against it being allowed to go ahead.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt”	21EA Former Barclays Sports Ground		Liz O'Driscoll	326	Individual

Policy H.1: Hanwell Spatial Strategy: Well what happened to the Core Strategy in that Hanwell was only supposed to have 109 new homes-now 350, at the least, without the new sites & no new infrastructure to support them. Or even over 900 if one counts St.Bernard’s Gate as it seems to be classified as Hanwell and the proposed Elthorne Works in Trumper’s Way. A. The Elizabeth Line might deliver new homes but certainly no new jobs. It is not an easily accessible station & the trains are not that frequent & it certainly isn’t a hub as mentioned in B. It is a historic area but the centre, which is the Hanwell Clock Tower CA, is still as awful as it ever was and should still be on the ‘At Risk’ register. Much tinkering has been going on but the shopfronts are still as garish and despite a bit of new paving & the odd bit of clutter removed it is the same as when it was noted that one would not realise one was going through a CA. B. Hanwell District Centre. To a certain extent it functions very well now although not particularly attractive and even contains an ironmongers, a material & haberdashery shop , Polish food shop, a second-hand furniture shop, a bakers, a gift shop & a independent white goods shop. Lidl is an excellent store and the car park has proved incredibly useful for people who want to stock up on a large number of goods. To remove the car park would be idiocy. The centre has 3 churches which bring people to the area-all of which provide other services such as a nursery, food bank and supply meals too. Events are also held in the halls. It has a large health centre, dentists & even a post office. And there are cafes, restaurants and general stores. When Wickes was there one could get most day-to-day things within a 20 minute walk. And there is also the excellent Gold’s Gym. DON’T build on the Lidl car park or	Noted. Whilst some development is proposed in Hanwell the quantum of development is far lower than the other sven towns, with the exception of Perivale. Growth in Hanwell will focus on diversifying the town centre’s retail and commercial offer, while maximising the opportunities provided by the Elizabeth line to deliver new homes and jobs for residents.	Policy H1: Hanwell Spatial Strategy		Susan New		328	Individual

* I object to the de-designation of part of Barclays Sports Ground as MOL * I object to allowing residential development on Barclays Sports Ground * I support the representations by Ealing Matters, Save Ealing Parks and CPRE * Barclays Sports Ground should become part of the proposed Regional Park * The proposed development budget of between £22 million and £87 million is not justified * NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. * The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		M. Drandakis		329	Individual
I live in Hanwell and like many locals who have enjoyed living here for all of my life, I object to the planned development sites in my local area for the reasons I have listed below. High Rise Buildings - Hanwell has a village look and feel currently. Hanwell contains several conservation areas that are beautiful and valued by locals. High rise buildings will ruin the character completely and more flats will overpopulate the area. Hanwell has had new flats built recently that are standing empty, one example is the previous Wickes site, now Hanwell Square Flats, Boston Rd, London W7 3SH. No design guidance of the planned high rise developments buildings. No mention of sustainability for these sites.	Noted. The Local Plan expects a lower quantum of residential led development within Hanwell reflecting fewer development opportunities than say Ealing or Southall. This is reflected in the number of development sites (8) of which half are considered to be potentially appropriate for a tall building (mostly in the district town centre). As specified in Policy H2 future development will be character led.	Policy H1: Hanwell Spatial Strategy		Edward Fullbrook		330	Individual

I live in Hanwell and like many locals who have enjoyed living here for all of my life, I object to the planned development sites in my local area for the reasons I have listed below. 01HA Ealing hospital frontage - The site is not suitable for a tall building. It is directly in front of the hospital without adequate space between the hospital and the proposed development site, causing privacy and light reductions. Unsuitable living conditions for a twelve storey building directly next to the Uxbridge Road. Climate change caused by the construction and the number of people living in a twelve story building.	Noted. Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study . Heights are to range up to a maximum of 12 storeys (42m) stepping down from the recently redeveloped high rise high density residential development at St Bernard's Gate. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	01HA Land to the front of Ealing Hospital		Edward Fullbrook		330	Individual
I live in Hanwell and like many locals who have enjoyed living here for all of my life, I object to the planned development sites in my local area for the reasons I have listed below. 02HA Grays Garage - Grays is a thriving business providing a valuable service to locals, constantly busy. Jobs will be lost with no permanent employment provided. No infrastructure provided for the expanding population living in 6-storey blocks on the busy Uxbridge Road, and no parking. No plans to mitigate climate change caused by the construction and the number of people living there. No requirements for sustainable building or the use of recycled resources. The area currently has character with the cottages located next to this site.	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to the heritage aspects of the adjoining St Mark's Church & Canal Conservation Area to the south and the Hanwell Clock Tower Conservation Area to the north-east. It is proposed that a mixed-use development that provides residential, commercial space and public open space should come forward therefore ensuring some employment opportunities in the future.	02HA Gray's Garage		Edward Fullbrook		330	Individual
I live in Hanwell and like many locals who have enjoyed living here for all of my life, I object to the planned development sites in my local area for the reasons I have listed below. 03HA George Street Car Park - Parking in Hanwell is required, this is the only car park we have. A car park is an important local amenity for children, the elderly and disabled. This will destroy the local character of the Clock Tower Conservation Area. It is a square of mainly low rise cottages and the proposed 6-storey building is located in the middle.	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to heritage aspects of the adjoining St Hanwell Clock Tower Conservation Area to the east. The design principles for the site seek to ensure that the height of any development proposals takes into consideration the 2 storey terraced cottages fronting the site, with scale and massing responding sensitively to the low-rise surrounding housing. They should reflect the fine-grained character of neighbouring streets. A mews style development is proposed to reflect existing adjacent residential development, with tree planting and soft landscaping to improve the public realm. The site also benefits from a relatively good public transport accessibility level.	03HA George Street Car Park		Edward Fullbrook		330	Individual

I live in Hanwell and like many locals who have enjoyed living here for all of my life, I object to the planned development sites in my local area for the reasons I have listed below. 04HA Lidl and Discount Store Site - Lidl and Poundstrecher are thriving businesses that are a valuable service to the local community. There is no community service provision, ie medical, educational or recreation. No plans to mitigate climate change caused by the construction and the number of people living there. No requirements for sustainable building or the use of recycled resources.	It is intended that a supermarket will be reprovided on the site. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	04HA Site of Lidl and discount store		Edward Fullbrook		330	Individual
I live in Hanwell and like many locals who have enjoyed living here for all of my life, I object to the planned development sites in my local area for the reasons I have listed below. 05HA Marshall site and area - This is an 8-storey building, once again ruining the low-rise character of Hanwell on the edge of the Clock Tower Conservation Area, and is on the busy, congested Uxbridge Road. No provision for children, the elderly and disabled. No plans to mitigate climate change caused by the construction. No requirements for sustainable building or the use of recycled resources.	Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study. It is proposed that a new community space on the southern part of the site is provided. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	05HA Marshall Site, Gold's Gym & Garages on Montague Avenue		Edward Fullbrook		330	Individual
I live in Hanwell and like many locals who have enjoyed living here for all of my life, I object to the planned development sites in my local area for the reasons I have listed below. 06HA Tile Deposit - No provisions detailed for medical, educational, and recreational needs, or for children, the elderly and disabled. No mitigation for climate change.	It is proposed that affordable and assisted housing be reprovided alongside the provision of new residential and community uses. In addition, Chris Payne House will be retained. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	06HA Tile Depot & Lambourn Close		Edward Fullbrook		330	Individual
I live in Hanwell and like many locals who have enjoyed living here for all of my life, I object to the planned development sites in my local area for the reasons I have listed below. 07HA Copley Close - This is a long thin space and not suitable for a building of 7 storeys. The plan says there is a problem of parking on pavements but no mitigation plans. No plans for health facilities.	This site is part of a larger estate regeneration project, much of which has already been completed and is subject to a masterplan. The allocation already notes that cars are parked along the length of Copley Close with many parked on pavements. It also notes that the public realm is poor quality and pedestrians and cyclists are not prioritised. Future development will seek to tackle these issues. Key infrastructure requirements for the site include the need for health facilities.	07HA Copley Close Estate		Edward Fullbrook		330	Individual

I live in Hanwell and like many locals who have enjoyed living here for all of my life, I object to the planned development sites in my local area for the reasons I have listed below. 08HA High Lane - No mention of employment provision. The people who were there previously will not be able to afford to go back and live there. Over-reliance on the Brent River Park and no other provision. No sustainable building requirements or provisions for the wildlife lost.	Affordable and assisted housing will be reprovided alongside the provision of new residential and community uses. This means that any existing residents who wish to remain at High Lane will be offered a home. Given the residential character of the neighbourhood, large-scale industrial or commercial development is not considered appropriate. The allocation also proposes to create green, pedestrian and cycle links to Mayfield Local Park and the Brent River Park. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	08HA High Lane Housing Estate		Edward Fullbrook		330	Individual
* I object to the de-designation of part of Barclays Sports Ground as MOL * I object to allowing residential development on Barclays Sports Ground * I support the representations by Ealing Matters, Save Ealing Parks and CPRE * Barclays Sports Ground should become part of the proposed Regional Park * The proposed development budget of between £22 million and £87 million is not justified * NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. * The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Samia Rida		333	Individual

Paras 4.1.43 - 4.1.46 of Acton Town Plan, Paras 4.1.55 - 4.1.65, Table A2, Figure A3, pp 124 - 127, Dean Court, Acton-07AC, pp140 & 141 The references above, from the text of the Local Plan itself, give very little information about the Dean Court proposal which is the subject of this representation. I shall be arguing that this proposal conspicuously fails the tests of soundness on the grounds of undeliverability and unsustainability. (c: Effective and deliverable, and d: Consistent with national policy and enabling the delivery of sustainable development in the tests of soundness). I also note that the requirement for sustainability forms part of a: positively prepared; and that as regards b:justified, I shall present the case that Dean Court and other proposed developments developments in Acton are not the most appropriate strategy and that there is a reasonable alternative. (See Question 6.) First though, in order to provide the Inspector with the relevant information, I present - on the next page - two illustrations of the Council's Dean Court suggestion taken from its Tall Buildings Strategy document Appendix 2, December '23. In addition, from Appendix E of the Local Plan documents, I would draw the Inspector's attention to the Arup material on pp 19 - 21 concerning the feasibility of the Acton development sites in general and the Dean Court site in particular. I shall have occasion to refer to this material later on. {Extracts from TB Study - Site Assessment for Dean Gardens} The Dean Court site, following the demolition of the existing housing, will not be a brownfield site. Is it not the policy now of the	Housing proposals in the plan are based upon capacity and derived from the Character Assessment and tall buildings policies, part of which derives from the London Plan. There are no apportionments of housing per se, just identified capacity. Dean Court was submitted as part of the Call for Sites exercise by the owners, A2 Dominium, an RSL who are committed to seeing the site upgraded and optimised to provide better housing for existing and new residents. The overall site assessment score was above average due to a substantial number of 'green' and 'amber' scores. There are four 'red' scores out of a total 27 criteria. Air Quality is a borough wide issue that cannot be addressed by individual sites. Air Quality will be addressed through draft strategic policy SP2. Similarly, Access to Open Space cannot be addressed by individual sites and reflects a wider issue for the Acton area, which will be addressed more directly through draft policy A1. The issue of Biodiversity relates to the adjacent SINC/Green Corridor that borders the site, along the railway track. Any proposal for the site will need to take into account draft policies G5 and G6, which requires an increase in biodiversity net gain. The Tree Preservation Order refers to trees that are adjacent to the railway track and embankment. Any proposals for the site will need to take the TPOs into consideration and take into account	07AC Dean Court		David Tennant	Cap The Tow	334	Community Interest Group

Development site 01HA: The car park at Ealing Hospital should remain as it is until a decision is made about an expansion of the hospital due to what will be a massive increase in the population of Ealing especially if there are going to be 10,000 new units in nearby Southall & this is the only hospital in the Borough. Transport links to other hospitals are not that easy by public transport and are miles away. The maternity unit has already been closed and the paediatric department. One cannot even register the birth of a child in Ealing & since this was the only maternity unit in Ealing-babies are born outside of the Borough. These are the places to register a birth-Queen Charlottes (and Chelsea) Hospital - Hammersmith and Fulham Council -Northwick Park Hospital - Brent Council-West Middlesex Hospital - Hounslow Council-Hillingdon Hospital - Hillingdon Council. Not exactly easy to register a birth but of course I suppose one does it online nowadays whereas it used to be an occasion. It also might be necessary to have various mobile units using this area for things such as breast screening, TB checks and MRIs. Units such as these quite often appear at other hospitals like St Mary's & Charing Cross where expansion was not possible. It has been established that early screening is essential and that certain cultural groups are reluctant to come in for screening & so screening should be made as easy as possible. The bus stop area at the hospital is not that conducive to being able to wait for buses & there is little shelter. Also the Council has come up with the mad idea of putting a 'floating bus stop' at the hospital Uxbridge Road stop so if you are not concentrating because you are painkillered up to the eyeballs or have just been told you have 6 months to live you might end up back in the hospital having been iniured by a cvclist who too has not	Noted. The council has always opposed cuts to critical health services at Ealing Hospital. It occupies a large campus and the land is not fully optimised. Future development of the car park site could provide much needed investment in health facilities without compromising existing services whilst also providing more affordable homes, including for key workers at the hospital.	01HA Land to the front of Ealing Hospital	Policy H2: Hanwell District Centre	Susan New		336	Individual

H2 (ii) Hanwell Station is not a gateway & never will be as it is not easy to get to, does not have frequent trains and only certain carriage doors can be opened at the station due to the short platforms. It only has a lift due to a lengthy campaign but dropping off people there in either a car or a taxi is not easy. When we all sat through endless presentations re Crossrail it was advertised as a fast way of getting to town & Canary Wharf not as a method of bringing people in to work in the area-more leaving it to get to work. H2 (iv) We don't need any more developments in the centre of Hanwell just improvements in shopfronts and crossings such as the southbound one of the Clock Tower area. The new-now old island flower beds at the Clock Tower have been a disaster with dying plants & trees & the seating has been removed because our alcoholic friends rather liked it. Now it just looks like a few odd boxes have been left there by mistake. Virtually all the seating in Hanwell has been removed as it too proved to be a convenient place to imbibe alcohol. However this is part of urban life & when the alcoholics used to sit in the church garden (now closed) & I walked through it they were a friendly lot as I joked with them about putting their cans & bottles in the recycling bins next to them. But of course as they were not allowed to go back during the day to the hostel nearby they had no access to public toilets & this proved to be a problem. The Lidl car park area did have public toilets but like all other public toilets they have been removed. The British seem to have an aversion to public toilet facilities whereas (I am told) places like Tokyo have plethora of them and they are so designed to be virtually self cleaning in every way-everything is automatic & so touch free & apparently a pleasure to use. {Sugggested modification: Removal as station as a gateway}	Noted. The station is a gateway in that it is a place that provides access to and from the area. According to railwaydata.co.uk Hanwell has seen a 62% increase in passenger volumes between 2013-14 and 2022-23.	Policy H2: Hanwell District Centre		Susan New		336	Individual
Development site 05HA: Both Gold's Gym, the Lidl car park and the little terrace of houses (Marshall building plan) should be retained as they are essential to a. providing a much needed & scarce healthy lifestyle resource and b. easy access to cheaper food whilst the terrace of houses is one of the oldest parts of Hanwell and is at a human scale. {Suggested modification} Removal of site 05HA}	Noted. The site allocation proposes to maintain the existing frontage on the Uxbridge Road.	05HA Marshall Site, Gold's Gym & Garages on Montague Avenue		Susan New		336	Individual

Policy G4: C. It is obvious that open space should only be used for nature conservation and recreation but as usual-if only. The Council has just passed a large development at Twyford Abbey which amongst other things was MOL land and in an area of open space deficiency losing in the process two thirds of the land which, if it had been the subject of a lottery bid, could have had a restored Abbey & grounds for public and community use. There is also the question of the Council's idea of re-wilding in parks which basically means not mowing a section. This is not my idea of re-wilding as one has to do it in a creative way to attract bees & wild life-weeds don't do that. Also sometimes it reduces the amount of space for children to play games such as cricket & ball games. {Suggested modification:} A complete rewording based on reality.	Noted.	Policy G4: Open Space – London Plan – Ealing LPA – local variation		Susan New		337	Individual
Please don't ruin Ealing any more. It's become terrifyingly overcrowded in the last few years and really not a nice place to live any longer. The transport systems are overloaded, the doctors and dentists over full, schools oversubscribed and the roads in central Ealing just a solid traffic jam most of the time. Beggars on the pavements, people camping in tents in the parks, people openly smoking weed on the streets, crappy shops along the main road, cars parked on double yellow lines - it's turning into a dump like Croydon. You should be concentrating on fixing these problems first not creating more for residents. Please leave the Barclays Bank Sports Ground alone, or make it into a park. It already has 2 large schools either side of it, and the Hanger Lane on the other. Park View Road has traffic chaos at the start and end time of Ada Lovelace School. Residents need some green space, not more congestion and hundreds of people living on top of each other. There is no justification for losing green space or MOL in an area that is already overpopulated. Please take this development proposal off the Local Plan and give some consideration to residents for a change.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled.	21EA Former Barclays Sports Ground		Stephanie Godfrey		338	Individual

I am emailing as I object to the de-designation of part of Barclays Sports Ground as MOL. I also object to allowing residential development on Barclays Sports Ground. I support the representations by Ealing Matters, Save Ealing Parks and CPRE.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled.	21EA Former Barclays Sports Ground		Thomas Spencer	Secretary, Lo	340	Individual
• I object to the de-designation of part of Barclays Sports Ground as MOL (MOL20) • I object to allowing residential development on Barclays Sports Ground (21EA) • I support the representations made by Ealing Matters, Save Ealing Parks and CPRE Also I would like to add the followings: • Barclays Sports Ground should become part of the proposed Regional Park • The proposed development budget of between £22 million and £87 million is not justified • NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. • The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the "Distance to nearest infant/primary school" criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to "Vehicular access to the site", however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Amir Fallah		341	Individual

I object to the de - designation of part of Barclays Sports Ground as MOL. I also object to allowing residential development on Barclays Sports Ground. Furthermore, I support the representations made by Ealing Matters, Save Ealing Parks and CPRE. Other points that I would like you to note : • Barclays Sports Ground should become part of the proposed Regional Park • The proposed development budget of between £22 million and £87 million is not justified • NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. • The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs. I reside at {address redacted} and even though I am some way away from the school entrance, I have been heavily affected by the school at the bottom of Park View Road. The mornings are mayhem, with parents dropping off their children at school. The parents carry out 3-point turns in the middle of the road and despite a Zebra crossing being installed, the congestion is second to none. There cannot be	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground			Nadeem Sarwar	343	Individual

I am deeply concerned about Ealing Council's Local Plan. For a start, this enormous document is impossible to digest and understand for the vast majority of people. It is inaccessible and therefore discriminatory. It does not protect green spaces in a climate and biodiversity crisis, it will allow developers to build on MOL and greenbelt and it is too vague and badly written to form the basis for council policy. It shows no understanding of flood plains or the access to nature and active travel that human beings need to be healthy and happy. This is a plan for developers, not people, and shows no understanding of the ecosystem and biodiversity that supports all life on this planet. It is regressive and unsustainable.	The Local Plan is by necessity a technical document. The Local Plan establishes a framework for maintaining, enhancing and expanding the network of green infrastructure in the borough. The drivers for reviewing Ealing's Green Belt and MOL designations is not to identify additional land to accommodate development, but rather to ensure that this land is afforded the correct designations. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Where changes have been proposed to the designation of GB and MOL in the majority of cases these sites continue to be covered by other appropriate policy designations such as Public Open Space, Community Open Space or Site of Importance for Nature Conservation (SINC), and such policies continue to protect these sites from inappropriate development. Only very limited releases have been considered and only where these are considered necessary to enable enhancements to the green network. A number of the recommended changes proposed at Regulation 18 are now not being pursued, as detailed in the stage 2 report.	SP2.2 Climate action		Ellie Lock		344	Individual

I am writing to express my vehement objection to the proposed de-designation of a portion of Barclays Sports Ground as Metropolitan Open Land (MOL). Additionally, I strongly oppose any plans to allow residential development on this site. I stand firmly in support of the representations made by Ealing Matters, Save Ealing Parks, and CPRE. It is my firm belief that Barclays Sports Ground should be integrated into the proposed Regional Park. Furthermore, the projected development budget, ranging from £22 million to £87 million, lacks any credible justification. Moreover, according to NPPF Article 140, alterations to Green Belt (and MOL) boundaries should only be considered under truly exceptional circumstances, which must be thoroughly evidenced and justified. The New Local Plan fails abysmally to provide any convincing justification or evidence of such exceptional circumstances. Even the proposed development budget is without any credible basis. The Site Selection Report greatly exaggerates the suitability of Barclays Sports Ground for development. For example, it places undue emphasis on the criterion of "Distance to nearest infant/primary school," yet the closest school, Montpelier, is already oversubscribed, and the proposed development is likely to fall outside its catchment area. Similarly, it prioritises "Vehicular access to the site," despite the fact that Park View Rd already suffers severe traffic congestion, particularly during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground			Syed Asim Hasan	345	Individual

1. Ealing Council is guilty of murder, killing the Queen of the Suburbs. It would have a massive negative impact on the quality of life in Ealing. The plan aims to bring another 80,000 people into the Borough without addressing the issue of how this will impact quality of life and the ability of infrastructure to cope. This is reckless in the extreme, once the plan is accepted the changes and impacts will be irreversible. 2. The housing targets it sets could have a huge negative impact on the Borough in terms of its health, education and transport infrastructure as well as access to amenities and green spaces. It aims to increase the population of Ealing by around 80,000 people without any analysis of the infrastructure needed to support this increase or a plan to deliver this new infrastructure. It also fails to show any analysis of the risks associated with this massive population increase or how they will be monitored and managed. Services are already at breaking point and this plan is reckless in the extreme. 3. It would kill communities in Ealing and drive social cleansing. Existing communities in Ealing are mixed in terms of culture, income and age; this plan would overwhelm these communities through a massive influx of ‘dormitory’ residents who live in Ealing but have little or no engagement in its communities. True communities accommodate citizens from ‘cradle to grave’ and meet their needs at all life stages. This is a feature of many of our communities where we see multiple generations living together and supporting each other. Ealing also has a rich street scene with small shops, work spaces and markets. The proposals for hyper-dense tower accommodation could not replicate this and would create unbalanced and unsustainable communities. It would drive out	Noted. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The plan also sets out proposals for maintaining, enhancing and expanding the network of green infrastructure in the borough.	General		Anthony Rice		346	Individual

EA15 Waitrose - STT considers that the arrival of the Elizabeth Line required the Council to prepare an area strategy for sites around West Ealing Station to ensure the widest public benefits would accrue from this major infrastructure investment. Unfortunately this did not happen and it has resulted in a wholly avoidable legacy of distrust on the part of the local community. Even now opportunities exist to repair relationships through an area based plan involving both the community and key landowners, including the John Lewis Partnership. The current Waitrose store has only existed for 18 years, and the one it replaced was only 14 years old. We have very major concerns about the sustainability of Waitrose's slash and burn business model and its impact on climate change. It really should stop. We applaud the proposed reduction in the maximum height to 13 storeys but think this would still be excessive and that it should be restricted to around 10 storeys. This would still exceed the tall building threshold of 7 storeys in West Ealing. As Allies and Morrisons say in their Tall Building Strategy (page 4) 'it follows that in all other locations beyond (areas identified as suitable for tall buildings) – that is, the vast majority of the Borough – tall buildings are not considered to be an appropriate form of development'. STT has commented elsewhere on the Waitrose proposals and we believe our comments need to be taken on board in the preparation of more appropriate scheme for this site than has so far been presented. Consideration of the appearance of the development when viewed from residential streets both to the north and the south is crucial. Development should include a replacement for Jacobs Ladder footbridge across the Railway.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities. Key infrastructure requirements for this site allocation include measures to improve active travel including Jacobs Ladder footbridge and Green Man Lane.	15EA Waitrose, West Ealing		Anthony Rice		346	Individual

EA16 West Ealing Station Approach: This is another site close to West Ealing Station that should form part of an area based plan strategy. (Having said that, STT does not understand why this site has been given this name. It is nowhere near the approach to the new West Ealing Station which is 100 metres down Manor Road on the other side of the railway.) STT holds that redevelopment of this site should accord with the 2013 site brief which required that ‘the height, scale and massing of new development must reflect the historic character of the surrounding residential areas on Hastings and Drayton Green Road. New development along Hastings Road must be low rise and not overlook the adjacent two storey terraced residential properties on this side, to create a harmonious streetscape and respect the current building line.’ We see no reason to depart from this principle. In particular, we do not accept that it is appropriate for the height of a development to be as high as 13 storeys as is now proposed. It should remain within the 7 storey tall building threshold which Policy D9 proposes.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	16EA West Ealing Station Approach		Anthony Rice		346	Individual

I am in support of the critical points raised by Stop The Towers with regards to the Ealing Local Plan. 1. It's a dangerously poor plan. The plan is critically important for the future of Ealing and its residents, but appears to be built on little or no solid evidence with few, if any, clear measures of success. There are also no strategies to monitor and manage the risks associated with the plan. This plan is so poor in its evidence base that we feel it does not meet the minimum legal requirements for a Local Plan. It has no evidence of need and shows a continuing failure of Ealing Council to define what success for its Local Plan will look like and how it will monitor whether the plan is working. This is particularly evident in regards to its housing targets which have no basis in an assessment of local need in terms of the kinds of housing local people, or Londoners more widely, need and can afford, or the point at which Ealing's infrastructure will fail to support the proposed 80,000 new residents. The plan also grants a 'green light' to developing towers by re-defining what a tall building is without an assessment of the local and wider impact of this kind of ultra-high density housing. It also fails to address growing evidence that developing high density towers as a way of providing housing is environmentally and socially unsustainable. 2. It would have a massive negative impact on the quality of life in Ealing. The plan aims to bring another 80,000 people into the Borough without addressing the issue of how this will impact quality of life and the ability of infrastructure to cope. This is reckless in the extreme, once the plan is accepted the changes and impacts will be irreversible. The housing targets it sets could have a huge negative impact on the Borough in terms of its health, education and	Noted. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The plan also sets out proposals for maintaining, enhancing and expanding the network of green infrastructure in the borough.	General		John Sturrock		347	Individual

I am writing to express my deep concerns about the draft Ealing Council Local Plan Reg 19 consultation. When the initial draft (Reg 18) was published, it was so long-winded, and with 38 appendices within which key information was difficult to locate, that it made me clinically depressed. This version has little improvement. I share the concerns that Ealing Matters, Stop The Towers, Five Roads Forum and other residents associations have expressed. 1. The Plan itself is verbose and repetitive. I am fairly educated and have been looking at planning documents for five years, but this Plan leaves me confused and concerned. If that's the case for me, someone who is university educated, then how inaccessible it must be for people with less academic education. What is worse, the glossy brochures produced did not reflect accurately the key issues proposed. It was deceitful and not an honest consultation. It is simply impenetrable to the vast majority of Ealing residents unfamiliar with planning jargon or issues. 2. Ealing's housing target of more than 40,000 homes over the next 15 years is excessive and undeliverable. This is a crazy expansion that is unrealistic. But if it were to be delivered, it would create unmanageable population growth of more than 80,000 people (more than the population of Guildford) according to GLA projections. 3. The infrastructure plans to support this very high growth rate are sketchy at best. There is no capacity within the NHS to cater for such a massive increase in population, let alone the extra burden on other services and amenities. Just because we now have Crossrail going through our borough, it will not provide everything needed. 4. The plan's proposals for wholesale redevelopment of relatively	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy. The case for	General		Denise Colliver		348	Individual

There are many sites where the proposals are too dense & too high. These two are of particular concern to me: EA15 Waitrose: STT considers that the arrival of the Elizabeth Line required the Council to prepare an area strategy for sites around West Ealing Station to ensure the widest public benefits would accrue from this major infrastructure investment. Unfortunately this did not happen and it has resulted in a wholly avoidable legacy of distrust on the part of the local community. Even now opportunities exist to repair relationships through an area based plan involving both the community and key landowners, including the John Lewis Partnership. The current Waitrose store has only existed for 18 years, and the one it replaced was only 14 years old. We have very major concerns about the sustainability of Waitrose’s slash and burn business model and its impact on climate change. It really should stop. We applaud the proposed reduction in the maximum height to 13 storeys but think this would still be excessive and that it should be restricted to around 10 storeys. This would still exceed the tall building threshold of 7 storeys in West Ealing. As Allies and Morrisons say in their Tall Building Strategy (page 4) ‘it follows that in all other locations beyond (areas identified as suitable for tall buildings) – that is, the vast majority of the Borough – tall buildings are not considered to be an appropriate form of development’. STT has commented elsewhere on the Waitrose proposals and we believe our comments need to be taken on board in the preparation of more appropriate scheme for this site than has so far been presented. Consideration of the appearance of the development when viewed from residential streets both to the north and the south is crucial. Development should include a replacement for	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	15EA Waitrose, West Ealing		Denise Colliver		348	Individual

There are many sites where the proposals are too dense & too high. These two are of particular concern to me: EA16 West Ealing Station Approach: This is another site close to West Ealing Station that should form part of an area based plan strategy. (Having said that, STT does not understand why this site has been given this name. It is nowhere near the approach to the new West Ealing Station which is 100 metres down Manor Road on the other side of the railway.) STT holds that redevelopment of this site should accord with the 2013 site brief which required that ‘the height, scale and massing of new development must reflect the historic character of the surrounding residential areas on Hastings and Drayton Green Road. New development along Hastings Road must be low rise and not overlook the adjacent two storey terraced residential properties on this side, to create a harmonious streetscape and respect the current building line.’ We see no reason to depart from this principle. In particular, we do not accept that it is appropriate for the height of a development to be as high as 13 storeys as is now proposed. It should remain within the 7 storey tall building threshold which Policy D9 proposes. As the next door neighbour to this site, our home would be dwarfed by anything above four storeys. We would lose sunlight in our living rooms and bedrooms. Our home would be overlooked. Adequate provision for deliveries and services must be made. Adherence to all planning policies and guidances should be adhered to.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	16EA West Ealing Station Approach		Denise Colliver		348	Individual

I am gravely concerned with the Ealing Local Plan and I hereby challenge the plan. This is due to the following reasons 1. It's a dangerously poor plan. The plan is critically important for the future of Ealing and its residents, but appears to be built on little or no solid evidence with few, if any, clear measures of success. There are also no strategies to monitor and manage the risks associated with the plan. This plan is so poor in its evidence base that we feel it does not meet the minimum legal requirements for a Local Plan. It has no evidence of need and shows a continuing failure of Ealing Council to define what success for its Local Plan will look like and how it will monitor whether the plan is working. This is particularly evident in regards to its housing targets which have no basis in an assessment of local need in terms of the kinds of housing local people, or Londoners more widely, need and can afford, or the point at which Ealing's infrastructure will fail to support the proposed 80,000 new residents. The plan also grants a 'green light' to developing towers by re-defining what a tall building is without an assessment of the local and wider impact of this kind of ultra-high density housing. It also fails to address growing evidence that developing high density towers as a way of providing housing is environmentally and socially unsustainable. 2. It would have a massive negative impact on the quality of life in Ealing. The plan aims to bring another 80,000 people into the Borough without addressing the issue of how this will impact quality of life and the ability of infrastructure to cope. This is reckless in the extreme, once the plan is accepted the changes and impacts will be irreversible. The housing targets it sets could have a huge negative impact on the Borough in terms of its health, education and	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy.	General		Eimty Hoque	349	Individual

EA15 Waitrose. STT considers that the arrival of the Elizabeth Line required the Council to prepare an area strategy for sites around West Ealing Station to ensure the widest public benefits would accrue from this major infrastructure investment. Unfortunately this did not happen and it has resulted in a wholly avoidable legacy of distrust on the part of the local community. Even now opportunities exist to repair relationships through an area based plan involving both the community and key landowners, including the John Lewis Partnership. The current Waitrose store has only existed for 18 years, and the one it replaced was only 14 years old. We have very major concerns about the sustainability of Waitrose’s slash and burn business model and its impact on climate change. It really should stop. We applaud the proposed reduction in the maximum height to 13 storeys but think this would still be excessive and that it should be restricted to around 10 storeys. This would still exceed the tall building threshold of 7 storeys in West Ealing. As Allies and Morrisons say in their Tall Building Strategy (page 4) ‘it follows that in all other locations beyond (areas identified as suitable for tall buildings) – that is, the vast majority of the Borough – tall buildings are not considered to be an appropriate form of development’. STT has commented elsewhere on the Waitrose proposals and we believe our comments need to be taken on board in the preparation of more appropriate scheme for this site than has so far been presented. Consideration of the appearance of the development when viewed from residential streets both to the north and the south is crucial. Development should include a replacement for Jacobs Ladder footbridge across the Railway.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities. Key infrastructure requirements for this site allocation include measures to improve active travel including Jacobs Ladder footbridge and Green Man Lane.	15EA Waitrose, West Ealing		Eimty Hoque		349	Individual

EA16 West Ealing Station Approach. This is another site close to West Ealing Station that should form part of an area based plan strategy. (Having said that, STT does not understand why this site has been given this name. It is nowhere near the approach to the new West Ealing Station which is 100 metres down Manor Road on the other side of the railway.) STT holds that redevelopment of this site should accord with the 2013 site brief which required that ‘the height, scale and massing of new development must reflect the historic character of the surrounding residential areas on Hastings and Drayton Green Road. New development along Hastings Road must be low rise and not overlook the adjacent two storey terraced residential properties on this side, to create a harmonious streetscape and respect the current building line.’ We see no reason to depart from this principle. In particular, we do not accept that it is appropriate for the height of a development to be as high as 13 storeys as is now proposed. It should remain within the 7 storey tall building threshold which Policy D9 proposes. Please revise the local plan.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	16EA West Ealing Station Approach		Eimty Hoque		349	Individual

I am writing to express my strong opposition to the proposed Ealing Local Plan, specifically regarding the development known as "The Towers." After reviewing the details provided, I believe this plan poses substantial risks to the community's fabric, environment, and overall quality of life in Ealing. The plan's apparent lack of a solid evidence base and failure to adequately address the infrastructure needs for the proposed influx of 80,000 new residents are particularly concerning. The redefinition of tall buildings, without a thorough assessment of the impacts on the local and wider community, is alarmingly short-sighted. The anticipated population increase, without a corresponding plan for infrastructure improvement, shows a disregard for the residents' quality of life. Such a change, once enacted, would be irreversible, putting unsustainable pressure on local services, amenities, and green spaces. This threatens the essence of our community and could degrade our living standards. The push for high-density tower developments conflicts with the need for sustainable living environments. These developments risk converting Ealing into a dormitory town, lacking the vibrant community life that defines us. The economic ramifications of this plan could spell disaster for local businesses and, consequently, the local economy. Additionally, the plan's commitment to achieving net-zero emissions and preserving the natural environment is questionable. Pursuing a development strategy that inherently increases carbon footprints and reduces green spaces is counterintuitive. The proposals for specific sites such as EA15 Waitrose and EA16 West Ealing Station Approach demonstrate a lack of community engagement and disregard for the area's character and needs. The suggested heights and densities are	Noted. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Louis Sassoon		350	Individual
From what I read on the council proposals the entire street would be repurposed, meaning the businesses currently operating from Cowley Road Acton Vale industrial park would need to relocate. We are not prepared to relocate our premises.	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development is noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House		Meroujan Oundjian	Ringback Ltd	352	Individual

Thank you for consulting Thames Water on the above consultation document. Thames Water are the statutory sewerage undertaker for the borough and the statutory water undertaker for the eastern area of the borough. Please find attached completed response forms in relation to the policies in the draft Local Plan. In addition we have the following additional comments for information. Water and Wastewater Infrastructure In relation to wastewater infrastructure, Policy SI5 of the London Plan states that Boroughs should work with Thames Water in relation to wastewater infrastructure requirements. Policies will need to ensure that development is delivered alongside any necessary upgrades to both water and wastewater infrastructure required to support it. It has not been possible to undertake high level assessments of proposed allocations as there is no information available on the likely development capacities. However, we would encourage developers to engage with us prior to submission of any application as the timescales for delivering upgrades can be significant with local upgrades taking 18 months to 3 years and more strategic upgrades taking 3 to 5 years. Progressing pre-planning enquiries will help to confirm existing capacity and to plan any necessary upgrades. Where planning applications proceed without any pre-planning engagement there is an increased risk that Thames Water would request phasing conditions to prevent any occupation of development until the networks upgrades have been completed as it is not possible for	Noted and agreed. The council engaged with Thames Water as part of the preparation of the IDP which includes sections on potable water and wastewater. The council will continue to engage with Thames Water to plan for new infrastructure and in meeting the additional needs of new developments.	SP4.1 Good Growth		Chris Colloff	Thames Water	353	Statutory Body

Paragraph 20 of the NPPF requires strategic policies to set out a strategy for making sufficient provision for infrastructure for water supply and wastewater and in paragraph 158 states plans should take a pro-active approach to mitigating and adapting to climate change taking into account long term implications for water supply. The London Plan addresses water supply in Policy SI5 stating development plans should promote improvements to water supply infrastructure to contribute to security of supply and that development proposals should, through the use of conditions, achieve mains water consumption of 105l or less per head per day. The Policy is not sound as it fails to ensure general conformity with the London Plan and NPPF as it does not address the issue of water supply and reducing the demand for water in new development. Reducing demand for water forms part of the strategic approach to water management within our approved Water Resource Management Plan and the draft Water Resource Management Plan. Water efficiency for new development is essential to help securing water supplies for the future by reducing increases in demand from new development. While the London Plan requires the use of conditions to secure water efficiency at rates of 105l/p/d excluding allowance of 5l for external water consumption. The requirement is not applied in practice to all new residential development granted planning permission. As such it is considered that the issue should also be covered in the Local Plan to ensure that the policies are effective in ensuring water efficiency measures are incorporated into all new development. Addressing the issue within Policy SP2 also provides an opportunity for the Local Plan to push for higher	Noted. The London Plan forms part of Ealing's Development Plan. The council has made a conscious effort to avoid repeating provisions contained in the London Plan in Ealing's Local Plan. This is deemed to be unnecessary and potentially unhelpful. London Plan Policy SI 5 - Water infrastructure will continue to apply to future development proposals.	Policy SP2: Tackling the climate crisis		Chris Colloff	Thames Water	353	Statutory Body

Please register my feedback to this plan, I support Ealing Matters' response, including below concerns: STT Key points 1. It's a dangerously poor plan. The plan is critically important for the future of Ealing and its residents, but appears to be built on little or no solid evidence with few, if any, clear measures of success. There are also no strategies to monitor and manage the risks associated with the plan. This plan is so poor in its evidence base that we feel it does not meet the minimum legal requirements for a Local Plan. It has no evidence of need and shows a continuing failure of Ealing Council to define what success for its Local Plan will look like and how it will monitor whether the plan is working. This is particularly evident in regards to its housing targets which have no basis in an assessment of local need in terms of the kinds of housing local people, or Londoners more widely, need and can afford, or the point at which Ealing's infrastructure will fail to support the proposed 80,000 new residents. The plan also grants a 'green light' to developing towers by re-defining what a tall building is without an assessment of the local and wider impact of this kind of ultra-high density housing. It also fails to address growing evidence that developing high density towers as a way of providing housing is environmentally and socially unsustainable. 2. It would have a massive negative impact on the quality of life in Ealing. The plan aims to bring another 80,000 people into the Borough without addressing the issue of how this will impact quality of life and the ability of infrastructure to cope. This is reckless in the extreme, once the plan is accepted the changes and impacts will be irreversible. The housing targets it sets could have a huge negative	Noted. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The plan also sets out proposals for maintaining, enhancing and expanding the network of green infrastructure in the borough.	General		Ewen Ketari		354	Individual
I support all the concerns outlined by Stop the Towers. Please protect and preserve the life and culture in West Ealing.	noted.	General		Giulia Emiliani		355	Individual

I have concerns about the above plan because:- 1. The plan does not meet the requirements of National Planning Policy Framework 14- meeting the challenge of climate change , flooding and coastal changes. The council have not ensured that the new areas marked for building development do not negatively impact and /or worsen loss of biodiversity , open space and flooding. 2. The plan does not meet the requirements of National Planning Policy Framework 15- conserving and enhancing the natural environment. The council have failed to consider sufficiently the effects of proposed changes to GB & MOL boundaries regarding the protection and enhancement of valued landscapes and sites of biodiversity. There is also no plan to improve public access or how to include working with neighbouring boroughs who are connected to us. 3. The council has not carried out its long overdue review of Sites of Importance for Nature Conservation (SINCs). Hence the decision to de-designate areas of GB and MOL is being partly based on out of date information. The current proposals to de-designate GB and MOL are environmental backward steps anyway and should be reconsidered. 4. Given the problems caused by climate change to rainfall and increased flooding as a result, areas of MOL which have become hard standing should be returned to green space to increase biodiversity and off set flood risk. Please note my objections to the current plan and request urgent work is carried out to rectify these issues in the plan.	Noted. It should be borne in mind that the London Plan (published in 2021) is an integral part of Ealing's development plan has a suite of policies covering green infrastructure and the natural environment and sustainable infrastructure. The Local Plan builds upon these policies with strategic policies on climate action and a suite of development management policies in Chapter 5 that go well beyond the London Plan. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy.	General		Gillian Ravenhill		356	Individual

EALING COUNCIL LOCAL PLAN- REGULATION 19 CONSULTATION The feedback from West Acton Residents Association largely supports the Ealing Matters’ concerns about the proposed Local Plan. 1. The Plan is verbose and repetitive. The documents are difficult to read, which makes it difficult for people to understand and, hence, comment on them. 2. Ealing’s housing target of more than 40,000 homes over the next 15 years appears excessive and undeliverable. It would create unmanageable population growth. This is the case in the area close to North Acton station where tower blocks already built have put a strain on local amenities; with several more tower blocks either under construction or coming through planning that will exacerbate the situation. 3. The infrastructure plans to support this very high growth rate are inadequate. This follows the aforementioned developments at North Acton that have been built with no increase in associated facilities, e.g. no additional GP surgeries and no increase capacity at North Acton station. 4. Tall building heights, especially in Ealing and Acton, are excessive and unjustified. The existing Local Plan allowed overbearing blocks of over 50 storey in the North Acton area that provide a poor visual impact. 5. The 82 individual development sites in the Local Plan have the potential for a considerable negative impact on the Borough and the proposals for them are totally insufficient. 6. Ealing’s proposals for monitoring the plan are no more adequate now than they have been in the past. 7. There is no vision or strategy for the near total redevelopment of	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Policy E2 sets out a vision for Ealing Town centre. The Council welcomes detailed feedback on the monitoring framework and indicators. Regards heritage, it should be borne in mind that the London Plan is an integral part of Ealing's local development plan and includes a suite of policies on heritage and culture (Policies HC1-HC7). Nonetheless, the local plan at Policy SP3.3 D seeks to ensure that	General		Alan Cartwright	West Acton P	358	Community Interest Group

EA15 Waitrose. STT considers that the arrival of the Elizabeth Line required the Council to prepare an area strategy for sites around West Ealing Station to ensure the widest public benefits would accrue from this major infrastructure investment. Unfortunately this did not happen and it has resulted in a wholly avoidable legacy of distrust on the part of the local community. Even now opportunities exist to repair relationships through an area based plan involving both the community and key landowners, including the John Lewis Partnership. The current Waitrose store has only existed for 18 years, and the one it replaced was only 14 years old. We have very major concerns about the sustainability of Waitrose’s slash and burn business model and its impact on climate change. It really should stop. We applaud the proposed reduction in the maximum height to 13 storeys but think this would still be excessive and that it should be restricted to around 10 storeys. This would still exceed the tall building threshold of 7 storeys in West Ealing. As Allies and Morrisons say in their Tall Building Strategy (page 4) ‘it follows that in all other locations beyond (areas identified as suitable for tall buildings) – that is, the vast majority of the Borough – tall buildings are not considered to be an appropriate form of development’. STT has commented elsewhere on the Waitrose proposals and we believe our comments need to be taken on board in the preparation of more appropriate scheme for this site than has so far been presented. Consideration of the appearance of the development when viewed from residential streets both to the north and the south is crucial. Development should include a replacement for Jacobs Ladder footbridge across the Railway.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities. Key infrastructure requirements for this site allocation include measures to improve active travel including Jacobs Ladder footbridge and Green Man Lane.	15EA Waitrose, West Ealing		Colin Lomas		357	Individual

EA16 West Ealing Station Approach. This is another site close to West Ealing Station that should form part of an area based plan strategy. (Having said that, STT does not understand why this site has been given this name. It is nowhere near the approach to the new West Ealing Station which is 100 metres down Manor Road on the other side of the railway.) STT holds that redevelopment of this site should accord with the 2013 site brief which required that ‘the height, scale and massing of new development must reflect the historic character of the surrounding residential areas on Hastings and Drayton Green Road. New development along Hastings Road must be low rise and not overlook the adjacent two storey terraced residential properties on this side, to create a harmonious streetscape and respect the current building line.’ We see no reason to depart from this principle. In particular, we do not accept that it is appropriate for the height of a development to be as high as 13 storeys as is now proposed. It should remain within the 7 storey tall building threshold which Policy D9 proposes.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	16EA West Ealing Station Approach		Colin Lomas		357	Individual

We are long residents in the Borough of Ealing having lived in {redacted} for nearly 30 years. We have loved living here but having read the proposed Ealing Local Plan and we can see only say we're filled with dismay at its' content and the process of involvement for Ealing residents. Our main criticisms are; 1) It's not a planning document at all, rather a list of obvious and bland 'mission statements' that could apply to any organisation, business or local authority these days. 2) Astonishingly there are no population statistics or forecasts in this plan so we have no numerical reference point to work to and it's impossible to assess what these plans mean in practice. 3) A shortcoming of the documents is that there is no mention of plans for new hospitals, police stations, schools and amenities etc. These are the subjects we residents are really concerned about. 4) There are no strategic policies presented, it's just a list of woolly but worthy sounding objectives without any or research data to support them. For example, the number 2 priority is to 'fighting inequality' which is a virtuous objective but sadly not just within the remit of the Council Planning departments to fix. 5) There is a huge emphasis throughout on 'affordable' homes but there is no definition of what is affordable and to whom? 6) The plan introduces '20 minute neighbourhoods' where all necessary services, schools, doctors, employers are within 20 minutes for every resident to walk to. If you think about this for one moment you realise this is an abstract and impossible concept to for any council to design and implement and an example of yet another unworkable Council initiative. 7) There is great weight given to 'Good growth and Good jobs' but what does this really mean. are the Council going to vet employers	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. Regards 20 minute neighbourhoods, the plan aims to give people more choices about how they want to travel in their local community without a car if they want or need to. More options can benefit physical and mental health and help to create a stronger sense of community, boost the local economy, and increase resilience to the effects of climate change. Good Growth - growth that is socially and economically inclusive and environmentally sustainable – underpins the whole of the London Plan and each policy. It is the way in which sustainable development in London is to be achieved. Ealing's Local Plan must be in general conformity with the London Plan. The consultation exercise at Reg 18 generated over 14,000 responses and reached part of the community and geographies	General		Nicholas Rice		359	Individual

1. It's a dangerously poor plan. The plan is critically important for the future of Ealing and its residents, but appears to be built on little or no solid evidence with few, if any, clear measures of success. There are also no strategies to monitor and manage the risks associated with the plan. This plan is so poor in its evidence base that we feel it does not meet the minimum legal requirements for a Local Plan. It has no evidence of need and shows a continuing failure of Ealing Council to define what success for its Local Plan will look like and how it will monitor whether the plan is working. This is particularly evident in regards to its housing targets which have no basis in an assessment of local need in terms of the kinds of housing local people, or Londoners more widely, need and can afford, or the point at which Ealing's infrastructure will fail to support the proposed 80,000 new residents. The plan also grants a 'green light' to developing towers by re-defining what a tall building is without an assessment of the local and wider impact of this kind of ultra-high density housing. It also fails to address growing evidence that developing high density towers as a way of providing housing is environmentally and socially unsustainable. 2. It would have a massive negative impact on the quality of life in Ealing. The plan aims to bring another 80,000 people into the Borough without addressing the issue of how this will impact quality of life and the ability of infrastructure to cope. This is reckless in the extreme, once the plan is accepted the changes and impacts will be irreversible. The housing targets it sets could have a huge negative impact on the Borough in terms of its health, education and transport infrastructure as well as access to amenities and green spaces. It aims to increase the population of Ealing by around 80,000 people without any analysis of the infrastructure needed to	Noted. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The plan also sets out proposals for maintaining, enhancing and expanding the network of green infrastructure in the borough.	General		Sanjiv Manektalla		360	Individual

Save Gurnell are a community group of Ealing residents, and we are writing to submit our feedback on the Ealing draft Local Plan Stage 2 (Regulation 19.) Due to the sheer volume of documents and limited time, we have commented on the topics that pertain to our area of focus (the Gurnell Area) as well as topics that impact the plans for that area. More specifically, we have commented on the areas that we disagree and should be challenged. 1. General comments about the Stage 2 consultation Before we get into the details of our feedback, we wanted to leave a few general comments about the plan and consultation itself: • With over 500 pages the plan is enormous, even though a “wayfinding guide” has been produced it is extremely difficult and time consuming to navigate. • Changes from the Regulation 18 version are very hard to spot which has made it very time consuming to verify if our Reg 18 comments had any impact or not. • The timing of the consultation is poor, spanning over the Easter holiday period when everyone has their children out of school and is taking time to be with family and friends. There seems to be a theme with Ealing Council choosing major holiday periods for key public consultations. The Reg 18 happened over Christmas of 2022 and only after significant public pressure, Ealing Council extended the consultation deadline. The purpose of the points raised above is to highlight that the overall management of the Local Plan process (including the Reg 18) has felt reactive and poorly planned when compared to other London councils (regardless of political party.) It feels like Ealing Council are rushing it through the minimum viable process, making it extra challenging for residents to provide their feedback.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19). It is imperative that the council has an up to date Local Plan and there are potentially severe consequences of failing to have one.	19EA Gurnell Leisure Centre		Chris Sinnock	Save Gurnell	361	Community Interest Group

As owner occupiers of premises at {redacted} Agnes Road we understand and support the principle of bringing forward brownfield land for development to provide new homes. However, the proposal for new residential block of up to 7 storeys on this site presents a challenge to the amenity of residents along the south-east side of Agnes Road that does not appear to have been addressed in the council’s plan. In particular, numbers 27 to 37, Agnes Road have sub-standard rear gardens due to the historic boundaries, presumably related to the original assembly of land now forming the Acton Vale Industrial Park. The development of new and taller buildings within the western rectangular extension of the Industrial Park has potential to cause serious harm to the setting, amenity, privacy and receipt of daylight of the existing houses. We would suggest that this could be mitigated by identifying all or part of this rectangular area for return to the Agnes Road houses as garden land, and requiring the set-back of any new development to at least the line of the rear garden extents to the north. We consider that the Plan would be made sound in respect of this site proposal if these matters were directly addressed in the version of the Plan to be issued to the Secretary of State. We are willing if necessary to attend at the plan inquiry to elaborate on these representations. Currently, the site is a mix of retail and light industrial use, with buildings no more than two storeys high. The plan aims to intensify the use by allowing six-storey developments. Here are my objections: - Unnecessary Intensification: Given the significant new development in the area over the past few years, I find the proposed six-storey height unnecessary. It risks altering the character of the	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development is noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House			Charlie Bateson		364	Individual

My family has lived in Ealing for over a hundred years. I grew up here and returned to live here. I am alarmed by the increasing number of “towers” that are planned or have been built in the Borough. Towers built in the 1960s, and now often demolished, remind us how such developments do not always serve the needs of the residents. I would urge the Council to study the urban landscape here in Ealing and realise what could be lost by overdevelopment. The need for housing is clear and overwhelming, but with thought and attention to detail this can be addressed. I would suggest that the Council look at successful developments and take a leaf out of their book. One block I know in the Borough works for residents and the environment . Admittedly it has been built with the needs of the over 60s in mind, but the type of building would work for all ages. It is Bryant Court at 278 The Vale in Acton, W3. The variety of apartments in size and layout would suit people of all ages and stages in life. It is low rise. There is plenty of communal green space. There is excellent gated parking (so often forgotten in new developments, but very important for those who need it) (disabled/ small children etc etc) There is a bike store, so important to encourage other forms of transport. There is a bus stop outside. An enormous amount of thought has been given to the needs of Bryant Court residents, and also to the aesthetic of the building, which enhances the local scene and does not create a blot on the landscape with a wind tunnel effect. The Council must also consider the extra services required when high density housing is built in a neighbourhood. It is already hard for people to access surgeries, get places at nurseries and schools etc. I am afraid that one is given the impression that buildings are thrown up without the sort of attention to detail that Charles Jones the nineteenth century	Noted.	General		Karen Staartjes		365	Individual

I am concerned about the very high population projection - 80,000 individuals - and the type of building structures that will be constructed to house this population. I can see the need to build new good quality housing, including low-rise flats, especially to accommodate social housing. But very high buildings, such as those being built and considered around West Ealing station, are inappropriate. They provide very little space for living, are likely to become sleeping hubs or dormitories for middle class commuters, before deteriorating after 20 years or so into poor quality, substandard accommodation. Overdeveloped sites, except in the most favoured locations, always end up this way. The housing model of the revamped Singapore estate, by contrast, is very good. The plan does not ensure a high quality of build. The fire risks aspect will have been dealt with effectively by the Building Safety Act 2022, but noise pollution from outside the structure of the building and between flats needs to be given a far higher priority. The minimal protection provided by the Building Regulations, sched. E results in a poor quality of life for many residents. The Council needs to ensure that only designs with a very high standard of resistance to the transmission of sound are allowed in any new development. The plan does not sufficiently consider the need to build additional infrastructure and facilities for ordinary living, commensurate with the population increase.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	General		John Pointing		366	Individual

As I am on holiday at the moment and have limited time to respond to this very dense and wordy document, I cannot raise every objection I have to this poorly considered proposal. However I can say that I totally agree with every one of the 10 points of objection raised recently by Ealing Matters. It appears that the document has been cynically contrived in a language, and at a length, such that the average resident would be discouraged from reading it and raising perfectly valid objections. The plan itself does not even meet legal requirements for a local plan. Redefining what is meant by a 'tall building' will give the go-ahead to developers to submit proposals totally out of keeping with the area, which would be socially and environmentally damaging. There is no analysis on how these high density dwellings would impact on local services, some of which are already strained to breaking point. Let alone what the effect would be on local communities. Many residents are long stay, family based people. My wife and I have lived here well over 40 years and so have many of our neighbours. This plan will encourage what has been described as a 'dormitory' population. Short stay, with no real commitment to the area. Tower accomodation is well known to have a high carbon impact, both in its construction and during its lifetime. I have already raised repeated objections to the proposed developments at Waitrose and the Majestic site. There was a willingness expressed by the Council in a 2013 brief that developments should always reflect the character of the residential area...and create a harmonious streetscape'. We appear to have a much less caring and sympathetic council today.	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council's ambitions and plans for each of the seven towns that make up the borough. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Policy D9 in Chapter 5 sets out more detail. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient.	General		Fred Harris		367	Individual

Writing in haste as there hasn't been enough notification about the deadline. Was notified by STT and Five Roads Forum, but I dread to think of all the wider Ealing residents who have no idea of this. Firstly I agree wholeheartedly with the 10 points made by Ealing Matters. The Ealing Plan isn't evidence-based and doesn't meet the legal requirements for a local plan. Redefining a 'tall building ' will only encourage developers to submit higher plans, regardless of the evidence that such buildings are environmentally and socially damaging. Bringing 80,000 more mainly 'dormitory', short stay people into the borough will impact services and other infrastructure and kill existing communities. Such residents, all a similar age, will be living isolated lives in their high-rise dwellings, with no commitment or input into the area. There's no analysis of the impact of the plan on local businesses. The towers proposed have known high-carbon impacts both during their build and in lifetime use. The commitments to protecting nature in the Borough seem to have been ignored. There are no mitigations on climate change. The developments at Waitrose are the third incarnation since 1987, which seems inconceivable, and they are far too tall for the area. We also need plans to renovate the Jacobs Ladder area, which has been neglected for years and could be a useful path into West Ealing if not so dangerous. Closest to my heart: the developments nearest my house, according to the 2013 brief, should 'reflect the historic character of the area....low rise..... create a harmonious streetscape'. This seems to have been forgotten and we live in dread of encroachment.	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council's ambitions and plans for each of the seven towns that make up the borough. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Policy D9 in Chapter 5 sets out more detail. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Measures to improve Jacobs Ladder footbridge in West Ealing are identified as key infrastructure requirements for site allocation 15EA.	General		Jane Harris		368	Individual

I am dismayed that the local plan has such emphasis on high density, high rise development which are anti-community. Overall it seems ill conceived and in conflict with the needs and concerns of the majority of residents who have opposed such development for many years. Ealing Council needs to listen to its residents and take account of the important issue of sustainability and climate change in the local plan. At the moment it does neither. The 'shipping container' debacle is an example of another terrible idea that was previously lauded by the Council as a fabulous new step forward. Have any lessons been learned from this? I support the concerns and objections raised by Ealing Matters (cc'ed).	Noted. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy. The case for enabling development exists entirely independently of Policy ENA, which serves to limit and define the scope of enabling schemes. The Council welcomes detailed feedback on the monitoring	General		Manika Power		369	Individual

Policy G5- Urban Greening: D. This is an absolute joke as LBE does have a plethora of trees and tree canopy but -a. the Council cannot cope with looking after them b.it cannot cope with leaf fall c. developers promise trees & then they plant them & then neglect them d. we have a singular lack of green roofs-the Log cabin has one & that is the only one I can think of e. podium gardens appear on plans but who will maintain them f. Green walls are removed from plans e.g. the BHS site g. allotments have vast waiting lists and are dominated by the middle classes who don't actually need them. Most allotments were originally for people who lived in flats nearby h. One of the mad cap ideas of the Council is pocket parks-this is just one example of a pocket park about 30 yards from an actual park!!! Basically a rubbish dump that attracts anti social behaviour. {image of a seating area} i. I haven't noticed developments making a positive contribution other than banging on about bird boxes and the suchlike when in fact the development should not have been passed purely on the basis that 100s of units have already been passed using the local park as its green space or even a cemetery for that matter. I would quite like to do an exercise where all the people who have a small local park that developments have put down as available green space are asked to come for a photo call to stand in the park. One would not be able to see the grass!!! A small local example-I noticed one street tree was dead but a local Councillor thought it was just resting! But it had been dead since planting and a dead tree that had been regularly watered. It took 2 years & another Councillor to get it replaced & then 4 appeared. We, as residents, have also been asked	Noted. This policy seeks to interpret how the parent policy in the London Plan will be applied.	Policy G5: Urban Greening – London Plan – Ealing LPA – local variation		Susan New		337	Individual

Policy G6 F (ii) (iii): Offsite provision. Absolutely not. The Borough has now come to the point that developers are even putting down cemeteries as the nearest green space & numerous large developments near me keep putting down Dean Gardens as the nearest green space even though in the last Local Plan it stated Dean Gardens Sites DPD Site context: The site is located along the Uxbridge Road corridor with good bus connections and within walking distance of West Ealing Station. Part of the site boundary along Leeland Terrace faces Dean Gardens, a well-equipped open space that is well used during the day but poses safety issues at night. Dean Gardens is too small to be classified as a local park, and the wider area suffers from local park deficiency, as well as moderate open space deficiency. Large developments were also supposed to have allotment space allocated but every allotment area has a long waiting list. These policies are just waffle & not based on actual reality. {Suggested modification:} A complete rewording based on reality.	Noted. The biodiversity net gain approach embeds a spatial hierarchy into habitat delivery, where there is a preference for onsite or local enhancements. Exceptions to this hierarchy will only be considered where it can be shown that offsite provision can secure substantially greater gains over the available on-site enhancement opportunities.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation			Susan New		337	Individual

Policy S1 :Southall Spatial Strategy but actually as it was in Reg.18- Opportunities for Southall. Given that the whole wording has changed for the Spatial Strategy & now appears as Opportunities for Southall I am submitting my Reg.18 comments as they are still relevant. This includes Shaping Ealing responses-4.7.10-4.7.12 and Opportunities for Southall-4.7.13-4.7.19. I don't live in Southall and I haven't been there recently and so it would seem somewhat of a cheek to make any comments but I will. 4.7.12 - The responses to Shaping Ealing from Southall residents says it all really and the Spatial Strategy does not address the issue that the residents are not happy with the way the area is changing and lack of good facilities such as schools, GPs & leisure. They also don't like the heights of the new buildings that are being foisted on them- most of which are unaffordable anyway & there is a lack of good employment. The latter due mostly to the fact that land that could have been used and was used for employment has been given over to residential units in large developments. This just seems to be an excuse to justify why LBE has built so many towers on so much land in Southall and that the London Plan is to blame for this. 4.7.15 - Re-set seems to imply that the tower building will stop but there are too many in the pipeline and so the Southall Re-set programme is nonsense. The damage has already been done. Re-set just seems to be tokenism. I don't quite know what a community led approach to regeneration and investment would be as the Core Strategy just concentrated on building more residential developments. It is a bit vague and the Council does not seem to be in tune with Southall residents and what they want and it must have come as a surprise when the LBE tried to sell off Southall Town Hall I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: High Rise Buildings: Hanwell has a village look and feel currently. Hanwell contains several conservation areas that are beautiful and valued by locals. High rise buildings will ruin the character completely and more flats will overpopulate the area. Hanwell has had new flats built recently that are standing empty, one example is the previous Wickes site, now Hanwell Square Flats, Boston Rd, London W7 3SH. No design guidance of the planned high rise developments buildings. No mention of sustainability for these sites.	Noted. The spatial strategy recognises that in future delivery will focus on more moderate levels of employment-led growth. A range of measures will build upon and promoting Southall's role as a cultural hub and destination of national importance. Office, retail, and leisure-based development will be encouraged and reinforced to develop a more diverse and resilient local economy, while ensuring community and civic infrastructure is delivered alongside residential development. The policy references the importance of making improvements to public realm and ecology along the Grand Union Canal towpath. It also stresses the importance of public realm interventions at Southall and King Street centres to make streets greener and more attractive, and combat perceptions of poor safety and vulnerability to crime. Regards the Elizabeth Line this improved public connectivity has been game changing with more regular and frequent services notably in the evenings and at weekends. The importance of proximity to Heathrow Airport for the local economy in terms of direct employment and the supply chain is also acknowledged. Regards the AMR, a 5YHS and Housing Trajectory was published in November 2023. A further update, including the most recent monitoring period 2023-24, will be published in early 2025.	Policy S1: Southall Spatial Strategy		Susan New		370	Individual
	Noted. The Local Plan expects a lower quantum of residential led development within Hanwell reflecting fewer development opportunities than say Ealing or Southall. This is reflected in the number of development sites (8) of which half are considered to be potentially appropriate for a tall building (mostly in the district town centre). As specified in Policy H2 future development will be character led.	Policy H1: Hanwell Spatial Strategy		Hannah Jones		373	Individual

I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 01HA Ealing hospital frontage: The site is not suitable for a tall building. It is directly in front of the hospital without adequate space between the hospital and the proposed development site, causing privacy and light reductions. Unsuitable living conditions for a twelve storey building directly next to the Uxbridge Road. Climate change caused by the construction and the number of people living in a twelve story building.	Noted. Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study. Heights are to range up to a maximum of 12 storeys (42m) stepping down from the recently redeveloped high rise high density residential development at St Bernard's Gate. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	01HA Land to the front of Ealing Hospital		Hannah Jones		373	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 02HA Grays Garage: Grays is a thriving business providing a valuable service to locals, constantly busy. Jobs will be lost with no permanent employment provided. No infrastructure provided for the expanding population living in 6-storey blocks on the busy Uxbridge Road, and no parking. No plans to mitigate climate change caused by the construction and the number of people living there. No requirements for sustainable building or the use of recycled resources. The area currently has character with the cottages located next to this site.	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to the heritage aspects of the adjoining St Mark's Church & Canal Conservation Area to the south and the Hanwell Clock Tower Conservation Area to the north-east. It is proposed that a mixed-use development that provides residential, commercial space and public open space should come forward therefore ensuring some employment opportunities in the future.	02HA Gray's Garage		Hannah Jones		373	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 03HA George Street Car Park: Parking in Hanwell is required, this is the only car park we have. A car park is an important local amenity for children, the elderly and disabled. This will destroy the local character of the Clock Tower Conservation Area. It is a square of mainly low rise cottages and the proposed 6-storey building is located in the middle.	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to heritage aspects of the adjoining St Hanwell Clock Tower Conservation Area to the east. The design principles for the site seek to ensure that the height of any development proposals takes into consideration the 2 storey terraced cottages fronting the site, with scale and massing responding sensitively to the low-rise surrounding housing. They should reflect the fine-grained character of neighbouring streets. A mews style development is proposed to reflect existing adjacent residential development, with tree planting and soft landscaping to improve the public realm. The site also benefits from a relatively good public transport accessibility level.	03HA George Street Car Park		Hannah Jones		373	Individual

I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 04HA Lidl and Discount Store Site: Lidl and Poundstrecher are thriving businesses that are a valuable service to the local community. There is no community service provision, ie medical, educational or recreation. No plans to mitigate climate change caused by the construction and the number of people living there. No requirements for sustainable building or the use of recycled resources.	It is intended that a supermarket will be reprovided on the site. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	04HA Site of Lidl and discount store		Hannah Jones		373	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 05HA Marshall site and area: This is an 8-storey building, once again ruining the low-rise character of Hanwell on the edge of the Clock Tower Conservation Area, and is on the busy, congested Uxbridge Road. No provision for children, the elderly and disabled. No plans to mitigate climate change caused by the construction. No requirements for sustainable building or the use of recycled resources.	Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study. It is proposed that a new community space on the southern part of the site is provided. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	05HA Marshall Site, Gold's Gym & Garages on Montague Avenue		Hannah Jones		373	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 06HA Tile Deposit: No provisions detailed for medical, educational, and recreational needs, or for children, the elderly and disabled. No mitigation for climate change.	It is proposed that affordable and assisted housing be reprovided alongside the provision of new residential and community uses. In addition, Chris Payne House will be retained. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	06HA Tile Depot & Lambourn Close		Hannah Jones		373	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 07HA Copley Close: This is a long thin space and not suitable for a building of 7 storeys. The plan says there is a problem of parking on pavements but no mitigation plans. No plans for health facilities.	This site is part of a larger estate regeneration project, much of which has already been completed and is subject to a masterplan. The allocation already notes that cars are parked along the length of Copley Close with many parked on pavements. It also notes that the public realm is poor quality and pedestrians and cyclists are not prioritised. Future development will seek to tackle these issues. Key infrastructure requirements for the site include the need for health facilities.	07HA Copley Close Estate		Hannah Jones		373	Individual

I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below: 08HA High Lane: No mention of employment provision. The people who were there previously will not be able to afford to go back and live there. Over-reliance on the Brent River Park and no other provision. No sustainable building requirements or provisions for the wildlife lost.	Affordable and assisted housing will be reprovided alongside the provision of new residential and community uses. This means that any existing residents who wish to remain at High Lane will be offered a home. Given the residential character of the neighbourhood, large-scale industrial or commercial development is not considered appropriate. The allocation also proposes to create green, pedestrian and cycle links to Mayfield Local Park and the Brent River Park. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	08HA High Lane Housing Estate		Hannah Jones		373	Individual
I have tried to read the draft local plan in full but it is not an accessible document. I also find it light on evidence and strong on generalisations and what may or may not be good intentions. I have read the views of Ealing Matters and Stop The Towers and fully support their concerns about the plan. It seems the Council is intent on ploughing on as it has done for some years now, in particular setting housing targets that are unrealistic, with no thought to the impact on the borough's infrastructure and, in terms of high buildings no thought to the environment, the quality of life or what kind of housing the borough actually needs. It is sad that despite all the local and very valid opposition to high rise proposals the Council continues to promote tower blocks as some kind of answer. This does not feel like a valuable Plan - process driven and lacking in aspiration. I fear it will get passed regardless and will sit on the shelf, used only to justify the worst that developers will hope to do to the borough.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council's ambitions and plans for each of the seven towns that make up the borough. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Simon Vile		374	Individual

Having read your local plan I would like to raise the following concerns : The wording of the plan is simply not accessible to the majority of residents unless you are familiar with planning terminology, I have spent more time looking up phrases used then actually reading the plan. It also repeats itself constantly without any clear vision or strategy. The target of more than 40,000 homes over the next 15 years is excessive and not realistic and I'm shocked you think this can be delivered, if it were to be completed it would create population growth of more than 80,000 people according to GLA projections which in itself is not sustainable. The infrastructure plans to support the population increase are somewhat vague. The plan's proposals for wholesale redevelopment of relatively new buildings will exacerbate climate change. Valuable areas of MOL are to be lost. A new policy of 'enabling development' will justify developing them in the Council's interests. There are no policies to protect the heritage of Ealing. Tall building heights, especially in Ealing and Acton, are excessive and unjustified. There is no vision or strategy for the almost total redevelopment of Ealing Metropolitan Town Centre that the Plan puts forward. The Plan's 82 individual development sites have the potential to have considerable impact on the Borough and the proposals for them are totally insufficient. Ealing's proposals for monitoring the plan are no more adequate now than they have been. Overall I have to say as a lifelong resident of Ealing I am shocked and appalled at this plan which seems to have no idea or any evidence to support the housing targets and in particular the needs of the people of Ealing.	The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the	General		Joanne Livingstone		375	Individual

As a longtime resident and council tax payer, I strongly object to this plan. These are my reasons: * The document is incredibly difficult to understand, it uses a lot of planning jargon, which I suspect is a deliberate attempt to confuse. It is far too long and I found it repetitive. * The Ealing infrastructure, water, sewerage, waste, electricity and more, is not adequate for such high growth, unless proof is given that this is not the case * The environmental footprint that such vast towers create is not adequately explained. The 82 individual development sites will have a considerable impact on the quality of life and infrastructure within the Borough. * EA15 and EA16, very close within an already dense area, do not accord with the site brief of 2013, limiting the height of buildings to 7 stories max. Especially as the Manor Road tower seems to be built already despite huge local opposition. * The population density in Ealing is already at capacity and with the intake of another proposed 80,000 people will further impact on the quality of life in the Borough. * Social cohesion is under threat and is not taken into account! * All services are already and have been for some time at breaking point. * Ultra dense highrise housing are not designed for families , but become investment cabins, dormitories staying empty most of the time. * It will not create much needed local jobs, or sustainable business hubs. * ~~Many of the recently newly built properties remain empty as~~	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council's ambitions and plans for each of the seven towns that make up the borough. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Silvie Nesbitt		377	Individual
I would like to endorse all the points made by the Stop the Towers action group against the implementation of the Ealing Local Plan. This plan is poorly prepared, limited in vision and utterly misguided. It is horrific short termism, which will hasten the decline of our borough in social, economic, environmental and health terms. It may solve an immediate problem, but it will create many more. Ealing will become less and less pleasant for ordinary individuals and families to live in. Please, please scrap or radically revise it.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council's ambitions and plans for each of the seven towns that make up the borough. The Local Plan is also based on an extensive technical evidence base.	General		Judy McGlashan		378	Individual

I chose to relocate here with my family almost 6 years ago and am seriously considering leaving due to the utter disregard of local residents concerns around the Council's plans to continue to over develop our neighbourhood, with unsightly, non-environmental apartment blocks, using a "build them tall and cheap" strategy. Ealing was once a town of great heritage and pride and now it is no longer. It is fast becoming just a functional, ugly, dirty, over developed town with a lack of community. Where is the environmental, ecological, green town we strive to live in so that Ealing can be considered a great place for families to thrive and prosper? I live in Connaught Rd and share serious concerns to a lack of thought and care for what the implications and consequences will be for local residents if Ealing continues with their plan to over-populate areas such as Manor Rd, West Ealing Station, Alexandria Rd - the traffic is already a nightmare, so I cannot imagine what adding an additional 40,000 residents will do to the Ealing neighbourhood. The infrastructure plan does not support this over development at all. I fully support the concerns raised by Ealing Matters and register my grave concerns as to the future of Ealing Borough.	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council's ambitions and plans for each of the seven towns that make up the borough. The Local Plan is also based on an extensive technical evidence base. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Jacqueline Bakhai		379	Individual

But as a member of the Brent River and Canal Soc, I am adding my views to theirs, but only copying their blog as I'm ill in bed but feel very strongly that their recommendations are really important . Please please listen to them , thank you . We welcome the proposal to give our Brent River Park (BRP) official Regional Park status. It is a fantastic opportunity to protect and improve the joined-up management of the whole of the BRP and adjacent green spaces. As a Regional Park, the BRP has great potential to become a flagship for Nature Recovery, Biodiversity Net Gain and the revival of our shockingly polluted River Brent. Our park is already providing a safe haven for wildlife, sports provision and wellbeing. We now have the chance to further improve upon it and to complete the vision our founder Luke FitzHerbert set out almost 50 Years ago when our charity first formed the park we all know and love today. The Brent River Park is a crucial floodplain and as a Regional Park we can improve its flood defence capacity thereby improving our boroughs resilience in the face of the Climate Crisis. We applaud the decision to declare Warren Farm Nature Reserve a Site of Importance for Nature Conservation and to give all of our rewilded meadow Local Nature Reserve designation. We are delighted that Ealing Council no longer plans to put sports on such an ecologically important site and has committed, with the support of Imperial College, to safeguarding Warren Farm NR and surrounding BRP Meadows. We also welcome the reversal of the decision to develop land on Uxbridge Road, a car dealership opposite the Viaduct Pub that abuts our park. This site is way too close to the River Brent and forms a part of the BRP floodplain.	The Local Plan establishes a framework for maintaining, enhancing and expanding the network of green infrastructure in the borough. The drivers for reviewing Ealing's Green Belt and MOL designations is not to identify additional land to accommodate development, but rather to ensure that this land is afforded the correct designations. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Where changes have been proposed to the designation of GB and MOL in the majority of cases these sites continue to be covered by other appropriate policy designations such as Public Open Space, Community Open Space or Site of Importance for Nature Conservation (SINC), and such policies continue to protect these sites from inappropriate development. Only very limited releases have been considered and only where these are considered necessary to enable enhancements to the green network. A number of the recommended changes proposed at Regulation 18 are now not being pursued, as detailed in the stage 2 report. As detailed in the stage 1 Green Belt and Metropolitan Open Land review, as well as reviewing the existing adopted network of sites, it was considered appropriate to examine whether any new sites warranted consideration for inclusion as GB or MOL. Following a high level of the LPA area, six potential candidate MOL sites were identified to be examined as part of the review. As with the established MOL parcels these sites were tested against the defining criteria to understand to what extent these parcels qualify. Whilst some variation was noted between the six parcels none	SP2.2 Climate action		Damaris Wollen		380	Individual

Policy A1: Acton Spatial Strategy: Once again the Local Plan is so different from what was presented for Reg 18 it is difficult to navigate the completely new wording. Preface Although I don't live in Acton I used to visit the town using the E3 bus on a regular basis especially in the 1990s when I went to aqua classes at the Acton Pool & then later in the 2000s when I had cheap acupuncture at the Michael Flanders Centre. I also submitted my views on the S.Acton Estate re-modelling for the Development Sites DPD & also on what was then Act 2. During this time I noticed the Council selling off the 'family silver' i.e. property. I think the first one that I noticed was the Old Fire Station as when I used to pass it there was a lunch club & then it had gone, then the Town Hall, the old pool, the Magistrates Court & then finally the library. The latter is now a community run cinema & centre. At this time I also noticed the decaying heritage assets of Acton Town Centre CA. The spatial strategy does not mention sports & leisure centres and so I don't know when to bring up this subject- Acton New Pool. I also don't know where Arup got the figures from but there are not 15 publicly accessible pools in Ealing-7 at the most. Just 3 public ones. Also to my irritation & annoyance Acton New Pool is not accessible to me as a disabled person whereas the old pool was and had a disabled changing room poolside. So no use for my leisure pass. The only pool that has disability sessions is Dormers Wells-one evening a week. Not exactly accessible for me. David Lloyd's looks very attractive but I don't have the money or a car to get there. E. Acton Gardens. In 2011, amongst all the other suggestions I made re the S.Acton Estate, I suggested a hopper bus that could link S.Acton & Acton Central. There is also now the problem of genuinely	Noted. Regards Acton Swimming Pool, whilst it may be less convenient than the old pool it has been designed to meet the relevant standards. Acton has the following accessible facilities located on the ground floor wet side areas: • Changing places changing room Changing Places Toilets (changing-places.org) - accessible for the teaching and main pools • Fully accessible changing room (toilet, shower and wash hand basin) - accessible for the teaching and main pools • Ambulant showers located in both the main poolside showers and the teaching poolside showers • A total of 7 accessible toilets within the wet change and poolside areas. • 4 accessible changing cubicles in the wet change areas. Pool side: • 1 x pool pod for accessing the teaching pool • 1 x pool pod for accessing the main pool • Accessible steps for accessing the main pool at the shallow end	Policy A1: Acton Spatial Strategy			Susan New	381	Individual

Policy A.2: Acton Town Acton District Centre: I am going to merge all the points (i)(ii)(iii) together re the enhancement of Acton’s role as a District Centre as they are all linked to the fact that most of the area is in the Acton Town Centre CA. A fact that has been ignored since it seems to have been on the ‘At Risk’ register from time the register was first published. The comments are always the same-street clutter, inappropriate frontages, garish signage, deteriorating buildings etc etc and nothing has ever been done about it. The area is full of the most wonderful Edwardian workmanship that has just been ignored as if it is some middle class desire to tart the place up a bit but even in the London Plan the importance of heritage is mentioned and there used to be a LP guidance that had exemplars from place like Leyton and the East London to show how an area can be improved just by simply changing shopfronts & generally maintaining buildings. Shopfronts don’t have to be clones as they can show individuality & sometimes quirkiness but must avoid garishness & and excessive illumination.I have the occasional foray into trying to persuade the Council to have shopfront guidance (as mentioned in all the CA reports) and did a considerable amount of free work on it plodding about places like Acton taking photos-last promised in 2014 after 6 years of work & then nothing. King’s Parade Grade 11 Listed –shows how little respect is paid to beautiful craftsmanship {image} The whole of Acton Town Centre is just full of decaying Edwardian buildings and garish frontages and ‘active measures’ have been promised in the past but never happened. There was even a shopfront grant scheme at one point & all that seemed to appear was the odd black or white clone shopfront. I have not noticed that development meets the highest design standards & responds	Noted. The policy highlights the importance of conserving and enhancing the historical attributes of Acton District Centre and taking active measures to secure the future repair, reuse, long-term survival, and management of Acton Town Centre Conservation Area and any heritage assets. Regards pop ups this is a useful way of avoidiung vacant retail units and also encourages experimentation. Meanwhile uses can also be used for cultural and creative activities and have been very successful in other places, notably West Ealing.	Policy A2: Acton District Centre			Susan New		382	Individual

I have lived in Ealing for a long time and originally went to school here back in the 1950/60s. I write to say that, once again, I am absolutely appalled at the new local plan that you have produced and your lack of transparency about this leaving it to local groups to alert residents rather than you contacting residents directly with the main points and asking for comments and the short response time. I wholeheartedly concur with Ealing Matters' critique of this bleak proposal. Specifically, I share their concern that its execution would transform Ealing into a mere dormitory town, accommodating individuals with minimal engagement in the Borough's economic activities or contribution to local businesses and employment opportunities. This would undoubtedly exacerbate the existing strain on essential resources like healthcare services, schools, and public spaces, stretching them to their limits and beyond. The proposed dense tower block accommodation represents an unsustainable approach, both in its construction and long-term consequences. Not only does it fail to address Ealing's pressing need for family housing, but it also neglects the demographic diversity essential for the Borough's vitality. Such housing solutions cater primarily to young, relatively affluent individuals, thereby altering the Borough's demographic landscape drastically. This myopic approach undermines the long-term social fabric and sustainability of Ealing, overlooking the crucial importance of much needed housing options suitable for families and diverse communities. Despite a slight reduction in height, the numerous proposed tower blocks remain imposing and discordant with the area's current ambiance. They will undoubtedly obscure natural light for many residents, detrimentally impacting their living environment. This critique extends to the proposed Waitrose redevelopment, whose	The Local Plan is based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy.	General		Gillian Woolfson		383	Individual

The Creffield Area Residents Association (CARA) has the following comments about the latest revision of the Local Plan for Ealing Reg 19: Ealing has traditionally been the Queen of Suburbs – there seem to be no polices to protect the borough’s heritage which includes fine streets of Victorian and Edwardian houses, or to protect the green space and gardens that make up the natural environment. The proposed tall building heights are excessive and do not conform to the local character of Ealing, and are opposed by most of the residents. We are concerned that the planned housing target of an extra 40000 homes is excessive and is not supportable by local infrastructure. In general we do not see that the local plan conforms to NPPF Section 16 Conserving and enhancing the historic environment: ‘Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account: a) the desirability of sustaining and enhancing the significance of heritage assets ... b) the wider social, cultural, economic and environmental benefits that conservation ... can bring; c) the desirability of new development making a positive contribution to local character and distinctiveness; and d) opportunities to draw on the contribution made by the historic environment to the character of a place.’ As Local Plan Reg 19 is 518 pages long this does not seem that fit for purpose as it is just too unwieldy. CARA Supports the views of Ealing Matters that have dedicated the time to going through the latest version. We are re-submitting the comments we made about Reg 18 which we believe still apply.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. Regards heritage, it should be borne in mind that the London Plan is an integral part of Ealing's local development plan and includes a suite of policies on heritage and culture (Policies HC1-HC7). Nonetheless, the local plan at Policy SP3.3 D seeks to ensure that new development meets the highest design standards, responds positively to the local character and recognises the role of heritage in place-making. There are numerous other references to the importance of heritage and conservation throughout the plan. The plan is also informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Margaret Cunningham	Creffield Area	509	Community Interest Group

Infrastructure NPPF Para 20. Requires that: 'Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: b) Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat). NPPF Para 34 requires that: ' Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).' London Plan Policy D1.B states that: 'In preparing Development Plans, boroughs should plan to meet borough-wide growth requirements, including their overall housing targets, by: 2. Assessing the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth; London Plan Policy S1.A states that: When preparing Development Plans, boroughs should ensure the	Noted. It should be noted that the housing target is set out in Policy 4.3 A and the the Mayor of London has raised no objections in his statement of general conformity regarding infrastructure delivery. Infrastructure needs are modelled variously upon population or household projections depending upon the type of provision, with health, for example, based upon GLA population projections. The local plan is subject to binding housing targets and it is not the role of the LPA to produce population projections. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. IDPs are living documents, acting as a 'snapshot in time', and as different infrastructure providers respond to their own unique challenges, the information will naturally date and alter over time. The IDP will require updating on a regular basis to reflect this. The delivery of infrastructure is the responsibility of various different bodies, as detailed within the IDP, including those with a statutory duty to provide sufficient infrastructure to meet identified needs, as well as those who are responding to market conditions.	SP4.1 Good Growth		Libby Kemp	Creffield Area	384	Community Interest Group

London Plan Public Open Space -Policy G4 Open space A Development Plans should: 1) undertake a needs assessment of all open space to inform policy. Assessments should identify areas of public open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for the different types required. Assessments should take into account the quality, quantity and accessibility of open space 2) include appropriate designations and policies for the protection of open space to meet needs and address deficiencies 3) promote the creation of new areas of publicly-accessible open space particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change 4) ensure that open space, particularly green space, included as part of development remains publicly accessible Areas of deficiency in access to public open space Areas lacking in sufficient publicly accessible open space, as defined by a set of standards in Policy G4 Open space Policy S4 Play and informal recreation A Boroughs should: 1) prepare Development Plans that are informed by a needs assessment of children and young person's play and informal recreation facilities. Assessments should include an audit of existing play and informal recreation opportunities and the quantity, quality and accessibility of provision. Boroughs should consider the need for cross-borough collaboration where appropriate 2) produce strategies on play and informal recreation facilities and	The absence of having prepared a GI strategy is acknowledged, although it is important to recognise that a GI strategy forms an umbrella strategy for a series of other plans, strategies and workstreams which have been published or actioned, and each of these have informed different aspects of the preparation of the Local Plan. These include: - Ealing's Indoor and Outdoor Sports Facilities Strategy published 2023 - Ealing's Biodiversity Action Plan published in 2022 - A SINC review - Local Nature Recovery Strategy – emerging and due to be published in 2025 - A Tree Strategy – 2013 - Green Belt and MOL review – Stage 1 (2022) and Stage 2 (2024) A number of these outputs will continue to evolve over the life of plan, following further updates, revisions etc. As well as informing plan preparation itself, the content of these outputs are also very much integral to the decision-making process itself. Recognising this, and with the intention of future proofing the Local Plan the plan provides appropriate hooks to these outputs (encompassing both current outputs and accounting for any future updates). Pending the preparation of a revised Green Infrastructure Strategy it has not been possible to prepare revised deficiency mapping. Once completed, revised mapping will be published as part of the Council's Authorities Monitoring Report. The AMR recognises that access can be expressed in terms of physical proximity to open space and in terms of the quantity of open space per head of population by geographical area (i.e. by ward), and the intention	Policy G4: Open Space – London Plan – Ealing LPA – local variation		Libby Kemp	Creffield Area	384	Community Interest Group
Please accept this email as confirmation of my agreement with the Five Roads response to the tower blocks. The two blocks in Hastings Road and Manor Road will be an abomination that the council will not be able to look back on with pride. I fully understand for additional housing but this has to be done sympathetically and without creating eyesores. The proposals seem to me to be a serious over development of two small sites.	Noted.	Policy E2: Ealing Metropolitan Town Centre		Nick Richards		385	Individual

The description of the current use in the Agenda document p.142 is misleading “Two residential buildings and associated parking and gardens” where there are some 40 homes. Fails to comply with the duty to co-operate This should be a retrofit with a complementary increase of homes. Friars Place Green (FPG) 0.1ha has been identified as Public Open Space (POS) for Dean Court. Friars Park development 1,257 homes c.3,000 persons, also cites FPG as their nearest open space. Friars Park has a shortage of POS of 4sqm per person. The FP developers are looking to increase the build. When selecting development sites POS should be on site where there is a shortage as in Acton. Southall and Ealing. The Friars Park overshadows FPG blocking the light south and the west. Tall buildings from the north and east will also shadow FPG. This will be detrimental to the grass and trees affecting the biodiversity of the Green and the Green corridor. {Diagram showing Friar's Place} {Suggested modification:} The c.40 homes should not be demolished but retrofitted and consideration should be given to increasing the number of homes through permitted development of adding 2 storeys and building on the large car park. Ealing Council must take POS seriously ensuring in areas where there is a shortage of POS/amenity space it must be provided on site. Ealing Council should provide a table showing POS by Ward.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height in the Tall Buildings Strategy. The site allocation was therefore informed by site specific design analysis.	07AC Dean Court	Policy G4: Open Space – London Plan – Ealing LPA – local variation	Libby Kemp	Creffield Area	384	Community Interest Group

Tackling the climate crisis is high on many people’s priorities but Policy SP2.2 is not likely to do this in planning policy terms because it is aspirational and its policies are unspecific in land use terms. The objective for the Borough to be carbon neutral was a most worthy one, but there is no evidence base at all to demonstrate how it can be achieved and no monitoring framework is proposed to measure whether the policy is succeeding. Furthermore, the plan’s overall focus on the widespread redevelopment of buildings that were erected relatively recently (ie in the past 40 years) is fundamentally at odds with best practice guidance for carbon reduction being promulgated by UK professional bodies like RIBA and RICS. These highlight the construction industry’s huge environmental impact, and urge us to ‘think reuse first, new build second’. They show that the construction industry is responsible for: •35-40% of the UK’s total emissions •Almost all the planet’s carbon-hungry cement •50% of its steel production •25% of all plastics And they argue that tearing down and replacing existing buildings is particularly wasteful. Almost two-thirds of all UK waste is construction debris. More than 90% of the resulting waste material is recovered, but most is recycled into a less valuable material which means more carbon is spent manufacturing the new materials the new buildings require. A Royal Institute of Chartered Surveyors report shows that 51% of the whole-life carbon of a typical new residential development is	Noted. Policies in the Local Plan (and indeed the London Plan) must be read as a whole. Policies in Chapter 3 provide a strategic policy framework for Ealing LPA and set overall objectives. Detailed DM policies are set out in Chapter 5 and includes a whole suite of policies on climate action most of which go beyond the current scope of the London Plan although are based on a common evidence base that the Mayor of London helped procure and coordinate. In particular, this includes Policy WLC on the whole life carbon approach. Applicants will be required to undertake an optioneering exercise as part of the Whole Life Cycle Carbon Assessment, which seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option. The findings of this optioneering exercise should be considered alongside other planning considerations to determine the most appropriate option, including consideration of a retrofit first approach. The ‘options’ considered should include reuse/refurbish options, alongside any new build options if pursued. All options evaluated should be capable of comparison reflecting the same best practice standards.	SP2.2 Climate action		Libby Kemp	Creffield Area	386	Community Interest Group

CARA supports the points made by Ealing Matters. The Plan has not been produced in accordance with legislative requirements. In particular: • This plan is the second to have been prepared by LBE under the Planning and Compulsory Purchase Act 2004. The first was adopted in 2012. The Act and its associated Regulations make no provision for sequential plan-making. Instead, Regulation 10A provides that plans must be reviewed at least every 5 years. Ealing’s 2012 Plan was not reviewed. Instead, under the current exercise, it is simply to be ditched with no consideration given to its performance or its continued relevance. • Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that a Local Planning Authority must notify persons, including residents ‘of the subject of a local plan which the local planning authority propose to prepare’, and to invite them ‘to make representations to the local planning authority about what a local plan with that subject ought to contain’. In preparing its plan, the authority ‘must take into account any representation made to them’. Under Regulation 18 Ealing Council did not invite any representations about what the plan should contain and so there was no opportunity for residents to make representations as to the things that should be in it. Had they been so invited they may well for example have proposed the plan include policies on the conservation and enjoyment of the historic environment, or that it	Noted. This is simply not true. The plan has been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. The Reg 18 version makes clear that: "All consultation feedback received will be considered and inform an amended version of the Local Plan, called the Proposed Submission Local Plan (Regulation 19). We invite everyone with an interest in the future of Ealing to provide comments on the Local Plan..." (Para 0.11). Subsequently, a consultation update was published setting out the key issues raised in the consultation and some broad metrics. It also provides details of the 48 public events conducted during the consultation including workshops, walking tours and other events that included both in person and online events at different days of the week and different times of the day. A summary of the key changes made in the Reg 19 Local Plan is provided at Paragraphs 0.20 to 0.25 and Table 1. These included significant changes based on the feedback received including major changes in scope, approach and detail including the withdrawal of over a third of the proposed Development Sites and amendments to boundaries of over a quarter of the remaining sites.	General		Libby Kemp	Creffield Area	386	Community Interest Group

Note that this representation concerns standards for the provision of amenity and play space in new development. London Plan Policy S4A Play and informal recreation requires Boroughs to ‘prepare Development Plans that are informed by a needs assessment of children and young person’s play and informal recreation facilities. Assessments should include an audit of existing play and informal recreation opportunities and the quantity, quality and accessibility of provision.’ Para 5.4.6 of the supporting text describes the London Plan’s approach to off-site provision. London Plan Policy D6 sets out minimum housing space standards. This includes at AF9, minimum standards for amenity space but indicates that borough development plan documents may have higher standards. London Plan Policy Table 3.2(iv) and (v) Qualitative design aspects to be addressed in housing developments sets out how private and communal amenity spaces should be addressed London Plan Policy H16 on Large-scale purpose-built shared living with its supporting text sets out considerations for amenity space that should apply in shared living developments. Table 7D.2 of Ealing’s current Development Management Plan document (adopted in December 2013) sets out the space provision requirements for new developments. These will still be in force, presumably until the new plan is adopted: {Table from Adopted Plan}	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and was published in 2021. This contains Policy S4 which deals with play and informal recreation and is used to help determine planning applications in Ealing. There is no need to repeat or duplicate these policies. Indeed, there are inherent risks in doing so. The use of quantitative amenity standards such as those currently set out in Adopted Policy 7D are considered to be less effective relative to more recent policy interventions including the Urban Green Factor tool, which allows officers to assess both the quantity and quality of provision together, and this leads to better outcomes in terms of the provision of urban greening in new developments.	Policy DAA: Design and Amenity – Ealing LPA – local policy		Libby Kemp	Creffield Area	386	Community Interest Group

I have found the Ealing Local Plan very difficult to read and comprehend. I am very concerned about all these high rise tower blocks, especially around West Ealing train station and Waitrose and those by Acton town tube station owned by TFL and on the industrial estates there. The Acton gardens development being built by Countryside is a much nicer development with a community feel and open spaces and much lower tower blocks. I support all Ealing Matters' concerns about the Plan.	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy. The case for enabling development exists entirely independently of Policy ENA,	General		Ruth Pase		387	Individual
We support the policy G6 F "F. Development proposals should achieve a biodiversity net gain of at least 20% or the advised national minimum amount, whichever is greater". We support setting a greater than 10% target for net gain where appropriate. By setting a more ambitious target, the Local Plan increases the chances that an average net gain of at least 10% will be delivered across the Plan area, given the possibility that some sites may not be able to deliver net gain within the Borough or that initiatives intended to deliver such gain may fall short in practice. We note that similar policies have been examined and adopted in recent local plans, including LPAs in Guildford, Worthing, and Maidstone.	Noted. Support welcomed.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation		Bridget Fox	Woodland Tr	388	Community Interest Group

We particularly support these sections with policy SP2.2 F (iv) Utilising green infrastructure to minimise the effects of climate change G Maintaining, enhancing, and expanding the network of green infrastructure including G (iv) Supporting tree planting, woodlands, orchards, hedgerows, and rewilding to promote carbon capture and help promote greater biodiversity. The climate crisis is paralleled by a nature crisis, and we need solutions that will tackle both. This approach is in line with NPPF paras 20d, 96c, 159a, and 181.	Noted. Support welcomed.	SP2.2 Climate action		Bridget Fox	Woodland Tr	388	Community Interest Group
Para 3.33 includes commitments to “maintaining, enhancing and expanding the network of green infrastructure in the borough” and targets for tree planting and increasing tree canopy cover to 25%. We strongly support this approach, which recognises the multiple benefits of urban trees, reflecting NPPF para 136. The UK Tree Equity Scorecard shows that some neighbourhoods within Ealing, including western Greenford, the Wayfarer Estate, and most of Southall, have less than 10% tree cover, with some parts of Southall having only 1% tree cover. It is vital that action to address this deficiency is integrated into the Local Plan.	Noted. Support welcomed.	SP2.2 Climate action		Bridget Fox	Woodland Tr	388	Community Interest Group

Proposed Policy ENA lacks reasoned justification, and therefore does not comply with section 8(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is therefore not legally compliant and unsound. Historic England summarises enabling development as ‘development that would not be in compliance with local and/or national planning policies, and not normally be given planning permission, except for the fact that it would secure the future conservation of a heritage asset.’ The NPPF uses the term only in connection with conserving the historic environment, saying that ‘Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.’ Application of the concept of enabling development to permit development on MOL sites thus appears a novel idea. Its use to develop Metropolitan Open Land in general would depart considerably from the principles that apply in the context of protecting historic assets. Enabling development policies do not appear to feature in the NPPG or and in the NPPF’s terminology they seem to constitute neither a strategic policy (para 20ff), nor a non-strategic one (para 28ff). MOL falls under the aegis of the London Plan which safeguards it to the same extent as the Green Belt which means that inappropriate development on it is only permissible in ‘very exceptional circumstances’. If it is endorsed, the policy would remove this higher level protection and allow the Council to	The policy does not mention MOL. The policy is necessary in order to manage development proposals and clearly set out the scope and limits of what may be regarded as enabling development.	Policy ENA: Enabling Development – Ealing LPA – local policy		Libby Kemp	Creffield Area	389	Community Interest Group

We have four concerns – which we call matters - with this policy. These arise from the fact that Policy D9 is not clearly written (or otherwise presented) and unambiguous which means it fails to meet the test in NPPF Para 16.(d) and is therefore unsound. Matter 4, in addition, is not justified as it is not based on proportionate evidence. Table DMP1 of the plan provides thresholds for what the Borough considers to be tall buildings across 59 different zones in the Borough. The thresholds range from 6 storeys in many parts of the Borough to 21 storeys in Ealing Town Centre. The justificatory text (para 5.14) explains that the policy ‘builds upon comprehensive evidence developed in line with the London Plan’. Although this is not specified, this evidence is understood to relate to a series of reports by Allies and Morrison which culminated in a final report dated December 2023, posted in the evidence base on the New Plan website with all the other Regulation 19 documents. It is worth noting that the Allies and Morrison reports appear to be the only evidence speaking to this part of the Plan. 1. Figure DMP1 on page 45 of Chapter 5 of the plan is of such small a scale that it is unclear in which area some streets lie. This matters because there are significant differences in the thresholds for tall building in some adjoining areas. In its present form, the Policy D9F says that ‘tall buildings above defined thresholds are exceptional and should be located upon specified Development Sites defined in the Development Plan’. There is no definition in the policy of the word ‘exceptional’ as it is applied here, but Roget offers synonyms such as ‘rare’, ‘uncommon’ or ‘unprecedented’. This is not how the policy is being applied in Acton where 50% of <u>development sites are identified as being suitable for tall buildings</u>.	Heights boundaries will be set out on the interactive policies map. The policy clearly sets out that 6 storeys constitutes a tall building across most of the borough. The consultation version Tall Buildings Study was subject to some transcription errors which have now been corrected in the submission version.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Libby Kemp	Creffield Area	389	Community Interest Group
As a local resident (W13) and parent, I would like to express my dissatisfaction with Ealing Council's proposed Local Plan. The Plan appears to redefine "tall building", which would allow developers to build as they saw fit, not reflecting the needs of real local people. In addition, the Plan does not provide adequate protection for the environment. This is a leafy borough; we should all work to protect and maintain that situation for ourselves and future generations.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Tess Hicks		390	Individual

Acton Developments Sites: Various wordings & lay out seem to have changed since Reg.18. My response Reg 18. “In the UDP each development site had, at the least, the number of units & preferred heights for a particular site and the last Sites DPD had quite detailed descriptions of the site & how it should fit into local streetscape. The new plan has neither-just vague and unsatisfactory.’ However I still don’t see the number of units assigned to each site although 01AC was presented as an example:	Noted. Relevant information is contained in the 5YHS and Housing Trajectory that was published in November 2023. A further update, including the most recent monitoring period 2023-24, will be published in early 2025.	Policy A1: Acton Spatial Strategy		Susan New		391	Individual
Please note my objections to the Ealing Local Plan and my support of Ealing Matters’ concerns about the Plan. My main concerns are as follows: 1.housing targets which have no basis in an assessment of local need in terms of the kinds of housing local people need and can afford. How can Ealing’s infrastructure support the proposed 80,000 new residents? 2.The plan also grants a ‘green light’ to developing towers by re-defining what a tall building is without an assessment of the local and wider impact of this kind of high development. 3.It would have a massive negative impact on the quality of life in Ealing. The plan aims to bring another 80,000 people into the Borough without addressing the issue of how this will impact quality of life and the ability of infrastructure to cope. This is reckless in the extreme, once the plan is accepted the changes and impacts will be irreversible. The housing targets it sets could have a huge negative impact on the Borough in terms of its health, education and transport infrastructure as well as access to amenities and green spaces. It aims to increase the population of Ealing by around 80,000 people without any analysis of the infrastructure needed to support this increase or a plan to deliver this new infrastructure. It also fails to show any analysis of the risks associated with this massive population increase or how they will be monitored and managed. Services are already at breaking point and this plan is reckless in the extreme. 4. Ealing has a rich street scene with small shops, work spaces and markets. The proposals for hyper-dense tower accommodation	Noted. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The plan also sets out proposals for maintaining, enhancing and expanding the network of green infrastructure in the borough.	General		Shirley Shillcock		392	Individual

As a chartered town planner, father and grandfather, I am extremely concerned regarding the climate crisis. The fact that the last ten months have been the hottest on record globally, that the Arctic is heating at four times the global average and the Antarctic twice as fast confirms that this is a critical moment in human history. As widely reported, (including in my recent book {redacted as would identify the respondent} urban areas contribute approximately 40% of global greenhouse emissions, so I was very impressed when Ealing Council announced it's intention to be a Net Zero borough by 2030. However, it is abundantly clear from the proposals outlined in the Reg19 Local Plan that Ealing will not only fail to achieve this objective, but by the largescale demolition of existing buildings, many of which are only four of five decades old (including Perceval House and the Town Centre complex) and their replacement by tall energy demanding and polluting developments, the Council would be making things far worse and therefore contributing to the crisis. It is therefore incumbent upon all responsible citizens and authorities to limit such changes to the existing environment to those that meet an empirically justified social need and that those developments that are proposed are required to meet proven high environmental building standards, such as passive house norms. {The following modification is suggested:} Environmental offsets, such as planting more trees, have been shown to be inadequate to offset the embedded energy involved in the demolition of existing buildings and their replacement, especially with tall buildings, for which the plan proposes a substantial number. A condition for all major planning applications should therefore include the requirement that they are: 1) empirically justified in terms of social need and 2) that they conform	Policy WLC 'Whole Life Cycle Carbon Approach' introduces locally the requirement for applicants to undertake an an optioneering exercise as part of the Whole Life Cycle Carbon Assessment. The requirement to prepare Whole Life Cycle Assessment for referable applications is currently a feature of London Plan policy SI 2. Local Policy WLC extends this requirement to all major developments. The optioneering exercise seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option. The findings of this optioneering exercise should be considered alongside other planning considerations to determine the most appropriate option, including consideration of a retrofit first approach, and different building forms (heights). The 'options' considered should include reuse/refurb options, alongside any new build options if pursued. All options evaluated should be capable of comparison reflecting the same best practice standards. The intention is to prepare additional guidance to support the implementation of carbon optioneering. Local Policy ECP 'Embodied Carbon' is also introduces embodied carbon limits by building type/use for new developments. To further embed circular economy principles into the building design process the requirement to prepare circular economy statements has also been extended through local variation policy SI 7 to include major developments. These policies have been written to ensure that the development itself is securing the highest standard of performance rather than deferring that responsibility off-site through offsetting	SP2.2 Climate action		Geoffrey Payne	Geoffrey Pay	393	Individual

I object to the de-designation of part of Barclays Sports Ground as MOL. Additionally, I object to allowing residential development on Barclays Sports Ground. Furthermore, I support the representations by Ealing Matters, Save Ealing Parks and CPRE. Barclays Sports Ground should become part of the proposed Regional Park. The proposed development budget of between £22 million and £87 million is not justified. Moreover, NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Kishore Samtani		395	Individual
I am concerned about the plans for w. ealing the buildings are overwhelming in size and space I support SST in their opposition to these development's.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	Policy E2: Ealing Metropolita n Town Centre		Caroline Atherton		396	Individual

Please take this email as my support and agreement with the ‘Stop the Towers’ campaign. I have written previously about my concern for the lack of traffic infrastructure shown in these developments. There has been an increase in traffic around West Ealing train station and an increase due to the new developments close by but no traffic easing in the area. Any further tower blocks will create pressure on the traffic system and isn’t sustainable.	Noted. Ealing’s proposals to reduce traffic in and through the borough are present in various documents: the previous Transport Strategy 2019-22, the current Climate and Ecological Emergency Strategy, and the 20-minute neighbourhood plans which are being produced for each of the seven towns. The new Transport Strategy, which will be published next year, will build on these plans with further details on transport and active travel policies. The 20-minute neighbourhood plans show our ambitions for prioritising walking and cycling in each town centre, using routes which will better connect residential areas, high streets, new developments, amenities and services.	Policy E2: Ealing Metropolitan Town Centre		Sarah Wheale		398	Individual
This email is to register my disapproval of the Council's Local Plan. My opinion is that in its current form it is an inappropriate basis for going forward. My criticism extends to the document's overarching intent that seems lacking in a coherent, joined-up vision, to several of its specific proposals, and also to the style of the document itself, which is full of woolly language and jargon. The document should be shorter, more concise and clearer about its implications for the future. Specifically, the housing targets and related population increase are out of all proportion. It seems an unrealistic and needless ambition. The rush to high density residential accommodation is in my view a strategic error that will lead to more inappropriate planning applications and decisions. The plans for corresponding provision of infrastructure that would definitely be required to sustain and support such levels of growth seem superficial and not thought through in detail. The fixation with tall buildings and the redefinition of "tall" in order to build them ever higher feels like an attack on the character of our towns. Frankly it seems incomprehensible that our elected representatives should here again show so little regard for the genuine concerns of our residents about this issue, which are not trivial. Also of note, the apparently casual attitude to the loss of MOL is likewise inappropriate and typical of a general lack of focus and regard within this document for Ealing as a place with its own specific heritage and historical context	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council’s ambitions and plans for each of the seven towns that make up the borough. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. On 20 munute neighbourhoods, the plan aims to give people more choices about how they want to travel in their local community without a car if they want or need to. More options can benefit physical and mental health and help to create a stronger sense of community, boost the local economy, and increase resilience to the effects of climate change.	General		Tom Murphy		399	Individual

I DO NOT support this application and support Ealing Matters for all the reasons that they have clearly identified. Ealing Council are trying to meet the housing target but have lost sight of the bigger picture as I have seen no plans to a question that I and many have repeatedly asked about. How is the growth being managed? * Access to a doctor. You can build a surgery at each complex but are there enough doctors to accommodate? * Schools fit for purpose. As a teacher I can see that current buildings cannot accommodate the growth in number of children and adults at the school. Funding, recruitment and derelict buildings are already an issue for schools . * Impact of no growth in infrastructure. Elizabeth line is already busy and the roads are congested which then has an impact on the environment. * What is the environmental impact? Already the current fortnightly bin collection has overflowing bins, fly tipping, etc..... How will the council manage the safety of those who need to access the areas around these tall developments. * Where are the green spaces to accomodate this increase? Could you please anwer these concerns?	Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	General		Harjindar Gill		400	Individual

The height of the proposed development of Dean Court (21 storeys) – site 07AC – located in Friary Road, W3 6AF in ACTON, Zone A4, does not conform with London planning policy or with the council’s own evidence base and is therefore unsound. Both London Plan policy D9 and the Tall Buildings strategy state that the maximum height of a tall building must be defined and for a Zone site such as Dean Court, the guidance for prospective tall buildings is 6-14 storeys, not 21. There seems to be a creeping in of what is suitable for Zone A1 (across the A40) into AF, which is characterised by low-rise Victorian and Edwardian houses. The indicative site layout provided for 07AC already suggests that there will be insufficient outdoor amenity space for the projected 419 dwellings. The London Plan dictates a minimum amount per head, so even 14 storeys would be excessive. Central Acton, which has less than 0.86 hectares of green space per 1,000 of the population, has one of the poorest rates in the borough and this data is drawn from out-of-date AMR figures, published 2014, as no new figures have been calculated, but it is certain that with all the development since Friary Park (1,200+ units), adjacent to the proposed Dean Court site, the paucity of greenery will be significantly worse if 419 dwellings are to be built at Dean Court. To build high-rise towers of 21 storeys conflicts with NPPF – 2 – paragraph 11. ‘All plans should promote a sustainable pattern of development’ and ‘meet the needs of the area’ and ‘improve environment’ and ‘mitigate climate change’. It has been proven by scientists that medium height / density buildings can offer a more ecological way to meet housing targets and no amount of mitigation	Site allocations for tall buildings were informed by site specific design analysis which supersedes the guidance in policy D9. Major development will be subject to carbon optioneering to ensure the most efficient approach to carbon emissions over their lives.	07AC Dean Court		Juliet McDonald	Friends of Fri	401	Community Interest Group

The adjacent green Friars Place Green, which Dean Court overlooks, is part of a network of three triangular greens that represent the only significant green space in the large residential area between Churchfield Road, the Overground track, the mainline track and Horn Lane. So these greens are of critical importance for the ecology of the area. To preserve these greens and maximise their ecological impact links to the requirement by The London Plan to provide a minimum amount of green space per head. Whilst FOFGA applauds Ealing Council for designating these three greens as Local Green Space, as lobbied for by our group (see 370+ testimonials submitted for Reg 18 attached), we would like the plan to be clear about their future. It was unanimously stated by Central Acton residents that any enhancements to the greens should be primarily horticultural, avoiding infrastructure/ hard-surfacing other than the most basic features – paths to walk on, benches – and definitely not imposing amenities such as playground or sports equipment, which should be provided for within the boundaries of new development sites to address the increase in population. We think it is important that ‘improvements’ to our three greens be defined in the local plan. {Suggested modification:} We would suggest...that the following ‘improvements’ be proposed. Friars Place Green – horticultural – perennial beds to screen the green from the fast-moving traffic in Friars Road (coming off the A40) and a hoggin path to allow pedestrians to cross the green. (Any amenities to be placed on the adjacent ‘stopped up’ spur road – we have suggested a nature/ adventure trail, not on the green itself, which is commonland.) Friars Gardens – replacement posts for the mini-meadow areas as	Noted. Support for designating these parcels of land Local Green Space welcomed. The suggested modification is perhaps overly detailed for the Local Plan but the intention is sound and therefore a modification to provide greater clarity is proposed.	Policy A4: Acton Main Line Station and Environs		Juliet McDonald	Friends of Fri	401	Community Interest Group

In order to create a new neighbourhood centre and destination effectively, it is necessary to provide office, retail and community space that is well-used, not just by the new tenants, but by the wider community who have been hugely impacted by the construction phase of the development. At the moment, the community use of the temporary community centre adjacent to Friars Place Green (we attended one of their events) is almost exclusively for the new residents of Friary Park and not for the residents of the surrounding streets. When the estate is fully developed it should ‘meet the needs of the area’ as per paragraph 11 in NPPF, but in Acton, generally, we have witnessed many of the commercial lets of mixed-used developments remain vacant for months, often years, because developers create vast spaces that are only suitable for large coffee chains or supermarkets to occupy. The retail units already provided at Friary Park are sizeable ones. {Suggested modification:} FOFGA suggests that a retail space be provided at Friary Park that is sub-divided into 12 small units (including a communal WC and kitchenette), that could be rented at reasonable cost by sole traders including knife sharpeners, shoe menders, key cutters, florists, physiotherapists, osteopaths, a bookseller and craftspeople including potters and jewellers. We need a mix of useful and beautiful emporiums that truly add character to an area not just the chain stores. It is in the evidence base that jobs need to be created in Acton, so this would be a boost to small traders. One in twelve of these units could even be offered on a rotating basis on a peppercorn rent to encourage a start-up	Noted. Both the temporary and proposed community centre at Friary Park host a large number of groups and users, whilst some of these group are aimed at the residents of the existing and emerging community at Friary Park the vast majority are for and accessible by the wider community. The organisations that currently use the community centre and have been integral to co-designing the new community centre include Earth Living, NFC, Delve, Maples Children centre, Felix, Sustrans, Resident Steering Groups and Antilles House. These organisations run events and provides services including youth groups, warm hub, food bank, yoga/pilates, parent and baby group etc. These services are open to all. The Friary Park redevelopment proposes commercial units of various sizes, the largest is to be occupied by the Creative Land Trust and will accommodate 25 smaller studios for artists and creatives. The second largest unit is occupied by ASDA as a convenience store. A local resident occupies one of the smaller units and runs a café. The final unit is a medium sized unit that is also under offer.	Policy A4: Acton Main Line Station and Environs		Juliet McDonald	Friends of Fri	401	Community Interest Group

* The Plan appears to have been drafted in a rush after considerable delay and appears inadequate, possibly even failing to meet the minimum legal requirements for a Local Plan. There is scant evidence to support the proposals, little indication of how success would be measured and how Ealing Council proposes to monitor whether the plan is working. This is of particular concern on the subject of housing and the intention to bring in another 80,000 residents which does not take into consideration the impact on existing residents nor what is really required to help Londoners looking for affordable housing nor any assessment of the significant impact and demands on our existing infrastructure. The 'green light' to developing towers by re-defining what a tall building is without any assessment of the local and wider implications of this kind of ultra-high density housing. There is growing evidence that developing high density towers as a way of providing housing is environmentally and socially unsustainable. * If another 80,000 people come into Ealing this will negatively impact the quality of life, in terms of its health, education and transport, the ability of that infrastructure to cope and adversely affect residents access to services, amenities and green spaces. This approach is ill-judged, naive and will be highly damaging to residents, once the plan is accepted the changes and impacts will be irreversible. * Despite Ealing Council decreeing a climate emergency this plan fails to drive action on achieving net zero or mitigating the impact of climate change. The Plan promotes the building of towers which are known to have high carbon impacts in their build and during their lifetime use, they also have typically short design lives meaning their net impact is much higher than low-rise buildings with longer	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan also follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Regards green space, the plan emphasises the importance of maintaining, enhancing and expanding the network of green infrastructure and the creation of new parks, such as in Perivale, is a good example. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy.	General		Jo Bond	Rothschild O	402	Community Interest Group

I have now seen the decision that Ealing Council proposes to remove MOL status from part of MOL20 (namely, part of Barclays Sports Ground). The revised Draft Local Plan places Barclays Sports Ground under the threat of a substantial residential development which would permanently damage the character of the neighbourhood and lead to the collapse of its infrastructure. Specifically, * I object to the de-designation of part of Barclays Sports Ground as MOL (MOL20) * I object to allowing residential development on Barclays Sports Ground (21EA) * I support the representations made by Ealing Matters, Save Ealing Parks and CPRE * The proposed development budget of between £22 million and £87 million is not justified - NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances An alternative would be that Barclays Sports Ground becomes part of the proposed Regional Park. In addition the Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Gill Law	403	Individual

I have been a resident of Park View Road since 1992. Then a beautiful road with the right balance of individual resident houses and a few flats. Since then I have had to put up with numerous developments including The White House which beggars belief, and a new school which brings in more traffic on top of the St Augustines school traffic. The whole character of the road has altered due to this and were the new development to proceed would aggravate the situation even more. Therefore I object to the de-designation of part of Barclays Sports Ground as MOL. Additionally, I object to allowing residential development on Barclays Sports Ground. Furthermore, I support the representations by Ealing Matters, Save Ealing Parks and CPRE. Barclays Sports Ground should become part of the proposed Regional Park. The proposed development budget of between £22 million and £87 million is not justified. Moreover, NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Amrit Sethi		404	Individual

In my view the proposed local plan is disgracefully unsound and dishonest. Dishonest is strong word but describing a tower of 20 stories (less than 21 stories) as not a tall tower is simply not using the English language in a legitimate way. You are not stupid people and you must have spent time considering this choice of words. You have chosen to be misleading. This is dishonest. In my view it is also dishonest to pretend that you are interested in consulting the views of the local population when you are quite obviously going against their views. The local plan was voted on in 2017 - {link to Ealing Civic Society} and local residents clearly rejected tall towers. If you really want to consult, why not put this local plan to a referendum? I think we all know what the result would be. I am not a NIMBY. I believe in developing sustainable communities. Ealing is a family area. All cities need well functioning family areas to succeed and I would not object to building blocks of say 6-8 storeys of 3-4 bedroom flats to cater for the great need for genuinely affordable family housing in the area. This plan with its emphasis on gigantic towers is a massive overdevelopment which will break the already overstretched local infrastructure. This will make the area unviable for families. This is not good for London or Ealing. You are supposed to work for the people of Ealing. You should be ashamed.	Noted. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation			Andrew Mountford		406	Individual

I am writing as Chair of the GRASS (Gordon Road and Surrounding Streets) Residents' Association which represents many households in the surrounding area. We fully support detailed comments made by Ealing Matters, Save Ealing Centre and Stop the Towers but would like to reiterate some concerns. General failure of the Council to review existing plans: Ealing Council has consistently failed to comply with National Planning Policy, which stipulates that Local Plans should be reviewed at least once every five years in order to take into account any change in circumstances in the area. The plans should then be updated if necessary. We understand that there has been no published review of the current Local Plan since its adoption in 2012 even though LBE's housing target has shown a significant increase over the last 12 years. The most recent full Authorities Monitoring Report for LBE (published in 2015) dates back to 2013-14. Residents have been asking for updates since 2016 without success. We are concerned that unlike other London Boroughs, such as Camden and Wandsworth, the Monitoring Framework is an appendix to the new Ealing Local Plan and not a policy within it. There are no strategies to monitor or manage the risks associated with the plan. As it is a statutory requirement to review and monitor Local Plans, it is essential that the Local Plan includes a specific policy to this effect.	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and was published in 2021. Ealing's local plan must be in general conformity with it. Regards monitoring, the statutory elements all relate to housing indicators and include the Five Year Housing Land Supply and the Housing Trajectory which was published by the Council in November 2023. An updated 5YLS and HJ will be published in early 2025.	General		Susan Deans	GRASS Residents	408	Community Interest Group

I am writing as Chair of the GRASS (Gordon Road and Surrounding Streets) Residents' Association which represents many households in the surrounding area. We fully support detailed comments made by Ealing Matters, Save Ealing Centre and Stop the Towers but would like to reiterate some concerns. Tall Buildings - Policy D9: The definition of a tall building in the Local Plan varies considerably across the borough ranging from 6 storeys in some areas to 21 storeys in Ealing's Town Centre. Policy D9F states that 'tall' buildings above defined thresholds are exceptional and should be located upon specified Development Sites. There is no definition in the policy of the word 'exceptional' but it is suggested that it means 'rare,' 'uncommon,' or 'unprecedented.' This is not how the policy is being applied in Acton where 50% of development sites are identified as being suitable for tall buildings, or Ealing 60% (94% in the Metropolitan Town Centre) or Southall (40%). The fact that Ealing Town Centre is close to several Conservation Areas appears to be ignored in the Plan. The Plan also fails to assess the growing evidence that high density tower blocks have high carbon impacts and short lives and are therefore socially and environmentally unsustainable.	Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. The London Plan requires boroughs to define what is a 'tall building' for specific localities, however this definition should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. This does not mean that all buildings up to this height are automatically acceptable, such proposals will still need to be assessed in the context of other planning policies in the usual way to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Of the site allocations in each Town Plan : 3 in Acton are potentially appropriate for a tall building out of 8 sites; in Ealing 15 out of 25; and, 8 out of 21 sites in Southall. Of the other four towns, 9 sites are potentially appropriate out of 30 sites. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Susan Deans	GRASS Residents	408	Community Interest Group

I am writing as Chair of the GRASS (Gordon Road and Surrounding Streets) Residents' Association which represents many households in the surrounding area. We fully support detailed comments made by Ealing Matters, Save Ealing Centre and Stop the Towers but would like to reiterate some concerns. Heritage Conservation and Growth: We consider that the Local Plan should include policies and strategies for the conservation and enjoyment of Ealing's historic environment. This requires a clear recognition of the role of heritage and should be used in the planning and design process. The plan lacks a positive strategy for the conservation and enjoyment of the historic environment and therefore puts heritage assets at risk through neglect and decay. The plan does not take into account the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation. It ignores the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring and the opportunities to enhance the contribution made by the historic environment to the character of the area. There is no comment about Ealing's Conservation Areas in the Plan which, because it fails to meet the requirements of the National Planning Policy Framework and the London Plan, is fundamentally unsound.	This is simply not true. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and was published in 2021. This contains an extensive policy suite (HC1-HC7) which are used to help determine planning applications in Ealing. There is no need to repeat or duplicate these policies. Indeed, there are inherent risks in doing so. Furthermore Policies SP2.2 F (vi), SP2.2 G (vi), SP3.1 B, SP3.3 D, SP4.1 A, SP4.1 E, SP4.2 H-I in the Local Plan all deal with varying impacts on heritage and many of the 84 development sites will consider specific heritage impacts, where appropriate. For example, Policy SP2.2 F (vi) says that a character and heritage-led approach to mitigating the causes and effects of climate change as appropriate in areas of high character and heritage value and in relation to heritage assets. Policy SP3.3 requires new development to meets the highest design standards, respond positively to the local character and recognises the role of heritage in place-making. Policy SP4.1 D requires a character-led and contextual approach to growth that optimises the capacity of sites while reflecting the valuable components of the built environment.	SP4.1 Good Growth		Susan Deans	GRASS Residents	408	Community Interest Group

I am writing as Chair of the GRASS (Gordon Road and Surrounding Streets) Residents' Association which represents many households in the surrounding area. We fully support detailed comments made by Ealing Matters, Save Ealing Centre and Stop the Towers but would like to reiterate some concerns. Housing and Infrastructure: The kind of infrastructure planning envisaged by both the NPPF and the London Plan is entirely absent from the Local Plan. No attempt at all is made to get to grips with the type or the scale of the infrastructure that Ealing's house building targets will require. The Local Plan is inconsistent with national policy and therefore unsound. While the plan itself omits to say how many new homes will be provided over the period, the Housing projection in the Council's evidence base puts the figure at 41,571. Although this figure is close to London Plan expectations, the Plan fails to consider the additional physical and social infrastructure required for the increased population. The GLA's population forecasts. predict that if Ealing's housing stock grows at the London Plan's target rate, the Borough will be housing 80,317 additional people by 2041. The plan does not address the issue of the impact that this would have on the quality of life . Many services are already at breaking point and a report by Ove Arup published in October 2022 as part of the regulation consultation found huge gaps already exist in most of the Borough's infrastructure. Moreover, the proposed construction of high rise tower blocks for students would create 'dormitory' residents destroying existing local communities which are mixed in terms of culture, income and age. The proposed tower blocks would put pressure on services like the Elizabeth line which is already operating at above capacity so that at the smaller	Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). This is set out in London Plan Policy H1 and Ealing' Local Plan Policy SP4.3 A. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	SP4.3 Genuinely affordable homes			Susan Deans	GRASS Residents	408	Community Interest Group

I am writing as Chair of the GRASS (Gordon Road and Surrounding Streets) Residents' Association which represents many households in the surrounding area. We fully support detailed comments made by Ealing Matters, Save Ealing Centre and Stop the Towers but would like to reiterate some concerns. Provision of amenities and play space: The proposed Plan fails entirely to consider standards for, or the design of, amenity and play space in new developments. With so many new homes proposed, many of which are in large residential blocks, it is essential that proper provision is made for residents to be provided with outside space. Indeed, many schemes in the borough, which have received consent fail to meet the London Plan’s minimum standards. Instead, small existing areas of outside space are held as being available to thousands of new residents, many of whom would have to cross main roads to access them.	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and was published in 2021. This contains Policy S4 which deals with play and informal recreation and is used to help determine planning applications in Ealing. There is no need to repeat or duplicate these policies. Indeed, there are inherent risks in doing so.	Policy DAA: Design and Amenity – Ealing LPA – local policy		Susan Deans	GRASS Residents	408	Community Interest Group

I am writing as Chair of the GRASS (Gordon Road and Surrounding Streets) Residents' Association which represents many households in the surrounding area. We fully support detailed comments made by Ealing Matters, Save Ealing Centre and Stop the Towers but would like to reiterate some concerns. The Regulation 19 Plan is not consistent with important higher level policies and the reasons for this have not been justified. To this extent the Plan is unsound. The need for the plan to understand and work with communities to create high quality sustainable buildings The National Planning Policy Framework (Chapter 12) establishes that the ‘creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.' NPPF Para 132 states ‘Plans should, at the most appropriate level, set out a clear design, vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations. This is not reflected in the Local Plan. It is important that there is public engagement in the design of new developments and that the Council will require that development:	The NPPF is a material consideration in making decision on individual planning applications. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and was published in 2021. This contains an extensive policy suite (D1-D14) which are used to help determine planning applications in Ealing. There is no need to repeat or duplicate these policies. Indeed, there are inherent risks in doing so. Policy DAA in Ealing's Local Plan supplements those policies.	Policy DAA: Design and Amenity – Ealing LPA – local policy		Susan Deans	GRASS Residents	408	Community Interest Group

I am writing as Chair of the GRASS (Gordon Road and Surrounding Streets) Residents' Association which represents many households in the surrounding area. We fully support detailed comments made by Ealing Matters, Save Ealing Centre and Stop the Towers but would like to reiterate some concerns. Town centres: The NPPF Para 90(a) requires planning authorities to ‘support the role that town centres play at the heart of local communities.’ Paras 2.9.1 and 2.9.2 elaborate: ‘A strategy should be developed for town centres that are experiencing significant change, such as projected declining demand, or significant planned infrastructure. Town Centre Strategies should be tailored to each town centre. A clear vision should be developed with the local community, taking account of the town centre’s strategic role, opportunities for growth, potential to support regeneration, spatial characteristics, economic challenges, and location in inner or outer London. Strategies should also consider the role of the night-time economy, as well as the cultural, heritage and tourism characteristics of the area.’ Over the past 10 years Ealing town centre has come to resemble a major building site with development schemes such as Dickens Yard, Ealing Filmworks and Ealing Broadway Station disrupting pedestrian and vehicle traffic, generating constant noise and poor air quality. Major stores and key community facilities have closed resulting in a growing surplus of empty shop units. Historic England lists two of the town centre’s Conservation Areas as under threat. It is not just the urban quality of the town centre that has declined. As the plan notes. ‘Over recent years the local population growth has stagnated	Noted. A report into the business health of 1,000 retail centres across the UK has seen Ealing Broadway including its shopping centre rise in recent years and is now ranked at number 64. Compiled by Newmark Retail, its annual Vitality Rankings for 2024 looks at various factors to determine its ranking including retail unit vacancy rate, space being adapted for other uses, shopper spend per annum and footfall figures. See: https://www.nmrk.com/insights/market-report/newmark-retail-vitality-rankings-2024 In 2022 Ealing Broadway was ranked at number 73 while in 2019 it came in at 173. The designation for the Ealing Metropolitan Town Centre is derived from the London Plan and Ealing's Local Plan sets out a spatial policy for the town centre at Policy E2. This takes a holistic as well as a character led approach recognising the different attributes and characteristics of individual parts of the centre.	Policy E2: Ealing Metropolita n Town Centre		Susan Deans	GRASS Reside	408	Community Interest Group

From {redacted} and an Ealing residents for the past 35 years. I refer to the council's so-called local plan, which seems to me to be an unmitigated recipe for disaster that will surely result in the ultimate destruction of this once historic borough. Amidst all the ambitious talk of attracting 80,000 newcomers to Ealing I do wonder if our councillors have given any consideration to what might actually attract people to come here in the first place? The borough that I came to live in 35 years ago has now virtually gone. Its one saving grace is Gunnersbury Park but that only survives on the income generated by endless music festivals that blight the park all summer long. Take a long hard look at Ealing's shopping centres. West Ealing is a ghost town populated by cheap and nasty purveyors of tat while the Broadway staggers on supported only by fast food outlets, beauty salons and betting shops -- what an edifying attraction to newcomers. And how do you propose to attract the doctors needed to man the surgeries that will be required to cater for such ridiculous population growth. Please don't think that everyone wants to live in high rise tenement blocks. The pandemic very effectively demonstrated that people want space and gardens, you can't get those on the 19th floor of a tower block. May I politely suggest you shred this plan and start again, preferably not wearing the labour red rose tinted glasses that would seem to be standard issue to the councillors who devised this appalling plan.	Noted. The alleged decline of the centre is not accepted and is a matter of perception. A report into the business health of 1,000 retail centres across the UK has seen Ealing Broadway including its shopping centre rise in recent years and is now ranked at number 64. Compiled by Newmark Retail, its annual Vitality Rankings for 2024 looks at various factors to determine its ranking including retail unit vacancy rate, space being adapted for other uses, shopper spend per annum and footfall figures. See: https://www.nmrk.com/insights/market-report/newmark-retail-vitality-rankings-2024 In 2022 Ealing Broadway was ranked at number 73 while in 2019 it came in at 173. The policy is supported by technical evidence including a Town Centre Health Check. +B203 Regards West Ealing, policy seeks to strengthen the local character and distinct offer of West Ealing, including food offer, retail, convenience and leisure while realising the potential of identified Development Sites to improve the quality of built environment and deliver new houses and jobs. Regards tall buildings, the London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Andrew Bond		409	Individual

Site 1.4 Acton Vale Industrial Park & Westgate House (06AC) As owner occupiers of premises at {redacted} we feel the proposal for new residential block of up to 7 storeys on this site presents a challenge to the amenity of residents along the east side of Agnes Road that does not appear to have been addressed in the council’s plan. It should be noted that the current building on the site is two storey with no windows whatsoever on the west facing elevation overlooking our house and garden. We ask that the following be given proper consideration: * Loss of Privacy: any windows and balconies on the west elevation of the proposed development would constitute an enormous loss of privacy, providing sight-lines into the rear living spaces of our home, perpendicular to our windows. Also into the entirety of our garden where there is currently none from that direction. * Loss of Light: the proposed 7 storey building would remove a vast amount of open visible sky and daylight from our house and garden. Any building exceeding the maximum height of the current building would constitute a significant loss of light. * Pressure on Amenities: there is no provision in the proposal for additional schooling, healthcare or similar to account for the increased local population. * Change of use: the commercial usage of the site is long standing and of benefit to the local community.. * It does not reflect the vision and aspiration of the the local community (para.1.15 of the regulation) * It is not aligned with the neighbourhood planning framework in that is not community led (para.1.20 of the regulation)	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development is noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House		Nick Murphy		411	Individual

I am writing in response to the Local Plan to let you know my opinion of its contents. Firstly I would say that it is vague on the details and puzzling in places. One example is where Ealing Station is referred to (on page 163); I am not aware that there is one called this and assume that it is an error. It is also written in such a way as to be difficult for people outside the town-planning community to comprehend. Talking of 'a strong knowledge economy' is jargon which is likely to be meaningful to a fairly small proportion of readers. It seems that the photos - of smiling culturally and ethnically diverse persons in sunlit situations - accompanying it are to soften the impact of its troubling contents. The housing target of 40,000 homes is surely unrealistic in terms of the infrastructure required for the people (likely to be at least two-fold) who would live in them. No details of its provision for this increase in growth rate - likely to be many times more than 40,000 if they're not all for single inhabitants - are included. The heights of buildings especially in Ealing and Acton are unreasonably high. High-rise buildings have high carbon impacts during their build and their lifetime. Redeveloping serviceable buildings - in some cases, relatively recently built - as proposed is environmentally undesirable and would certainly heighten climate change. Examples such as Perceval House, Waitrose and the project near to West Ealing Station are all far too high for the area. They would ruin the appearance of their locations. The dismal visual effect of these shoddy high rise developments can be seen at Dickens Yard and Filmworks which have both spoiled the appearance of central Ealing and look more	Noted. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The Local Plan sets out policies for carbon optioneering as part of the Whole Life Cycle Carbon Assessment, which seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option (see Policy WLC). It should be noted that plans for the future redevelopment of Perceval House include retention and retrofit of the main office building. Regards tall buildings, the London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Harding Wyatt		412	Individual

Site 1.4 Acton Vale Industrial Park & Westgate House (06AC) As owner occupiers of premises at {redacted} we feel the proposal for new residential block of up to 7 storeys on this site presents a challenge to the amenity of residents along the east side of Agnes Road that does not appear to have been addressed in the council’s plan. It should be noted that the current building on the site is two storey with no windows whatsoever on the west facing elevation overlooking our house and garden. We ask that the following be given proper consideration: * Loss of Privacy: any windows and balconies on the west elevation of the proposed development would constitute an enormous loss of privacy, providing sight-lines into the rear living spaces of our home, perpendicular to our windows. Also into the entirety of our garden where there is currently none from that direction. * Loss of Light: the proposed 7 storey building would remove a vast amount of open visible sky and daylight from our house and garden. Any building exceeding the maximum height of the current building would constitute a significant loss of light. * Pressure on Amenities: there is no provision in the proposal for additional schooling, healthcare or similar to account for the increased local population. * Change of use: the commercial usage of the site is long standing and of benefit to the local community.. * It does not reflect the vision and aspiration of the the local community (para.1.15 of the regulation) * It is not aligned with the neighbourhood planning framework in that is not community led (para.1.20 of the regulation) * There is limited or no provision of green spaces as set out in	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development is noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House		Sophie Murphy		413	Individual

01AC-Morrisons: what was Act 2. so I will just repeat some of what I said then plus the fact that it is an unsuitable site for tall buildings and just by building on a car park will not stop people using cars & actually the car park brings people into the town centre to use other shops & amenities. “ACT2 Acton Gateway Mixed use-vague / residential- unsuitable. Yet again an obsession with Gateways.In the 2009 Acton Town centre Conservation Area Character Appraisal is states that ‘King’s Parade (Listed Grade 11).... together with Acton Hill Church forms a gateway to the town centre from the west.’ The Acton Gateway site is bounded on three sides by the Conservation Area and therefore any development on the site must be sympathetically designed to integrate into this area and not detract from it. However the only vague plan I have seen for this site is the one from the Acton Town Development Framework document from 2008 with a rather strange podium with towers with the letters A C T O N (I don’t know what is written on the 6th tower).It looks rather like something one would have found in the 70s at the Elephant and Castle. I do admit that the car park is not a thing of beauty but the problem with any exterior supermarket is that, to maximise shelving, there are nearly always 3 solid walls. The supermarket chose to have its main entrance on Market Square however in the possible development for Morrisons (2008) a possible supermarket extension is marked. I don’t actually see why the Council does not just ask Morrisons to provide more imaginative landscaping. Any extra height on the High Street will detract from the restored Locally Listed old Fire Station and the spire of the Grade 11 Listed St.Mary’s Church.” {Suggested modification:} We do not need all these fancy photos & lengthy development sites descriptions. It just needs condensing & I	Noted. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth.	01AC Acton Gateway (Morrisons)		Susan New		391	Individual

03AC-Ealing Common Depot: I know this site will be passed for residential as it is part of the TfL plan to fill the empty coffers but many people think of this site at being the Transport Museum and its open days have grown in popularity from the time when I took my young son to it years ago to now when there are vast queues. It is an asset and should be kept & knowing what usually happens, if it is going to another site it will be bound to be in East London-not here. It is an underused asset and should be expanded and opened on a daily basis with amenities like a cafe. {Suggested modification:} We do not need all these fancy photos & lengthy development sites descriptions. It just needs condensing & I am not going to do it. The photos & endless amounts of waffle & repetition have made it very difficult for my computer to cope with & I am sure that is true of a lot of people. It means responding to anything takes ages.	Noted. The allocation recognises the importance of the reprovion of TfL Museum on site or at another suitable location.	03AC Ealing Common Depot		Susan New		391	Individual
04.AC Builders Merchants Bollo Bridge Road: Not suitable for mixed-use and residential as we need builders merchants & timber yards although it seems to have permission to change. {Suggested modification:} We do not need all these fancy photos & lengthy development sites descriptions. It just needs condensing & I am not going to do it. The photos & endless amounts of waffle & repetition have made it very difficult for my computer to cope with & I am sure that is true of a lot of people. It means responding to anything takes ages.	Noted.	04AC Builders Merchants Bollo Bridge Road		Susan New		391	Individual
07AC & 08AC: I thought these 2 sites formed part of the Friary Park estate & are NOT suitable for tall buildings. Already passed by the Council when in fact the estate could have been retrofitted. {Suggested modification:} We do not need all these fancy photos & lengthy development sites descriptions. It just needs condensing & I am not going to do it. The photos & endless amounts of waffle & repetition have made it very difficult for my computer to cope with & I am sure that is true of a lot of people. It means responding to anything takes ages.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height in the Tall Buildings Strategy.	07AC Dean Court		Susan New		391	Individual
07AC & 08AC: I thought these 2 sites formed part of the Friary Park estate & are NOT suitable for tall buildings. Already passed by the Council when in fact the estate could have been retrofitted. {Suggested modification:} We do not need all these fancy photos & lengthy development sites descriptions. It just needs condensing & I am not going to do it. The photos & endless amounts of waffle & repetition have made it very difficult for my computer to cope with & I am sure that is true of a lot of people. It means responding to anything takes ages.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height in the Tall Buildings Strategy.	08AC Oaktree Court		Susan New		391	Individual

I am writing to express my horror at the draft Ealing Council Local Plan Reg 19 consultation. When the initial draft (Reg 18) was published, it was so long-winded, with 38 appendices within which key information was difficult to locate, that my overwhelming feeling was one of anger. This version has little improvement. I share the concerns that Ealing Matters, Stop The Towers, Five Roads Forum and other residents associations have expressed. 1. The Plan itself is verbose and repetitive. I have been looking at planning documents for over five years and have become familiar with their form but this Plan leaves me confused and concerned. If that's the case for me then how inaccessible it must be for people. What is worse, the glossy brochures produced do not accurately reflect the key issues proposed. It is deceitful and not an honest consultation. It is simply impenetrable to the vast majority of Ealing residents unfamiliar with planning jargon or issues. 2. Ealing's housing target of more than 40,000 homes over the next 15 years is excessive and undeliverable. This is a crazy expansion that is unrealistic. If it were to be delivered it would create unmanageable population growth of more than 80,000 people (more than the population of Guildford) according to GLA projections. 3. The infrastructure plans presented to support this very high growth rate are sketchy at best. There is no capacity within the NHS to cater for such a massive increase in population, let alone the extra burden on other services and amenities. Just because we now have Crossrail going through our borough, it will not provide everything needed. 4. The plan's proposals for wholesale redevelopment of relatively new and serviceable buildings will exacerbate climate change. Every	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council's ambitions and plans for each of the seven towns that make up the borough. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. The Local Plan is also based on an extensive technical evidence base. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19). It is imperative that the council has an up to date Local Plan and there are potentially severe consequences of failing to have one. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	General		Tony Colliver		415	Individual

EA15 Waitrose. STT considers that the arrival of the Elizabeth Line required the Council to prepare an area strategy for sites around West Ealing Station to ensure the widest public benefits would accrue from this major infrastructure investment. Unfortunately this did not happen and it has resulted in a wholly avoidable legacy of distrust on the part of the local community. Even now opportunities exist to repair relationships through an area based plan involving both the community and key landowners, including the John Lewis Partnership. The current Waitrose store has only existed for 18 years, and the one it replaced was only 14 years old. I have very major concerns about the sustainability of Waitrose's slash and burn business model and its impact on climate change. It really should stop. I applaud the proposed reduction in the maximum height to 13 storeys but think this would still be excessive and that it should be restricted to 10 storeys or less. This would still exceed the tall building threshold of 7 storeys in West Ealing. As Allies and Morrisons say in their Tall Building Strategy (page 4) 'it follows that in all other locations... the vast majority of the Borough – tall buildings are not considered to be an appropriate form of development'. STT has commented elsewhere on the Waitrose proposals and I believe that their comments need to be taken on board in the preparation of a more appropriate scheme for this site than has so far been presented. Consideration of the appearance of the development when viewed from residential streets both to the north and the south is crucial. Development should include a replacement for Jacobs Ladder footbridge across the Railway.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities. Key infrastructure requirements for this site allocation include measures to improve active travel including Jacobs Ladder footbridge and Green Man Lane.	15EA Waitrose, West Ealing			Tony Colliver		415	Individual

EA16 West Ealing Station Approach. This is another site close to West Ealing Station that should form part of an area based plan strategy. (Having said that, I do not understand why this site has been given this name. It is nowhere near the approach to the new West Ealing Station which is 100 metres down Manor Road on the other side of the railway.) I hold that redevelopment of this site should accord with the 2013 site brief which required that ‘the height, scale and massing of new development must reflect the historic character of the surrounding residential areas on Hastings and Drayton Green Road. New development along Hastings Road must be low rise and not overlook the adjacent two storey terraced residential properties on this side, to create a harmonious streetscape and respect the current building line.’ I see no reason to depart from this principle. In particular, I do not accept that it is appropriate for the height of a development to be as high as 13 storeys as is now proposed. It should remain within the 7 storey tall building threshold which Policy D9 proposes. Adequate provision for deliveries and services must be made. Adherence to all planning policies and guidance should be mandatory to. As the immediate next door neighbour to this site, our home would be dwarfed by anything above four storeys. We would lose sunlight in our living rooms and bedrooms. Our home would be overlooked – something that we are already subject to and suffer from as a result of the 13 storey block immediately north of us across the railway. Residents of this block can see directly into our bedrooms and we have been and continue to be subject to antisocial behaviour as a result – up to and including voyeurism and the subsequent shouting of remarks from balconies in the block. When we moved into our house in 1993 we were aware, amongst other things, of both the presence of low	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	16EA West Ealing Station Approach		Tony Colliver		415	Individual

I would like to object to the Ealing Local Plan I am concerned that the Towers approach proposed in the plan will be detrimental to the Ealing community due to the isolating nature of tall buildings promoting difficulties for community cohesion. I am also concerned that the population growth facilitated by the plan cannot be properly served by the existing or future community facilities and services. Also I am aware that the Ealing Local Plan will also impact badly on the currently stretched electricity and water services available to the borough. It should not go ahead, please reconsider.	The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	General		Sean Francis		418	Individual

For almost 34 years together with my family we have been residents of {redacted}, directly opposite the clubhouse of Barclays Bank Sports Grounds. We are shocked to find out that the Ealing Council is planning to develop this area with multiple residential accommodation. We have been observing how over the years our road was becoming more and more busy. Building the Ada Lovelace school at the bottom of the road a few years ago fulfilled a noble practical necessity yet it has increased the traffic considerably. At the other end there is a similar situation with cars parking to drop/collect pupils of Saint Augustine’s Priory school. We cannot imagine having to put up with more traffic caused by residents of the planned new housing on the grounds of former Barclays Bank Sport grounds. We strongly oppose to the MOL (MOL 20) de-designation of BB Sport Grounds parts as it can only happen in exceptional circumstances. The only circumstances we can see at present are the business acumen and simple greed of the developer. Please notice that the residents of Park View rd are mostly owners-occupiers who have been connected with Ealing for years, without fail beautifully looking after the grounds of their properties and carrying on with their homes here because of the relative peace of the area. The Ealing Council’s initiative of the residential development plan (21EA) will irreversibly destroy the residential character of the neighbourhood. Please register our objection to it. We therefore request that Barclays Sport Grounds should become the proposed Regional Park. We support the representations made by Ealing Matters, Save Ealing Parks and CPRE.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. School capacities do change over time and any development would need to mitigate any adverse impacts regards the availability of school places as part of any planning obligations should development be consented. There are no physical vehicular access issues for this site. Traffic congestion associated with the ‘school	21EA Former Barclays Sports Ground		Eva Eggar		419	Individual

As an Ealing Resident for the past 35 years, I am frankly shocked by the poor quality of the proposed Local Plan, and wholeheartedly support Ealing Matters' concerns. I wish to register my strong objections to the Plan in general, as well as on these specific points: 1. Not only is it extremely difficult to read the document, the Plan itself is not coherent. It does not paint an integrated picture of the planning vision for the burrough, the infrastructure development required to sustain it, and how it will be monitored and assessed. Without these elements clearly articulated it cannot be described as adequate. 2. The housing target of more than 40,000 homes over the next 15 years will create population growth of more than 80,000 people. The infrastructure plans to support this very high growth rate are entirely inadequate. Local hospital beds, doctors surgeries, dentists, schools, electricity grid, sewerage supplies and all other key services are already critically overstretched today. We need clear plans for how this population growth will be provided with the increased infrastructure required to support it, so that services in Ealing do not go into further decline. A local plan must clearly articulate how it will enhance local infrastructure for the people it serves. Without this the plan is wholly inadequate. 3. There are no clear policies to protect the Borough's heritage, despite overwhelming feedback from residents that this is important to OUR community - to the very community YOU have been elected to represent. 4. The number of tall buildings and their heights are excessive and unjustified. The plan grants a 'green light' to developing towers by re-defining what a tall building is without an assessment of the local	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council's ambitions and plans for each of the seven towns that make up the borough. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. The Local Plan is also based on an extensive technical evidence base. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19). It is imperative that the council has an up to date Local Plan and there are potentially severe consequences of failing to have one. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	General		Jennie Sykes		420	Individual

The plan for development site 06AC Acton Vale Industrial Park is not legally compliant and is unsound for many reasons. 4.1.31 New development at Acton Vale Industrial Park and any increase in height of buildings would negatively effect the surrounding area and change the character of the surrounding area, particularly the Edwardian houses in Agnes Road which forms the boundary and would result in an unacceptable sense of enclosure with a negative impact on residents quality of life, due to a lack of sunlight and privacy in gardens and homes. This would also have the same impact on the flats on Cowley and Swainson Roads. The plan fails as it contradicts Ealing Councils plans for 'Net zero' emissions. Any building developments will substantially increase carbon emissions both during construction and in use. Any increase in residential units would have an impact on amenities which are already overstretched, including schools, doctors etc. Parking is already an issue in the area, despite controlled parking on Agnes Road, parking spaces are often scarce. Additional development, even if car free would worsen the situation for all residents. The diversity of businesses would be reduced as the majority of existing businesses on Cowley Road would not be permissible when part of a residential block. The result would be a glut of office space.	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development is noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House		redacted		422	Individual
I'm writing to agree with the Five Roads response regarding the Plan Reg 19 consultation. I am against tower blocks being built in the area and support the Stop the Towers campaign.	Noted.	Policy E2: Ealing Metropolitan Town Centre		Sharone Marsh		423	Individual

1. There does not seem to be any mention of one of the most prized and important features of the main centre of Ealing – that is Haven Green. Successive Councils have ensured it is no longer the “haven” it was and should be, by joining up with TfL to use it as a cheap (and dirty and crowded!) bus interchange. The plan should address the future of this and alternatives and consider more deeply the effects on it of developments south of it. 2. Any ideas of preserving the borough’s unique heritage have gone out of the window with emphasis on high rise and a house building programme that would only be feasible by destroying the areas character (and, indeed by making it a less pleasant place to live even for those being housed). 3. There is no joined-up approach to the management of parks, open spaces and water courses. The idea of turning a well-used golf course into wilding is total madness. It was only claimed by the Council as accepted by the majority of respondents as they were led by slanted questions to agree it was a good idea in principle without being asked straight questions about why they thought in practice it was not a good idea. 4. 20 minutes neighbourhoods, although clothed in the usual “climate emergency” apparel are worryingly straight out of George Orwell’s 1984. Individual's choice as to how one lives one’s life is being constantly more curtailed by the local authorities and the State and such measures will only increase the ability to do that. 5. Finally, the Plan should be a vision for the future of Ealing, but when taken as a whole there is no vision, just a template for the Council to do what it wants. This is easily achievable by the Council as it has great scope in this Plan as detail of how things are to be done is wonderfully sketchy.	Noted. Policy E2 C (ix) aspires to protect and enhance the network of parks around Ealing Metropolitan Town Centre and the green links connecting them and although not mentioned by name this would include Haven Green. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The proposal to turn Perivale Golf Course into a park has been implemented and provides access to nature, leisure and recreation for far greater numbers of people. A 20-minute neighbourhood would usually include access to public transport, health, education, employment, community, retail, culture, leisure, and green spaces. This plan aims to give people more choices about how they want to travel in their local community without a car if they want or need to. More options can benefit physical and mental health and help to create a stronger sense of community, boost the local economy, and increase resilience to the effects of climate change.	General		Richard J Ashmore		424	Individual
I am writing to put on record that as a 5 ROADS resident in Broughton Road West Ealing that I fully support the concerns detailed in the letter from the 5 Roads {redacted names} regarding the above.	Noted.	Policy E2: Ealing Metropolitan Town Centre		Samantha Richards		425	Individual

Site 1.4 Acton Vale Industrial Park & Westgate House (06AC) As owner occupiers of {redacted}, we understand and support the principle of bringing forward brownfield land for development to provide new homes. However, the proposal for a new residential block of up to 6 storeys on this site presents a challenge to the amenity of residents along the south-east side of Agnes Road that does not appear to have been addressed in the council’s plan. In particular, numbers 27 to 37, Agnes Road have sub-standard rear gardens due to the historic boundaries, presumably related to the original assembly of land now forming the Acton Vale Industrial Park. The development of new and taller buildings within the western rectangular extension of the Industrial Park has potential to cause serious harm to the setting, amenity, privacy and receipt of daylight of the existing houses. We would suggest that this could be mitigated by identifying all or part of this rectangular area for return to the Agnes Road houses as garden land, and requiring the set-back of any new development to at least the line of the rear garden extents to the north. We are willing if necessary to attend at the plan inquiry to elaborate on these representations.	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development is noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House		Redacted		426	Individual

For almost 34 years together with my family we have been residents of {redacted}, directly opposite the clubhouse of Barclays Bank Sports Grounds. I am shocked to find out that the Ealing Council is planning to develop this area with multiple residential accommodation. I have been observing how over the years our road was becoming more and more busy. Building the Ada Lovelace school at the bottom of the road a few years ago fulfilled a noble practical necessity yet it has increased the traffic considerably, hence jeopardizing road safety. At the other end there is a similar situation with cars parking to drop/collect pupils of Saint Augustine's Priory school. We cannot imagine having to put up with more traffic caused by residents of the planned new housing on the grounds of former Barclays Bank Sport grounds. I strongly oppose to the MOL (MOL 20) re-designation of Barclays Bank Sport Grounds parts as it can only happen in exceptional circumstances. The only circumstances we can see at present are the business acumen and simple greed of the developer. Please notice that the residents of Park View Road are mostly owners-occupiers who have related to Ealing for years, looking after the grounds of their properties without fail beautifully and carrying on with their homes here because of the relative peace of the area. The Ealing Council's initiative of the residential development plan (21EA) will irreversibly destroy the residential character of the neighbourhood. Please register my objection to it. I therefore request that Barclays Sport Grounds should become the proposed Regional Park. I support the representations made already by Ealing Matters, Save Ealing Parks and CPRE.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt" category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. School capacities do change over time and any development would need to mitigate any adverse impacts regards the availability of school places as part of any planning obligations should development be consented. There are no physical vehicular access issues for this site. Traffic congestion associated with the 'school	21EA Former Barclays Sports Ground			Andrzej Formaniak	427	Individual

Representations made on behalf of Acton Gardens LLP in respect of proposed site allocation 02AC Acton Gardens revised masterplan. Representor states that matters raised at Regulation 18 consultation have not been addressed and is reiterating the points made. Regulation 18 representation is attached as Appendix A. Background and context including previous planning history, including statement that flexibility has allowed for continuous optimisation of future phases and that there are no infrastructure or heritage matters which are considered to constrain future optimisation.	Noted	02AC Acton Gardens		Alex Kitts	Stantec obo Acton Gardens LLP	428	Developer

Local Plan Housing Targets & Land Supply Policy SP4.3 (Genuinely Affordable Homes) of the draft Ealing Local Plan seeks to meet the 21,570 unit 10-year housing supply target set out in the Adopted London Plan for the period 2019-20 to 2028-29. However, the Five Year Housing Land Supply Position Statement & Housing Trajectory (November 2023), which forms part of the evidence base for the Regulation 19 Local Plan, confirms that Ealing’s 5-year housing land supply position is only 3.7 years. A shortfall of units against the London Plan 2020-2040 target of 43,190 homes has been identified by the Council, when accounting for total planning permissions, allocations and small site contributions coming forwards. When measured against the cumulative requirement, the identified supply in the borough equates to 75%, with an absolute shortfall of 3,935 units. As such, there is a clear need to identify further homes to meet requirements and ensure the Plan’s soundness. This letter outlines below the potential for Acton Gardens to help address this shortfall.	The Council’s latest 5 YHLS position statement is dated November 2023, and reflected the provisions of the then contemporaneous NPPF (September 2023), which required Local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement. This position statement established that the identified supply over the next five years in Ealing fell short of the requirement calculated for the same period. Since this time however further revisions have been made to the NPPF (published December 2023), which change the circumstances around when authorities need to establish a supply position and how this should be calculated when required. This is detailed in paragraphs 76, 77 and 226 of the NPPF. As revised, in circumstances where the adopted Local Plan is over five years old as is the case in Ealing, the authority is required to continue to update annually a supply of specific deliverable sites, although this should be measured against a reduced requirement equivalent to four years’ worth of housing, where the authority is advancing a new Local Plan which has reached either Regulation 18 or Regulation 19 stage. Having published Regulation 18 and 19 plans in November 2022 and February 2024 respectively, Ealing can take advantage of this reduced four year requirement. Adjusting the calculations to account for the new provisions, Ealing’s identified supply exceed the four year requirement, and in doing so the authority avoids triggering the presumption. Separately this presumption is also avoided as a result of the latest published Housing Delivery Test measure (2022).	02AC Acton Gardens		Alex Kitts	Stantec obo Acton Gardens LLP	428	Developer

Proposed Optimisation of Remaining Phases As shown in Appendix A, the previous Representations submitted for Regulation 18 stated that an uplift in dwellings could be achieved for the remaining Acton Gardens phases. The Regulation 19 Local Plan does not provide any allocation numbers for Site Allocation 02AC; as such, the comments that were submitted in the previous Representation have been reiterated below. Omitting Phases 9.3, 9.5 and 9.6, which are intended to be delivered in line with the approved reserved matters application (ref: 215892REM), of the remaining Phases remaining to be delivered, a total of 987 units are to be delivered. It is considered that a minimum of 1,200 homes can be suitably delivered on the remaining Phases. This would equate to an uplift of approximately 21.5%, only slightly higher than the overall uplift achieved (17.7% when excluding Phase 7.2), and less than was achieved on phase 9.4 (25.6%); a slight exceedance in uplift is further justifiable given a more-comprehensive redesign and optimisation of the wider Acton Gardens site could be embarked upon, rather than a phase-by-phase optimisation which is more restrictive. As part of the Site’s proposed optimisation and increase in unit numbers, Acton Gardens LLP are committed to continuing	Noted. The details given will inform revisions to the housing trajectory. A number of factors have informed the decision to omit site capacity figures / quantum from the site allocations, including: -Challenges around pre-determining optimal development capacity ahead of more detailed design work at the application stage -Challenges establishing workable capacity figures which will endure for the life of the plan. -Our preference to avoid prescription which may be viewed too rigidly and stifle/constrain different design options for sites. Notwithstanding the above position capacity estimates have been determined for each site, and these estimates have inputted into the Housing Trajectory. A revised housing trajectory will be published in early 2025.	02AC Acton Gardens		Alex Kitts	Stantec obo Acton Gardens LLP	428	Developer

Red-Line Boundary The current red-line boundary underpinning Site Allocation 02AC, which can be found on page 130 of the draft Local Plan, broadly includes the undelivered Phases of the Acton Gardens masterplan, relying on the red-line boundary for the Hybrid Masterplan at the site (ref: 182579OUT). It is considered that the red-line boundary should be amended to omit Phases 9.3, 9.5 and 9.6, at the southwestern end of the allocation, adjoining Enfield Road, Hanbury Road and Osborne Road. Acton Gardens LLP are intending to deliver the approved reserved matters application (ref: 215892REM) relating to these Phases, and therefore consider they should be removed. The allocation should also exclude Avenue Park and Central Plaza, as well as Catalyst land located between Central Plaza and Phase 8.3, as this land is not under Acton Gardens LLP’s ownership and does not form part of the Acton Gardens masterplan.	Agree to amending red-line boundary to omit Phases 9.3, 9.5 and 9.6 where works have commenced. Development sites are not allocated on the basis of land ownership boundaries. There are broader placemaking objectives for this proposed site that go beyond Acton Garden LLP's landholding.	02AC Acton Gardens		Alex Kitts	Stantec obo Acton Gardens LLP	428	Developer

Building Heights <u>Maximum Heights</u> With regard to maximum heights set out in Site Allocation 02AC, the allocation states that ‘an agreed masterplan indicates a maximum height of 15 storeys (52.5 metres)’ (page 130); this is also repeated on page 131: ‘Heights should range between 8 –15 storeys across the site’. However, this is demonstrably false. As part of the 2018 Hybrid Outline Application (Ref: 182579OUT), a Minimum and Maximum Building Heights Parameter Plan was approved (ref: 16250-00-07-006, Rev P1). This parameter plan included a key relating specifically to buildings between 16 and 20 storeys (maximum AGL 70.35m), and this has been retained in all subsequent versions of the approved Minimum and Maximum Building Heights Parameter Plan. The latest version (ref: Z03324-BBA-ZZ-ZZ-DR-A-0155 Rev. P01) was approved in March 2023 under application 230711NMA, and has been enclosed in Appendix B of this letter. On this basis, Site Allocation 02AC should be amended to reflect the agreed maximum height of 20 storeys (70.35 metres). <u>Observed Building Heights</u>	The stated maximum heights are an error which will be corrected through proposed modifications.	02AC Acton Gardens		Alex Kitts	Stantec obo Acton Gardens LLP	428	Developer

Defensible Space Site Allocation 02AC, on page 131, lists the following as a design principle: ‘provide a minimum of 3m well landscaped private amenity space for all dwellings with windows at the same level as communal courtyards, which acts as defensible space.’ This level of detail is considered to be onerous for a site allocation; any forthcoming reserved matters applications are bound by the detail approved under the 2018 Hybrid Outline Application (Ref: 182579OUT), and matters such as overlooking and privacy will be considered by officers at the application stage, and balanced alongside other material considerations in determining whether an application is acceptable. Accordingly, reference to the provision of defensible space should be removed, to be addressed as part of the planning application decision-making process.	Noted. It is agreed that this is perhaps overly prescriptive and should be dealt with at the reserved matters stage. A modified design principle is proposed instead.	02AC Acton Gardens		Alex Kitts	Stantec obo Acton Gardens LLP	428	Developer
In addition to Site Allocation 02AC referred to above, the following policies also support the development of Acton Gardens Policy A1 (Acton Spatial Strategy) states that Acton Gardens ‘will capitalise on its proximity to Acton Town Station and will be a focus for residential-led growth and regeneration’. Policy A3 (South Acton) further supports Policy A1 by seeking to continue ‘the residential led regeneration based on a masterplan for Acton Gardens (the former South Acton Estate) to create a new and attractive locality with new homes, infrastructure, retail, and community spaces’ The above policies continue to be supported given the status of the Acton Gardens masterplan, as well as the matters addressed above	Support welcomed.	02AC Acton Gardens		Alex Kitts	Stantec obo Acton Gardens LLP	428	Developer

In conclusion, the allocation of the Acton Gardens masterplan under site allocation 02AC is supported; however, it is considered that the site has potential to deliver an increased number of units above what has been consented in the 2018 Hybrid Outline Application (Ref: 182579OUT). The site is considered developable and deliverable and therefore meets the criteria of an appropriate site under the requirements of the NPPF; the Council also do not have a 5-year housing land supply and have a shortfall of housing against London Plan targets. As such, further housing needs to be identified to ensure the Local Plan meets its requirements. The Acton Gardens site has a history of flexibility built into the permission to ensure that optimisation can be achieved, and it is considered that an optimisation of unit numbers in line with what has been previously achieved is possible, whilst taking into account the site constraints and opportunities. An amendment of the site allocation’s red-line boundary should also be made to reflect the status of certain phases, along with amendments to the wording within Site Allocation 02AC. Acton Gardens LLP are committed to continuing the regeneration of Acton Gardens, which will benefit from the proposed increase in unit numbers.	Concluding summary noted. The issues raised have been addressed individually. Commitment to the regeneration of Acton Gardens is welcomed.	02AC Acton Gardens		Alex Kitts	Stantec obo Acton Gardens LLP	428	Developer

Bluestone Planning is instructed by London Network Church (hereby referred to as the “Client”) to respond to the Ealing’s Draft Local Plan Final Proposals Regulation 19 Consultation that has been prepared by Ealing Borough Council (hereby referred to as the “Council”). Our Client is the owner of a parcel of land that is located to the eastern edge of the borough, within the north eastern part of Acton and contains the London Network Church building and the Garden Nursery building. A Location Plan of the site is included with these representations. We make this representation to express our client’s support to the MOL boundary changes that are recommended by the Council in their latest GB/MOL boundary review (ref MOL23) which forms part of the Base Evidence Documents supporting this Emerging Local Plan. Part to the rear of our Client’s curtilage currently falls within MOL23 and the proposed MOL boundary changes appear to result in the deletion of much of this land from the MOL designation. Whilst our Client is supportive of this change, they would be grateful if they could receive further clarification from the Council in regards to the exact boundaries of the land that is proposed to be removed from the MOL designation. As it is currently drawn and depicted in the Interactive Policies Map, it is unclear whether this includes the whole land to the rear of our Client’s site due to apparent inaccuracies in the boundaries of the land to be removed, which do not always follow boundaries on the base map. Atlas of Change ref:37 states that the recommended MOL boundary changes include the removal of “land behind London Network Church (MOL23)”, but this does not shed further light on the precise boundaries.	Comments noted. The proposed MOL de-designation includes the whole land to the rear of this site.	SP2.2 Climate action		Jeremy Flawn	London Netw	430	Community Interest Group

I fully support Ealing Matters’ and Stop the Towers responses to the draft local plan (reg 19). I have many concerns regarding the proposals. Ealing Council claims that it “ has actively listened to the feedback it received ” – however I can see little improvement from the Regulation 18 document. 1. The consultation document is very verbose and repetitive. It is very difficult to read and fully understand the contents unless you have a large amount of spare time and understand the jargon. The proposals will have a massive impact on Ealing and residents, and the document should be easier to understand. 2. There are no policies to protect the Borough’s important heritage. 3. There is no vision or strategy for the near total redevelopment of Ealing Metropolitan Town Centre that the Plan envisages. 4. The draft plan contains very little evidence of need that the policies are based on. For example, the housing targets have no basis in an assessment of local need in terms of the kinds of housing local people, or Londoners more widely, need and can afford. 5. A plan cannot be called a ‘plan’ without defining what success means, and without metrics and measures to monitor whether the plan is working. Ealing’s proposals for monitoring the plan are no more adequate now than they have been over the past 10 years. There appears to be no mechanism for measuring, monitoring and mitigating risk, for example the point at which Ealing’s infrastructure will fail to support the proposed 80,000 new residents. As an example, the climate and ecology emergency strategy (2021) states that Ealing will use planning powers to “Set measurable sustainability standards for new developments, for example BREEAM or Passivhaus”. The local plan does not set such	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. The Local Plan is also based on an extensive technical evidence base. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19). The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Supporting infrastructure plans are set out in the Infrastructure	General		Hilary Jayne		431	Individual

HMO policy: Under section Section 3.5.8 of the plan “The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs”. Why doesn’t the Council just get on and do this instead of ‘considering’ it? Hounslow Council have used Article 4 to mandate that HMOs cannot be built without planning permission, which is leading to a huge influx of them into Ealing where there are no existing restrictions. These HMOs create appalling living conditions for residents, blight many local communities, and cause a negative impact on residents across Ealing e.g. Framfield Road in W7 and in areas of Northolt.	Houses in Multiple Occupation (HMOs) are an important part of London’s housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: “by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence.” However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: “New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs.” Ealing Council is actively considering a non-immediate Article 4, which means once it is ‘made’ it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers.	SP4.3 Genuinely affordable homes		Hilary Jayne		431	Individual
EA15 Waitrose. The current Waitrose store has only existed for 18 years, and the one it replaced was only 14 years old. The impact of this policy of throwing away existing buildings is hugely damaging to the environment, and is not sustainable. The height of their proposals is unacceptable, and will have a huge impact on the surrounding residents. It should be restricted to the height of existing nearby structures such as Luminosity i.e. no more than 10 storeys. Any more and the character of the area and the local community will be irreparably damaged.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	15EA Waitrose, West Ealing		Hilary Jayne		431	Individual
EA16 West Ealing Station Approach. This should form part of a cohesive local area-based plan strategy. Any redevelopment of this site should ensure that the height, scale and massing of new development must reflect the historic character of the surrounding residential areas on Hastings and Drayton Green Road. New development along Hastings Road must be low rise and not overlook the adjacent two storey terraced residential properties on this side, to create a harmonious streetscape and respect the current building line. The proposed height of development (13 storeys) is far too high for the location.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	16EA West Ealing Station Approach		Hilary Jayne		431	Individual

I am writing to add my concerns regarding the Council's draft Local Plan, particularly regarding the large number of tower blocks being permitted in the borough and the reduced protection of many of our green spaces. Proposals to build towers adjacent to low rise housing makes no sense and is totally out of keeping with the character of so many of our residential neighbourhoods. Such towers, even if they are reduced from 18 to 13 storeys, still present unacceptable fire risks (as found in the Grenfell Enquiry). Towers create chilly, shaded and unpleasant wind tunnels (as demonstrated by Dickens Yard which I walk through regularly and where I often park my bike). I am also very concerned by the downgrading of the status of some of our open spaces, such as some Metropolitan Open Land, which will lead inevitably to loss of more green space, when we really need to give all our green spaces MORE protection, not less, to help with the borough's health and welfare. Deteriorating health will only cost local services and the NHS more. I appreciate the Council needs to raise revenue to balance a tight budget, but there are better thought out, fairer, more creative and healthier ways to do this. Future generations will not thank us if we get this wrong. I agree with the concerns raised by Ealing Matters and the Stop The Towers groups (both copied).	Noted. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy. The case for enabling development exists entirely independently of Policy ENA, which serves to limit and define the scope of enabling schemes.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Kate Mythen		432	Individual
I support Ealing Matters' concerns, especially about the local infrastructure. If we are to have so many additional residents, then lots must be done to upgrade local facilities, especially the road junctions near West Ealing station and at the Drayton Green Road / Broadway crossing!	Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Haydn Jones		433	Individual

The area of land about which I write is known as: Allotments, East Churchfield Road, Acton, Ealing W3 7LP. This land is disused and has been derelict for many years. It is a “land-locked” rectangular area of just under a quarter of a hectare which is designated as Community Open Space. It is not visible from any public viewpoint. The only way to access the land is by crossing a rough and uneven track in another party’s ownership over which the land owner has a right of way on foot only. Preventing access from the track to the land itself is a two metre high brick wall. Thus there is no practical access to the land at all. The owner of the land applied to the London Borough of Ealing to insert a gate in the brick wall to provide basic access to the land. The London Borough of Ealing refused planning permission for the gate. The Planning Inspectorate upheld the London Borough of Ealing’s decision on appeal. Thus there can be no benefit whatsoever in retaining the Community Open Space designation of the land. The land can only be brought back into use as an extension to the gardens of some of the houses which abut the land. In the circumstances, to retain the Community Open Space designation, which the London Borough of Ealing proposes in its proposed Local Plan, is unsound. Instead this designation should be removed. The property reference is: 000012142731 The Planning Application for the gate reference is: 220130REF The Planning Inspectorate Appeal reference for the gate: APP/A5270/W/22/3313028 Remove the Community Open Space designation.	Noted, the site remains designated as Community Open Space, and there are no proposals to alter this designation at present.	Policy A5: East Acton Neighbourh ood Centre		David Parry		435	Individual

* I object to the de-designation of part of Barclays Sports Ground as MOL (MOL20). * I object to allowing residential development on Barclays Sports Ground (21EA). * I support the representations made by Beechcroft House Management, Ealing Matters, Save Ealing Parks and CPRE. * NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. * Site Selection Report on Site 21EA exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely to fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs. * The views from Beechcroft House towards Barclays Sports Ground should be protected as part of the openness purposes of MOL. Because of that, and to stay in compliance with NPPF rules on MOL protection, any development on 21EA, even if allowed, should not exceed the current size of the Clubhouse (2-3 storeys).	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. School capacities do change over time and any development would need to mitigate any adverse impacts regards the availability of school places as part of any planning obligations should development be consented. There are no physical vehicular access issues for this site. Traffic congestion associated with the ‘school	21EA Former Barclays Sports Ground		Emmanuelle Chevreau	436	Individual

As owner occupiers of premises at {redacted} Agnes Road we understand and support the principle of bringing forward brownfield land for development to provide new homes. However, the proposal for a new residential block of up to 7 storeys on this site presents a challenge to the amenity of residents along the south-east side of Agnes Road that does not appear to have been addressed in the council’s plan. In particular, numbers 27 to 37, Agnes Road have sub-standard rear gardens due to the historic boundaries, presumably related to the original assembly of land now forming the Acton Vale Industrial Park. The development of new and taller buildings within the western rectangular extension of the Industrial Park has potential to cause serious harm to the setting, amenity, privacy and receipt of daylight of the existing houses. We would suggest that this could be mitigated by identifying all or part of this rectangular area for return to the Agnes Road houses as garden land, and requiring the set-back of any new development to at least the line of the rear garden extents to the north. We consider that the Plan would be made sound in respect of this site proposal if these matters were directly addressed in the version of the Plan to be issued to the Secretary of State.	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development is noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House		Natasha Serember and Mark Schmid		437	Individual

This is the response to Ealing Council's draft local plan from the Drayton's Community Association(DCA). The DCA is a residents group covering Manor Road, Drayton Road, Drayton Gardens, Drayton Avenue, Drayton Grove, Sutherland Road and Drayton Green in West Ealing. It is a non-party political community association representing local people in the area described above and active membership currently stands at over 350 people. The DCA was set up over 15 years ago to improve the quality of life in the Drayton's area of West Ealing. It has dealt with issues of anti-social behaviour, responded to the pandemic in protecting vulnerable residents, it organises street parties and events and improves the local area with litter picking and flower planting. In summary, our view of the Local Plan is that it is poor, would negatively impact Ealing and its residents and that it is not legally compliant due to its lack of a coherent narrative and evidence base that links the actions of the plan with its objectives and the lack of meaningful consultation during its creation. The plan, its Annexes and its supporting documents represent a huge amount of information and yet there is no coherent narrative that explains how the plan will deliver the stated policy objectives or how the evidence offered supports the plan. Nevertheless the DCA and other local groups have scrutinised the plan and the DCA supports the conclusions reached by other local organisations including Friends of The Earth, Ealing Matters, West Ealing Neighbours and Save Ealing's Centre (SAC) including that: It has not been positively prepared. It does not 'provide a strategy which, as a minimum, seeks to meet the area's objectively assessed	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. Policies writing has been informed by an extensive evidence base and early stakeholder consultation. This included the development of three 'reasonable alternative' spatial options to enable a preferred spatial option to be identified. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The plan does NOT give blanket approval to developments under 6-7 storeys. The definition of Tall Buildings is derived from London Plan Policy D9. This does not mean that all buildings up to this height are automatically acceptable; such proposals will still need to be assessed in the context of other planning policies to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area.	General		Gerald Power	Drayton Com	438	Community Interest Group

I am concerned that Ealing Council has put out for consultation Reg 19 of a draft plan running to over a thousand pages and affecting all aspects of life in Ealing with only a few weeks for residents to comment. It is of utmost concern that the draft plan has not taken into account the many adverse comments about high rise buildings in this traditionally suburban area. There Is no point to your consultation if you don't take account of what the residents have said. I agree with the points raised by Five Road Forum namely: The concern is that Ealing Council will then use the draft local plan as a blueprint for the future without sufficient consultation on controversial proposals such as building large tower blocks and abolishing GreenBelt land. The draft plan identified over 100 potential building sites within the borough – with nine sites in the Ealing town centre area (which includes West Ealing) as being as high as 21 storeys (73.5 metres). This is a huge number of very tall buildings in an area which has never as yet, seen a 21 storey building and is currently a reasonably pleasant suburban area. This is about to change as the council has recently passed several plans for 21 storey buildings in Ealing and the concern is the draft plan will increase this trendmaking Ealing look and feel like a high-rise, totally urban city. This directly affects the roads we live in which have two potential building sites in them: EA25 (41 Hastings Road & 44-54 Drayton Green Road) and EA14 (Arden Road car park). Added to that, we are on the edge a potential cluster of tall buildings including the Manor Road plan which has been given permission for 21storeys and the Waitrose site where the indicative height in the draft plan is 13	Noted. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Charmian Boyd		439	Individual

I fully support the concerns of Ealing Matters, particularly with reference to the hazardous bottleneck around West Ealing station. Further development of appropriate infrastructure and a reduction in height of un-neighbourly towers is essential. The Argyle Road is a hazard of polluting cars when we go to meet grandchildren from primary school. Alternatively, crossing the line at Jacob's ladder is dangerous for infants - impossible for younger parents with buggies or anyone with a mobility problem. I'd like to bus the children home from Northfields (Fielding) but waiting for 2 buses in the dark winter cold is hard. I love the Elizabeth line, but although over 70, I've been lucky to get a seat recently - or even a train! Looking out from the Greenford train, it looks like there's more space for building out towards South Greenford (eg Gurnells, if we're not getting a replacement pool?) My main concern remains the number and density of residents in excessively high towers around the hazardous area of West Ealing station. We must try to maintain the leafy character of West Ealing streets for future generations.	Noted. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Susan Jones		440	Individual

Beechcroft House Management is the freeholder of Beechcroft House (47-49 Park View Rd, W5 2JF), the closest property to the Clubhouse on Barclays Sports Ground. Beechcroft House is the property most affected by the plans regarding MOL20 and 21EA (Barclays Sports Ground). We have the following objections to the Reg 19 Local Plan: • MOL20: the proposal to de-designate as MOL part of Barclays Sports Ground • 21EA: allowing residential development on Barclays Sports Ground (presently designated as MOL20) • Policy ENA - Enabling Residential Development These items do not satisfy the Local Plan soundness tests, and do not comply with national policies. We support the representations made by Save Ealing Parks, Ealing Matters, and CPRE in this respect. We subscribe to their arguments regarding the deficiencies in the above policies. We would like to emphasise and further develop the points being made by Save Ealing Parks and Ealing Matters as follows: 1. According to Infrastructure Delivery Plan Part 5 - Infrastructure Delivery Schedule, the prioritisation for Site 21 EA is Desirable, which is the lowest type of priority. Only around 10 out of around 70-90 items in Infrastructure Delivery Schedule have this lowest ranking. This means that site 21EA ranks in the bottom 15% of all infrastructure projects by priority. Hence that there are no exceptional reasons for this low-priority project to go ahead at the cost of losing MOL and allowing residential development. Delivery of the desired hockey and other pitches should happen without the loss of MOL to residential development. Therefore the	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt"	21EA Former Barclays Sports Ground	Policy ENA: Enabling Development – Ealing LPA – local policy	Firuz Mamedova	Beechcroft H	441	Community Interest Group

Relating to Site 1.4 Acton Vale Industrial Park & Westgate House (06AC) As owner occupiers of premises at {redacted} Agnes Road we understand and support the principle of bringing forward brownfield land for development to provide new homes. However, the proposal for new residential block of up to 7 storeys on this site presents a challenge to the amenity of residents along the south-east side of Agnes Road that does not appear to have been addressed in the council’s plan. Numbers 27 to 37 Agnes Road in particular will be particularly affected by the development of new and taller buildings within the western rectangular extension of the Industrial Park - this has potential to cause serious harm to the setting, amenity, privacy and receipt of daylight of the existing houses. I object on the following basis: - o Unnecessary Intensification: Given the significant new development in the area over the past few years, I find the proposed six-storey height unnecessary. It risks altering the character of the neighborhood and impacting residents’ quality of life. - o Impact on Cowley, Swainson, and Agnes Roads: The construction of a six-story property on Cowley and Swainson Roads will have adverse effects on residents not only on those roads but also on Agnes Road, which connects with Swainson Road. The increased height will overshadow homes and gardens, affecting access to sunlight and privacy. - o Lack of Additional Services: The plan does not adequately address the strain on existing services. There are no provisions for additional schools, doctors, dentists, or other essential amenities. Further	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development is noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House		Caroline Jenkins		442	Individual

Site 1.4 Acton Vale Industrial Park & Westgate House (06AC) As owner occupiers of premises at {redacted} Agnes Road we understand and support the principle of bringing forward brownfield land for development to provide new homes. However, the proposal for new residential block of up to 7 storeys on this site presents a challenge to the amenity of residents along the south-east side of Agnes Road that does not appear to have been addressed in the council’s plan. In particular, numbers 27 to 37, Agnes Road have sub-standard rear gardens due to the historic boundaries, presumably related to the original assembly of land now forming the Acton Vale Industrial Park. The development of new and taller buildings within the western rectangular extension of the Industrial Park has potential to cause serious harm to the setting, amenity, privacy and receipt of daylight of the existing houses. We would suggest that this could be mitigated by identifying all or part of this rectangular area for return to the Agnes Road houses as garden land, and requiring the set-back of any new development to at least the line of the rear garden extents to the north. We consider that the Plan would be made sound in respect of this site proposal if these matters were directly addressed in the version of the Plan to be issued to the Secretary of State. We are willing if necessary to attend at the plan inquiry to elaborate on these representations.	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development is noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House			Robert Jenkins		443	Individual

Ealing Council Local Plan consultation must pass Legal tests and be sound = “tests of soundness”: * Positively prepared * Justified * Effective * Consistent with national policy The following attached submission sets out why the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. The comments indicate the legal tests of soundness have not been fully met by Ealing Council in preparing the Local plan. - The Regulation 18 [R18] consultation process adopted by Ealing was extremely difficult to follow and the R19 process has improved only a little on a very poor R18 process. - In any case to expect the public to understand, review and provide quality feedback in the timescales, and comment on the many and various Local Plan documents is unreasonable: there are >50 documents, and the main document is over 500 pages, and the preferred option c100 pages – plus MOL/GB atlas of change document for R18 and again R19, with over 80 designation detailed changes - ALSO the consultation for Ealing’s Community infrastructure Levy (CIL) was running during the same time which also had a deadline of 10th April – this made the public contribution confused and very difficult to respond as required in quantity and quality - ALSO a project to decide on conservation areas in Ealing concluded at the same time as R18 but decisions are not adequately reflected in the R19 Ealing Local plan.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council’s ambitions and plans for each of the seven towns that make up the borough. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. The Local Plan is also based on an extensive technical evidence base. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19). It is imperative that the council has an up to date Local Plan and there are potentially severe consequences of failing to have one.	General			Philip Alford	444	Individual

Timelines / Vision: • The 15-year perspective stated as a key horizon for the Ealing plan has been almost entirely ignored, and for example key Government targets such as achieving 30% protection of UK's land by 2030 ignored • there needs to be Environmental monitoring measures/KPIs to demonstrate Ealing are for delivering objectives with targets • the whole R19 Local Plan process needs to set out the “look & feel” of what it will be like to live in Ealing in 15yrs, or even 25 or 30yrs to meet Government’s published environmental strategic deadlines. • Suggest = where are the Top 5 ambitions to achieve for each of the 7 Towns in 15 yrs. • river and canal are more like ribbons across the towns so this water infrastructure needs to be recognized as such when planning/budgeting in Towns and both locally and regionally • where are 15yr actions plans and vision for all the Towns? • Need a vision reflecting a ‘day in the life’ that sets out the intended cross borough boundaries, corridors and networks and describing what it will be like to live in the borough • The reports should set out how things will feel after reflecting all the proposed site developments and how these proposed ‘intensifications’ needed to hit long term targets • There is insufficient recognition of the positive impact on the shared environment of working with neighboring or NGO/centralized bodies, so missing cross border synergies • Town focus seems to be only inward facing and does not acknowledge resources or impacts immediately cross border e.g., Gunnersbury/Minet	Noted. As drafted the Local Plan articulates a 15-year vision for the Ealing. Tangible place based interventions aimed at delivering this vision are detailed in the Town Plans in Chapter 4. Each town plan identifies the key issues and opportunities for that area. Tackling the climate crisis is one of three core themes underpinning the plan. Whilst the Local Plan alone will not be able to resolve this crisis, the planning system has a pivotal role to play in mitigating climate change and in increasing our resilience to it. The Local Plan will support and complement a number of other strategies and interventions, a number of which are appropriately referenced throughout the Local Plan. In the context of the natural environment this includes the Council's Biodiversity Action Plan and the emerging London wide Local Nature Recovery Strategy.	General		Philip Alford		444	Individual

Biodiversity inclusion: • There is insufficient inclusion of national frameworks or infrastructure documents [that have emerged recently] which must be addressed in the Local Plan and Ealing’s 15yr response, for example: • National Green Infrastructure Framework” and “Design Guide” to deliver 15yr expectations; also • the first revision 2023 of the 5yr “Environment Improvement Plan” also • Biodiversity Net Gain [BNG] requirements and metrics; also • Ealing Council will need to adopt a BNG approach for each Town; also • BNG and mapping needs to be actively incorporated and Local Plan resourced accordingly to demonstrate how the expected 20% net gain for each site can realistically be achieved. There are no visible actions and deadlines for the “Biodiversity Net Gain” framework which was published October 2023 – it is hard to see how the 20% BNG can be achieved if this is not adequately resourced • Policy SP2 mentions a few buzz words such as SuDS (Sustainable Drainage Systems), Urban Greening (UG), but it has no specifics or targets, for 15yrs? = and only has the comment “measures to encourage” without explaining what that means • Concepts such as “urban greening” factors and related targets are not addressed over 15yrs • There are no specific actions, targets and deadlines stated across the 15yrs to successfully deliver the recently completed Ealing BAP (Biodiversity Action Plan), or links into Ealing’s Climate and ecological emergency strategy [CEES 2021-2030] targets] • There is no mention/actions of the “Local Nature Recovery	Local policy G6 has been written to build from the mandatory BNG provisions, and it is envisaged that these local policy provisions will operate against the same framework as exists for mandatory BNG. At present, beyond the need perhaps for additional training/guidance, it is not envisaged that significant additional resources will be needed to support implementation of this Local Policy beyond that needed to facilitate implementation of mandatory BNG. The costs associated with a higher percentage target will be borne by the applicant, although evidence indicates that an increase from 10 to 20% is not considered to be prohibitive. Defra’s own Impact Assessment document indicated that the majority of costs associated with net gain are incurred to reach a no net less position. The costs associated with moving from 10 to 20% is considered to be marginal. Both the BAP and the LNRS are now referenced under policy SP2 and Policy G6, noting their relevance as material planning considerations and in signalling future enhancement opportunities/priorities. Pending the publication of the LNRS which is anticipated in 2025, the Local Plan is considered to provide an appropriate hook for this forthcoming strategy. As proposed to be revised in the Reg. 19 plan local policy G5 seeks to adopt the same Urban Greening target levels as already established in the London Plan. London Plan policy G9 identifies Horsenden Hill as a Regionally Important Geological Site.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation		Philip Alford		444	Individual

Green Belt / MOL designations: • There seems to be a lot of ‘tinkering’ with the MOL borders e.g. MOL with Brent River Park & river banks = the need and benefit for these needs to be challenged and explained • These seems to be unnecessary to change [84 specific add/delete items] resulting in additional administration cost – if there are development consequences this needs to be stated as there is no information in many cases, even at an appendix ‘map’ level • R18 = The decision for de-designation of some MOL parcels contains errors and contradictions, plus 7 other MOL have major errors and inconsistencies which need to be resolved before progressing [MOL2,5,13,18,20,22 plus NEW04] • Warren Farm is shown as sports which is misleading, as it is also as key environmental site • Blondin Park – NEW04 – should be a MOL - it is already allocated as a Local Nature reserve and has good access on 3 sides, plus onsite amenities	GB/MOL boundary corrections reflect the current reality and use of sites. Ensuring GB and MOL sites have correct, up-to-date, and defensible boundaries is important. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. The proposed boundary adjustments seek to ensure that Ealing's Green Belt and MOL sites have correct, up-to-date, and defensible boundaries. Warren Farm: Our revised plans for the future of Warren Farm will bring ‘the best of both worlds’, with the site becoming a local nature reserve, while a new sports ground will be built on additional land next to it. Blondin Park: The site was assessed against the London Plan's MOL criteria, which it does not meet. Assigning the wrong policy designations to sites can do more harm than good. There are alternative local policy designations which demonstrate sites are locally important. Such designations are effective and robust safeguards against the threat of inappropriate development.	SP2.2 Climate action		Philip Alford		444	Individual

Network of Green spaces / wellbeing: • There is a general lack of acknowledgment in the local plan to improve wellbeing for residents and health over the 15yrs horizon • The 6 x “Golf courses” used as parcels of land that are not mentioned but the GC are a dominant habitat and a major part of the green infrastructure of Ealing borough, so the GC’s should have strategy and a 15yr view • Where are the stated 10 new parks, specifically? • “Brent Valley Park” = barely mentioned – it is core for wellbeing and wildlife so it needs to be recognised as ringfenced for no build or development [it was much used by residents] during lock down] • Existing and proposed “Local Nature Reserves” need to be recognized as such, and protected specifically • “key Habitats” = barely mentioned = needs a section for each section of BAP with priorities - o Hedgerows most importance to linear habitat corridor - o trees = only right type; list priority - o wetlands / ponds - o “River Brent” not mentioned at all in lead consultation documents = rivers importance to green corridor, wildlife, heat footprint, air pollution and significant wellbeing factor - not protected at all, it needs to be - o Remove Invasive species enables accessibility, especially river side • Missing targets = given significance of water in the borough, what is planed improvement of river pollution over 15 yrs using Water Framework Directive criteria? • <u>Grand Union Canal [GUC] has many mentions, but what are</u>	Noted. Pear Tree Park (formerly Perivale Golf Course) opened in July 2024 and is the first of 10 new parks. The other parks will be identified in due course. Whilst the Brent River Park/Brent Valley Park is not identified as a Planning designation per se, it is protected by a raft of open space designations in the Local Plan. The relevant town chapters signal that development should support the preservation and enhancement of the River Brent co-ordinated as part of the wider Regional Park Strategy. All existing and proposed Local Nature Reserves are designated as SINC’s already and a separate layer for LNRs is not deemed necessary. Supporting material including citations is accessible for each SINC site via the policies map. We will ensure that the LNR status is referenced as part of this supporting material. The Local Plan does recognise and seek to utilise the value of the blue ribbon network in the borough. The relevant town chapters signal that development should support the preservation and enhancement of the River Brent co-ordinated as part of the wider Regional Park Strategy.	SP2.2 Climate action		Philip Alford		444	Individual
South Ealing: • What does improve “infrastructure” mean, specifically • Specific needs not addressed as subsumed as part of Ealing Common which is not balanced • Probably similar unhelpful polycentric approach for other ‘small’ defined character areas	Infrastructure is defined in the glossary as Including: - physical infrastructure, such as transport, energy and utilities, flood management, digital connectivity, waste management facilities; - social infrastructure, such as education, sports and leisure facilities, health and social care, emergency services, and community facilities; and, - green infrastructure. Both South Ealing and Ealing Common contain neighbourhood centres with a similar strong local character and functions.	Policy E4: Southern Ealing and Ealing Common		Philip Alford		444	Individual

Key Missing information: • Conservation Areas: barely mentioned in this consultation. The findings need to be included and referenced, and be shown to influence development sites planning decisions going forward in the Local Plan • No mention of the route/network provided by “Capital ring” as being key and to be maintained • Missing = strategy for working with NGOs and TfL • Missing = What is the future and importance for ‘festivals’ = wellbeing – destination events? • Missing = Where can Ealing become a ‘regional’ provider of service, sports, entertainments, working with other bodies? • Missing = potholes/surface targets to support local transport and cycles • Missing = action plan to resolve residential flooding within projections • Missing = assessment of impact on sewage/drain network capacity network • Missing = assessment for misconnections to improve water quality – to include ‘connectright” as mandatory for developers • There are mentions of additional ‘crossings’ to create joined up routes/networks = but where? • Very poor signage/ way fare through borough currently = need more to help public explore/exercise exploit the new networks and corridor • How can make valid decisions if final results of SINC review not available for R18, and still missing for R19?	Comments noted. The principal survey work associated with the SINC review (conducted over 4 phases) was completed in 2023. Work is ongoing to compile a full set of supporting documents including mapping. Once complete, the Council intends to submit the survey data and recommendations to a Local Site Selection Panel. Should further new revisions arise from this process it is acknowledged that these may need to be consulted on as part of any proposed modifications.	General		Philip Alford		444	Individual
Missing Information: The following MOL proposals are not explained or quantified – need detailed explanation if relates to developments. Area ☐ Unexplained☐ Reason? ☐ MOL07☐. Addition of Grand Union canal.☐ MOL9☐. Addition of River Brent running through the site.☐ MOL10☐. Addition of River Brent running through the site.☐ MOL10☐. Removal of High Lane☐ MOL11☐. Addition of River Brent running through the site☐ MOL12☐. Addition of River Brent running through the site☐ MOL15☐. Addition of Grand Union Canal running through the site.	GB/MOL boundary corrections reflect the current reality and use of sites. Ensuring GB and MOL sites have correct, up-to-date, and defensible boundaries is important. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal.	SP2.2 Climate action		Philip Alford		444	Individual

Referring to my local area which is Mandeville. 1 Building has been ongoing for a number of years now with no sign of support services being developed to service a growing community. The current plan does not address this and will leave the community overwhelmed. 2. Plans to build on Mandeville Parkway will destroy an essential part of the environment which assists in absorbing pollution from traffic in the area. It goes against the local 15 minute policy which requires local parkland. 3. The proposed building next to the Leisure Centre of a high rise is a poor use of space and will lead to more congestion in the area. This area is needed for the development of the station to cater for a growing population. 4. Building on Belvue park will cause congestion in the village area and will take away essential greenery which absorbs pollution from the M40. 5. The council, according to its own policy,needs to plant more trees and retain green spaces. 6, Northolt Mandeville has declined in the last 10 years and these plans do nothing to redress that. The Bank has closed and the Post Office is closing. The congestion will be more intense with the increase in population. To use the word Town is somewhat premature as Mandeville has limited facilities. Building and bringing in more people will leave them without support. 7. The whole plan is starting the wrong way round. We are being asked to walk through a mirror into a world of illogical behaviour. 8. The worst thing about the plans are that they are an example of autocratic behaviour and are not meant to be accessible to the voting population.		Policy N1: Northolt Spatial Strategy		Graham Wheeler		445	Individual

Table E1: Key infrastructure delivery schedule contains nothing about water supply or sewerage. Thames Water have said that planning application 221687FUL, site Ealing – 03EA can’t go ahead without improvements to the water supply. Similar issues may well apply to many other proposed developments sites.

Water usage per person has stayed relatively static over the years and a large expansion of residential will greatly increase the need for water. It may not be possible for Thames Water to produce this supply without resorting to desalination, with significant cost and timescales.

{Suggested modification:} An assessment needs to be made of the infrastructure needed to implement every major proposed development, plus a check that the relevant infrastructure provider can indeed implement that in the required timeframe.

Parcels with poorly defined boundaries are also vulnerable to further

Policy E1: Ealing Spatial Strategy		Richard	The Park Con	446	Community Interest Group

There doesn't seem to be any clear strategy on whereabouts in the area particular facilities should go. In particular, the development sites listed look to have a poor allocation of offices and residential locations, especially around the Uxbridge Road. Offices are typically best located near stations, which is where the newer successful developments are clustering. The International House development, planning application 214524FUL, is currently being built and 9-42 The Broadway has just got final approval. Approved office developments further west on Uxbridge Road, like 07EA and 08EA show no sign of work being started. It may be better to concentrate residential developments in this area instead. There also doesn't seem to be much assessment of the amount of working from home that is done in the central parts of Ealing. That is very common for professional work where one room of a large house is often used as a study and newer houses are often built with a room intended as a study. {Suggested modification:} Produce a clear researched strategy for the siting of major usage categories, plus an assessment of the extent of working from home. There might also be some consideration of changing home building standards so that more new homes have a separate study.	Noted. The policy seeks to maintain the role and critical mass of the office corridor while improving the built and pedestrian environment along the Uxbridge Road, particularly the provision of active frontage and mixed uses at ground floor.	Policy E2: Ealing Metropolita n Town Centre		Richard	The Park Con	446	Community Interest Group

Comments from the Birkdale Area Residence Association (BARA) Once again the set of documents is not written in a simple 'layman style' that gives clear precise future intentions of the Council's vision for the future development of the London Borough of Ealing (LBE). It feels more like a list of wishes rather than a set of clear development plans. • The New Proposed Plan is still driven by providing homes, which is only part of any planning policy. The vision is not clear and it does not explain how the infrastructure for this greater number of 'units' is to be managed. The support infrastructure should be considered first, this being the how the water, waste water, electricity, medical needs and schooling. In Ealing there is a general emphasis on affordable homes. If the present policy to have this developer lead this will not happen. A developer will always wish to see the maximum profit, which any 50% target is not realistic. To continue to build and find a development is not fully occupied owing to some company or person 'sitting' on that property, but not using it, just means there would continue to be a need to further build. The result of this type of growth means that targets will never be reached. BARA believe by not fully preparing how and what is to be delivered any proposed schemes will not fulfil the requirements of the NPPF for sustainable development within the Framework and any other Planning Policies, where relevant. • There are no specific policies for delivering a coherent green infrastructure or for enhancing or conserving the natural environment. There is a mention of making a new regional park, but this area is not defined. (If this is the much publicised removal of the <u>Perivale Golf Club for re-modelling</u>, this is misleading. The space is	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan which contains a suite of housing policies at H1-H16. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. Regards heritage, it should be borne in mind that the London Plan is an integral part of Ealing's local development plan and includes a suite of policies on heritage and culture (Policies HC1-HC7). Nonetheless, the local plan at Policy SP3.3 D seeks to ensure that new development meets the highest design standards, responds positively to the local character and recognises the role of heritage in place-making. There are numerous other references to the importance of heritage and conservation throughout the plan. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Regards the conservation officer, much work has been done to update them conservation area appraisals and this has involved	General		Birkdale Area Residents Association	Birkdale Area	447	Community Interest Group
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below... High Rise Buildings: Hanwell has a village look and feel currently. Hanwell contains several conservation areas that are beautiful and valued by locals. High rise buildings will ruin the character completely and more flats will overpopulate the area. Hanwell has had new flats built recently that are standing empty, one example is the previous Wickes site, now Hanwell Square Flats, Boston Rd, London W7 3SH. No design guidance of the planned high rise developments buildings. No mention of sustainability for these sites.	Noted. The Local Plan expects a lower quantum of residential led development within Hanwell reflecting fewer development opportunities than say Ealing or Southall. This is reflected in the number of development sites (8) of which half are considered to be potentially appropriate for a tall building (mostly in the district town centre). As specified in Policy H2 future development will be character led.	Policy H1: Hanwell Spatial Strategy		Jonathan Busby		448	Individual

I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below... 01HA Ealing hospital frontage: The site is not suitable for a tall building. It is directly in front of the hospital without adequate space between the hospital and the proposed development site, causing privacy and light reductions. Unsuitable living conditions for a twelve storey building directly next to the Uxbridge Road. Climate change caused by the construction and the number of people living in a twelve story building.	Noted. Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study. Heights are to range up to a maximum of 12 storeys (42m) stepping down from the recently redeveloped high rise high density residential development at St Bernard's Gate. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	01HA Land to the front of Ealing Hospital		Jonathan Busby		448	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below... 02HA Grays Garage: Grays is a thriving business providing a valuable service to locals, constantly busy. Jobs will be lost with no permanent employment provided. No infrastructure provided for the expanding population living in 6-storey blocks on the busy Uxbridge Road, and no parking. No plans to mitigate climate change caused by the construction and the number of people living there. No requirements for sustainable building or the use of recycled resources. The area currently has character with the cottages located next to this site.	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to the heritage aspects of the adjoining St Mark's Church & Canal Conservation Area to the south and the Hanwell Clock Tower Conservation Area to the north-east. It is proposed that a mixed-use development that provides residential, commercial space and public open space should come forward therefore ensuring some employment opportunities in the future.	02HA Gray's Garage		Jonathan Busby		448	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below... 03HA George Street Car Park: Parking in Hanwell is required, this is the only car park we have. A car park is an important local amenity for children, the elderly and disabled. This will destroy the local character of the Clock Tower Conservation Area. It is a square of mainly low rise cottages and the proposed 6-storey building is located in the middle.	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to heritage aspects of the adjoining St Hanwell Clock Tower Conservation Area to the east. The design principles for the site seek to ensure that the height of any development proposals takes into consideration the 2 storey terraced cottages fronting the site, with scale and massing responding sensitively to the low-rise surrounding housing. They should reflect the fine-grained character of neighbouring streets. A mews style development is proposed to reflect existing adjacent residential development, with tree planting and soft landscaping to improve the public realm. The site also benefits from a relatively good public transport accessibility level	03HA George Street Car Park		Jonathan Busby		448	Individual

I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below... 04HA Lidl and Discount Store Site: Lidl and Poundstrecher are thriving businesses that are a valuable service to the local community. There is no community service provision, ie medical, educational or recreation. No plans to mitigate climate change caused by the construction and the number of people living there. No requirements for sustainable building or the use of recycled resources.	It is intended that a supermarket will be reprovided on the site. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	04HA Site of Lidl and discount store		Jonathan Busby		448	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below... 05HA Marshall site and area: This is an 8-storey building, once again ruining the low-rise character of Hanwell on the edge of the Clock Tower Conservation Area, and is on the busy, congested Uxbridge Road. No provision for children, the elderly and disabled. No plans to mitigate climate change caused by the construction. No requirements for sustainable building or the use of recycled resources.	Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study. It is proposed that a new community space on the southern part of the site is provided. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	05HA Marshall Site, Gold's Gym & Garages on Montague Avenue		Jonathan Busby		448	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below... 06HA Tile Deposit: No provisions detailed for medical, educational, and recreational needs, or for children, the elderly and disabled. No mitigation for climate change.	It is proposed that affordable and assisted housing be reprovided alongside the provision of new residential and community uses. In addition, Chris Payne House will be retained. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	06HA Tile Depot & Lambourn Close		Jonathan Busby		448	Individual
I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below... 07HA Copley Close: This is a long thin space and not suitable for a building of 7 storeys. The plan says there is a problem of parking on pavements but no mitigation plans. No plans for health facilities.	This site is part of a larger estate regeneration project, much of which has already been completed and is subject to a masterplan. The allocation already notes that cars are parked along the length of Copley Close with many parked on pavements. It also notes that the public realm is poor quality and pedestrians and cyclists are not prioritised. Future development will seek to tackle these issues. Key infrastructure requirements for the site include the need for health facilities.	07HA Copley Close Estate		Jonathan Busby		448	Individual

I live in Hanwell and like many locals who have enjoyed living here for many years, I object to the planned development sites in my local area for the reasons I have listed below... 08HA High Lane: No mention of employment provision. The people who were there previously will not be able to afford to go back and live there. Over-reliance on the Brent River Park and no other provision. No sustainable building requirements or provisions for the wildlife lost.	Affordable and assisted housing will be reprovided alongside the provision of new residential and community uses. This means that any existing residents who wish to remain at High Lane will be offered a home. Given the residential character of the neighbourhood, large-scale industrial or commercial development is not considered appropriate. The allocation also proposes to create green, pedestrian and cycle links to Mayfield Local Park and the Brent River Park. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	08HA High Lane Housing Estate		Jonathan Busby		448	Individual
With regards to the “Reg 19 consultation comments” please note: * I object to the de-designation of part of Barclays Sports Ground as MOL * I object to allowing residential development on Barclays Sports Ground * I support the representations by Ealing Matters, Save Ealing Parks and CPRE I also believe that; * Barclays Sports Ground should become part of the proposed Regional Park * The proposed development budget of between £22 million and £87 million is not justified * NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. * The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs. My children attend Ada Lovelace High School which will be adversely affected by building works on the neighbouring land, especially with noise, dirt and traffic increases.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Luciana Chamberlain		449	Individual

While the Regulation 19 version of the local plan is an improvement, there are still many issues to be resolved. Regarding West Ealing, it is disappointing that this area has not been given "town" status but has been lumped in with Ealing Broadway, an area with very different needs. The number of high rise developments which will be allowed in West Ealing under this plan are also totally inappropriate. The high street and pavements are narrow. Current higher new builds along the Uxbridge Road have already made the area far windier making it unpleasant to walk and shop when there is a moderate breeze, further 9 storey plus builds will increase this turbulence. There is also insufficient infrastructure to cope with the planned increase in dwellings. There have already been a number of power outages, water pressure is often low and there is a strain on GP practices making it impossible to get appointments. There seems to be no plans to increase recreational facilities in West Ealing or to develop new green space. Deans Gardens is far too small for the planned increase in population.	The designation for the Ealing Metropolitan Town Centre is derived from the London Plan and Ealing's Local Plan sets out a spatial policy for the town centre at Policy E2. This takes a holistic as well as a character led approach recognising the different attributes and characteristics of individual parts of the centre. Policy E2 G emphasises the importance of strengthening the local character and distinct offer of West Ealing, including food offer, retail, convenience and leisure while realising the potential of identified Development Sites to improve the quality of built environment and deliver new houses and jobs.	Policy E2: Ealing Metropolitan Town Centre		Vivien Carter		450	Individual
The whole Local Plan is heavily focused on the built environment and ignores various requirements of National Planning Policy. There is not sufficient emphasis on ensuring that new developments will not increase the risk of flooding or result in a loss of biodiversity. There is also little emphasis on the requirement to enhance the green infrastructure. The removal of Metropolitan Open Space designation from 6 new sites is disappointing particularly as this includes 4 parks, namely Southall Park, Blondin Park, Ravenor Park and Islip Manor Park. With the planned increase in dwellings, protecting our green spaces for public use is even more important.	Policy SP2.2 F emphasises the importance of building resilience and adapting to a changing environment by preventing an increase in flood risk from inappropriately located and designed development. It also supports flood resilience and alleviation projects and the promotion of sustainable drainage systems (SuDS). This is supported by a substantive evidence base. Where a high risk of fluvial and surface water flooding has been identified for individual site allocations the policy requires that the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 Strategic Flood Risk Assessment (SFRA) Site Assessment. These should also be read alongside the general mitigation requirements. Policy SP2.2 G emphasises the importance of maintaining, enhancing and expanding the network of green infrastructure. Where MOL boundaries have been amended in the vast majority of cases there is another significant policy designation - usually public open or community open space - in place and these are also protected from inappropriate development.	SP2.2 Climate action		Vivien Carter		450	Individual

I am a parent of a 9 year old State school boy, who has been a member of the Ealing hockey club for two years. We were delighted to find this club after my son’s inspiration from watching the men’s hockey in the Commonwealth Games on TV. The commitment and dedication of the volunteer coaches has driven my son to be proud of his Under 10s team and its many successes. In our matches with other hockey Clubs and with our travels to opposing teams’ clubs, it has struck me that surrounding hockey clubs, mainly due to the need for artificial turf, tend to be mainly present in wealthier areas of London, where there is less mixed race participation, or in private schools (hence Ealing hockey club’s need to currently operate out of one or two local private schools who can afford such facilities). Speaking to an opposing (private school) team’s coach recently he said how impressed he was with our Ealing Hockey Club community team’s play and coaching. This school were in the process of building their 3rd pitch. It felt rather unfair comparing this facility where they were struggling to find enough players, compared to the Ealing Hockey Club who are so well supported and growing in numbers, yet with no pitches or club house of their own. It saddens me that there would be a huge number of children, regardless of their background, who could be attracted to this sport if only it were more locally accessible. Our local State primary schools cannot offer hockey as a sport due to the lack of suitable ground and equipment. The proposed location. next to Ada Lovelace High School would mean that the club could build on its local support base and in addition provide a fantastic facility to encourage participation in a sport by the Ada Lovelace children, who are short on space for their own sports provision. Indeed I could foresee a situation where local Primary Schools could take advantage of the proposed pitches for	Noted. Support welcomed. The council’s Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine’s via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground		Claire Jones		451	Individual

I wanted to make my objections clear on the potential development that may take place at the Barclays Sports Ground in Park View Road. I object to the de-designation of part of Barclays Sports Ground as MOL (MOL20) I object to allowing residential development on Barclays Sports Ground (21EA) I support the representations made by Ealing Matters, Save Ealing Parks Barclays Sports Ground should become part of the proposed Regional Park The proposed development budget of between £22 million and £87 million is not justified NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs. This matter is extremely important.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground			Chris Barrett	452	Individual

The Old Oak and Park Royal Development Corporation (OPDC) welcomes the opportunity to respond to the London Borough of Ealing’s consultation on its Regulation 19 draft Local Plan. OPDC is generally supportive of policies and aspirations within the draft Local Plan and is keen to continue the positive joint working relationship with the council on cross boundary activities to deliver benefits for the local area and communities. OPDC has provided comments overleaf on the draft Local Plan. These in many instances repeat comments made during the Regulation 18 consultation. The comments are split into two tables – the first table is comments of greater significance whilst the second is suggestions to make the Ealing Local Plan accurate/clearer. We look forward to meeting you to discuss or representations in further detail.	Noted.	General		Tom Cardis	Old Oak and	453	Statutory Body
Reference: General Summary of issues: Ensuring clarity of OPDC’s role and boundary. OPDC comments: OPDC welcomes references to the OPDC in the document, subject to further refinements set out in our proposed amendments. However, OPDC considers the Local Plan should be revised to provide a clearer definition of OPDC’s role and geographic extent early on in the document in Chapter 1 and early on in all relevant evidence base documents. Suggested actions: We would suggest a single page comprising a map and associated text defining OPDC’s role and how Ealing and OPDC are working together on a number of ambitions and projects. This would help coordinate existing information elsewhere in the document.	Noted. An amendment to the cartography is suggested to provide better clarity and correct any transcription errors including making it clearer that the scope of the plan does not extend to the area of Old Oak and Park Royal Development Corporation (OPDC) which is a separate Local Planning Authority with its own plan making powers. It is acknowledged by both the council and the OPDC that collaboration on strategic planning and other matters is both important and of mutual benefit.	General		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Figure 2.2 Summary of issues: Figure clarity and corrections OPDC comments: Figure 2.2 should clearly show the OPDC boundary that distinguishes the OPDC area from other Opportunity Areas as a local planning authority. The Industrial Land shown in the OPDC is incorrect and the emerging Old Oak major town centre is not identified. Suggested actions: Amend figure 2.2 as follows: - Show the OPDC boundary clearly and differently from other Opportunity Areas as a local planning authority. Label on key. - SIL boundary should align with the boundary in OPDC's Local Plan Policies Map. The relevant files can be downloaded from here. - Depict the emerging Old Oak major town centre. - Kensal Canalside Opportunity Area should be labelled in RBKC. - Harlesden district town centre should be shown.	Noted. An amendment to the cartography is suggested to provide better clarity and correct any transcription errors including making it clearer that the scope of the plan does not extend to the area of Old Oak and Park Royal Development Corporation (OPDC) which is a separate Local Planning Authority with its own plan making powers. It is acknowledged by both the council and the OPDC that collaboration on strategic planning and other matters is both important and of mutual benefit.	General		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Figure 2.3 Summary of issues: Figure clarity and corrections OPDC comments: Figure 2.3 should clearly show the OPDC boundary that distinguishes the OPDC area from other Opportunity Areas as a local planning authority. The Strategic Industrial Locations shown in the OPDC are incorrect and the emerging Old Oak major town centre is not identified. Suggested actions: Amend figure 2.3 as follows: - Show the OPDC boundary clearly and differently from other Opportunity Areas as a local planning authority. - Label on key. - Designations within the OPDC area should be greyed out reflecting that OPDC's Local Plan provides guidance for the area. - The SIL boundary is incorrect and should align with the boundary in OPDC's Local Plan Policies Map. The relevant files can be downloaded from here. - Depict the proposed Old Oak major town centre.	Noted. An amendment to the cartography is suggested to provide better clarity and correct any transcription errors including making it clearer that the scope of the plan does not extend to the area of Old Oak and Park Royal Development Corporation (OPDC) which is a separate Local Planning Authority with its own plan making powers. It is acknowledged by both the council and the OPDC that collaboration on strategic planning and other matters is both important and of mutual benefit.	General		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Figure SS2 Summary of issues: Figure clarity OPDC comments: Figure SS2 does not identify the OPDC boundary. This suggests the key diagram provides guidance for areas within the OPDC area. Suggested actions: Amend figure SS2 as follows: - Show and label the OPDC area. - The diagram should also include labels or a key as without, it's difficult to interpret what it's trying to show.	Noted. An amendment to the cartography is suggested to provide better clarity and correct any transcription errors including making it clearer that the scope of the plan does not extend to the area of Old Oak and Park Royal Development Corporation (OPDC) which is a separate Local Planning Authority with its own plan making powers. It is acknowledged by both the council and the OPDC that collaboration on strategic planning and other matters is both important and of mutual benefit.	Policy SP1: A Vision for Ealing		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Figure SS3 Summary of issues: Figure corrections OPDC comments: Figure SS3 should clearly show the OPDC boundary that distinguishes the OPDC area from other Opportunity Areas as a local planning authority. Suggested actions: Amend figure SS3 as follows: - Show the OPDC boundary clearly and differently from other Opportunity Areas as a local planning authority. Label on key. - The OPDC area should be greyed out reflecting that OPDC's Local Plan provides guidance for the area or the SIL boundary is updated to reflect the SIL boundary in OPDC's Local Plan.	Noted. An amendment to the cartography is suggested to provide better clarity and correct any transcription errors including making it clearer that the scope of the plan does not extend to the area of Old Oak and Park Royal Development Corporation (OPDC) which is a separate Local Planning Authority with its own plan making powers. It is acknowledged by both the council and the OPDC that collaboration on strategic planning and other matters is both important and of mutual benefit.	Policy SP1: A Vision for Ealing		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Para 4.1.7 Summary of issues: Typo OPDC comments: OPDC Local Plan supports the delivery of 19,850 new homes over the plan period Suggested actions: Amend text as follows: "Acton includes a sizeable part of the area covered by the Old Oak and Park Royal Development Corporation (OPDC) which includes North Acton and much of Park Royal. OPDC aims to deliver ~~13,670~~ <u>19,850</u> new homes, create 36,350 new jobs and create 250,428 sqm of extra industrial floorspace over the its plan period <u>to 2038</u>. North Acton acts a key gateway and strategic transition area from the rest of the Acton into the wider opportunity being delivered as part of OPDC's local plan. This creates an opportunity for all Acton residents and businesses to directly benefit from this and Ealing Council will continue to help shape future plans with the OPDC."	Noted and accepted.	Policy A1: Acton Spatial Strategy		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Figure A1 Summary of issues: Figure clarity and corrections OPDC comments: Figure A1 should clearly show the OPDC boundary that distinguishes the OPDC area from other Opportunity Areas as a local planning authority. The West London Orbital Station on Old Oak Common Lane does not form part of the existing context. Suggested actions: Amend figure A1 as follows: - Show the OPDC boundary clearly and differently from other Opportunity Areas as a local planning authority. - Label on key. - Label the OPDC area. - Remove line indicating two Opportunity Areas. - Remove West London Orbital station at Old Oak Common Lane from background	Noted. An amendment to the cartography is suggested to provide better clarity and correct any transcription errors including making it clearer that the scope of the plan does not extend to the area of Old Oak and Park Royal Development Corporation (OPDC) which is a separate Local Planning Authority with its own plan making powers. It is acknowledged by both the council and the OPDC that collaboration on strategic planning and other matters is both important and of mutual benefit.	Policy A1: Acton Spatial Strategy		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Page 101, Image: North Acton Tall Buildings Summary of issues: Figure clarity OPDC comments: Including an image of North Acton implies the Local Plan provides guidance for North Acton. Suggested actions: Replace image on page 79.	Noted. A suggested modification is proposed.	Policy A1: Acton Spatial Strategy		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Figure A2 Summary of issues: Figure clarity and corrections OPDC comments: Figure A2 should clearly show the OPDC boundary that distinguishes the OPDC area from other Opportunity Areas as a local planning authority. The Strategic Industrial Locations in the OPDC area are incorrect. Old Oak Common Station is not shown. Active travel route is not shown correctly in the Westway Estate on the boundary of the OPDC area. Suggested actions: Amend figure A2 as follows: - Show the OPDC boundary clearly and differently from other Opportunity Areas as a local planning authority. - Label on key. - Label the OPDC area. - SIL boundary and North Acton neighbourhood town centre should align with the boundary in OPDC's Local Plan Policies Map. The relevant files can be downloaded from here. - Show the Old Oak Common Station location as per OPDC's Local Plan. - Active travel route to follow Old Oak Common Lane.	Noted. An amendment to the cartography is suggested to provide better clarity and correct any transcription errors including making it clearer that the scope of the plan does not extend to the area of Old Oak and Park Royal Development Corporation (OPDC) which is a separate Local Planning Authority with its own plan making powers. It is acknowledged by both the council and the OPDC that collaboration on strategic planning and other matters is both important and of mutual benefit.	Policy A1: Acton Spatial Strategy		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Table A1 – Key infrastructure delivery schedule ‘Highways’ Summary of issues: Clarity regarding infrastructure provider OPDC comments: Table A1 identifies that OPDC is the infrastructure provider for improvements to North Acton Gyrratory. Any identified improvements will be delivered by the highway authorities and developers with input from OPDC. Suggested actions: Amend Table A1 for North Acton Gyrratory as follows: - Ealing Council / TfL / Developers / OPDC	Noted and accepted..	Policy A1: Acton Spatial Strategy		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Policy A.6 North Acton and Park Royal Summary of issues: Construction skills centre OPDC comments: Further discussions are required regarding the development of a local construction skills centre. OPDC’s IDP does not identify the requirement for a construction skills centre and it is not something that OPDC has been securing planning contributions towards. Suggested actions: Further discussions required.	Noted and accepted.	Policy A6: North Acton and Park Royal		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Ealing Local Plan Health Study Report figure 14 Summary of issues: Figure clarity OPDC comments: Figure 14 shows Air Quality Focus Areas which differs from those in OPDC’s Local Plan figure 6.6. Suggested actions: Amend figure 14 to show designated Air Quality Focus Areas in the OPDC area.	Noted. This will be picked up in any future update of the health evidence base. It seems unlikely to have material effects on the management of applications.	SP3.3 Healthy lives		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Tall Building Strategy – all maps Summary of issues: Figure clarity OPDC comments: OPDC notes the Tall Buildings Strategy is evidence base and not proposed policy. However, the maps included in the document provide recommendations for the OPDC area that are managed by the OPDC Local Plan. This is particularly important for the maps on pages 21 and 22 which define suitable locations for tall buildings. These maps should be amended to show the OPDC boundary and remove any infill. This will address any confusion to readers presented by the figure. Suggested actions: Amend all relevant maps as follows: - Show OPDC boundary - Remove any infill from OPDC area	Noted. It is proposed that updates to the tall buildings mapping are made to the electronic policies map version that will be used to manage applications.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Various in Local Plan and evidence base Summary of issues: Figure clarity OPDC comments: A number of maps in the Local Plan and evidence base documents show the West London Orbital London Overground line as part of the existing context while it is not yet in existence. Suggested actions: Remove West London Orbital from existing context maps and figures and instead only show it as part of proposed future context maps and figures.	Noted. An amendment to the cartography is suggested to provide better clarity and correct any transcription errors including making it clearer that the scope of the plan does not extend to the area of Old Oak and Park Royal Development Corporation (OPDC) which is a separate Local Planning Authority with its own plan making powers. It is acknowledged by both the council and the OPDC that collaboration on strategic planning and other matters is both important and of mutual benefit.	General		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Paragraph 0.11 Summary of issues: Clarifying OPDC's role and boundary OPDC comments: This references Park Royal but it isn't made clear that this is within the OPDC area. Suggested actions: Amend text as follows: This Local Plan shows what Ealing has to offer the world, as part of London and the wider UK. It builds on our status as a gateway to London thanks to Heathrow and the new ~~HS2 terminus~~ <u>HS2 station at Old Oak Common Station</u> and cements our position at the heart of west London's economy thanks to our industrial centres – Park Royal in the east <u>(in the OPDC area)</u> and Southall to the west.	Noted and accepted.	General		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Figure 2.1, 'London Borough of Ealing Regional Context Summary of issues: Figure clarity and corrections OPDC comments: Figure 2.1 should show the OPDC boundary in addition to borough boundaries. Old Oak Common Station will be a temporary HS2 terminus and provides access to Elizabeth line and national rail services. Suggested actions: Amend figure 2.1 to: - Show OPDC area boundary and include on key. - Replace Old Oak Common HS2 Terminus label with <u>Old Oak Common Station</u>. - Amend key to reflect HS2, Elizabeth line and national rail services being provided at Old Oak Common Station.	Noted and accepted.	General		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Fig. 2.1. 'London Borough of Ealing Regional Context Summary of issues: Representation of the future rail network. OPDC comments: [redacted] (1) Has Transport for London (TfL) confirmed that the West London Orbital (WLO) can be included in the local plan as the rail context. This is still an unfunded project. (2) Given the recent government announcement on Old Oak Common station being a temporary terminus for well beyond the local plan period, should the HS2 Euston station link be included? Suggested actions: Seek TfL's confirmation on inclusion of WLO as transport context. (Ignore this comment if TfL have already agreed to this). Seek a view from HS2 on whether the HS2 link to Euston station should be included, and how this should be represented.	Noted. TfL are content with inclusion of WLO and an amendment on extension of HS2 to Euston has been suggested,	General		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Page 46 - 52 [redacted] Summary of issues: Interchange opportunities OPDC comments: [redacted]The drawings at Figure 2.1, 2.2 and 2.3 is not able to show this level of detail but the supporting text should include Old Oak Common serving as a major transport hub which connects several rail services – HS2, Elizabeth Line and Great Western Railway (GWR) as well as improved bus interchange. Suggested actions: Include appropriate text that acknowledges the interchange opportunities created by the OOC station.	Noted.	General		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Paragraph 2.5 [redacted] Summary of issues: HS2 information correction [redacted] OPDC comments: [redacted]Paragraph 2.6 provides incorrect information for Old Oak Common Station. Suggested actions: Amend paragraph 2.6 as follows: The borough's strategic position near Heathrow Airport, the new High Speed 2 (HS2), <u>Elizabeth line and national rail station terminus</u> at Old Oak Common <u>after 2028</u> ~~in 2030~~, and the five new Elizabeth Line stations that opened in 2022 to complement the wide range of existing underground and mainline stations, and ease of access to the strategic road network make it one of London's best-connected boroughs.	Noted and accepted.	General		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Paragraph 2.6 Summary of issues: Clarifying OPDC's role and boundary. OPDC comments: This references Park Royal but it isn't made clear that this is within the OPDC area. Suggested actions: Amend text as follows: As one of the largest concentrations of industrial floorspace in London and with the proximity to Park Royal (in the OPDC area) – being the UK's largest industrial estate, Ealing is well placed to maximise these infrastructure assets...	Noted and accepted.	General		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Paragraph 2.13 Summary of issues: HS2 information correction OPDC comments: Paragraph 2.13 provides incorrect information for Old Oak Common Station. Suggested actions: Amend paragraph 2.13 as follows: One instance is the 'Ealing Productivity Arc' which places Ealing in the centre of west London's economic activity, by linking Heathrow Airport and Hillingdon with the proposed HS2 ~~station-terminal~~ at Old Oak Common <u>in the OPDC area</u>.	Noted and accepted.	General		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Paragraph 2.18 Summary of issues: Lack of reference to the borough's blue infrastructure (the Blue Ribbon Network) OPDC comments: Para 2.18 makes reference to the borough's green infrastructure and not the blue infrastructure. Given the Blue Ribbon Network passes through the borough (as already identified in the policies map, Local Plan Figure 2.3 'river/canal' and Policy E1 (part G) identifies the Brent River), it would be useful to identify this asset while setting the borough context. Suggested actions: Make reference to borough's Blue Ribbon Network in Para 2.18	Noted.	General		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Paragraph 2.20 Summary of issues: HS2 information correction OPDC comments: Paragraph 2.19 provides incorrect information for Old Oak Common Station. Suggested actions: Amend paragraph 2.19 as follows: The borough benefits from being one of the best connected in the United Kingdom. Ealing bridges the internationally significant transport hubs of Heathrow (in Hillingdon) and the future High Speed 2, <u>Elizabeth line and national rail station terminus</u> at Old Oak Common. This is complimented by five new Elizabeth Line stations along the Uxbridge Road, the Central Line serving seven stations, and the Piccadilly Line serving eleven stations	Noted and accepted.	General		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Paragraph 2.33 Summary of issues: Repetition correction OPDC comments: Para 2.33 repeats the same text twice: ‘...and Ecological Emergency Strategy was adopted in 2021. This sets out how carbon emissions can be reduced as quickly as possible. The Local Plan includes policies that better enable our communities to adapt to the effects of climate change in the borough including heat waves, increased flood risk, and impacts on biodiversity, energy and food’. Suggested actions: Delete repetition	Noted and accepted.	General		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Page 55. Paragraph 2.32 – 2.37 “Climate Action” Summary of issues: Strategic objectives OPDC comments: Given the importance of reducing transport emission as key climate action, this should be captured in the strategic objectives. It talks about neighbourhoods being well served by bus and rail/tube and making walking and cycling the primary modes of transport in the borough but doesn’t explicitly state that a key objective of the plan will be to reduce traffic on the network (through various mechanisms). Suggested actions: Add text to make explicit that reducing transport emission is a key climate action.	Noted.	General		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Chapter 3 Summary of issues: Opportunities to support local people and supply chain OPDC comments: Policies could be enhanced by referring to additional opportunities and updating references. As you may be aware, OPDC's Equity, Diversity and Inclusion (EDI) Corporate Strategy was approved by Board in March 2022. As such we welcome opportunities to work with the host boroughs to support EDI across our areas. Suggested actions: Adding references to supporting local people into employment and training and the use of the local supply chain – which would also feed into the 20 min neighbourhoods objective – and encouraging contractors and building occupants to sign up to the London Living Wage. References to 'equality' should be changed to 'equity'. This would better recognise that people may be starting from different positions and have varying needs.	Noted.	SP4.1 Good Growth		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Policy SP2 (SP2.2) (iii) Summary of issues: Combined focus on improving existing and providing new public realm OPDC comments: The policy only focuses on improving the existing public realm. There should be an equal focus on ensuring a coordinated approach between new development sites to improve existing public realm and provide new public realm. Suggested actions: (iii) improving <u>existing and provide new</u> public realm, which will ensure greener, healthier and safer neighbourhoods.	Noted and accepted.	SP2.2 Climate action		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Policy SP2 (SP2.2) (F) Summary of issues: Climate action should also focus on water efficiency and consumption OPDC comments: Climate action does not acknowledge water management (making efficient use of water) as part of climate change mitigation in line with London Plan objective GG6. Suggested actions: Add new: F. Building resilience and adapting to a changing environment by: (xxx) <u>Improving water efficiency and consumption.</u>	Noted.	SP2.2 Climate action		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Policy SP2 (SP2.2) (F)☐ Summary of issues: Lack of reference to mitigating and avoiding contribution to the Urban Heat Island Effect. OPDC comments: ☐limate action does not acknowledge mitigation of Urban Heat Island Effect as part of climate change mitigation in line with London Plan objective GG6. Policy SP3 Fighting inequality makes reference to it in part H of the policy. However, it is felt that it best sits within Policy SP2 Tackling the climate crisis Suggested actions: Add new: F. Building resilience and adapting to a changing environment by: (xxx) <u>mitigating and avoiding contributing to the Urban Heat Island Effect.</u>	Noted.	SP2.2 Climate action		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Policy SP2 (SP2.2) (G)☐ Summary of issues: Lack of focus on protecting/conserving the existing green infrastructure which offer valuable green assets OPDC comments: ☐he existing wording does not including protecting the existing green assets. For the implementation of biodiversity regulations, it is important to include its protection/conservation. Suggested actions: G. <u>Conserving</u>, Maintaining, enhancing and expanding the network of green infrastructure by:	Noted.	SP2.2 Climate action		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Policy SP2 (SP2.2) (H)☐ Summary of issues: Lack of reference to Air Quality Positive or Neutral OPDC comments: ☐he Monitoring Framework (Table 1) identifies Air Quality Positive and Air Quality Neutral as an Indicator. The target is set as ‘all developments to be Air Quality Neutral’ with key policies monitored identified as SP.2 and SP.3. There is a lack of mention within the policies themselves on the need to achieve these targets. For clarity purposes, this should be identified within the policies. It will also be helpful to identify which type of development will trigger this requirement. As a minimum, it should be clear within policies if all developments (minor and major) are required to be Air Quality Neutral or Air Quality Positive. Suggested actions: Add requirement of AQN and AQP within Policies SP.2 and SP.3.	Noted.	SP2.2 Climate action		Tom Cardis	Old Oak and	453	Statutory Body

Reference: SP2.3 (C) [1] Summary of issues: Lack of reference to diverse communities. OPDC comments: [2] It is important to recognise the diversity of the communities that exist within Ealing. OPDC's welcomes the opportunities to recognise the diversity within the borough and support equitable opportunities for all in line with OPDC's Equity, Diversity and Inclusion (EDI) Strategy. Suggested actions: C. Protecting and enhancing community facilities to help develop strong inclusive <u>and diverse</u> communities and contribute to social integration, cohesion, and civic pride.	Noted.	SP2.3 Thriving communities		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Page 71 3.18 [3] Summary of issues: PTAL walktime to buses OPDC comments: [4] Paragraph 3.18 talks about a 10-minute walk to and 10-minute walk back. However, the maximum distance (used in PTAL calculations) where sites are considered to have good bus access is an 8-minute walktime/640m from the nearest bus stop. This is a minor point but makes it seem that 20-minute city conflicts with PTAL assessments for bus. Suggested actions: Amend: That includes bus stops or other public transport...	Noted.	SP2.2 Climate action		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Paragraph 3.22 Summary of issues: Commitment to working on a new WLWP OPDC comments: OPDC does not have a separate apportionment target but has been working with the host boroughs to help them to meet their waste apportionment targets. OPDC’s adoption of the Local Plan and 2015 WLWP as well as our involvement in the new WLWP demonstrates how the OPDC area is helping the boroughs to meet their apportionment targets The OPDC area is also making a significant contribution towards meeting industrial and housing needs in the wider market area. OPDC welcome continued collaboration with LBE and other stakeholders on the respective roles and contributions that we can each make to help address waste needs in line with the London Plan. Suggested actions: The London Plan sets more ambitious waste apportionment targets for the boroughs with the goal of achieving greater self-sufficiency. Ealing’s waste apportionment target accounts for a 6.6% share of London’s household, commercial and industrial waste (2021-2041).However, this figure includes the whole of the London Borough of Ealing <u>but does not have a separate waste figure for OPDC.</u>, ~~making no allowance for the OPDC, which is the largest area of industrial land in the borough (the key variable in determining Ealing’s apportionment share) and also makes a significant contribution to overall waste levels (now and in the future).~~ Instead, the London Plan requires Mayoral Development Corporations like the OPDC to “cooperate with host boroughs to meet identified waste needs” (Policy S1 8 C).	Noted.	SP2.2 Climate action		Tom Cardis	Old Oak and	453	Statutory Body

Reference: SP 4.2 Decent living incomes Summary of issues: Clarification of the strategic approach and how this would meet identified industrial needs OPDC comments: Welcome the Plan's general commitment to maintaining the existing supply of industrial land on designated and undesignated sites and adding to this where possible and that para 3.53 references that a net uplift in demand is projected over the Plan period. The supporting text could summarise the changes proposed to SIL/LSIS compared to current baseline i.e. new SIL at Golf Driving Range, changes (additions/deletions) to LSIS. There are still inconsistencies/clarifications needed to ensure this objective can be achieved – please see comments under Chapter 4 and policies E4 and E6 which might undermine this. If any work has been done to assess the opportunities to intensify the industrial areas, then this information could be referenced more clearly how demand could be met within the borough. Suggested actions: Consider amendments to supporting text and see other comments below.	Noted.	SP4.2 Decent living incomes		Tom Cardis	Old Oak and	453	Statutory Body
Reference: SP4.3 Genuinely affordable homes Summary of issues: Annual housing target OPDC comments: The policy sets out the 10-year housing supply target in the London Plan and an annual target for the “rest of the Local Plan period”. Clarify that the annual housing target covers the whole Local Plan period, which presumably from elsewhere in the plan is 2157 homes. Suggested actions: A. Meeting the 21,570 unit 10-year housing supply target identified in the London Plan for the period 2019-20 to 2028-29. This also forms an annual target of 2157 units for the rest of the Local Plan period.	Noted.	SP4.3 Genuinely affordable homes		Tom Cardis	Old Oak and	453	Statutory Body
Reference: SP4.3 Genuinely affordable homes Summary of issues: Affordable housing tenures OPDC comments: The policy refers to maximising the provision of affordable homes, particularly social rent, to meet identified needs. The specific tenure requirements are set it out in DM policy HOU. It would be helpful to provide a link to this from the strategic policy. Suggested actions: Refer to tenure requirements set out in policy HOU.	Noted.	SP4.3 Genuinely affordable homes		Tom Cardis	Old Oak and	453	Statutory Body

Reference: SP4.3 Genuinely affordable homes C Summary of issues: Affordable housing on Build to Rent schemes OPDC comments: It is not clear how SP4.3C with the emphasis on social rent will apply to Build to Rent schemes. As set out in response to policy HOU below it is not considered practical to expect social housing out of Build to Rent schemes. Suggested actions: Additional policy point on tenure expectations for Build to Rent schemes.	Noted.	SP4.3 Genuinely affordable homes		Tom Cardis	Old Oak and	453	Statutory Body
Reference: SP4.3 Genuinely affordable homes D Summary of issues: Improving opportunities for higher quality Build to Rent OPDC comments: This strategic policy is supported but it is not clear whether there are appropriate development management policies to realise the ambition. Suggested actions: Consider additional development management policies. Reference: SP4.3 Genuinely affordable homes D Summary of issues: Supporting the development of local community led housing OPDC comments: This strategic policy is supported but it is not clear whether there are appropriate development management policies to realise the ambition. Suggested actions: Consider additional development management policies.	Noted.	SP4.3 Genuinely affordable homes		Tom Cardis	Old Oak and	453	Statutory Body
I'm writing to show my objections to the planned development as I believe it is wholly unsuitable, massively overdeveloped and another potential blot on the Ealing landscape. What is with this craze for oversized tower blocks throughout our once beautiful borough?	Noted. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Hew Stevenson		454	Individual

I support Ealing Matters concerns about the plan. In particular, as a Hanwell resident living close to Hanwell town centre, I object to the plan on the basis of a high number of areas ear marked for tall buildings shown on the map within the plan. The plan stipulates 4 Development Sites potentially suitable for a tall building of which 2 sites are 10 storeys or more. Extensive high density development has already taken place on the former Wickes site which has categorically failed to meet the need for affordable housing for local residents. This is due to the high cost of apartments plus expensive service charges in this development. Further developments of more tall buildings are designed as investment opportunities and will not address the housing need of the actual residents of Ealing. These excessively tall buildings also take away from the character of the local area. Recent evidence to support Ealing Council's lack of proper planning for Hanwell can be seen on a daily basis with permission granted for a Tesco Express (as part of the Hanwell square development) which has huge articulated delivery lorries parking on the road outside it, reducing traffic flow on lower Boston manor road on a daily basis. I believe the plan needs to realistically consider residents' needs and not those of developers, which Ealing Council has generously accommodated in recent developments.	Regards tall buildings, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The Local Plan expects a lower quantum of residential led development within Hanwell reflecting fewer development opportunities than say Ealing or Southall. This is reflected in the number of develoment sites (8) of which half are considered to be potentially appropriate for a tall building (mostly in the district town centre). As specified in Policy H2 future development will be character led.	Policy H1: Hanwell Spatial Strategy			Rosemary Wall		455	Individual

General Points While we welcome the abandonment of most of the changes to Metropolitan Open Land and Green Belt in the Reg 18 Local Plan, the Atlas of Change at Reg 19 has redrawn the boundaries of a number of MOLs in order to “nibble away” at the edges to establish an unwelcome presumption in favour of enabling development and is thus erosion of green space by incremental steps rather than a clear strategic approach. Among the 82 development sites, four new sites with limited consultation have been added - two in Acton, one in Northolt and one in Southall. This shows a further lack of imagination and a lost opportunity by Ealing Council to look at the spaces across the borough rather than focus on the historical metropolitan town centre of Ealing and its two associated historical towns of Acton and Southall. The built environment is an area of heated debate and many residents continue to feel that they are ignored. This includes a lack of clarity on carbon offsetting especially in buildings which are over six storeys high (tall buildings), which by their very nature are not and cannot be carbon neutral but are carbon intensive. The Regulation 19 plan is overly long and somewhat opaque, being framed as such to exclude most residents from commenting. This active obfuscation further extends to a 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 but remain unarticulated and the last IFS was published in 2020/2021, which is over three years out of date. When this is considered with	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy. Of the 88 developmet sites, it should be noted that that almost one third (31%) are located in Greenford, Hanwell, Northolt and Perivale which account for more than one third of the borough's population (35%). It could be argued that this helps ensure that each town is contributing to future growth and development and also sharing the benefits. It should also be noted that these areas contain proportionally more Green Belt/MOL and industrial land which the Local Plan seeks to protect. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Ealing LPA CIL will be implemented in early 2025, not 2026, subejct to the outcome of the examination process and resolution by a future Full Council.	General		CLlr Jon Ball	Liberal Democ	456	

Policy D9 Tall Buildings While we welcome the introduction of threshold heights, Policy D9 and table DMP1 do not set an overall height limit for buildings which could be built across the borough and some of the thresholds are excessively tall, for instance 21 storeys in parts of Ealing. This is regrettable as increasingly tall built and proposed buildings are excessively tall for their respective areas and are alienating residents. This is at odds with Ealing Council's stated aim of being carbon neutral by 2030 as high rise has a higher carbon impact than the same number of units of midrise.	Noted. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The Local Plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Similarly, the plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Cllr Jon Ball	Liberal Democ	456	
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.	The cost of a 50% requirement would such that it would render the fast track approach meaningless and all but a handful of development would go the viability tested route.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Cllr Jon Ball	Liberal Democ	456	

SP2.2 Climate Action The climate change policy should be expanded to more urgently encourage transition to more carbon neutral transport modes including the use of electric vehicles and walking with associated infrastructure by modifying paragraphs in this policy as follows: In B. (vii) to require that on-street EV charging points are low cost, as some of the ones currently being installed by Ealing Council are several multiples of the cost of charging at home. Add support for ramps or channels across pavements to allow residents who do not have off-street parking to charge electric vehicles from their domestic electricity supply at low cost. Add the introduction of welcoming green corridors to encourage walkers.	Noted. It is not possible for the Council to require that EV charge points are objectively low cost, as the cost of charging is dependent on the energy market and wholesale electricity prices, which vary significantly. The Council is aware of the price differences between home charging, low-power on-street charging, and rapid charging. In our forthcoming EV Charging Strategy, which will be published for consultation in November 2024, our focus is on the longer-term delivery of a good quality charging network. A key component of this is the installation of a large number of lamp column charge points through the national government LEVI fund. Lamp column chargers are the most affordable on-street option, and we are committed to ensuring that contract arrangements provide as favourable a price point as possible. The current position on cross-pavement charging gullies is that they are not permitted, for the reasons noted below. This is to allow us to gather more data on how they're working in other local authorities. The government is expected to publish guidance on gully charging next year. Currently the Council, as Highways Authority, has legal responsibility to arrange and fund the maintenance of the footways and carriageways across the borough. These considerations and responsibilities include: - How utilities connections and any streetworks are coordinated with the chargers and who is responsible for repairs - Who is responsible for maintaining the gully, and decommissioning the gully at the end of its life	SP2.2 Climate action		Cllr Jon Ball	Liberal Democ	456	

Site 21EA Barclays Sports Ground We warmly welcome hockey provision on this site but query the wording “potentially linked to the existing facilities at St Augustine’s via combined facilities” as unnecessarily prescriptive. The site is between two schools and linking facilities with those at Ada Lovelace is at least equally desirable. Specific evidence in the sports facility strategy is cited for hockey use but not for football pitches which are not underprovided to the same extent in the locality and borough. Football therefore should not be included in this site brief. We feel that the assumption that there will need to be a “quantum of residential development” is flawed as it is possible to develop hockey use on the site funded by national sports funding sources rather than via enabling development. The very special circumstances required to justify development on MOL that is not directly ancillary to a sporting use have not been set out here and so the reference to housing is unsound. While enabling development could take place entirely outside the MOL, due to the proposed removal of the former clubhouse site from MOL20 shown in Map 35 in the Atlas of Change, this is itself unsound because removing the clubhouse from MOL would make it very difficult to resist a freestanding residential development on the former clubhouse site alone. This could be applied for without any hockey development on the remaining MOL within 21EA, and the landowner could continue to landbank the MOL portion of the site.	Noted and support welcomed for efforts to provide hockey on the site. There is some sense is trying to get community use agreements with both site owners to optimise use of the playing fields neither of which are not publicly accessible. The inclusion of the word "potentially" should allay concerns that the approach is not intended to be prescriptive. A key beneficiary regardless will be the Ada Lovelace School which is adjacent to the green spaces. It would be most desirable if the landowner would consent to lease or sell their land for sports and recreational use but they have indicated they have no intention of so doing. The Council could consider exercising CPO powers as a last resort but this is likely to be an expensive, protracted process and is not likely to be a viable proposition given the council's finances. Any proposals for an enabling development would need to provide sports and recreational facilities and include a community use agreement to be deemed potentially appropriate. It is therefore most unlikely that a purely residential scheme would be consented.	21EA Former Barclays Sports Ground		Cllr Jon Ball	Liberal Democ	456	
Site 09NO - Kingdom Workshop, Sharvel Road While we recognise that there is a need for six additional permanent traveller pitches in the borough, we question the soundness of the selection of this particular site for this purpose. It threatens the economic viability of Down Barns Farm of which it is a part, and is close to residential streets, which has the potential to lead to tensions between the traveling and settled community. In addition, there is clear unmet need for traveller transit pitches as well as permanent pitches. The rejection of the need for transit facilities in the Gypsy and Traveller Pitch Provision Site Assessment was inconsistent with the evidence that there are frequent unauthorised traveller encampments in the Borough, clearly indicating an unmet transit need.	Noted.	09NO Kingdom Workshop, Sharvel Road		Cllr Jon Ball	Liberal Democ	456	

Site 16SO Warren Farm During the decade since it was closed for sporting use, Warren Farm rewilded into an informal nature reserve, providing acid grassland habitat supporting many rare species of birds, insects and plants. We strongly object to any development which would threaten this nature reserve, that is anything beyond the required minor development to formalise the Nature Reserve use, for example a visitor centre. In response to pressure from local campaigners and the Opposition, Ealing Council’s Cabinet agreed the following resolutions at their meeting on 6th March 2024, after the publication of this Reg 19 consultation: “I. Agreed that the entirety of the existing green space at Warren Farm Sports Ground is retained and enhanced for the purposes of nature, rewilding and biodiversity. II. Delegated authority to the Strategic Director of Economy and Sustainability to apply to Natural England with updated plans to designate the entirety of the Warren Farm Sports Ground (in red) as a Local Nature Reserve in accordance with sections 19 and 21 of the National Parks and Access to Countryside Act 1949 (as amended) in collaboration with local user groups to safeguard the land for future generations” In order to be a positively prepared and effective document, the local plan should clearly be modified to reflect the local authority’s newly determined purpose for the entirety of the Warren Farm part of this site allocation as an official Local Nature Reserve.	Noted. The council does not plan any development on Warren Farm. Our revised plans for the future of Warren Farm will bring ‘the best of both worlds’, with the site becoming a local nature reserve, while a new sports ground will be built on additional land next to it.	16SO Warren Farm and Imperial College Land		Cllr Jon Ball	Liberal Democ	456	

I am writing as chair of the Warwick Road Residents' Association which represents households near Ealing Common. We fully support the detailed comments made by the Ealing Matters, Save Ealing Centre and Stop the Towers groups. Below are our comments about the draft Plan that are of the most concern to our members who live near Ealing Common and the Town Centre. Metropolitan Open Land: Map 33 – MOL 18 Actonians, Gunnersbury Avenue. We strongly object to the removal of protection from this site. It should be retained as Metropolitan Open Land to ensure it is protected into the future. If the intention is for it to be retained as open space, then at a minimum it should be Local Green Space but, given the designations give the same strong protection, there seems no clear reason to remove the MOL protection.	The facilities on the site are generally in poor condition and in need of upgrade or replacement, as identified in Ealing’s Sports Facilities Strategy 2022-2031. Given the age and condition of the existing facilities, and the cost of improving them, it is anticipated that some enabling residential development will be necessary to cross-subsidise the enhancements to the sports and leisure offer. The quantum of residential development should be limited to the amount absolutely necessary to financially secure the delivery of the replacement sports and leisure facilities, limiting the amount of development on open space. By consolidating the footprint of the existing buildings on the site, the proposals should increase the amount of usable pitch/court space. The improvement of the site will include greening and biodiversity measures. There is also an opportunity to explore the possibility to jointly manage Baron’s Pond and secure day time access to facilities for local schools. In the absence of the proposed development, it is unlikely that the site’s inefficient layout and aging sports and leisure facilities will be improved.	SP2.2 Climate action		Roger Green	Warwick Roa	457	Community Interest Group
I am writing as chair of the Warwick Road Residents' Association which represents households near Ealing Common. We fully support the detailed comments made by the Ealing Matters, Save Ealing Centre and Stop the Towers groups. Below are our comments about the draft Plan that are of the most concern to our members who live near Ealing Common and the Town Centre. Lack of Vision for Ealing Metropolitan Town Centre: The plan offers no clear vision for Ealing Metropolitan Town Centre whose piecemeal development has been at the whim of property development companies keen to cash in on the Elizabeth Line. In particular there is confusion over what height of buildings that would be allowed ranging from not too bad nine stories to surely-out-of-the-question 21 stories. With major development looking likely for the Arcadia/Broadway Connection and Sandringham Mews the lack of a proper vision means that we’ll be stuck with whatever random ideas that their respective developers can get away with.	The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Policy E2 sets out a vision for the area.	Policy E2: Ealing Metropolita n Town Centre		Roger Green	Warwick Roa	457	Community Interest Group

I am writing as chair of the Warwick Road Residents' Association which represents households near Ealing Common. We fully support the detailed comments made by the Ealing Matters, Save Ealing Centre and Stop the Towers groups. Below are our comments about the draft Plan that are of the most concern to our members who live near Ealing Common and the Town Centre. Design and Amenity Policy: We note that although the National Planning Policy Framework states Design notes that “policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics.” The Policy has not been developed with local communities, does not respond to local aspirations and shows no understanding of Ealing’s defining characteristics. No Heritage Strategy: Despite frequent references to ‘heritage’ in the draft Plan there is no proper strategy in it in accordance with the London Plan Policy HC1B and as required by the National Planning Policy Framework, Chapter 16.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	SP4.1 Good Growth		Roger Green	Warwick Road	457	Community Interest Group
I am writing as chair of the Warwick Road Residents' Association which represents households near Ealing Common. We fully support the detailed comments made by the Ealing Matters, Save Ealing Centre and Stop the Towers groups. Below are our comments about the draft Plan that are of the most concern to our members who live near Ealing Common and the Town Centre. No Planning for Future Infrastructure Needs: Given the Plan’s forecast of massive population growth in the Borough we are concerned about the complete lack of infrastructure planning called for by both the National Planning Policy Framework and the London Plan. We are concerned that in the absence of any planning the consequence of Ealing getting anywhere near its house building targets will put at risk our electricity and water supplies and sewage services.	Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	SP4.1 Good Growth		Roger Green	Warwick Road	457	Community Interest Group

I am opposed to the local plan for the following reasons: Ealing’s housing target of more than 40,000 homes over the next 15 years is excessive and undeliverable. But if it were to be delivered, it would create unmanageable population growth of more than 80,000 people (more than the population of Guildford) according to GLA projections. The infrastructure plans to support this very high growth rate are sketchy at best. Valuable areas of MOL are to be lost. A new policy of ‘enabling development’ will justify developing them in the Council’s interests. Tall building heights, especially in Ealing and Acton, are excessive and unjustified. There is no vision or strategy for the near total redevelopment of Ealing Metropolitan Town Centre that the Plan envisages. Ealing’s proposals for monitoring the plan are no more adequate now than they have been over the past 10 years.	The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. The Council welcomes detailed feedback on the monitoring framework and indicators.	General		Selina Smith		458	Individual

I wish to make the following observations and recommendations:- - There is insufficient emphasis on the need to fully respect the early 80's redefined River Brent floodplain. The plan needs to clearly state that no building at all within the floodplain should ever be allowed. With increasing high precipitation episodes very likely to be the norm in future there also should ideally be provision for extending the 'modern flood plain'. It would certainly help the Council and the public to have the floodplain-defining earth banks/walls clearly marked on Brentside planning maps, and on the ground.	National policy tasks Local Planning Authorities with preparing a Strategic Flood Risk Assessment (SFRA), which assess the risk of flooding from all sources, now and in the future, whilst taking account of the impacts of climate change. The SFRA is a planning tool which supports and informs the preparation of the Local Plan and the determination of planning applications. It provides the Council with the evidence it needs to steer new development away from areas of greatest risk of flooding. In May 2018, the Council, jointly with neighbouring authorities in West London, published a new (Level 1) SFRA. This illustrates the extent and level of risk around the River Brent and beyond. The Council have used the findings of this Level 1 SFRA to steer development, including allocations to the lowest risk areas through the application of the sequential test. Where it is not possible to accommodate all allocations within areas of low risk of flooding, it is necessary to prepare a level 2 SFRA, as is the case in Ealing. Completed in January 2024, Ealing's level 2 SFRA has entailed undertaking a site-specific assessment of the individual allocations to provide the information needed to undertake the Sequential and Exception Tests, and the exercise identifies mitigation measures. As per national guidance the application of the Sequential and Exception Tests is documented through the Sustainability Appraisal process as part of the Integrated Impact Assessment. Forming part of Ealing's Development Plan the London Plan also	SP2.2 Climate action		Peter Edwards		459	Individual

Section 1 We object to the proposal to de-designate part of Barclays Sports ground as MOL, and to enable residential development on site 21EA, because this proposal does not satisfy the soundness tests as set out below. According to Infrastructure Delivery Plan, Part 5 - Infrastructure Delivery Schedule, it mentions the following regarding Barclays Sports Ground: Project Description: Outdoor sports facility to include winter and summer sports pitches, ideally hockey compliant artificial grass pitches (AGPs) and ancillary facilities. Prioritisation: Desirable Total cost (lower): 22 million Total cost (upper): 87 million Total cost: 55 million Funding secured: TBC Anticipated funding source: Developer Contributions We point out the following issues with this: 1. The sum of £55 million is not justified, and potentially not sound. It is not clear why the construction of hockey grass pitches would require this staggering sum. For comparison, the redevelopment from scratch of Gurnell Leisure Centre has a similar or smaller budget, and involves the construction of a state-of-the-art indoor gym and Olympic sized swimming pool. It is likely that the construction of hockey pitches should cost much less. 2. It is unrealistic that the funds raised from the developer by allowing residential development on site 21EA (part of Barclays Sports Ground) could raise a sum approaching 55 million. For	Noted. The council is only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land that does not meet the criteria for MOL designation. The former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, including hockey. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. The main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. In terms of the costs, we have reviewed these further and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around	21EA Former Barclays Sports Ground		Dmitry Tonkonog	Save Ealing P	460	Community Interest Group

I wish to make the following observations and recommendations:- - The natural environment parts of the plan are not strong enough. Especially regarding fully respecting the special natural habitats and species known in the Borough. A huge amount of competent surveying of natural habitats, and individual species was carried out by LBE in the 90's and 00's, and set out in HAPs (Habitat Action Plans) and SAPs (Species Action Plans). These should be acted on, - including via monitoring surveys, education, management regime consistency etc., - which includes not compromising existing long-established old grasslands, with their rich biota, by planting trees on them. Trees in appropriate places only. In the absence of an LBE ecologist, and/or Greater London Authority ecologists (much wished for by local naturalists like me), provision should be explicitly made for voluntary specialists to be fully consulted, via surveys, assessments, and advice.	Noted. The Local Plan establishes a revised SINC network. In addition policies SP2.2 and G6 establish a framework for managing development to secure the best outcome for nature. This includes a locally tailored approach for implementing BNG, building from the mandatory provisions. Whilst the Local Plan is an important tool, significant activity has and will have to happen beyond the Local Plan process.	SP2.2 Climate action		Peter Edwards		459	Individual
I wholeheartedly endorse the response from Greenshoots Racecourse Community Group. My parents moved into Sedgefield Court, Newmarket Ave when I was a baby and then we moved to Sussex Crescent. Mandeville Parkway was my playground as a child and is my sanctuary as an adult but it is so much more. It's our history. As a primary school teacher in Northolt we teach children about our local area. Mandeville Parkway is the last remaining part of the actual Racecourse. It brings history to life for our children. This is as important, if not more important than any artefact or historical building.	Noted.	Policy N1: Northolt Spatial Strategy	02NO Mandeville Parkway	Susan Ryan		461	Individual

Please accept this email as my response to the Ealing Local Plan. My own thoughts are below, but please note that I support the umbrella group for residents' associations, Ealing Matters' concerns about the Plan. 1. I find the plan difficult to understand in detail. I am not familiar with planning jargon and believe the plan has been produced in this manner with the deliberate intention of making it inaccessible to the vast majority of people. 2. I expect that it does not meet the minimum legal requirements for a Local Plan. Where is the evidence of need? What are the measures for success? Where have the risks been identified? And how will these be managed? 3. Tower blocks are not welcome in areas of traditional Victorian and Edwardian housing stock, overshadowing existing properties and changing the dynamics of people's homes. Most of the proposed planning takes into no account the local, or wider area. The intention seems to be to tear the heart out of existing communities. 4. The environmental concerns with this plan are numerous. Is your intention to quite literally bulldoze over what is supposed to be protected land, to produce high-density housing that there is no proven need for, and those for whom it is allegedly generated, cannot afford?! Where are the plans for a workable health, education and transport infrastructure? What access to amenities and green spaces will be provided? It is not a plan to say you will build boxes, and fill them with people. People need amenities. 5. How does this plan reflect on Ealing's net zero commitments? I'm certain that destroying perfectly serviceable existing buildings, to replace them with high rise blocks known to have high carbon	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council's ambitions and plans for each of the seven towns that make up the borough. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Lynn Kirkwood-Price		462	Individual

I object to the de-designation of part of Barclays Sports Ground as MOL. Additionally, I object to allowing residential development on Barclays Sports Ground. Furthermore, I support the representations by Ealing Matters, Save Ealing Parks and CPRE. Barclays Sports Ground should become part of the proposed Regional Park. The proposed development budget of between £22 million and £87 million is not justified. Moreover, NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Jaya Bhanot		463	Individual
Paragraph: Chapter 4 pages 194-5 E2 Ealing Metropolitan Town Centre paragraph G Policies Map: 12E (Chignell Place, West Ealing) The plan for this site cannot be delivered as Ealing Council has already approved an application for an 8-storey building on this site despite the plan designating it suitable only for 4 storeys. Suggested modification: Given that the Council’s plan for this site is in conflict with what the Council has already decided it’s not clear how this can be made compliant.	Noted. You are correct reagrds the extant planning permission but a decision on whether or not to retain the site allocation will be made once a legal agreement has been signed and there is evidence that the planning permission is being implemented.	12EA Chignell Place, West Ealing		David Highton		464	Individual

Paragraph: Chapter 4 pages 192-3 Policy: E2 Ealing Metropolitan Town Centre Paragraph G Policies Map: Site 11EA (Sainsbury's and Library, West Ealing) This major site is the 'town centre' for West Ealing. It plays a crucial role in the local community. This site was only redeveloped in the mid-1980s so is a recent addition to this area. This development would mean demolishing buildings which the council should not be encouraging given the urgent need to tackle climate change. The development of such a significant site in the heart of West Ealing requires far more guidance which should include detail about public realm and its relationship with its surroundings. Above all, developing this site should only be considered after a proper consultation with the local community. Suggested modification: Chapter 4 pages 192-3 should be amended to set a maximum height of 13 storeys along with any other references to site 11EA.	Noted. This site is of strategic importance and, alongside other development sites in west ealing, should deliver significant and co-ordinated improvements to the public realm. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Any future development proposals will be subject to public and stakeholder consultation before an application is determined.	11EA Sainsbury's & Library, West Ealing		David Highton		464	Individual
Paragraph: Chapter 4 pages 200-201 Policy: E2 Ealing Metropolitan Town Centre paragraph G Policies Map:015E (Waitrose, West Ealing) Waitrose is already in its second incarnation on this site. The first store lasted 14 years and the current one 18 years so far. To, yet again, demolish this store and rebuild a new one is a major waste of resources at a time of our climate emergency. The height of 13 storeys is more appropriate but still significantly exceeds the 7 storeys limit for West Ealing. The site definition fails to make mention of a crucial item of public realm for the area – Jacob's Ladder. This is one of the main pedestrian routes across the railway. It is dilapidated and wholly impassable for wheelchair users and extremely difficult for anyone with a pushchair or poor mobility. To produce a 15-year plan without addressing this vital link is a major omission. The plan neither addresses the inevitable increase in road traffic along Alexandria Road if this development goes ahead nor the necessary car parking space that this new store would require. Overall. The planning for vehicles is inadequate and unsound. Suggested modification: Amend the plan to incorporate Jacob's Ladder and state clearly that the developer for this site must set out their plan to make significant improvements in this vital pedestrian route. The plan needs to address the question of road traffic in and around this site. There needs to be a proper study to analyse the likely increase if traffic and how it will be managed.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities. Key infrastructure requirements for this site allocation include measures to improve active travel including Jacobs Ladder footbridge and Green Man Lane.	15EA Waitrose, West Ealing		David Highton		464	Individual

Unfortunately, the Draft Plan is predicated on unsubstantiated claims that the local economy will be ‘refreshed’ and that new, well-paid jobs will be created, accessible to existing residents of Ealing Borough. No convincing evidence is provided as to how this could be achieved. For example, the Summary of the Draft New Draft Local Plan [‘Ealing Town Plan’] (p 10) notes that over recent years ‘the local population has stagnated and there has been a decline in higher paying jobs. Consequently, this new Local Plan will require the social and economic role of Ealing Metropolitan Centre to be refreshed and strengthened by significant levels of high density residential and employment growth’. The Plan makes reference to ‘the knowledge economy’. However, it is far from certain that the local economy will be regenerated. No evidence is given to suggest that the market will respond in localities such as West Ealing. And if it did, metrics are not provided to substantiate claims that local health and education services - along with transport and other infrastructure, e.g. electricity grid, water and sewage system - have sufficient capacity. With stagnant or declining employment, the impact of the proposed amount of new housing on the Borough’s diverse communities will be negative in the extreme. Without new job opportunities, the policies and proposals contained in the Plan will facilitate the creation of a dormitory for new residents working in more distant areas of London and beyond. With respect to height and density of accommodation in West Ealing, the Draft Plan affirms that the maximum will be 7-13 storeys. There should be a more emphatic statement that this will apply to	Noted. The Local Plan is also based on an extensive technical evidence base including on the economy. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. The omission of a definition of urban greening is acknowledged and a modification to the plan is now proposed. The importance of public realm is referenced throughout the plan and features prominently in the Infrastructure Delivery Plan. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	General			Stephen Shaw	465	Individual

The Local Plan is not consistent with national policy nor with the London Plan, and is therefore unsound. I quote from the NPPF: (paragraph 8a) an overarching economic objective is coordinating the provision of infrastructure (paragraph 11a) all plans should promote a sustainable pattern of development that seeks to ... align growth and infrastructure (paragraph 86c) planning policies should seek to address potential barriers to investment, such as inadequate infrastructure The London Plan says in policy D2.B: Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly. The electricity supply in the West Ealing area is already overburdened. There have been recent power cuts – such as that of 19 January 2024 – and a major fire at the ageing Dean Gardens substation. This is just one of many ageing assets that need replacing – but no plan for this is apparent. The Local Plan does not address this issue which is already critical. Please see the table at the end of the Infrastructure Delivery Plan, Part Two: Infrastructure Delivery Schedule. Near the beginning of this table are five “Electricity Supply” projects. All five are marked “Critical”. Four of them have a delivery period of “TBC” including	The provision of electricity supply is the responsibility of the energy companies, not the council. The IDP cannot provide a timeframe for the delivery of new electricity infrastructure because that does not depend on the council. The council engaged with energy providers as part of the preparation of the IDP and will continue to engage with energy providers and key partners to plan for the adequate provision of energy infrastructure across the borough.	SP4.1 Good Growth		Kevin Raftery	West Ealing M	466	Community Interest Group

The 15EA site definition fails to include the single most important part of the public realm in that area – the footbridge known as Jacob’s Ladder. This has long been a major passage for north-south foot traffic across what is otherwise an impassable railway line. To propose a 15-year plan without addressing the dilapidated state of Jacob’s Ladder, and the key part it plays in active travel, is a terrible oversight. In this regard the Local Plan has not been positively prepared and is therefore unsound. Chapter 4 page 201 addresses car parking issues for this site. In several ways it is deficient: - It does not address the significant requirement for supermarket car parking. No reasonable person would claim that the current well-used car park can simply be wished away. Space must be allocated within the site (perhaps underground) for shoppers who need to park and carry significant loads. - It does not address the routes by which vehicles will approach the site. Alexandria Road may be unable to tolerate the increased traffic required to service hundreds of new homes on the site. Deliveries (Amazon, UPS etc.) must be considered. - It says “Incorporate car free shopper parking for replacement food store/supermarket”. I cannot make sense of that statement. It seems to imply that car-free shoppers will need parking spaces. The planning for vehicles is ineffective and therefore unsound Modification(s) suggested: Incorporate Jacob’s Ladder – or at least the south end of it – in site plan 15EA. and make clear that whoever develops the site must	Noted. Key infrastructure requirements for this site allocation include measures to improve active travel including Jacobs Ladder footbridge and Green Man Lane. Providing car parking for the supermarket is contrary to policies in the London Plan and TfL have sought modifications to the Local plan that remove any flexibility in the policy as currently drafted.	15EA Waitrose, West Ealing			Kevin Raftery	West Ealing N	467	Community Interest Group

Policy SP2.1 paragraph B says that Ealing Council will promote an inclusive economy by retaining vital public assets and buildings, using them for the maximum benefit for the borough’s residents and keeping them in public hands for public use. This policy is not deliverable and is therefore not effective and is unsound. If there is one blindingly obvious “vital public asset” In Ealing it is the Town Hall. This cherished Victorian building has long been used for weddings, the welcoming of new citizens, election-day polling, and COVID vaccinations among other uses. Its position in the heart of Ealing and its august appearance provide the ultimate in “wayfinding” and a visceral connection with Ealing’s past. Yet what Ealing Council has done, against the wishes of Ealing residents, is attempt to sell the Town Hall to a hotel developer. This is the opposite of what Policy SP2 proclaims: - The vital public building has not been retained. - It is no longer available to provide any benefit whatsoever to residents. - It has not been kept in public hands for public use. Ealing Council has ceased maintenance of the building so that its structure and furnishings are becoming ever less able to serve the Ealing public. The situation is so bad that the council is having to spend money putting up tents in Walpole Park to support the May elections – with deleterious effects upon the park and discomfort for the voters. If the council had any true concern for “vital public assets” the Town Hall would have served its customary role on election day. The council has not been content in trying to sell off its “vital public assets”. It has also attempted to sell off Victoria Hall, which abuts the Town Hall, even though the council does not own it. Victoria Hall	Noted. The extant planning permission retained parts of the buidling for civic and community use in addition to a hotel.	SP2.1 Inclusive economy		Kevin Raftery	West Ealing N	468	Community Interest Group

For site 11EA, Chapter 4 says on page 192 “design analysis indicates a maximum height of 16 storeys”. But I see no design analysis in the Local Plan or its supporting documents which would support that assertion. On the contrary, the “Tall buildings strategy, main report” gives guidance for West Ealing overall on page 28, with prospective tall building heights being 7-13 storeys. Further, the “Tall buildings strategy appendix – Guidance for study sites” includes on page 49 a map more specific to this site’s area, clearly showing that no building taller than 13 storeys is desirable. Further, a maximum height of 13 storeys for this site was proposed at the Regulation 18 stage of consultation. I have found no explanation for the increase between stages 18 and 19. If the council’s aim was to add a certain number of new homes in the area, an increase to this site’s target height was not necessary, because sites 12EA and 14EA will inevitably produce significantly more homes than envisioned for them in the Local Plan. (See further Part B representations below.) Site 12EA will provide four storeys more than planned, and site 14EA will provide another three storeys more than planned. The sum of new homes across sites 11EA, 12EA and 14EA will be enough to meet the council’s aims even when the 11EA target is reduced back to 13 storeys where it stood at Regulation 18. If I may refer again to the “Tall buildings strategy, main report”, it says on page 6: Examples of inappropriately tall buildings include developments that ... exceed the upper limit of the guidance set out for an appropriate location for tall buildings. The proposed 16-storey replacement for West Ealing Sainsbury’s would thus be inappropriately tall, by the council’s own definition. NPPE paragraph 31 says the preparation and review of all policies	Site analysis is set out in the tall buildings strategy.	11EA Sainsbury’s & Library, West Ealing		Kevin Raftery	West Ealing N	469	Community Interest Group

Policy: ENA: Enabling Development – Ealing LPA – local policy At the Regulation 18 stage of review, Ealing’s draft Local Plan included the designation of a great many tracts of Metropolitan Open Land (MOL). It was the council’s intent to allow building on much of this land. Had the council had its way, much of the formerly protected green spaces would have been lost forever. This ploy by Ealing Council was stopped only by direct order of the Mayor of London. Policy ENA would enable the council to resume its intention to build on MOL. Acting as its own judge and jury, the council could declare that in any given case the benefits of sidestepping planning rules would outweigh any material planning harm. One political party has an overwhelming majority in the council chamber. Residents are familiar with its tendency to do whatever it pleases, against their wishes. The sudden imposition of Low Traffic Neighbourhoods and the demolition of West Ealing’s central Art Deco heritage building are two obvious examples. We, the residents of the borough of Ealing, do not trust our council with the powers that would be bestowed by policy ENA. The fact that policy ENA is presented only on the last page of the last chapter of the plan, and not described accurately, says much about the council’s intent. Historic England, and national policy, make it clear that Enabling Development is intended solely to secure the conservation of a heritage asset. There is no mention of this in Ealing’s plan, thus leaving the reader with the impression that the policy can be applied to any situation, even where no heritage asset is at stake. The policy fails to comply with NPPF paragraph 16.d which says that policies should be unambiguous, so it is evident how a decision maker	Noted. The drivers for reviewing Ealing’s Green Belt and MOL designations was not to identify additional land to accommodate development, but rather to ensure that this land is afforded the correct designations. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Where changes have been proposed to the designation of GB and MOL in the majority of cases these sites continue to be covered by other appropriate policy designations such as Public Open Space, Community Open Space or Site of Importance for Nature Conservation (SINC), and such policies continue to protect these sites from inappropriate development. Whilst proposals may be presented as enabling development, the application of this label is sometimes used loosely. Local policy ENA therefore seeks to define what is meant by enabling development in an Ealing context, and it establishes a number of key tests/principles which proposals must satisfy if an applicant is seeking to make the case for enabling development. The intention of this policy is not to promote or facilitate enabling development. It is recognised that it should be used sparingly, but if is engaged proposals must satisfy a number of key principles. Firstly it establishes that the enabling works must be led by the designation and the associated outcomes. Sites may be subject to multiple designations and applications will typically be assessed against a suite of policies, each with separate objectives and with the potential to compete for enabling support. This policy	Policy ENA: Enabling Development – Ealing LPA – local policy		Kevin Raftery	West Ealing M	470	Community Interest Group

I write as a local long-term resident having lived in the London Borough of Ealing throughout my life. I strongly object to the proposals in the Council’s draft Local Plan that proposes the de-designation of Metropolitan Open Land (MOL) status of any part of the former Barclays Sports Ground (MOL 20) - and for the development of that site for residential use. I support the objections submitted by Ealing Matters, Save Ealing Parks and CPRE. Residents are being asked to submit comments on an incomplete plan which seeks to abrogate the MOL status of the land, stripping it of its protections and allowing property developers a blank canvas to build on what is currently an invaluable protected piece of green space. My objections are as follows: Local Plan Chapter 4 Town Plans and Development Sites Site EA31 Former Barclays Sports Ground ‘Development site’ EAL31 comprises the land that is the former Barclays Sports Ground, which has been protected for many years from inappropriate development via its designation as Metropolitan Open Land (MOL), (which is similar to Green Belt). The London Borough of Ealing (LBE) is proposing through the Local Development Plan (LDP) to de-designate site EL31, remove the MOL status and change its permitted use from exclusively sports and leisure to a “Leisure-led scheme with enabling residential use facilitating access to sports and play pitches”. This is a vague definition of the intended use for the site, which is open to interpretation and is designed to remove planning controls and change the current permitted use for sports and leisure. to include an unspecified amount of residential	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet.	21EA Former Barclays Sports Ground			Daniel Hazan	471	Individual

The Local Plan is not consistent with national policy. I quote from the NPPF: (paragraph 8a) an overarching economic objective is coordinating the provision of infrastructure (paragraph 11a) all plans should promote a sustainable pattern of development that seeks to ... align growth and infrastructure (paragraph 86c) planning policies should seek to address potential barriers to investment, such as inadequate infrastructure. An item of infrastructure that every large community needs is a police station where the public can go to seek help or, for example, to leave goods which appear to have been stolen. Central/West Ealing, a town of 91,149 people, has been without such a police station for several years. The Local Plan does not address this in a timely way. In Chapter 4 page 159, Table E1, the refurbishment of Ealing Police Station has a target date “TBC”. The table at the end of the Infrastructure Delivery Plan, Part Two also says “TBC”. Chapter 4 site selection 06EA sets a target for completion of 2038. This is not soon enough. New housing developments in Central/West Ealing adding thousands more people should not go forward until there is water, electricity, transport ... and a fully functional police station. The Infrastructure Delivery Plan, Part Two: Infrastructure Delivery Schedule, page 20 does not give one any additional hope: In terms of planned service provision, the Metropolitan Police Service identified the ‘Strongest Ever Neighbourhood Policing’ initiative, which would see investment by the Metropolitan Police in more local police officers and police community support officers (PCSOs) in the neighbourhood. There is nothing concrete in this statement. It is neither a plan nor a schedule. It’s what is commonly called “waffle” The Local Plan has not been positively prepared because it	The provision of police services is the responsibility of the Metropolitan Police, not the council. The IDP cannot provide a timeframe for the delivery of a new police station because that does not depend on the council. The council engaged with the Metropolitan Police as part of the preparation of the IDP and will continue to engage with the Metropolitan Police and key partners to seek improved police services across the borough.	06EA 49–69 Uxbridge Road		Kevin Raftery	West Ealing M	472	Community Interest Group
I support Ealing Matters’ concerns about the Plan	Noted.	General		Oscar Sanandres		475	Individual

Proposed Policy ENA lacks reasoned justification, and therefore does not comply with section 8(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is therefore not legally compliant and unsound. Historic England summarises enabling development as ‘development that would not be in compliance with local and/or national planning policies, and not normally be given planning permission, except for the fact that it would secure the future conservation of a heritage asset.’ The NPPF uses the term only in connection with conserving the historic environment, saying that ‘Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.’ Application of the concept of enabling development to permit development on MOL sites thus appears a novel idea. Its use to develop Metropolitan Open Land in general would depart considerably from the principles that apply in the context of protecting historic assets. Enabling development policies do not appear to feature in the NPPG or and in the NPPF’s terminology they seem to constitute neither a strategic policy (para 20ff), nor a non-strategic one (para 28ff). MOL falls under the aegis of the London Plan which safeguards it to the same extent as the Green Belt which means that inappropriate development on it is only permissible in ‘very exceptional	Policy ENA clarifies rather than expands the scope of enabling development, which is a case that is available to development whether or not a policy exists. As the policy makes clear, only development that is 'demonstrably led by the objectives of the designation in question' can qualify as enabling development. The policy further clarifies that the benefits should be to the designation itself and must outweigh any harm, as well as being the minimum necessary to deliver the identified benefit.	Policy ENA: Enabling Development – Ealing LPA – local policy		Stuart Morley	Central Ealing	476	Community Interest Group

I am a resident of Woodville Gardens and have already seen the duplicity of this council in the way they redesignated MOL to build the school on Barclays sports ground. At the time it was promised that the rest of the ground would be made a park or further sports facilities for the community and the school. This is what we need. We are quite aware that over the years the council have been collaborating with the owners of the land to push through development. This is wrong and immoral. Residents are also aware that part of the UIEZ expansion has been a way of pushing through further residential developments by disregarding claims of pollution and the need for MOL. MOL is important and getting rarer. This should be left for sports and parkland. As such: * I object to the de-designation of part of Barclays Sports Ground as MOL * I object to allowing residential development on Barclays Sports Ground * I support the representations by Ealing Matters, Save Ealing Parks and CPRE * Barclays Sports Ground should become part of the proposed Regional Park * The proposed development budget of between £22 million and £87 million is not justified * NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. * The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground			Nina Giani	477	Individual

Our representation concerns the need for the Plan to contain policies for the recognition and good management of our Heritage and Conservation Areas, particularly in Ealing Town Centre Under Regulation 18, Ealing Council did not invite any representations from the Advisory Panel about what the Plan should contain with regard to the historic environment that defines the Borough and its Town Centre. For this reason alone, the Plan is neither Fit for Purpose nor Legal and therefore is not Sound. • No consideration has been shown in relation to the future of our Conservation Areas, which have already been deemed as “Heritage at Risk” by Historic England • There is no factual base of evidence that supports the proposals in the Plan to designate certain areas in the Town Centre as suitable for Tall Buildings. This lack of consideration is directly in opposition to the guidance in the National Planning Policy Framework (Chapter 16). • Given the close proximity of Ealing’s only Grade I Listed Building, Pitzhanger Manor, the Heritage Walpole Park and the Conservation Areas, any such developments will impose irreversible intensification in the immediate area and will cause significant material harm on the Town Centre and Ealing Green Conservation Areas. • The artificial construct of the “Ealing Metropolitan Centre” joining Ealing with West Ealing is outdated and not relevant to the current architectural and built environment, particularly in relation to our Heritage and Conservation Areas. {suggested modification:} As a lay body, the Conservation Areas Advisory Panel is not necessarily best placed to provide definitive advice on suitable modifications to help make the Plan legally	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on design, heritage and culture. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. Neither the Mayor of London nor Historic England have raised objections to this approach. The local plan at Policy SP3.3 D seeks to ensure that new development meets the highest design standards, responds positively to the local character and recognises the role of heritage in place-making. There are numerous other references to the importance of heritage and conservation throughout the plan including at Policies SP2.2 F (vi), SP2.2 G (vi), SP3.1 B, SP4.1 A, SP4.1 E, SP4.2 H-I. The plan is also informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The Site Selection reports also informs any Development Sites whose narrative in the plan includes both contextual considerations and design principles to guide any future development proposals. The designation for the Ealing Metropolitan Town Centre is derived from the London Plan and Ealing's Local Plan sets out a spatial policy for the town centre at Policy E2. This takes a holistic as well as a character led approach recognising the different attributes and characteristics of individual parts of the centre.	SP3.3 Healthy lives		Patrick Chapman	Ealing Green and Ealing To	Community Interest Group

Regarding the new Local Plan, I find this lacking and disjointed. Therefore I have to support the concerns raised by Ealing Matters who have addressed several issues succinctly (much more succinctly than the Local Plan authors have managed. These are some of my objections to the plan. a) The housing target of more than 40,000 homes over the next 15 years will create population growth of more than 80,000 people. The infrastructure plans to support this very high growth rate are entirely inadequate. Local hospital beds, doctors surgeries, dentists, schools, electricity grid, sewerage supplies and all other key services are already critically overstretched today. We need clear plans for how this population growth will be provided with the increased infrastructure required to support it, so that services in Ealing do not go into further decline. A local plan must clearly articulate how it will enhance local infrastructure for the people it serves. Without this the plan is wholly inadequate. b) As reported previously "The Council acknowledges that it cannot demonstrate a five-year supply of deliverable housing sites" Even after all this time it is surely a gross dereliction of duty that the council we voted in still does not supply these figures so that excessive housing developments cannot be contained. Thus allowing at least the Manor Road development to go ahead after appeal. c) There are no clear policies to protect the Borough's heritage, despite overwhelming feedback from residents that this is important to OUR community - to the very community YOU have been elected to represent. d) It appears that Ealing Council has a new way of defining what a tall building is. This seems to keep increasing the closer you get to <u>West Ealing Station</u>.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns.	General		John Rovira		479	Individual
I strongly object to your local plan for West Ealing. West Ealing is an area of two-storey homes - why are you imposing tower blocks on us? The sites for these towers are too small, there is no area for car parking - even if you don't want people to have cars, they will still have them. You are turning Ealing into a skyscraper urban desert with no soul.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	Policy E2: Ealing Metropolitan Town Centre		S Rundle		480	Individual

1.The Plan itself is verbose and repetitive. It is simply impenetrable to the vast majority of Ealing residents unfamiliar with planning jargon or issues. 2. Ealing’s housing target of more than 40,000 homes over the next 15 years is excessive and undeliverable. But if it were to be delivered, it would create unmanageable population growth of more than 80,000 people (more than the population of Guildford) according to GLA projections. 3. The infrastructure plans to support this very high growth rate are sketchy at best. 4. The plan’s proposals for wholesale redevelopment of relatively new and serviceable buildings will exacerbate climate change. 5. Valuable areas of MOL are to be lost. A new policy of ‘enabling development’ will justify developing them in the Council’s interests. 6. There are no policies to protect the Borough’s heritage. 7. Tall building heights, especially in Ealing and Acton, are excessive and unjustified. 8. There is no vision or strategy for the near total redevelopment of Ealing Metropolitan Town Centre that the Plan envisages. 9. The Plan’s 82 individual development sites have the potential to have considerable impact on the Borough and the proposals for them are totally insufficient. 10. Ealing’s proposals for monitoring the plan are no more adequate now than they have been over the past 10 years. Ealing Council seem set on walking all over local residence concerns. You are systematically ruining our beautiful borough of London with your tasteless plans that will not add any jot of quality to our area. It is shameful and I urge you to think again for a local plan that accommodates existing residences.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy. The case for	General		Lisa Ayson		481	Individual

I support Ealing Matters' concerns about the Local Plan and their comments, echoed by all, are as follows... 1.The Plan itself is verbose and repetitive. It is simply impenetrable to the vast majority of Ealing residents unfamiliar with planning jargon or issues. 2. Ealing’s housing target of more than 40,000 homes over the next 15 years is excessive and undeliverable. But if it were to be delivered, it would create unmanageable population growth of more than 80,000 people (more than the population of Guildford) according to GLA projections. 3. The infrastructure plans to support this very high growth rate are sketchy at best. 4. The plan’s proposals for wholesale redevelopment of relatively new and serviceable buildings will exacerbate climate change. 5. Valuable areas of MOL are to be lost. A new policy of ‘enabling development’ will justify developing them in the Council’s interests. 6. There are no policies to protect the Borough’s heritage. 7. Tall building heights, especially in Ealing and Acton, are excessive and unjustified. 8. There is no vision or strategy for the near total redevelopment of Ealing Metropolitan Town Centre that the Plan envisages. 9. The Plan’s 82 individual development sites have the potential to have considerable impact on the Borough and the proposals for them are totally insufficient. 10. Ealing’s proposals for monitoring the plan are no more adequate now than they have been over the past 10 years.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy. The case for	General		James Ayson Parrish		482	Individual

A. The existing evidence base does not contain sufficient supporting documentation on green spaces to allow for an informed consultation on the local plan. A green and blue infrastructure strategy including a Local Nature Recovery Strategy to underpin the proposals in the local plan is needed to ensure that the provision of green spaces, the ecological network and the ecosystem services they provide are adequately considered.	The absence of having prepared a GI strategy is acknowledged, although it is important to recognise that a GI strategy forms an umbrella strategy for a series of other plans, strategies and workstreams which have been published or actioned, and each of these have informed different aspects of the preparation of the Local Plan. These include: - Ealing’s Indoor and Outdoor Sports Facilities Strategy published 2023 - Ealing’s Biodiversity Action Plan published in 2022 - A SINC review - Local Nature Recovery Strategy – emerging and due to be published in 2025 - A Tree Strategy – 2013 - Green Belt and MOL review – Stage 1 (2022) and Stage 2 (2024) A number of these outputs will continue to evolve over the life of plan, following further updates, revisions etc. As well as informing plan preparation itself, the content of these outputs are also very much integral to the decision-making process itself. Recognising this, and with the intention of future proofing the Local Plan the plan provides appropriate hooks to these outputs (encompassing both current outputs and accounting for any future updates). An initial SINC review report was published alongside the Reg.19 plan. The GLA has been appointed as the 'responsible authority' to produce the Local Nature Recovery Strategy (LNRS) for Greater London, with the boroughs supporting this process. The LNRS is expected to be published sometime in 2025. Both the BAP and the LNRS are now referenced under policy SP2. Pending the publication of the LNRS the Local Plan is considered to provide an appropriate	SP2.2 Climate action		Michael Pilkington		483	Individual

B. The Local Plan evidence base for green infrastructure is currently very thin which makes it impossible to make informed decisions about proposals in the Local Plan The National Planning Policy Framework (2021) paragraph 98 - “Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.” The London Plan 2021 also clearly lays out the importance of green infrastructure planning by London boroughs in Policy G1 Green infrastructure which states: “A) London’s network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits. B) Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A. C) Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:	The absence of having prepared a GI strategy is acknowledged, although it is important to recognise that a GI strategy forms an umbrella strategy for a series of other plans, strategies and workstreams which have been published or actioned, and each of these have informed different aspects of the preparation of the Local Plan. These include: - Ealing’s Indoor and Outdoor Sports Facilities Strategy published 2023 - Ealing’s Biodiversity Action Plan published in 2022 - A SINC review - Local Nature Recovery Strategy – emerging and due to be published in 2025 - A Tree Strategy – 2013 - Green Belt and MOL review – Stage 1 (2022) and Stage 2 (2024) A number of these outputs will continue to evolve over the life of plan, following further updates, revisions etc. As well as informing plan preparation itself, the content of these outputs are also very much integral to the decision-making process itself. Recognising this, and with the intention of future proofing the Local Plan the plan provides appropriate hooks to these outputs (encompassing both current outputs and accounting for any future updates). The GLA has been appointed as the 'responsible authority' to produce the Local Nature Recovery Strategy (LNRS) for Greater London, with the boroughs supporting this process. The LNRS is expected to be published sometime in 2025. Both the BAP and the LNRS are now referenced under policy SP2. Pending the publication of the LNRS the Local Plan is considered to provide an appropriate hook for this forthcoming strategy.	SP2.2 Climate action		Michael Pilkington		483	Individual

C. The green infrastructure strategy should also consider how well Ealing’s green spaces are currently serving ecosystem services as well as how they can be improved In the literature about green infrastructure, the aim of the concept is to focus on the role that nature plays in providing ecosystem services. These are services such as adapting to climate change, improving stormwater management capacity, alleviating heat island effects, reducing environmental pollution and improving biodiversity (Ying et al. 2020). Many of these ecosystem services are not analysed in the current draft Local Plan, yet all of these are essential for Ealing to be able to mitigate and adapt to climate change, promote social well-being, human health and social equality in the process. (see: Jun Ying, Xiaojing Zhang, Yiqi Zhang & Svitlana Bilan (2022) Green infrastructure: systematic literature review, Economic Research-Ekonomska Istraživanja, 35:1, 343-366, DOI: 10.1080/1331677X.2021.1893202)	The absence of having prepared a GI strategy is acknowledged, although it is important to recognise that a GI strategy forms an umbrella strategy for a series of other plans, strategies and workstreams which have been published or actioned, and each of these have informed different aspects of the preparation of the Local Plan. These include: - Ealing’s Indoor and Outdoor Sports Facilities Strategy published 2023 - Ealing’s Biodiversity Action Plan published in 2022 - A SINC review - Local Nature Recovery Strategy – emerging and due to be published in 2025 - A Tree Strategy – 2013 - Green Belt and MOL review – Stage 1 (2022) and Stage 2 (2024) A number of these outputs will continue to evolve over the life of plan, following further updates, revisions etc. As well as informing plan preparation itself, the content of these outputs are also very much integral to the decision-making process itself. Recognising this, and with the intention of future proofing the Local Plan the plan provides appropriate hooks to these outputs (encompassing both current outputs and accounting for any future updates).	SP2.2 Climate action		Michael Pilkington		483	Individual

D. Ealing’s Biodiversity Action Plan should have informed the plan as should a Local Nature Recovery Strategy I am disappointed that the Biodiversity Action Plan that was developed and released in 2022 does not form part of the evidence base and isn’t being used to inform decisions regarding green space. This is an excellent plan which is setting out how to improve biodiversity in the borough and forms a council led response to the ecological emergency which is mentioned in the draft Local Plan’s vision. It should have been taken into account in the evidence base. Furthermore, I would have liked to have seen a Local Nature Recovery Strategy developed as part of the evidence base for the Green Infrastructure Strategy. This is especially important as it is written in the National Planning Policy Framework paragraph 179 that: “To protect and enhance biodiversity and geodiversity, plans should: a) identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.” The current Local Plan for Ealing does not do this.	Ealing's BAP has informed the development of this Local Plan. The GLA has been appointed as the 'responsible authority' to produce the Local Nature Recovery Strategy (LNRS) for Greater London, with the boroughs supporting this process. The LNRS is programmed to be published in 2025. As well as informing the drafting of the Local Plan, the BAP and LNRS (once published) also function as material planning considerations. To this end both the BAP and the LNRS are now referenced under policy SP2 and policy G6, directing applicants to have regard to each.	SP2.2 Climate action		Michael Pilkington		483	Individual

E. We would have expected to see a detailed local open space needs assessment As part of the analysis of green infrastructure, London Plan 2021 Policy G4 Open Space also states that “A) Development Plans should: 1) undertake a needs assessment of all open space to inform policy. Assessments should identify areas of public open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for the different types required 136 Assessments should take into account the quality, quantity and accessibility of open space”. Whilst, the infrastructure note offers some basic insights into public open space provision, this only considers provision on the borough wide level, not at the local level where there is much more variation. It also does not consider all the different types as required by the local plan.	The absence of having prepared a GI strategy is acknowledged, although it is important to recognise that a GI strategy forms an umbrella strategy for a series of other plans, strategies and workstreams which have been published or actioned, and each of these have informed different aspects of the preparation of the Local Plan. These include: - Ealing’s Indoor and Outdoor Sports Facilities Strategy published 2023 - Ealing’s Biodiversity Action Plan published in 2022 - A SINC review - Local Nature Recovery Strategy – emerging and due to be published in 2025 - A Tree Strategy – 2013 - Green Belt and MOL review – Stage 1 (2022) and Stage 2 (2024) A number of these outputs will continue to evolve over the life of plan, following further updates, revisions etc. As well as informing plan preparation itself, the content of these outputs are also very much integral to the decision-making process itself. Recognising this, and with the intention of future proofing the Local Plan the plan provides appropriate hooks to these outputs (encompassing both current outputs and accounting for any future updates). Pending the preparation of a revised Green Infrastructure Strategy it has not been possible to prepare revised deficiency mapping. Once completed, revised mapping will be published as part of the Council's Authorities Monitoring Report.	SP2.2 Climate action		Michael Pilkington		483	Individual

F. The London Plan goes on to elaborate on this point further “8.4.2 Boroughs should undertake an open space needs assessment, which should be in-line with objectives in green infrastructure strategies (Policy G1 Green infrastructure) (drawing from existing strategies such as play, trees and playing pitches). These strategies and assessments should inform each other to deliver multiple benefits in recognition of the cross-borough function and benefits of some forms of green infrastructure. Assessments should take into account all types of open space, including open space that is not publicly accessible, to inform local plan policies and designations.” As the green infrastructure strategy does not exist, nor does it contain an appropriate open space needs assessment, we are not being provided with the necessary evidence to have an informed consultation on the Local Plan.	The absence of having prepared a GI strategy is acknowledged, although it is important to recognise that a GI strategy forms an umbrella strategy for a series of other plans, strategies and workstreams which have been published or actioned, and each of these have informed different aspects of the preparation of the Local Plan. These include: - Ealing’s Indoor and Outdoor Sports Facilities Strategy published 2023 - Ealing’s Biodiversity Action Plan published in 2022 - A SINC review - Local Nature Recovery Strategy – emerging and due to be published in 2025 - A Tree Strategy – 2013 - Green Belt and MOL review – Stage 1 (2022) and Stage 2 (2024) A number of these outputs will continue to evolve over the life of plan, following further updates, revisions etc. As well as informing plan preparation itself, the content of these outputs are also very much integral to the decision-making process itself. Recognising this, and with the intention of future proofing the Local Plan the plan provides appropriate hooks to these outputs (encompassing both current outputs and accounting for any future updates).	SP2.2 Climate action		Michael Pilkington		483	Individual

G. There should not be open spaces earmarked for future development given the evidence base provided thus far It is not clear how the loss of open space aligns with the National Planning Policy Framework (2021) paragraph 99 which makes it clear that with such spaces: "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." If one or more of the above points was pertinent to an area earmarked for future development, the local Plan should clearly state which apply and what evidence was used to arrive at that conclusion. Again this information should be clearly signposted to members of the public. This is not the case currently and thus the Local Plan cannot be seen as sound in terms of justifying the de-designation and loss of open space to development.	The absence of having prepared a GI strategy is acknowledged, although important to recognise that this forms an umbrella strategy for a series of other plans, strategies and workstreams which have been published or actioned, and each of these have informed different aspects of the preparation of the Local Plan. These include: - Ealing's Indoor and Outdoor Sports Facilities Strategy published 2023 - Ealing's Biodiversity Action Plan published in 2022 - A SINC review - Local Nature Recovery Strategy – emerging and due to be published in 2025 - A Tree Strategy – 2013 - Green Belt and MOL review – Stage 1 (2022) and Stage 2 (2024)	SP2.2 Climate action		Michael Pilkington		483	Individual

H. Connectivity of habitats and green spaces needs to be at the heart of the Local Plan There is currently no analysis of the connectivity of Ealing’s green spaces and where this connectivity can be enhanced. This is important because if you are proposing development sites, there should be awareness of where they may damage existing connectivity and where there are potentials for developments to improve connectivity. There are development sites allocated to green spaces that may reduce connectivity for example, the suggested development of Northolt Driving Range for employment-led mixed use scheme. This site is greenbelt and as an open space it currently serves as a means to connect Northolt Manor Local Nature Reserve into the wider green network through its links to the Grand Union Canal. Furthermore, NPPF paragraph 175 states plans should “take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.” This hasn’t occurred and thus the Local Plan is not being lacks the necessary evidence to make informed decisions with regards to de-designating and building on existing open spaces.	The absence of having prepared a GI strategy is acknowledged, although it is important to recognise that a GI strategy forms an umbrella strategy for a series of other plans, strategies and workstreams which have been published or actioned, and each of these have informed different aspects of the preparation of the Local Plan. These include: - Ealing’s Indoor and Outdoor Sports Facilities Strategy published 2023 - Ealing’s Biodiversity Action Plan published in 2022 - A SINC review - Local Nature Recovery Strategy – emerging and due to be published in 2025 - A Tree Strategy – 2013 - Green Belt and MOL review – Stage 1 (2022) and Stage 2 (2024) A number of these outputs will continue to evolve over the life of plan, following further updates, revisions etc. As well as informing plan preparation itself, the content of these outputs are also very much integral to the decision-making process itself. Recognising this, and with the intention of future proofing the Local Plan the plan provides appropriate hooks to these outputs (encompassing both current outputs and accounting for any future updates). Regards Northolt Driving Range (04NO), design principles require Improved pedestrian routes to and through the site and connections to green space.	SP2.2 Climate action		Michael Pilkington		483	Individual

There needs to be better underpinning evidence for the de-designation of Green Belt (GB) and Metropolitan Open Land (MOL) and site allocations for development on current MOL and GB. If not, then no GB or MOL should be de-designated and no site allocations for developments should be made on existing GB or MOL. If Ealing is to de-designate GB or MOL and to propose developments on it, this needs to be underpinned by evidence from a Green Infrastructure Strategy (GIS). A Green Infrastructure Strategy including a Local Nature Recovery Strategy produced in collaboration with the public and local community groups interested in green spaces and nature. This should - o Build on the Biodiversity Action Plan 2022 - o Contain a thorough analysis of how all types of green and open space will be protected - o Consider how well Ealing's green spaces are currently serving ecosystem services as well as how they can be improved - o Include a detailed local open space needs assessment - o Ensure and improve connectivity of habitats and green spaces. The evidence in Green Infrastructure and Local Nature Recovery Strategy used to underpin the Local Plan. They should inform the choice of development sites as well as indications of how these sites are to be developed to ensure that Ealing's green infrastructure and ecological network is maintained and improved. Having a GIS will make the Local Plan legally compliant and sound because the London Plan 2021 in Policy G1 Green Infrastructure states that such strategies should be prepared and any development plans (such as the Local Plan) should use evidence around the green	The proposed changes to the Green Belt and Metropolitan Open Land network has been underpinned by an detailed and comprehensive two stage review and having regard to consultation feedback at Reg. 18 and Reg. 19. The absence of a GI strategy is acknowledged, although it is important to recognise that a GI strategy forms an umbrella strategy for a series of other plans, strategies and workstreams which have been published or actioned, and each of these have informed different aspects of the preparation of the Local Plan. These include: - Ealing's Indoor and Outdoor Sports Facilities Strategy published 2023 - Ealing's Biodiversity Action Plan published in 2022 - A SINC review - Local Nature Recovery Strategy – emerging and due to be published in 2025 - A Tree Strategy – 2013 - Green Belt and MOL review – Stage 1 (2022) and Stage 2 (2024) A number of these outputs will continue to evolve over the life of plan, following further updates, revisions etc. As well as informing plan preparation itself, the content of these outputs are also very much integral to the decision-making process itself. Recognising this, and with the intention of future proofing the Local Plan the plan provides appropriate hooks to these outputs (encompassing both current outputs and accounting for any future updates). The GLA has been appointed as the 'responsible authority' to produce the Local Nature Recovery Strategy (LNRS) for Greater	SP2.2 Climate action		Michael Pilkington		483	Individual
Please note that I fully endorse and support Greenshoots response.	Noted.	Policy N1: Northolt Spatial Strategy	02NO Mandeville Parkway	John Caden		484	Individual

Ealing's distinctive character 4.0.4 'Character-led growth' in the context of this Plan is a meaningless term. Proposals, including those for 'Tall Buildings' in areas of characterful low-rise housing, pay no attention to the vernacular and the presence of gigantic, overshadowing towers in the midst of predominantly low-rise retail and housing, e.g. around West Ealing Station, will have a highly detrimental effect on communities and quality of life for existing residents. There is very little evidence base for the proposals relating to Tall Buildings or the listed development sites, so the whole Plan is fundamentally unsound. For example, in the case of one of the most important sites in the borough, Ealing Town Centre, there should be a full analysis of the age, height and density of development, a proper urban design policy plus plans for infrastructure and maintenance. In 2012 the Council envisaged the town centre as a rival to White City: we now have a failing Ealing Broadway retail offer dominated by coffee shops. Plans for two vast British Land projects, 01EA and 02EA, would if implemented be likely to create lines of very high buildings facing each other over the Broadway and turning the comparatively narrow Uxbridge Road into a dark canyon. No account is taken of the high carbon impact of such vast developments, let alone of the embedded carbon in the existing buildings (some of them of comparatively recent creation, such as Ealing Broadway Centre), or the fact that the high buildings likely to replace the current ones are socially and environmentally unsustainable. <u>Unnecessary demolition is a disastrous policy</u>	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. The alleged decline of the centre is not accepted and is a matter of perception. A report into the business health of 1,000 retail centres across the UK has seen Ealing Broadway including its shopping centre rise in recent years and is now ranked at number 64. Compiled by Newmark Retail, its annual Vitality Rankings for 2024 looks at various factors to determine its ranking including retail unit vacancy rate, space being adapted for other uses, shopper spend per annum and footfall figures. See: https://www.nmrk.com/insights/market-report/newmark-retail-vitality-rankings-2024 In 2022 Ealing Broadway was ranked at number 73 while in 2019 it came in at 173. The policy is supported by technical evidence including a Town Centre Health Check.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Gill Rowley		485	Individual
The Government has specifically advised (Gove, 6 December 2021, inter alia) that housing targets are merely a starting point to inform plan-making. They are not mandatory and should not encourage buildings at densities significantly out of character or at an inappropriate scale and impact. The Local Plan disregards this, paving the way for high-rise blocks on every possible site, currently occupied or not, that will permanently change the character of this predominantly Victorian/Edwardian low-rise borough.	Noted. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). The London Plan also requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth.	SP4.3 Genuinely affordable homes		Gill Rowley		485	Individual

Conservation Areas/heritage Likewise, the fact that central Ealing is surrounded by Conservation Areas (see para. 4.2.5, where two are identified as Heritage at Risk) has had no bearing on the proposals, and heritage buildings such as Christ the Saviour church, Pitzhanger Manor and the Town Hall/Victoria Hall are totally disregarded. The proposed massive developments around these will mar or obliterate views towards them and be highly detrimental to their locations. From being key buildings of distinction in the centre of Ealing they will be reduced to quaint anomalies within the encroaching mass of featureless high-rises.	Noted. New development must respond positively to Ealing's character and seek to enhance its identity. Development will need to respond sensitively having regard to the growth and intensification themes and associated tall buildings guidance/indicative heights identified in each local character sub-areas. This is further set out in the Ealing Character Study.	Policy E2: Ealing Metropolitan Town Centre		Gill Rowley		485	Individual
Public transport Time and time again throughout the Local Plan document reference is made to the panacea of the Elizabeth Line (one example is para. 4.2.16), which is supposed to cope with passengers deriving from a gargantuan increase in population over the next 20 years. Ealing's target for housing by 2030 is 80,317 units suggesting that it will grow at the same rate as Tower Hamlets (80,947), whereas the average for all London boroughs is 30,000. (No evidence base for these population-related assumptions is cited.) How can the Elizabeth Line cope with the increased public transportation demand when it is already oversubscribed (passengers at West Ealing and Hanwell, for example, are often unable to board trains)? Other infrastructure requirements are similarly overlooked: schools, hospitals, recreational facilities, policing etc., not to mention the already serious water shortage and the abysmal sewerage management in this area.	Noted. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. Infrastructure needs are modelled variously upon population or household projections depending upon the type of provision, with health, for example, based upon GLA population projections. The local plan is subject to binding housing targets and it is not the role of the LPA to produce population projections.	SP4.1 Good Growth		Gill Rowley		485	Individual
Environment: a simple step to improve the environment, not included in the Plan, would be a policy to prevent the paving-over of front gardens (usually for parking): this could do a great deal to prevent rainwater run-off and our drains being unable to cope with water volumes.	The London Plan forms part of Ealing's Development Plan, and the Council has made a conscious effort to avoid repeating provisions contained in this document in Ealing's Local Plan. This is deemed to be unnecessary and potentially unhelpful, and future development proposals will continue to be tested against SI 13, H2, G5 and other London Plan policies (i.e. G5), which are considered to provide good policy provision already for managing proposals involving the hard standing of gardens, changes to the green cover and to secure appropriate urban greening measures.	SP2.2 Climate action		Gill Rowley		485	Individual

4.2.17 Across Ealing town its smaller centres and local parades (i.e. Northfields, The Avenue and Pitshanger Lane) are not meeting their full potential... Ealing’s priority to reimagine local centres as a network of 20-minute neighbourhoods. There is no hint of how this would come about. Will the Council be providing facilities currently lacking in these areas? The whole notion of ’20-minute neighbourhoods’ is wishful thinking, with the underlying threat of penalising anyone who wants to travel outside their immediate vicinity. If the latter is not the case, why is this not made clear? The reference to 'social hubs’ that follows is similarly meaningless. Once an area has lost its health facilities – a UK-wide trend from which Ealing is not immune – and its post office, not to mention its pubs, it can no longer operate as a social hub, or for that matter as a 20-minute neighbourhood. Does the Council have the ability to rectify such losses? Obviously not, so it should stop referring to this fantasy concept. Table E2 etc. The Plan appears to regard an alarming number of public utilities to be dispensable: car parks, including those for builders’ merchants (Wickes, Travis Perkins) and supermarkets (Hanwell Lidl), along with leisure facilities, community venues, vehicle repair and MOT centres, and so on. What possible rationale can there be for depriving the public of such resources? This utilities-extermination policy is anti-consumer, anti-business and against the interests of the community. And how does this policy fit with 20-minute neighbourhoods? Must we travel to Hounslow or Harrow for a bag of cement in future?	Noted. The key aim is to create complete and connected places, with 800m generally used as the length of an average 10-minute walk. A 20-minute neighbourhood would usually include access to public transport, health, education, employment, community, retail, culture, leisure, and green spaces. This plan aims to give people more choices about how they want to travel in their local community without a car if they want or need to.	Policy E1: Ealing Spatial Strategy		Gill Rowley		485	Individual

Policy ECP, referring to embodied carbon, should, but does not, declare a presumption for the retention and adaptation of existing buildings. Yet Table E2 in the Town Plans section proposes that Ealing Broadway Centre, built in 1985, should be demolished. This development is visually attractive and works well. The sole beneficiaries of its redevelopment would be British Land. The proposal to demolish and replace this site with ‘perimeter blocks of varied heights’ is contrary to the London Plan and Government intentions.’	Policy WLC 'Whole Life Cycle Carbon Approach' introduces locally the requirement for applicants to undertake an optioneering exercise as part of the Whole Life Cycle Carbon Assessment. The requirement to prepare Whole Life Cycle Assessment for referable applications is currently a feature of London Plan policy SI 2. Local Policy WLC extends this requirement to all major developments. The optioneering exercise seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option. The findings of this optioneering exercise should be considered alongside other planning considerations to determine the most appropriate option, including consideration of a retrofit first approach, and different building forms (heights). The ‘options’ considered should include reuse/refurb options, alongside any new build options if pursued. All options evaluated should be capable of comparison reflecting the same best practice standards. The intention is to prepare additional guidance to support the implementation of carbon optioneering. This process will allow options to be appraised objectively in the round, and is preferable to establishing a presumption.	Policy ECP: Embodied Carbon – Ealing LPA – local policy		Gill Rowley		485	Individual
Policy ENA: 'Enabling development' is ill-defined but appears to establish a principle for allowing development where planning permission would not normally be granted – for example, on MOL at Gurnell (including the flood plain). It seems to be a lazy mechanism for green-lighting development that would otherwise be refused.	Whilst proposals may be presented as enabling development, the application of this label is sometimes used loosely. Local policy ENA therefore seeks to define what is meant by enabling development in an Ealing context, and it establishes a number of key tests/principles which proposals must satisfy if an applicant is seeking to make the case for enabling development. The intention of this policy is not to promote or facilitate enabling development. It is recognised that it should be used sparingly, but if is engaged proposals must satisfy a number of key principles. Firstly it establishes that the enabling works must be led by the designation and the associated outcomes. Sites may be subject to multiple designations and applications will typically be assessed against a suite of policies, each with separate objectives and with the potential to compete for enabling support. This policy provision then is intended to assist with identifying the necessary and principal policy outcome which we are seeking to enable, which is often tied to a primary designation. It also establishes the core principle that the scale of the enabling works should be no more than is necessary to secure the outcome defined.	Policy ENA: Enabling Development – Ealing LPA – local policy		Gill Rowley		485	Individual

Missing: policies on heritage and Conservation Areas. There is no protection for heritage buildings or for Ealing’s 29 Conservation Areas, including Ealing Town Centre, Haven Green, Brentham Gardens, Grange and White Ledges, Ealing Common, Montpelier Park, Mount Park and St Stephen’s. All would appear, according to this Plan, to be fair game for developers, supported by LBE. The plan was required to have been developed with input from local communities. This has not happened, therefore the entire Regulation 19 is unsound. I fully support the comments on the Local Plan Reg. 19 submitted by Save Ealing’s Centre (SEC), Stop the Towers and GRASS.	Noted. New development must respond positively to Ealing’s character and seek to enhance its identity. Development will need to respond sensitively having regard to the growth and intensification themes and associated tall buildings guidance/indicative heights identified in each local character sub-areas. This is further set out in the Ealing Character Study.	Policy E1: Ealing Spatial Strategy		Gill Rowley		485	Individual
This is a response to the Regulation 19 Ealing Draft Local Plan, as published on 28 February 2024. I comment as a resident in the Borough for 38 years who has witnessed a significant degradation of amenity and character as a result of inappropriate development in recent years, in particular the consequences of building high-rise accommodation blocks. Overall, I fully agree with the objections raised by the umbrella group for residents’ associations Ealing Matters, about inappropriate development. Of particular concern is that the Plan continues to be fundamentally flawed by failing to address in practical and definitive terms the likely outcomes of its implementation. For example, in his introduction, Councillor Mason talks of “...ambitious ideas to capitalise on our unique connectivity and character. That will help us make Ealing an even better place to invest or start a business.” The Plan then details numerous developments mainly intended to provide additional accommodation for 80,000 more people. However, of the Plan’s 73 identified associated infrastructure schemes, 45 are simply marked as “TBC” for delivery phasing – and most of the others have nebulous “throughout the Plan” entries. Moreover, there is nothing to show quantitatively how the identified schemes will, assuming they are ever actually implemented, meet demand – and thus whether more such schemes might be needed. The infrastructure schemes also only purport to address public services; there is nothing about the consequences for local businesses. How can any Plan be rational until its effects have been identified, quantified and resolved before implementation? I very much hope that you will undertake a fundamental re-think and re-balancing of the development proposals to ensure that all development is proportionate and achievable without further detriment to the character of the	Noted. The Local Plan is also based on an extensive technical evidence base. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	General		Mandy Jutsum		486	Individual

Central Ealing Neighbourhood Forum (CENF) is a Neighbourhood Forum established under the Town and Country Planning Act 1990 and has produced a Neighbourhood Plan (NP) that has legal weight in the planning process. The NP sits beneath the NPPF, London Plan and Ealing Local Plan and must be conformant with those plans. It follows that the revised Ealing Local Plan (LP) must take into account its policies and provisions and should be developed with engagement with and input from the Forum. The following NPPF references on LP content and the process for its preparation provide the context for our responses: NPPF Para 16 (c) states that plans should ‘be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, ...’ There has been no effective engagement with communities with regard to the proposals in the LP. NPPF Para 29 states that ‘Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan.’ As above, the Neighbourhood Plan covers Ealing Town Centre and sets out policies for some of the sites in Chapter 4 of the LP. What these policies say is not reflected in that chapter. NPPF Para 132 which states that ‘Plans should, at the most appropriate level, set out a clear design vision and expectations, so	Noted. The plan has been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on design, heritage and culture. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. The Site Selection reports also informs any Development Sites whose narrative in the plan includes both contextual considerations and design principles to guide any future development proposals. The council acknowledges that there are duly made neighbourhood plans and these remain in use. See Local Plan Para 1.23 for example.	General		Tony Miller	Central Ealing	487	Community Interest Group

I agree with Ealing Matters and Stop the Towers concerns about the plan. 1. The Plan itself is verbose and repetitive. It is simply impenetrable to the vast majority of Ealing residents unfamiliar with planning jargon or issues. 2. Ealing’s housing target of more than 40,000 homes over the next 15 years is excessive and undeliverable. But if it were to be delivered, it would create unmanageable population growth of more than 80,000 people according to GLA projections. 3. The infrastructure plans to support this very high growth rate are sketchy at best. 4. The plan’s proposals for wholesale redevelopment of relatively new and serviceable buildings will exacerbate climate change. 5. Valuable areas of Metropolitan Open Land are to be lost. A new policy of ‘enabling development’ will justify developing them in the Council’s interests. 6. There are no policies to protect the Borough’s heritage. 7. Tall building heights, especially in Ealing and Acton, are excessive and unjustified. 8. There is no vision or strategy for the near total redevelopment of Ealing Metropolitan Town Centre that the Plan envisages. 9. The Plan’s 82 individual development sites have the potential to have considerable impact on the Borough and the proposals for them are totally insufficient. 10. Ealing’s proposals for monitoring the plan are no more adequate now than they have been over the past 10 years. Too many tall towers. Lack of infrastructure. Lack of open spaces.		General		Rachel Martineau		488	Individual

Further to the above. I would like to fully endorse the attached document produced by Greenshoots Racecourse Community Group. As a near resident, having lived just across the road from Mandeville Parkway for 39 years, I know only too well how precious this green space is to the local community. Any development would be seriously detrimental in so many ways to so many residents (and urban wildlife) and would be a great disservice by Ealing Council to Northolt residents. Please listen to the people who call this area home and love Mandeville Parkway. Further to my comments on the above, please see the attached photos taken on my walks on Mandeville Parkway {2 batches wre sent}. This green space was a mental health Godsend during lockdown and proved the beneficial value of green spaces for our mental health. I hope this visual statement will show how much we all benefit from Mandeville Parkway and want it to remain unspoiled and undeveloped. Images of Mandeville Parkway green space during different seasons and times of the day. Some images show blooming flowers and fruit and other images show the green space at sunset and different times of the day.	Noted.	Policy N1: Northolt Spatial Strategy	02NO Mandeville Parkway	Anita & Paul Capon		489	Individual

The latest Ealing Local Plan is very poor as, for a plan to be adopted, it should pass a series of legal tests that are consistent with achieving sustainable development after alternative strategies have been considered. The fundamental flaw in the Plan envisages accommodating the massive increase in the population up to 2038, mainly in tower blocks, whilst the climate impact of this sort of construction is much greater than low level development or renovating property and will make it impossible to meet its Net Zero target. The Plan anticipates 43,000 extra housing units, much of these as tall buildings. However, these new builds will not match with the pattern of demand, which is for more affordable housing, but the majority will be marketed to overseas investors for renting out at high levels. Everyone in the Borough will be affected if the council proceeds with its local Plan, not just those living in proximity to newly built tower blocks. The Borough is already over-crowded, hospitals and doctors’ surgeries are stretched to breaking point, public transport and roads are congested and polluted whilst green open spaces are threatened by de-designation and building. Electricity and water supplies are under severe pressure whilst sewage is regularly discharged into our waterways. Customers’ bills for services such as water will rocket, but not just to cover the cost of their own services, they will have to pay for, i.e. subsidise, capital expenditure for services to all the new flats. Unfortunately it would seem the main part of the Plan has been created by two different teams, who had no discussion with each other, so their options are never going to work.	Noted. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. Infrastructure needs are modelled variously upon population or household projections depending upon the type of provision, with health, for example, based upon GLA population projections. The local plan is subject to binding housing targets and it is not the role of the LPA to produce population projections.	General		Roland Wallace		490	Individual

I am an Ealing resident and have lived in the Borough for nearly 40 years and would like to voice my concerns regarding the draft Ealing Local Plan This plan does not appear to be sustainable and I feel will have a negative impact on the existing population. There seems to be a complete lack of vision regarding the quality of life of local residents. It does not appear to incorporate sympathetic architecture styles which will enhance the look of the Borough or substantially increasing green spaces and improving air quality. The aim to add 43,000 extra housing units will only increase the pressure on public services which are already over-stretched to near breaking point and in particular our over-crowded hospitals and doctors' surgeries which put local lives at risk. Utility services will be further stretched eg increasing the demand for electricity and water. The roads will become more overcrowded and dangerous.	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Zoe Kavanagh		491	Individual

The Home Builders Federation (HBF) is the representative body of the home building industry in England and Wales. The HBF’s member firms account for some 80% of all new homes built in England and Wales in any one year, and include companies of all sizes, ranging from multi-national, household names through regionally based businesses to small local companies. Private sector housebuilders are also significant providers of affordable homes, building 50% of all affordable homes built in the last five years, including all homes for social rent. Aspects of the spatial strategy are unsound because it is unjustified and inconsistent with London Plan and national policy. We challenge aspects of the spatial strategy. We challenge the Council’s reading of the London Plan and its interpretation contained in paragraph 3.6 of the draft Local Plan. This implies, according to the draft Local Plan, that the London Plan prioritises development in the following three types of places: — focus growth in opportunity areas and growth corridors; — focus growth within town centres first; and — prioritise strategic and local regeneration areas. This is an overly narrow interpretation of the London Plan seemingly in an attempt to justify lower levels of development in some parts of the borough, such as Hanwell and Perivale, despite the very good levels of public transport accessibility in these and other areas. In fact, the Good Growth section of the London Plan says this at paragraphs 1.2.4 and 1.2.5: 1.2.4 Making the best use of land means directing growth towards the most accessible and well-connected places, making the most	Noted. The London Plan is an integral part of Ealing's LPA's local development plan so there is no need to repeat or duplicate polcies or text in the London Plan including in this case Policy GG2. The policy at D says that a design led approach must be adopted to determine the optimum capacity of sites and the local plan seeks to direct development to appropriate geographies. in any case the highlighted text is not policy but seeks to help set the scene.	General		James Stevens	House Builder	494	Developer

Policy SP2: Tackling the climate crisis Elements of this policy, particularly Part D, conflict with national policy and the plan agreed between government, housebuilders and product manufacturers on a feasible pathway to net zero carbon homes from 2030. The Minister of State for Housing, Lee Rowley has in a statement dated 13 December 2023 that: “the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale.” In view of the other pressing challenges facing the Council, not least the struggle it faces in meeting the housing needs of its citizens, and the housing needs of Londoners more generally (because London constitutes a single housing market area), setting standards ahead of the Building Regulations would be unwise. There is an agreed plan as part of the Building Regulations to deal with the energy emissions of new homes. The plan to deliver the required number of homes needed within Ealing is far more uncertain. As paragraph 2.9 of the draft Local Plan observes: “Over the past decade (2011 to 2021), Ealing’s population increased by 8.5%, a higher rate of population growth than both the London and England rates over the same period. All of Ealing’s towns have experienced population growth, with the greatest proportional increases in Ealing and Southall and to a lesser extent in Northolt. This translates into greater demand for housing and social infrastructure across the borough. Adding to	The proposed policies as revised have been underpinned by evidence - namely the 'Delivering Net Zero' study. This has tested the proposed policies in terms of technical feasibility and viability. The latter has also been tested in the round alongside the full suite of local plan policies as part of a whole plan viability assessment. The revised policy approach is considered to be justified, effective and consistent with national policy objectives. The December 2023 WMS does not prevent Ealing from setting its own local policy which utilise an energy-based metric which is distinct from the Part L framework. The 2023 WMS is policy guidance only, it does not constitute a default instruction, and it can be deviated from, where robust evidence is provided (e.g. the Delivering Net Zero' study).	SP2.2 Climate action			James Stevens	House Builder	494	Developer

SP4.1 Good Growth: The policy is unsound because it is unjustified and ineffective. The policy fails to provide an effective overview of where residential development in the borough will be supported. We note Part B of the policy. This states: B. Directing development to sustainable locations that are well connected to sustainable transport modes or within close proximity to town centres, and thus deliver patterns of land use that reduce the reliance on the car and facilitate making shorter and regular trips by walking and cycling. This is in conformity with the London Plan, but this is undermined by Figure SS3: London Borough of Ealing key diagram which omits many rail and tube stations like Drayton Green, Castle Bar Park, South Greenford, and Greenford tube station. This would appear to limit development opportunities. Also, the town centre areas are drawn too narrowly, disregarding London Plan policy that encourages development, especially small sites development within 800m of a town centre boundary. It is unclear where residential development will be supported in the borough. Figure SS3 is limited in terms of providing an indication of where residential development would be permissible.	Noted. The Mayor of London has not raised this concern in his letter of general conformity. It should be borne in mind that the key diagram is a diagrammatic representation and more detail is providing in each of the seven town plans.	SP4.1 Good Growth		James Stevens	House Builder	494	Developer

SP4.3 Genuinely affordable homes. The policy is unsound because it is ineffective. This policy would appear to provide the primary statement about the housing requirement in the plan. Part A will need to provide more clarity about the total housing requirement and the period over which this is intended to be delivered. Para. 0.57 states that the plan will operate over a 15-year period. First, it is unclear what the timeframe of the plan will be. Without this, it is difficult for representors to assess whether the housing requirement is the right one and will be delivered in time. Assuming the Local Plan is adopted in 2025, as per the Council's statement in paragraph 0.49, are we meant to assume that the plan is intended to operate over the period 2025 to 2040? We do agree that the full London Plan requirement for Ealing on 21,570 homes should be delivered between 2019/20 and 2028/29. We also agree that it is appropriate to roll forward the annual average figure of 2,157 dwelling per annum for the additional years of the plan up to the end (which might be 2040). However, until we know the base date of the local plan, it is impossible for us to assess what the residual housing requirement is taking into account the under-delivery (or potentially over-delivery) of net additional homes in Ealing since 2019/20. It is necessary for the Council to set out clearly the housing requirement for Ealing, taking into account delivery of net additional homes against the London Plan target since 2019/20 and accounting for the balance to be delivered by this plan up to 2028/29. It will then need to add the 2,157 homes a year that will then need to be	Ealing's Local Plan is intended to guide development over a 15 year period. The Regulation 19 plan confirms that this covers the period from 2024 to 2039. This also aligns with supporting evidence and namely the latest iteration of the Housing Trajectory (due to be published early 2025). The emerging Local Plan derives its housing requirement from the 2021 London Plan. London Plan policy H1 establishes a delivery target of 21,570 net additional units for Ealing LPA over the 10 year period 2019/20 to 2028/29. Any shortfall or surplus accumulated prior to this date (31st March 2019) is assumed to have been accounted in determining target and isn't rolled forward. Any deficit or surplus in delivery against the target arising since the 1st April 2019 is however calculated and is added to the outstanding requirement. As reported 6,366 units were completed between 2019/20 and 2022/23 against a target of 8,628 for that period giving a shortfall of 2,262. The basic calculated requirement for 2023/24 to 2038/39 is 34512, which when added to the shortfall gives a current remaining requirement of 36,774. The latest iteration (due to be published early 2025) of the trajectory and 5 YHLS position statement both use the 1st April 2024 as the point of break between future and past activity, with anything expected to occur from the 1st April 2024 onwards being treated as occurring in the future, and anything occurring between 1st April 2019 and 31st March 2024 currently being treated as past activity. This current 'split' reflects the latest available information on housing completions which have been verified up to the 31st March 2024. Unlike the plan itself however the Trajectory and 5YHLS position statement operate as live documents, and will be	SP4.3 Genuinely affordable homes		James Stevens	House Builder	494	Developer

Five-year housing land supply We have considered the Council’s paper: Five Year Housing Land Supply Position Statement & Housing Trajectory, November 2023. This identifies a need for 15,656 net additional dwellings over the next five years, including a 20% buffer. We agree that the shortfall accumulated since the London Plan was adopted should be included in the calculation. We do not dispute the figure. We are concerned that there will be a shortfall owing to a shortage of deliverable sites in the next five years. As the Council observes in the Executive Summary: “When measured against the cumulative requirement the identified supply equates to 75% of this total, with an absolute shortfall of 3,935 units. This equates to 3.7 years of supply.” The Council argues that the lack of capacity in the short-term will be offset by an increase in supply in years 3 to 11 of the plan. Importantly, the Council observes, the London Plan requirement will be delivered in full by 2028/29. This would not be an unreasonable position if the supply of housing across London when considered as a whole (and London is a single housing market area) was in a less parlous state. Unfortunately, delivery in London is significantly below the annual average required of 52,000 homes a year, let alone the assessed need for 66,000 homes. As the London Plan Review Report of Expert Advisers, January 2024, observes in its summary: 2. No one disputes that London is experiencing a significant housing crisis. Over the long term, the supply of new homes has not kept pace with increases in jobs, population and housing demand. The	Whilst the shortage of deliverable supply over the next five years is acknowledged, it should be borne in mind that the Council has adopted a fairly precautionary approach when determining which large sites qualify as ‘deliverable’, i.e. those whose capacity is assigned to the 'next five years'. Only capacity from sites benefitting from full permission have been included, when in reality some capacity might be delivered during that period from sites which are currently less advanced in the planning cycle. It is possible then that the identified deliverable capacity might underestimate what supply could potentially be delivered within that window of time. As detailed in the report itself, the position when examined over a longer timeframe, is more positive. Over the full 19 year trajectory period delivery/supply is expected meet the cumulative requirement with a modest contingency. Whilst it is helpful to examine the position over a longer timeframe to even out the inevitable fluctuations that can occur from year to year, the use of a longer timeframe also poses challenges. This is particularly evident for the latter part of the trajectory period where it is difficult to comprehensively identify which sites might be available and suitable that far into the future. As a consequence it is probable that the trajectory undercounts what capacity might be delivered over the life of the plan. The need to allocate a range of sites (including by size) is recognised, and this is reflected through the inclusion of a number of small sites in the suite of allocations. A range of factors have informed the decision to allocate sites, but ultimately sites are	SP4.3 Genuinely affordable homes		James Stevens	House Builder	494	Developer

Paragraph 3.53: Industrial Space The paragraph sets out how the Council will protect industrial land for continuing industrial use. We acknowledge the importance of industrial land in Ealing and how much of this, especially the Strategic Industrial Land (SIL), contributes to the performance of the wider London economy. We would question, however, whether it is necessary to take such a protective approach to industrial land of the various types to the exclusion of considering other options. An approach which at least considered the merits of converting SIL, locally significant industrial sites (LSIS) and non-designated industrial land where intensification and co-location with uses was proposed, reflecting the approach in the London Plan at Policies H1, E4 and E7, would be beneficial. London Plan policy E7, part B discusses how “certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified to provide additional industrial capacity. Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses...” Therefore, while we acknowledge the importance of safeguarding London’s industrial capacity, there could be opportunities through intensification to provide housing.	A clear approach to intensification in line with demonstrated local needs and the london plan is set out in policies E3-E6	SP4.2 Decent living incomes		James Stevens	House Builder	494	Developer

Strategic place interventions (pages 87-90) This section is unsound in places because it conflicts with the London Plan and national policy. We question why some of the places are not earmarked for residential development when it is a particular focus of the London Plan to support residential development in all town centres and locations well by public transport. For example, Policy H1 of the London Plan, part B, 2 seeks to, and we quote in full: optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity: a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses d) the redevelopment of surplus utilities and public sector owned sites e) small sites (see Policy H2 Small sites) f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London’s economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution. Instead, this section of the Plan appears to set out a more restrictive	The plan sets out a clear spatial approach to development across the borough proritising the most sustainable locations and promoting development across all of the seven towns.	Policy SP4: Creating good jobs and growth		James Stevens	House Builde	494	Developer

Chapter Four: Town Plans This section of the plan is unsound because it is ineffective in terms of articulating the Council’s approach to supportive the delivery of housing on small sites. The local plan is also contrary to national and London Plan policy in this respect. Increasing housing delivery on small sites is a strategic priority for the London Plan (set out in policy H2). Ealing is expected to provide 4,240 dwellings on small sites. This chapter of the draft Local Plan is unclear how the town plans will support this delivery. Although there is a small sites policy later in the plan (Policy SSC) this is about the contribution of small sites to affordable housing, not a policy to assist delivery, including the identification and allocation of small sites. We note that each of the town spatial strategy policies say very little about where housing will be supported, and nothing about small sites. None of the town plans provide an indication of how many homes will be provided in each location. It would be helpful if the Council provided this indication. Paragraph 4.0.12 This paragraph states that the town plans will include developments sites (site allocations) but there is no mention of how, or whether, the Council will expect small sites to be delivered in these locations, whether on allocated sites or as windfall. Delivering homes on small sites equivalent to a tenth of the housing requirement on sites of one hectare or less is a national policy requirement (NPPF, para. 70). The London Plan establishes a target for homes to be delivered on sites of a quarter hectare or less. Part A of London Plan policy H2 requires boroughs to proactively	Whilst the London Plan establishes a minimum small site target it must be recognised that a significant portion of any delivery against this capacity figure will come from windfall opportunities. There can be no expectation therefore that each authority is required to identify and allocate an equivalent number of small sites capable of meeting that target. The NPPF employs a different definition of small sites to that used locally and in the London Plan. Based on the NPPF definition which employs a size threshold of one hectare or larger, in excess of 10% of the allocations would quality as small sites. Beyond the identification of select sites, and other policies targeting all scales of development, the Council has not identified the need for any further policy cover locally in respect of managing small site opportunities. Policy H2 of the London Plan is considered to deal with this comprehensively already. The spatial distribution of future housing delivery (measured by capacity) is detailed at table 8 of the 5 year housing land supply position statement and housing trajectory. Figures are given by each of the seven towns and also broken down by source type. This includes the anticipated contribution from small site for each town. This table will be updated in future iterations of this report. As a more general observation the Council has intentionally chosen not confirm its supply position via the Local Plan itself, as any conclusion in this regard can only ever represent a snapshot in time, and therefore it is considered unhelpful to ‘fix’ this in the plan itself. National guidance is clear that there is a need for LPAs	SP4.3 Genuinely affordable homes		James Stevens	House Builder	494	Developer

Policy A1: Acton Spatial Strategy The policy is unsound because it is ineffective in terms of supporting housing delivery. Consequently it is contrary to national policy and the London Plan. It is unclear where residential schemes, including small sites, will be supported. Although parts B and C provide a clue, it is unclear if the Council intends to implement the aims of policies H1 and H2 of the London Plan through its local plan, which is to encourage the supply of housing in the town centres, around transport nodes, within PTALS 3-6 and within 800m of town centre boundaries and transport nodes. This policy should be amended to include a reference to how the Council will support residential schemes that comply with policy H1 and H2 of the London Plan, including the specifics of London Plan policy H1, B, 2, a). The Council should also consider extending this radius to 1km as it will be perfectly feasible for many residents to walk or cycle a kilometre to a town centre or public rail station / tube. We note that paragraph 4.1.27 wishes to encourage active travel. Acton Development Sites We note the allocations. This is helpful. One - Acton – 04AC Builders Merchants Bollo Bridge Road – is a site of 0.19ha in size. However, one site is too few for this area of the borough.	The focus around the seven towns is likely to facilitate a fairly dispersed pattern of growth. With some exceptions (namely environmental designations and SIL) the Local Plan adopts a fairly open approach to accommodating new residential development. The locational attributes mentioned have clearly informed target setting and directly impinge on the scale of development, but there is no intention to preclude residential development outside of such areas. Policy A1 identifies the main focus areas of growth in Acton, and is likely to influence the scale of development coming forward in certain areas, it avoids setting or emphasising criteria which might limit spatially where development should go. The Local Plan seeks to avoid adding additional prescription or emphasis which might be read as a rigid sequential approach. London Plan Policy H2 does not preclude or resist small site opportunities from coming forward which are beyond 800m of a town centre boundary or station, and it is not considered that much would be gained from extending this to 1km in the context of planning decisions, although it is acknowledged that the use of variable distances may be useful in the context of capacity studies and plan making. The need to allocate a range of sites (including by size) is recognised, and this is reflected through the inclusion of a number of small sites in the suite of allocations. A range of factors have informed the decision to allocate sites, but ultimately sites are allocated where value is added.	Policy A1: Acton Spatial Strategy		James Stevens	House Bui	494	Developer

Policy E1: Ealing Spatial Strategy The policy is unsound because it is ineffective in terms of supporting housing delivery. Consequently it is contrary to national policy and the London Plan. It is unclear where residential schemes, including small sites, will be supported in Ealing. This policy should be amended to include a reference to how the Council will support residential schemes that comply with policy H1 and H2 of the London Plan, including the specifics of London Plan policy H1, B, 2, a). The Council should also consider extending this radius to 1km as it will be perfectly feasible for many residents to walk or cycle a kilometre to a town centre or public rail station / tube. The Council intends to support active travel, as illustrated by part N of the policy and supporting paragraphs 4.2.25 and 4.2.26. Ealing Development Sites We note that there are several small sites allocated. This is helpful. It would be helpful if the Council could provide an estimate of how many dwellings would be provided on these allocations.	The focus around the seven towns is likely to facilitate a fairly dispersed pattern of growth. With some exceptions (namely environmental designations and SIL) the Local Plan adopts a fairly open approach to accommodating new residential development. The locational attributes mentioned have clearly informed target setting and directly impinge on the scale of development, but there is no intention to preclude residential development outside of such areas. Policy E1 identifies the main focus areas of growth in Ealing and is likely to influence the scale of development coming forward in certain areas, it avoids setting or emphasising criteria which might limit spatially where development should go. The Local Plan seeks to avoid adding additional prescription or emphasis which might be read as a rigid sequential approach. London Plan Policy H2 does not preclude or resist small site opportunities from coming forward which are beyond 800m of a town centre boundary or station, and it is not considered that much would be gained from extending this to 1km in the context of planning decisions, although it is acknowledged that the use of variable distances may be useful in the context of capacity studies and plan making. The need to allocate a range of sites (including by size) is recognised, and this is reflected through the inclusion of a number of small sites in the suite of allocations. A range of factors have informed the decision to allocate sites, but ultimately sites are allocated where value is added.	Policy E1: Ealing Spatial Strategy			James Stevens	House Builder	494	Developer

Policy G1: Greenford Spatial Strategy The policy is unsound because it is ineffective in terms of supporting housing delivery. Consequently it is contrary to national policy and the London Plan. It is unclear where residential schemes, including small sites, will be supported in Greenford. This policy should be amended to include a reference to how the Council will support residential schemes that comply with policy H1 and H2 of the London Plan, including the specifics of London Plan policy H1, B, 2, a). The Council should also consider extending this radius to 1km as it will be perfectly feasible for many residents to walk or cycle a kilometre to a town centre or public rail station / tube. Greenford Development Sites We note one small site has been allocated – 03GR 370–388 Oldfield Lane North. It would be helpful if the Council could provide an estimate of how many dwellings might be provided on this allocation.	The focus around the seven towns is likely to facilitate a fairly dispersed pattern of growth. With some exceptions (namely environmental designations and SIL) the Local Plan adopts a fairly open approach to accommodating new residential development. The locational attributes mentioned have clearly informed target setting and directly impinge on the scale of development, but there is no intention to preclude residential development outside of such areas. Policy G1 identifies the main focus areas of growth in Greenford and is likely to influence the scale of development coming forward in certain areas, it avoids setting or emphasising criteria which might limit spatially where development should go. The Local Plan seeks to avoid adding additional prescription or emphasis which might be read as a rigid sequential approach. London Plan Policy H2 does not preclude or resist small site opportunities from coming forward which are beyond 800m of a town centre boundary or station, and it is not considered that much would be gained from extending this to 1km in the context of planning decisions, although it is acknowledged that the use of variable distances may be useful in the context of capacity studies and plan making. The need to allocate a range of sites (including by size) is recognised, and this is reflected through the inclusion of a number of small sites in the suite of allocations. A range of factors have informed the decision to allocate sites, but ultimately sites are allocated where value is added.	Policy G1: Greenford Spatial Strategy		James Stevens	House Builder	494	Developer

Policy H1: Hanwell Spatial Strategy The policy is unsound because it is ineffective in terms of supporting housing delivery. Consequently it is contrary to national policy and the London Plan. It is unclear where residential schemes, including small sites, will be supported in Hanwell. This policy should be amended to include a reference to how the Council will support residential schemes that comply with policy H1 and H2 of the London Plan, including the specifics of London Plan policy H1, B, 2, a). The Council should also consider extending this radius to 1km as it will be perfectly feasible for many residents to walk or cycle a kilometre to a town centre or public rail station / tube. We note that supporting paragraphs 4.4.27 and 4.4.28 provide an indication but it is unclear if residential schemes will be supported outside of the allocations made. The Council observes that this is one of least affordable areas in the district (para. 4.4.10). Para. 4.4.15 observes the excellent public transport provision to the north of the area. Despite this, very few allocations have been made in this location. Hanwell Development Sites We note that two small sites are allocated. This is helpful but the spatial policy should express support for other windfall development in this location given its good connectivity and the need for housing. Ideally more small sites should be allocated.	The focus around the seven towns is likely to facilitate a fairly dispersed pattern of growth. With some exceptions (namely environmental designations and SIL) the Local Plan adopts a fairly open approach to accommodating new residential development. The locational attributes mentioned have clearly informed target setting and directly impinge on the scale of development, but there is no intention to preclude residential development outside of such areas. Policy H1 identifies the main focus areas of growth in Hanwell and is likely to influence the scale of development coming forward in certain areas, it avoids setting or emphasising criteria which might limit spatially where development should go. The Local Plan seeks to avoid adding additional prescription or emphasis which might be read as a rigid sequential approach. London Plan Policy H2 does not preclude or resist small site opportunities from coming forward which are beyond 800m of a town centre boundary or station, and it is not considered that much would be gained from extending this to 1km in the context of planning decisions, although it is acknowledged that the use of variable distances may be useful in the context of capacity studies and plan making. The need to allocate a range of sites (including by size) is recognised, and this is reflected through the inclusion of a number of small sites in the suite of allocations. A range of factors have informed the decision to allocate sites, but ultimately sites are allocated where value is added.	Policy H1: Hanwell Spatial Strategy		James Stevens	House Builder	494	Developer

Policy N1: Northolt Spatial Strategy The policy is unsound because it is ineffective in terms of supporting housing delivery. Consequently it is contrary to national policy and the London Plan. It is unclear where residential schemes, including small sites, will be supported in Northolt. We note parts B (i) and G, but outside of this it is unclear where new residential development will be supported. This policy should be amended to include a reference to how the Council will support residential schemes that comply with policy H1 and H2 of the London Plan, including the specifics of London Plan policy H1, B, 2, a). The Council should also consider extending this radius to 1km as it will be perfectly feasible for many residents to walk or cycle a kilometre to a town centre or public rail station / tube. We note that supporting paragraphs 4.4.27 and 4.4.28 provide an indication but it is unclear if residential schemes will be supported outside of the allocations made. We acknowledge that the public transport connections are poorer, but those locations that are in line with the London Plan policies should be supported at the very least by a reference to this is the policy. Part D of the policy also explains the Council’s plans to improve transport connectivity, so this would also provide opportunities. As para. 4.5.29 observes, this is a part of the borough characterised by low density suburban residential development, so it is an area suitable for further housing developments, including the ‘incremental densification’ envisaged by the London Plan at paragraph 4.2.4. Paragraph 4.2.2 of the London Plan expects: increasing housing provision in accessible parts of outer London to help address the substantial housing need in these areas and deliver market homes in more affordable price brackets. Despite the poorer levels of public transport in this location, large parts of this location	The focus around the seven towns is likely to facilitate a fairly dispersed pattern of growth. With some exceptions (namely environmental designations and SIL) the Local Plan adopts a fairly open approach to accommodating new residential development. The locational attributes mentioned have clearly informed target setting and directly impinge on the scale of development, but there is no intention to preclude residential development outside of such areas. Policy N1 identifies the main focus areas of growth in Northolt and is likely to influence the scale of development coming forward in certain areas, it avoids setting or emphasising criteria which might limit spatially where development should go. The Local Plan seeks to avoid adding additional prescription or emphasis which might be read as a rigid sequential approach. London Plan Policy H2 does not preclude or resist small site opportunities from coming forward which are beyond 800m of a town centre boundary or station, and it is not considered that much would be gained from extending this to 1km in the context of planning decisions, although it is acknowledged that the use of variable distances may be useful in the context of capacity studies and plan making. The need to allocate a range of sites (including by size) is recognised, and this is reflected through the inclusion of a number of small sites in the suite of allocations. A range of factors have informed the decision to allocate sites, but ultimately sites are allocated where value is added.	Policy N1: Northolt Spatial Strategy			James Stevens	House Builder	494	Developer

Policy P1: Perivale Spatial Strategy The policy is unsound because it is ineffective in terms of supporting housing delivery. Consequently it is contrary to national policy and the London Plan. It is unclear where residential schemes, including small sites, will be supported in Perivale. We note parts B (i) and G, but outside of this it is unclear where new residential development will be supported. This policy should be amended to include a reference to how the Council will support residential schemes that comply with policy H1 and H2 of the London Plan, including the specifics of London Plan policy H1, B, 2, a). The Council should also consider extending this radius to 1km as it will be perfectly feasible for many residents to walk or cycle a kilometre to a town centre or public rail station / tube. We note that the area is characterised in part, by low-density residential development. This is an area that would lend itself to incremental densification in line with the aims of the London Plan. Improving public transport connectivity in line with Part D of the draft Local Plan will help to increase these opportunities. As with the other locations, it would be helpful if the Council provided an indication of how many homes this location is expected to provide. Perivale Development Sites The allocations are relatively small in number – only four. There is one small site allocation. This is welcome, but one is too few for this area, given its character. More small sites should be identified and allocated if possible.	The focus around the seven towns is likely to facilitate a fairly dispersed pattern of growth. With some exceptions (namely environmental designations and SIL) the Local Plan adopts a fairly open approach to accommodating new residential development. The locational attributes mentioned have clearly informed target setting and directly impinge on the scale of development, but there is no intention to preclude residential development outside of such areas. Policy P1 identifies the main focus areas of growth in Perivale and is likely to influence the scale of development coming forward in certain areas, it avoids setting or emphasising criteria which might limit spatially where development should go. The Local Plan seeks to avoid adding additional prescription or emphasis which might be read as a rigid sequential approach. London Plan Policy H2 does not preclude or resist small site opportunities from coming forward which are beyond 800m of a town centre boundary or station, and it is not considered that much would be gained from extending this to 1km in the context of planning decisions, although it is acknowledged that the use of variable distances may be useful in the context of capacity studies and plan making. The need to allocate a range of sites (including by size) is recognised, and this is reflected through the inclusion of a number of small sites in the suite of allocations. A range of factors have informed the decision to allocate sites, but ultimately sites are allocated where value is added.	Policy P1: Perivale Spatial Strategy		James Stevens	House Builders	494	Developer

Policy S1: Southall Spatial Strategy The policy is unsound because it is ineffective in terms of supporting housing delivery. Consequently it is contrary to national policy and the London Plan. It is unclear where residential schemes, including small sites, will be supported in Perivale. We note parts B (i) and G, but outside of this it is unclear where new residential development will be supported. This policy should be amended to include a reference to how the Council will support residential schemes that comply with policy H1 and H2 of the London Plan, including the specifics of London Plan policy H1, B, 2, a). The Council should also consider extending this radius to 1km as it will be perfectly feasible for many residents to walk or cycle a kilometre to a town centre or public rail station / tube. This is a location identified as one of London's Major Centres (part B of the policy). We note paragraph 4.7.32 which observes: 4.7.32 Southall is experiencing the highest population growth in the borough and will require additional housing provision to meet its future needs. It also suffers from high levels of deprivation and poverty. Access to genuinely affordable housing will be critical to addressing local needs. The Council should provide an indication of the total number of homes to be provided at Southall. Southall Development Sites Several sites are allocated but only one (the Hambrough Tavern) is for a residential scheme that is smaller than a quarter hectare. More small sites should be allocated.	The focus around the seven towns is likely to facilitate a fairly dispersed pattern of growth. With some exceptions (namely environmental designations and SIL) the Local Plan adopts a fairly open approach to accommodating new residential development. The locational attributes mentioned have clearly informed target setting and directly impinge on the scale of development, but there is no intention to preclude residential development outside of such areas. Policy S1 identifies the main focus areas of growth in Southall and is likely to influence the scale of development coming forward in certain areas, it avoids setting or emphasising criteria which might limit spatially where development should go. The Local Plan seeks to avoid adding additional prescription or emphasis which might be read as a rigid sequential approach. London Plan Policy H2 does not preclude or resist small site opportunities from coming forward which are beyond 800m of a town centre boundary or station, and it is not considered that much would be gained from extending this to 1km in the context of planning decisions, although it is acknowledged that the use of variable distances may be useful in the context of capacity studies and plan making. The need to allocate a range of sites (including by size) is recognised, and this is reflected through the inclusion of a number of small sites in the suite of allocations. A range of factors have informed the decision to allocate sites, but ultimately sites are allocated where value is added.	Policy S1: Southall Spatial Strategy		James Stevens	House Builder	494	Developer
Comment overall Overall, the Council has managed to allocate some small sites of a quarter hectare in size or less – ten in number we believe. This is helpful to a degree, but it is unclear how many dwellings these small site allocations will provide, and therefore, if the Council is doing enough to support housing supply on small sites. As observed previously, national policy requires that a tenth of a council's housing requirement is provided on small sites through allocations and/or the brownfield register. National policy also cautions against relying too much an extent on windfall supply (NPPF, para. 72) although the London Plan is more lenient in this regard (para. 4.2.3).The draft Local Plan needs to be amended to encourage residential schemes on small sites in all the above locations, by including reference to the London Plan policy.	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on design, heritage and culture. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. The Mayor of London has not raised objections to this approach. Small sites constitute an inherent part of Ealing's housing capacity and delivery target as set out in the London Plan Policy H2.	SP4.3 Genuinely affordable homes		James Stevens	House Builder	494	Developer

Policy HOU: Affordable Housing – Ealing LPA – local policy Part C of the policy is unsound because it is ineffective and unjustified. Part C raises the qualifying threshold for applicants to benefit from the faster-track route to planning permission from 35 per cent affordable housing in the London Plan (policy H5) to 40 per cent. In view of the very poor level of delivery of homes across London as a whole against the London Plan targets (see the Government’s Report on Housing Delivery in London) – and London is a single housing market area, so the consequences of poor delivery across London does have consequences for Ealing – it is unjustified to increase the burden on housing development when the Council should be exploring ways to incentivise it further. The Threshold Policy in policy H5 of the London Plan is intended to act as an incentive to make it easier and faster for housebuilders to secure planning permission by avoiding the need for lengthy and involved discussions about scheme viability so long as the applicant commits to providing 35% affordable housing on a scheme while also following the council’s favoured tenure split. Raising this to 40 per cent erodes any benefit potentially increasing the number of schemes that will have to be tested for viability and the new conditions relating to early, mid and late-stage reviews means that the Council’s policy will be more of a hindrance than a help. The amount of time it takes SME housebuilders to agree a S106 with local authorities is a growing matter of concern. The complexity of planning policy in London will require even more local authority officer time to be devoted to scrutinising the terms of the affordable	The policy is a necessary step toward meeting affordable housing need and has been assessed as viable in the whole plan viability assessment.	Policy HOU: Affordable Housing – Ealing LPA – local policy			James Stevens	House Builder	494	Developer

Policy SSC: Small Sites Contribution – Ealing LPA – local policy The policy is unsound because it is contrary to national policy. It is unclear how the Ealing draft Local Plan is supporting housing delivery on small sites. First, there is no reference in the draft Local Plan to the small sites target in the London Plan (policy H2) and the smalls sites target (Table 4.2 of the London Plan) and how the Council intends to implement this through the Local Plan. London Plan policy H2, part B (3) requires, among other things, for the boroughs to: 3) identify and allocate appropriate small sites for residential development. Second, although some small sites allocations have been made, it is unclear how many dwellings the several small site allocations will provide, and therefore, if the Council is doing enough to support housing supply on small sites. For example, one could conclude that the Council is relying on windfall supply to deliver most of its small sites housing requirement. The approach to contributions for affordable housing from small sites is unsound because it is contrary to national policy. The policy seeks contributions to affordable housing from minor residential development. National policy is opposed to contributions from minor residential development (NPPF, para. 65). The purpose of this policy is to assist small developers and encourage more housing delivery on small sites. The policy will cause particular difficulties for smaller housebuilders. A report by Lichfields for Pocket Living released in September 2020 entitled <i>Small Sites: Unlocking housing delivery</i> found that the	The policy is a necessary step toward meeting affordable housing need and has been assessed as viable in the whole plan viability assessment.	Policy SSC: Small Sites Contribution – Ealing LPA – local policy		James Stevens	House Builder	494	Developer

Older Persons Housing The draft Local Plan is unsound because it omits a policy on the supply of housing for older people. This is contrary to national and London Plan policy. The NPPF at paragraph 60 requires local plans to support the supply of homes, including homes that meet the needs of specific groups. The London Plan policy H13, Part A requires the London boroughs to: “work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing”. The draft Local Plan does not include a policy to support the delivery of older persons housing in Ealing. If it is the Council’s intention to defer to the London Plan it would be helpful if the Local Plan said this. We note that the Council is keen to support the provision of multi-generational housing, as the spatial plan for Southall refers to this. The London Plan policy H13 sets benchmark targets in Table 4.3 for the London boroughs for the supply of older persons housing. The figure for Ealing is for 200 units of older persons housing per year. This is not a binding target, but a benchmark against which Ealing can measure the extent to which it is supporting the supply of housing for older people. The Ealing Local Plan should refer to this policy and target. The draft Ealing Local Plan should include a policy to support the supply of older persons housing. The draft Ealing Plan has other policies based on the London Plan – like urban greening - so there is no reason why this one should be omitted.	Support for specialist housing is set out in SP3.3 K.	SP4.3 Genuinely affordable homes		James Stevens	House Builder	494	Developer

Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation Part F is unsound because it is unjustified. Part F goes further than national policy by stipulating biodiversity net gain (BNG) of 20 per cent. The Planning Practice Guidance advises (paragraph: 006 Reference ID: 74-006-20240214): Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented. The viability assessment demonstrates the impact of this policy, and the urban greening factor, on residential developments where the starting residual land value is low (see Table 6.30.1 on page 56 and para. 6.31). This would mean that many developments where sales values are lower would be compelled to enter into negotiations with the Council in order to suspend delivery of another policy objective to secure an implementable scheme. One must also be aware that this modelling does not assess the impact of net zero carbon (operational and embodied) so the impact on viability is likely to be even worse. Given the grievous shortfall in housing delivery in London generally, and a shortfall in Ealing specifically, this is not an appropriate policy at this time. The Council should adhere to the national advised rate of 10 per cent.	Noted. It is acknowledged that the National Planning Practice Guidance on BNG seeks to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission. Defra’s own Impact Assessment indicated that the majority of costs associated with biodiversity net gain are incurred to reach a no net less position. The costs associated with moving from 10 to 20% is therefore considered to be marginal. However, the NPPG was published after considerable delays and only on February 14th 2024 (with updates on May 1st 2024) . This was after the Regulation 19 Local Plan and associated evidence base had been finalised ahead of the Full Council meeting held on February 21st 2024 and the beginning of the consultation period that ran from February 28th 2024. The council now acknowledges that additional time and further evidence is needed to prepare evidence to justify a rationale for pursuing a higher BNG percentage target. Therefore, the policy has been modified accordingly and a revised policy potentially containing a higher target will be considered as part of the next Local Plan review.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation			James Stevens	House Builder	494	Developer

Policy OEP: Operational Energy Performance –Ealing LPA –local policy The policy in relation to operational energy to be net zero carbon is unsound because it is contrary to national policy. There is a stepped programme to reach zero carbon homes by 2030. Housebuilders are required to build homes that are zero carbon ready by 2025 (i.e. they are ready to operate alongside the decarbonisation of the national grid), but they are not required to be fossil fuel free from now until then. This would be challenging in the extreme. The Housing Minister, Lee Rowley, in his statement to parliament on 13 December 2023 has written: A further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes. The Minister continues: In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a wellreasoned and robustly costed rationale that ensures:	Tackling the climate crisis is one of three core themes underpinning the plan. The proposed policies as revised have been underpinned by evidence - namely the 'Delivering Net Zero' study. This has tested the proposed policies in terms of technical feasibility and viability. Chapter 9 of the DNZ study provides detailed cost modelling for the various archetypes and scenarios. This demonstrated that policy option 2 (which Ealing's Local Plan policy OEP models) would result in modest uplift in construction costs of around 1% to 4% relative to a Part L baseline. Viability has also been tested in the round alongside the full suite of local plan policies as part of a whole plan viability assessment. The revised policy approach is considered to be justified, effective and consistent with national policy objectives. The December 2023 WMS does not prevent Ealing from setting its own local policy which utilise an energy-based metric which is distinct from the Part L framework. The 2023 WMS is policy guidance only, it does not constitute a default instruction, and it can be deviated from where robust evidence is provided. The WMS does not constrain or limit the extent of the duty in section 19(1A) of the Planning and Compulsory Purchase Act 2004.	Policy OEP: Operational Energy Performance –Ealing LPA –local policy			James Stevens	House Builder	494	Developer

Policy ECP: Embodied Carbon – Ealing LPA – local policy The policy in relation to embodied carbon is unsound because it is contrary to national policy. This policy should not a priority for the Council in view of the poor rate of housing delivery in London and the shortfall in Ealing, plus the falling level of new approvals in London. The Housing Minister had advised against local authorities setting targets that exceed the Building Regulations in his statement of 13 December 2023. This policy requirement will have an adverse impact on development viability, as illustrated by the viability assessment. As the report observes at para. 6.35, the combination of the policies for operational and embodied energy will have a deleterious effect on viability especially in locations where residual land values are low: The impact of this scenario on the residual land values is higher, with a typical reduction of between circa 13% and 40% from the baseline residuals. In some cases, the percentage change is much higher, but this is typically where the starting residual land values are relatively low and the introduction of any cost increase will have a disproportionate impact on the residual land value. This is not a priority for the Council. The Council has stated in its Plan that it has a desperate housing need (para. 2.58 and 2.59) and poor housing supply affects health (para. 3.43). There is a plan to move towards net zero carbon homes by 2030 but a plan to meet London’s housing needs is far more uncertain.	Tackling the climate crisis is one of three core themes underpinning the plan. The proposed embodied carbon policy introduces stepped embodied carbon limits for different building types/use. These are based on LETI best practice targets. The December 2023 WMS is concerned more narrowly with operational energy performance, in that it promotes the continued use of a Part L framework, and therefore it is not considered that this impinges on Ealing's ability to set policies around embodied carbon. In any event the WMS does not constrain or limit the extent of the duty in section 19(1A) of the Planning and Compulsory Purchase Act 2004.	Policy ECP: Embodied Carbon – Ealing LPA – local policy			James Stevens	House Builder	494	Developer

Policy WLC: Whole Life Cycle Carbon Approach – Ealing LPA – local policy The policy in relation to Whole Life Cycle assessments is unsound because it is contrary to national policy. As stated previously, the Government is opposed to local authorities setting local standards for energy efficiency that diverge from the current building regulations. As the Housing Minister has stated on the 13 December 2023: The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government’s commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. The viability evidence demonstrates the adverse effect this and other policies relating to energy use will have on delivery, and nor does the policy comply with the Government’s requirement that any additional requirements are expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP). This is not a priority for the Council. Its priority is ensuring that the homes that are desperately needed in Ealing can be delivered.	The December 2023 WMS is concerned more narrowly with operational energy performance, in that it promotes the continued use of a Part L framework, and therefore it is not considered that this impinges on Ealing’s ability to set policies around embodied carbon or in respect of a whole life cycle carbon approach. In any event the WMS does not constrain or limit the extent of the duty in section 19(1A) of the Planning and Compulsory Purchase Act 2004. Tackling the climate crisis is one of three core themes underpinning the plan. It should be noted that this policy builds from the provisions of policy SI 2 of the London Plan which establishes the requirement to undertake WLC assessments, albeit for referable applications. This London Plan policy would have been tested in respect of viability impacts already. Viability has also been tested in the round alongside the full suite of emerging Ealing Local Plan policies as part of a whole plan viability assessment. Clearly extending the scope of the policy to also catch major developments will involve additional costs in undertaking the assessment. The introduction of an optioneering exercise is a process requirement – it does not specify an output as such. Further guidance on the implementation of this policy will be provided.	Policy WLC: Whole Life Cycle Carbon Approach – Ealing LPA – local policy		James Stevens	House Builder	494	Developer
Reference: Paragraph 3.53 Summary of issues: Cross reference OPDC comments: It might be useful to clarify that industrial demand would also include any waste needs and add a cross reference to SP.2. Suggested actions: Amend text as follows: Industrial space will be protected and expanded where possible to meet a net uplift in industrial demand projected over the lifetime of the plan..... <u>Planning for waste uses will be considered through the new West London Waste Plan (see SP2).</u>	Noted.	Policy SP4: Creating good jobs and growth		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Chapter 4 – Town Plans (general – development sites) Atlas of Change Summary of issues: Clarification of approach OPDC comments: This chapter includes proposals that affect industrial designations/sites. The following clarifications are needed: SIL/LSIS - Golf driving range (new designation and development site 04NO) – Policy N4 proposes this as a new SIL. If the site is to be designated as SIL then the description of proposed uses for 04NO should reflect this. This clarification is also needed to understand the net balance of SIL land, taking into account the proposed re-designation of Hanger Lane from SIL to LSIS. - Some development sites are located in SIL (i.e. 03PE, 04PE and 17SO) but supporting text for these refers to potential for residential uses which appears to be inconsistent with the approach to SIL in policies SP4.2 and E4. The supporting text could be amended to clarify this. Non designated sites - Some of the proposals for non designated industrial sites include residential led mixed use development which could imply the balance of uses when testing and the prioritisation of industrial uses required under E4c). The descriptions could be simplified to include the mix of uses that might be appropriate with the balance of these to be determined as part of the testing required under E4c). The introductory supporting text for the development sites could also be amended (please see suggested text) to ensure that the prioritisation of industrial uses in line with LBE policy E4c) is clear. General - Any proposed development sites that affect industrial sites should	Noted.	General		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Chapter 4 – Town Plans (general) Summary of issues: Clarifying the justification for the approach to industrial sites being proposed for development OPDC comments: The supporting text in the Town plans sections should outline the justification for industrial sites being proposed/allocated for development. There should be cross references to the evidence base that provides the justification for the approach in each Town section. Suggested actions: Need to include specific references to the evidence base documents so that the justification for the approach to industrial areas is clear.	Noted.	General		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Policy A.1: Acton Spatial Strategy Summary of issues: Text clarity OPDC comments: References to collaborating on the Creative Enterprise Zone should be clarified. Suggested actions: Amend text as follows: G. The Council will work collaboratively with the Old Oak and Park Royal Development Corporation and other key stakeholders <u>to support the Creative Enterprise Zone</u>, address severance caused by the A40 and railway lines, ~~and~~ maximise the potential opportunities that arise from significant development around North Acton station (see Policy A.6) <u>and within the Old Oak major centre and North Acton neighbourhood centre</u>.	Noted. This is Policy A1 M (ii) and was amended after reg 18.	Policy A1: Acton Spatial Strategy		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Paragraph 4.1.14 Summary of issues: HS2 information correction OPDC comments: Paragraph 4.1.14 provides incorrect information for Old Oak Common Station. Suggested actions: Amend paragraph 4.1.14 as follows: Acton is the borough's most diverse Town Plan area including many different town centres and numerous industrial areas. It also forms the southern gateway to the UK's largest regeneration zone at Old Oak and Park Royal that will include the new <u>Old Oak Common Station due to open after 2028. High Speed 2 terminus by 2030</u>.	Noted and accepted.	Policy A1: Acton Spatial Strategy		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Policy A.1.G Summary of issues: Coordination with Old Oak major town centre and North Acton neighbourhood centre. OPDC comments: Reference to coordination to the Old Oak major town centre and North Acton neighbourhood centre should be provided. References to collaborating on the Creative Enterprise Zone should be clarified. Suggested actions: Amend Policy A.1.G as follows: G. The Council will work collaboratively with the Old Oak and Park Royal Development Corporation and other key stakeholders address severance caused by the A40 and railway lines, ~~and~~ maximise the potential opportunities that arise from significant development around North Acton station (see Policy A.6) <u>and within the Old Oak major centre and North Acton neighbourhood centre</u>.	Noted and accepted.	Policy A1: Acton Spatial Strategy		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Paragraph 4.1.23 Summary of issues: Text clarity OPDC comments: Clarification should be provided that the noted transport infrastructure and employment opportunities fall within the OPDC area. Suggested actions: Amend paragraph 4.1.23 as follows: Acton represents a significant opportunity for investment to deliver improved employment and housing opportunities. The spatial strategy seeks to capitalise on ~~Acton's~~ the excellent transport infrastructure and employment opportunities <u>in the OPDC area including</u> at North Acton (Central line) and (once completed) Old Oak Common (London Overground, Great Western Railway, Elizabeth line and High Speed 2) and use these as a catalyst for regeneration of the area.	Noted.	Policy A1: Acton Spatial Strategy		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Table A1 – Key infrastructure delivery schedule Summary of issues: Clarity regarding flood mitigation OPDC comments: Table A1 identifies Feasibility studies on critical drainage areas including potential flood mitigation measures in North Acton. Clarity if this work has commenced and includes areas in the OPDC area. Suggested actions: Clarification if the North Acton studies falls within OPDC area.	Noted.	Policy A1: Acton Spatial Strategy		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Policy A.6 North Acton and Park Royal Summary of issues: Clarity of roles between Ealing's and OPDC's Local Plans. OPDC comments: A policy entitled North Acton and Park Royal is confusing for readers as the majority of these locations sit wholly within the OPDC area. The policy has a different role to the other area specific policies as its focus is on collaboration commitments and not the development of land. Therefore, OPDC suggests the title is amended to reflect collaboration between our organisations. OPDC fully supports the intention of the policy wording regarding collaboration between OPDC, Ealing and other key stakeholders to address severance and coordination of development and infrastructure close to the OPDC boundary. Suggested actions: Amend the title and opening portion of Policy A.6 as follows: Policy A.6: <u>Cross boundary working with OPDC North Acton and Park Royal</u> A. To work collaboratively with the Old Oak and Park Royal Development Corporation (OPDC) and other key stakeholders <u>along the border with North Acton and Park Royal</u> to:	Noted and accepted.	Policy A6: North Acton and Park Royal		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Paragraph 4.1.52 Summary of issues: Text clarity OPDC comments: Clarification that Park Royal Centre is not new (it was previously designated a centre in Ealing's Core Strategy) and is a neighbourhood centre Suggested actions: Amend text as follows: Much of North Acton and Park Royal is located within the OPDC boundaries but people do not adhere to administrative boundaries. The area's significant supply of Strategic Industrial Locations (SIL) and the services provided by North Acton Centre are accessed by workers and residents across Acton. Key development sites identified in the OPDC Local Plan (2022) include those centred around Park Royal SIL (P4, P4C1, P5), ~~the a new~~ <u>neighbourhood</u> town centre in Park Royal (P6), and new neighbourhood centres at North Acton (P6, P7, P7C1).	Noted and accepted.	Policy A6: North Acton and Park Royal		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Figure E2 Summary of issues: Figure consistency OPDC comments: Figure E2 identifies a town centre south of Hanger Lane which is not shown on other town centre maps. The Strategic Industrial Locations in the OPDC area are incorrect Suggested actions: Clarify whether Figure E2 should be amended to reflect other town centre maps. Amend figure E2 to ensure that the SIL boundary aligns with the boundary in OPDC's Local Plan Policies Map. The relevant files can be downloaded from here.	Noted.	Policy E1: Ealing Spatial Strategy		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Paragraph 4.3.10 Summary of issues: Text clarity OPDC comments: Clarification should be provided that North Acton falls within the OPDC area. Suggested actions: Amend the paragraph 4.3.10 as follows: A range of innovative tech, logistic, manufacturing and food businesses provide local jobs as well as attracting workers to Greenford from further away. It forms part of the Productivity Arc extending along the A40 from North Acton <u>(in the OPDC area)</u> to Northolt.	Noted.	Policy G1: Greenford Spatial Strategy		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Paragraph 4.3.51 Summary of issues: Text clarity OPDC comments: This refers to co-location of uses on existing sites, primarily within SIL. This should align with policy objectives to protect SIL for SIL conforming uses. Suggested actions: Given the scarcity of available land for development, and well-established pressures to deliver additional housing and social infrastructure, it is important to maximise the potential for industrial intensification (<u>primarily in Strategic Industrial Locations</u>) and co-location of uses on existing sites, ~~primarily at Strategic Industrial Locations~~. This will require careful consideration of industrial vehicular routes to minimise disruption to local communities and to create safer and more attractive walking and cycling routes.	Noted.	Policy G1: Greenford Spatial Strategy		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Paragraph 4.6.6 Summary of issues: Text clarity OPDC comments: Clarification should be provided that North Acton falls within the OPDC area. Suggested actions: Amend the paragraph 4.6.6 as follows: Perivale's industrial land is a major employer for the area and forms part of the Productivity Arc extending along the A40 from North Acton <u>in the OPDC area</u> to Northolt.	Noted.	Policy P1: Perivale Spatial Strategy		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Figure DMP1 Summary of issues: Figure correction OPDC comments: OPDC notes the annotation to figure DMP1 regarding applications within the OPDC area. However, to ensure complete clarity, the figure should show the boundary of the OPDC area and remove any infill relating to tall building threshold heights. Suggested actions: Amend figure DMP1 as follows: - Show OPDC boundary. - Remove infill from the OPDC area.	Noted. An amendment to the cartography is suggested to provide better clarity and correct any transcription errors including making it clearer that the scope of the plan does not extend to the area of Old Oak and Park Royal Development Corporation (OPDC) which is a separate Local Planning Authority with its own plan making powers. It is acknowledged by both the council and the OPDC that collaboration on strategic planning and other matters is both important and of mutual benefit.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Policy E3 Northern Ealing and Policy E3: Affordable workspace Summary of issues: Clarification OPDC comments: There are two policies in the plan titled 'E3' which will be confusing when applied within a development management context. Suggested actions: Suggest revising the titling to differentiate more clearly between the two policies.	Noted and accepted.	Policy E3: Northern Ealing	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation	Tom Cardis	Old Oak and	453	Statutory Body

Reference: Policy E4: Land for Industry, Logistics and Services to Support London's Economic Function Chapter 4 – Town Plans (general)² Summary of issues: Clarification of approach OPDC comments: The objective seems to be to maintain industrial space on LSIS and optimise the reprovion of industrial space on non-designated sites. The proposed site allocations that affect non-designated and LSIS sites should explicitly include industrial as a proposed use and include any parameters to ensure any space proposed would be fit for purpose and genuinely meets needs. This might compound existing demand issues across the market area if provision is not being made for them as part of the redevelopment or elsewhere in the plan area. Suggested actions: Clarification	Noted.	Policy E4: Land for Industry, Logistics and Services to Support London's Economic Function – Ealing LPA – local variation		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Policy E4: Land for Industry, Logistics and Services to Support London's Economic Function² Summary of issues: Clarification OPDC comments: To ensure the plan is effective, a definition for industrial intensification should be set out in the supporting text and aligned with SP4.2 i.e. focussed on delivering a net uplift.² Suggested actions: Clarification ²	Noted.	Policy E4: Land for Industry, Logistics and Services to Support London's Economic Function – Ealing LPA – local variation		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Policy E6: Locally Significant Industrial Sites ² Summary of issues: Clarification of approach OPDC comments: Part D)ii) refers to ensuring proposals meet objectively assessed needs. However, there is no cross reference to evidence base related to objective assessed need is or how this might be considered. Also, is there an opportunity to include other requirements to help demonstrate how the objective of meeting industrial needs could be achieved? for example, setting out plot ratios for assessment that optimise reprovion or how to ensure space is fit for purpose and genuinely meets needs. Suggested actions: Clarification	Noted.	Policy E6: Locally Significant Industrial Sites (LSIS) – Ealing LPA – local variation		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Policy TCS: Town Centres Summary of issues: More information is needed before OPDC is able to comment OPDC comments: It is noted that Ealing is still developing their evidence base on this, and more information would be needed before OPDC is able to comment on this aspect of the Plan. OPDC is keen to ensure that the expansion and introduction of new town centres is based on a robust retail evidence base and would not adversely impact other centres. It could also be interesting to understand if this explores opportunities for town centres to relieve pressure/overspill on industrial sites. Suggested actions: More information is needed before OPDC is able to comment	Noted. After consulting at Reg 18, this draft policy was withdrawn.	General		Tom Cardis	Old Oak and	453	Statutory Body
Reference: HOU Affordable Housing Summary of issues: 70% social rent expectation on Build to Rent schemes OPDC comments: It is recognised that the London Plan allows LPAs to require a proportion of affordable homes as social rent on Build to Rent schemes and there is an acute need for social rent housing. However, in OPDC's experience, Build to Rent developers will expect to deliver their affordable housing requirement as Discount Market Rent with at least 30% as London Living Rent equivalent. Social housing units would presumably have to be managed by a Registered Provider whilst the other rented units managed by the Build to Rent operator. This could cause issues in a single building where it is not possible to separate out the social housing units and the non-social housing units. Suggested actions: Consider whether it is realistic for Build to Rent developers to build 70% of the affordable housing as social rent.	Noted.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Tom Cardis	Old Oak and	453	Statutory Body
Reference: HOU Affordable Housing E Summary of issues: Affordable housing contributions from large scale purpose built shared living (PBSL) OPDC comments: The policy to require affordable housing in lieu contributions from PBSL is supported. However, it might be more appropriate to use such contributions to provide conventional C3 affordable housing on a different or adjacent site to the one occupied by the PBSL in order to better manage the amenity impacts arising out of the PBSL. Suggested actions: Consider whether it is realistic for affordable housing contributions from large scale purpose built shared living (PBSL) should be in the form of conventional housing units on site.	Noted.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Tom Cardis	Old Oak and	453	Statutory Body

Reference: HOU Affordable Housing Summary of issues: Reference to unit sizes OPDC comments: It is appreciated that LBE does not want to repeat London Plan guidance. However, it is recommended that the policy sets out unit size mix requirements for schemes. They may be set out in the SHMA but it will be clearer if there is a policy on size mix through which LBE can appropriately assess planning applications. Suggested actions: Provide more clarity about housing mix requirements so developers know what they will be assessed against.	Noted.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Tom Cardis	Old Oak and	453	Statutory Body
Reference: HOU Affordable Housing Summary of issues: Reference to identified needs in the most recent SHMA in the supporting text OPDC comments: It is assumed that this more specifically refers to the Ealing Local Housing Needs Assessment Update November 2022. If this is going to be used to assess planning applications under Policy HOU A (iii) then it is recommended that the plan sets out which table within the study applications will be assessed against. Is it figure 4 or 5 or another figure? Alternatively, this could be referenced in the policy. Suggested actions: Provide more clarity about housing needs so developers know what they will be assessed against.	Noted.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Tom Cardis	Old Oak and	453	Statutory Body
Reference: HOU Affordable Housing Summary of issues: Reference to specific number of units for people in different income brackets in the supporting text OPDC comments: It is recommended that it is clarified which data will be used to assess delivery against need unit by unit. Presumably this refers again to the Ealing Local Housing Needs Assessment Update November 2022 so it would be helpful to refer to the specific figure references so it is clear how planning applications will be assessed. Alternatively, this could be referenced in the policy. Suggested actions: Provide more clarity about housing needs so developers know what they will be assessed against.	Noted.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Tom Cardis	Old Oak and	453	Statutory Body
Reference: HOU Affordable Housing Summary of issues: Reference to Ealing’s Local Planning Policy Guidance in the supporting text OPDC comments: It is not clear what is referred to here. Would it not be more appropriate to set out these policies within the Local Plan? Suggested actions: Clarification.	Noted.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Tom Cardis	Old Oak and	453	Statutory Body

Reference: Policy G4: Open Space – London Plan Ealing LPA – local variation Summary of issues: In case of recreation, the lack of a sequential/ hierarchy approach can result in loss of open space without the emphasis on the ‘enhancement’ of open space. The policy also does not address areas with open space deficiency. OPDC comments: London Plan supports proposals to ‘enhance’ open spaces to provide a wider range of benefits (including recreation). However, the policy does not emphasize on the need for enhancement of open space in cases of recreation. It may be a case a facility does not benefit the users of the green space and has limited access. London Plan G4 requires development plans to include appropriate designations and policies for the protection of open space to meet needs and address deficiencies. Plan policy does not identify areas of open space deficiency where a varied local approach is needed to provide sufficient accessible open space, avoid loss of open space or compensate off-site. Town Plans makes reference to ‘deficiency in green open space provision’. However, the approach has not been set out as to what scale of proposals should contribute in improving deficiency. Suggested actions: H. Development proposals on green and open space should: (i) Be led by the purposes of <u>enhancement of open space</u> for nature conservation and recreation. The size of development within green and open spaces and its impact upon visual openness must be kept to a minimum (ii) <u>In areas of open space deficiency, enhance existing open space or provide new open space</u> (iii) <u>Preserve and enhance the visual openness of green and open</u>	Noted.	Policy G4: Open Space – London Plan – Ealing LPA – local variation		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Policy G6 Summary of issues: Support OPDC comments: The policy sets out to achieve a higher biodiversity net gain target of 20%. Suggested actions: OPDC welcomes the opportunity to work together to ensure a consistent cross boundary approach where possible.	Noted. Support welcomed.	Policy G5: Urban Greening – London Plan – Ealing LPA – local variation		Tom Cardis	Old Oak and	453	Statutory Body

Reference: General comment: Water management Summary of issues: Lack of local approach to water efficiency measures, water consumption and wastewater management OPDC comments: The Local Plan does not identify its approach to water management Suggested actions: Set out local approach to water management or clarify that the London Plan policy for water management applies somewhere in supporting text.	Noted.	SP2.2 Climate action		Tom Cardis	Old Oak and	453	Statutory Body
Reference: Glossary of Terms Summary of issues: Text clarity and HS2 information correction OPDC comments: The glossary provides incorrect information for Old Oak Common Station. Suggested actions: Amend the Glossary as follows: The Productivity Arc is a broadly defined area that connected the planned HS2 <u>station terminus</u> at Old Oak Common, <u>in the OPDC area</u> , with Heathrow Airport in Hillingdon	Noted.	General		Tom Cardis	Old Oak and	453	Statutory Body

I write to confirm the statutory safeguarding position of the Ministry of Defence (MOD) in relation to the Ealing Borough Council Draft New Local Plan Regulation 19 document. The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments. Paragraph 101 of the National Planning Policy Framework (December 2023) requires that planning policies and decisions take into account defence requirements by ‘ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.’ Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Department for Levelling Up. The area covered by any Ealing Borough Council New Local Plan is washed over by safeguarding zones that are designated to preserve the operation and capability of RAF Northolt. Copies of these relevant plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.	Noted.	General		Christopher Waldron	Ministry of D	496	Statutory Body
It is noted that within the Strategic Policy SP.2. 2 Climate action: Section F reference is made to RAF Northolt proposals for expansion. Given that RAF Northolt is not within Ealing Council’s planning area, this policy is neither justified nor effective. Any consideration for development at RAF Northolt would be dealt with by the relevant Local Planning Authority in consultation with appropriate statutory bodies and interested parties through the planning system. It is requested that any reference to RAF Northolt is removed from this section.	Noted. The pollicy seeks to mitigate the environmental impacts of the aviation industry, particularly in the context of any proposals for expansion of Heathrow Airport or Royal Air Force (RAF) Northolt, with major improvements in the way that measurable environmental targets are applied, monitored and reported. The increase in use of the airport poses significant environmental impacts on Ealing including noise and pollution.	SP2.2 Climate action		Christopher Waldron	Ministry of D	496	Statutory Body

Development Management Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation identifies that “Development proposals should achieve a biodiversity net gain of at least 20% or the advised national minimum amount, whichever is greater, as follows: (i) Biodiversity net gain will be calculated using up-to-date national calculation methodology and should normally be provided on-site. (ii) Offsite provision may be considered where this can provide greater gains and impact.” The MOD request that; when drafting policy and guidance which addresses green infrastructure, biodiversity, ecology, and Biodiversity Net Gain; Ealing Borough Council bear in mind that some forms of environmental improvement or enhancement may not be compatible with aviation safety. Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and the MOD should be consulted where any element falls within the marked statutory safeguarding zone.	Noted. It is accepted that such policies will not operate in isolation of other material factors, and when considered in the round proposed interventions may need to be moderated / adjusted. At this stage the Local Plan does not specify locations for off-site BNG provision. The identification of locations for off-site provision will need to be determined at the point that an application is assessed, having regard to the Biodiversity Gain Hierarchy and the circumstances of the individual case. It is not possible at this stage to predict any possible conflict.			Christopher Waldron	Ministry of D	496	Statutory Body
A number of the sites allocated at regulation 19 in the Ealing Borough Council Local Plan fall within statutory safeguarding zones. For your convenience, please find a table at Appendix A which provides a summary of the safeguarding criteria that would apply to those potential development sites identified. The table below provides a summary of those sites and the triggers for statutory safeguarding consultation that would apply. {Appendix A summary of the safeguarding criteria that would apply to those potential development sites identified that includes: • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.}	Noted.			Christopher Waldron	Ministry of D	496	Statutory Body

For almost 34 years together with my family we have been residents of {redacted} directly opposite the clubhouse of Barclays Bank Sports Grounds. I am shocked to find out that the Ealing Council is planning to develop this area with multiple residential accommodation. I have been observing how over the years our road was becoming more and more busy. Building the Ada Lovelace school at the bottom of the road a few years ago fulfilled a noble practical necessity yet it has increased the traffic considerably, hence jeopardizing road safety. At the other end there is a similar situation with cars parking to drop/collect pupils of Saint Augustine's Priory school. We cannot imagine having to put up with more traffic caused by residents of the planned new housing on the grounds of former Barclays Bank Sport grounds. I strongly oppose to the MOL (MOL 20) re-designation of Barclays Bank Sport Grounds parts as it can only happen in exceptional circumstances. The only circumstances we can see at present are the business acumen and simple greed of the developer. Please notice that the residents of Park View Road are mostly owners-occupiers who have related to Ealing for years, looking after the grounds of their properties without fail beautifully and carrying on with their homes here because of the relative peace of the area. The Ealing Council's initiative of the residential development plan (21EA) will irreversibly destroy the residential character of the neighbourhood. Please register my objection to it. I therefore request that Barclays Sport Grounds should become the proposed Regional Park. I support the representations made already by Ealing Matters, Save Ealing Parks and CPRE.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt" category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. School capacities do change over time and any development would need to mitigate any adverse impacts regards the availability of school places as part of any planning obligations should development be consented. There are no physical vehicular access issues for this site. Traffic congestion associated with the 'school	21EA Former Barclays Sports Ground			Monika Agnew	497	Individual

Please find attached response from Ealing Civic Society to the Local Plan Regulation 19 consultation. Also attached is our response at Regulation 18 for completeness. Ealing Civic Society is a membership organisation, established in 1967, whose members care about their local environment, its character and history. Our strapline is ‘working to preserve and improve our borough’ and we cover the whole of Ealing borough, but are particularly focused on Central Ealing, the original Borough of Ealing. We are members of the national organisation for Civic Societies, Civic Voice. We are not connected with any political party or the Council, but have always sought to work with the Council on matters of concern including but not limited to planning policy and development management. As a key local group concerned with the built environment and how the borough develops, the Society has attempted to engage with the new Local Plan development process, but has unfortunately not been formally involved by the Council in the development of the Plan at a formative stage. We submitted an extensive response to elements of the draft plan at Regulation 18 stage (copy attached to this email) but in common with other interested groups, find it necessary to make further submissions at Regulation 19 stage as many of our concerns have not been addressed in the latest Plan draft. The following NPPF references on Local Plan content and the process for its preparation provide context for our responses: NPPF Para 16 (c) states that plans should ‘be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, ...’ There has been no effective	Noted. The plan has been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on design, heritage and culture. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. The Site Selection reports also informs any Development Sites whose narrative in the plan includes both contextual considerations and design principles to guide any future development proposals. The council acknowledges that there are duly made neighbourhood plans and these remain in use. See Local Plan Para 1.23 for example.	General		Ann Chapman	Ealing Civic S	498	Community Interest Group

Conservation and Heritage This representation concerns the need for the plan to contain polices for the conservation and enhancement of the historic environment. The Central Ealing area is particularly rich in heritage, with a number of listed buildings, Conservation Areas and architecturally interesting Victorian and Edwardian residential development. These contribute to its particular character, but in the absence of policies to protect them, are at risk. Ealing Civic Society raised concerns at regulation 18 regarding the lack of reference to and support for conservation and heritage in the draft plan. We remain extremely concerned that this deficit has not been addressed in the Regulation 19 submission. This gives the strong impression that heritage and Conservation Areas will be of minor importance when decisions on development are taken in the future. Developers and other applicants for planning permission will not know how or where to find the necessary policy guidance; in the absence of specific information, they could assume and argue that the Council has no such policies. London Plan Policy HC1B: Heritage, Conservation and Growth requires that: ‘Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by: - setting out a clear vision that recognises and embeds the role of heritage in place making - utilising the heritage significance of a site or area in the planning	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on design, heritage and culture. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. Neither the Mayor of London nor Historic England have raised objections to this approach. The local plan at Policy SP3.3 D seeks to ensure that new development meets the highest design standards, responds positively to the local character and recognises the role of heritage in place-making. There are numerous other references to the importance of heritage and conservation throughout the plan including at Policies SP2.2 F (vi), SP2.2 G (vi), SP3.1 B, SP4.1 A, SP4.1 E, SP4.2 H-I. The plan is also informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The Site Selection reports also informs any Development Sites whose narrative in the plan includes both contextual considerations and design principles to guide any future development proposals. Regards the conservation area appraisals, much work has been done to update them and this has involved extensive and detailed consultation with the ECS and other interested parties. This body of work is separate from the Local Plan and the council is currently recruiting a new dedicated Conservation Officer whose first key task will be to complete and implement the review, taking into	Policy SP3: Fighting inequality	Policy SP2: Tackling the climate crisis	Ann Chapman	Ealing Civic S	498	Community Interest Group

Design The NPPF Chapter 12 sets out requirements regarding the importance of good design, with paragraph 132 stating ‘Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics (our emphasis). Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.’ London Plan Policy D1A requires that ‘Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas’ capacity for growth’. Together, these requirements can be summarised as the need for the plan to work with communities to understand local aspirations and to reflect them to achieve well designed and beautiful places. Policy DAA in the Regulation 19 Plan has not been developed with local communities, does not respond to local aspirations and shows no understanding of Ealing’s defining characteristics. We understand	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on design, heritage and culture. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. Neither the Mayor of London nor Historic England have raised objections to this approach. Delivering good design, design scrutiny and maintaining design quality are important. The Local Plan at Policy SP3.3 D seeks to ensure that new development meets the highest design standards, responds positively to the local character and recognises the role of heritage in place-making. There are numerous other references to the importance of heritage and conservation throughout the plan including at Policies SP2.2 B (iii), SP2.2 D, SP2.2 F (i) and (vi), SP3.1 C, SP4.1 A, SP4.1 D–F. The plan is also informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The Site Selection reports also informs any Development Sites whose narrative includes both contextual considerations and design principles to guide any future development proposals.	Policy DAA: Design and Amenity – Ealing LPA – local policy	SP2.2 Climate action	Ann Chapman	Ealing Civic S	498	Community Interest Group

Tall Buildings Ealing Matters/SEC have provided a comprehensive response on policy D9, concluding that this is not sound. We concur. Without repeating the detail in that response, we conclude that the policy as drafted is arbitrary and not based on any rational and agreed evidence base. As we commented at the Regulation 18 stage, the plan includes metrics defining what is considered a tall building in a number of defined areas. The implication is that any building of lesser height is not ‘tall’ and thus acceptable. These area boundaries and associated heights appear to have been plucked out of the air, with no criteria offered against which the proposals have been assessed and no justification provided for the heights, which are often entirely inconsistent with the surrounding area. Evidence as may be found (the Allies and Morrison report) is not being adopted, with excessive and unjustified thresholds for what constitutes a tall building being applied to, in particular, the Central Ealing area, where the proposed policy states that only buildings of over 21 storeys would be considered tall. The Town Centre is largely covered by two Conservation Areas, has a number of nationally and locally listed buildings and buildings of heritage significance, and is characterised by typically low-rise family-friendly Victorian and Edwardian housing; it is thus particularly sensitive to inappropriate development. Rather than being respected and enhanced, this character would be utterly destroyed if the tall buildings policy D9 were to be adopted. No recognition whatsoever has been given to the Borough’s heritage assets or to the provisions of Neighbourhood Plan policies regarding building heights that take into account local heritage. Conservation	The tall buuildings policy is based upon a comprehensive tall buildings and character assessment of the borough.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Ann Chapman	Ealing Civic S	498	Community Interest Group

Development Sites and Masterplanning An overriding concern regarding the Plan is the absence of overall master plans for effective development of areas where significant redevelopment is envisaged, in particular the flagship Ealing Town Centre, West Ealing and parts of Acton. Rather, development sites are arbitrarily identified without any reference to one another and with no basis for their selection and definition. Much stronger guidance regarding the need for and content of master plans and the process for their adoption must be explicit in the Plan. We refer you to representations submitted by {name redacted}, one of the Society’s Executive Committee members, on this topic. Many sites are identified as suitable for residential development but without any indication of the quantum of development proposed for them individually or overall. The ‘evidence base’ commissioned by the Council and prepared by Allies and Morrison could provide this context but is flawed in that it has again been produced in a vacuum without local input or the opportunity to comment. Furthermore, it is not clearly set out where, how and why the report’s findings have informed the Plan or, alternatively, have not been adopted. We comment below on Central Ealing sites that have particular significance in terms of the potential impact of redevelopment on the surrounding heritage assets and Conservation Areas. Similar concerns may arise for some sites in other areas. {Suggested modification:} The missing engagement with Ealing’s	Noted. Masterplanning can play an important role in place shaping and its role is repeated throughout the plan, where appropriate. The Tall Buildings Study did look at the impact of neighbouring development sites so that the impact of 'clusters' could be considered holistically. The plan has been shaped by three rounds of public and stakeholder consultation.	General		Ann Chapman	Ealing Civic S	498	Community Interest Group

EA01 Broadway Connection and Arcadia Shopping Centre. This site, which has had a long and highly controversial planning history, has doubled in extent since the Regulation 18 plan was consulted on without any explanation or pre-announcement to the communities who have been long involved with it. Planning consent was granted earlier in 2024 on the eastern half of the site in the face of criticism from local groups, Historic England, GLA officers and the Metropolitan Police, but their comments are not acknowledged and reflected in the site proposals. Previous proposals for the entire site were the subject of a 3 week public inquiry after which the Secretary of State overturned LBE’s planning consent, agreeing with the Inspector that that the bulk, massing and certain aspects of the design of the scheme would be inappropriate in its surroundings and would fail to preserve or enhance the character and appearance of the Town Centre conservation area and the setting of the Haven Green conservation area, as well as harming the setting of the Grade II* listed Church of Christ the Saviour. The entire site also is covered by an existing SPD that was consulted on and approved in 2012 after the Secretary of State’s decision. This set out principles for its development including on pedestrian movement, sight lines and visual impact and built form and height. The current document ignores the contents of the SPD and its principles. Further concerns are that this is not one of the sites considered by Allies and Morrison and British Land, which owns the eastern half of the site, also owns the EAL2 site considered below. The combined impact on the Town Centre if these two significant sites were to be developed as suggested would be immense and has not been considered. This underlines the importance of producing a master plan for the Town Centre in conjunction with all Ealing’s stakeholders, and especially	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	01EA Broadway Connection & Arcadia Shopping Centre		Ann Chapman	Ealing Civic S	498	Community Interest Group

EA02 Ealing Broadway Shopping Centre and Crystal House. This major Town Centre asset was developed and opened by the late Queen less than 40 years ago and has been the subject of recent improvements and refurbishment without a damaging increase in height. It includes a locally well-liked, award-winning shopping centre that was locally listed in Ealing's 2004 UDP. It is also a very busy centre that continues to meet the needs of the Ealing community. Further or upward development would be unacceptable. Again, there has been absolutely no local engagement with any proposals for its redevelopment despite the fact that if it were to proceed, demolition and redevelopment of the site would have a transformative effect on the Town Centre. Allies and Morrison's considerations of the possible height and massing of a new development are buried deep in the evidence base in the Appendix to their Tall Buildings Study as Cluster A. This study has never been discussed locally. It must be brought into the open and the public must be given a fair opportunity to comment on it.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The plan has also been shaped by three rounds of public and stakeholder consultation.	02EA Ealing Broadway Shopping Centre & Crystal House		Ann Chapman	Ealing Civic S	498	Community Interest Group
EA03 Sandringham Mews. This is a sensitive site at the heart of the Town Centre. Consent has recently been granted to construct buildings from 3-8 storeys over the southern half, despite objections to the maximum height. Consideration of even greater heights is excessive and inclusion of the wider site into Cluster A creates additional issues that need to be examined in connection with the rest of that Cluster. As mentioned above, this should be part of a properly prepared SPD.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	03EA Sandringham Mews		Ann Chapman	Ealing Civic S	498	Community Interest Group
EA05 Perceval House. Despite the approval of a 26-storey tower on this site, against significant local objection, no precedent has been set that suggests this site would be suitable for the proposed maximum of 21 storeys. This would still have an excessive and detrimental visual impact on important heritage assets. If a new scheme is to emerge it needs to take greater heed of the Central Ealing Neighbourhood Plan as well as Historic England advice, the design principles of the NPPF, and the London Plan.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	05EA Perceval House		Ann Chapman	Ealing Civic S	498	Community Interest Group
EA07 CP House. Consent to redevelop this site for a 12 storey office development was granted in 2022 in the face of objections that the height and bulk would impact detrimentally on the Ealing Green Conservation Area and Walpole Park. This consent has not yet been implemented. We note, and would support, the proposed reduction in the maximum height to 10 storeys, which would reduce the impact on Walpole Park and the Ealing Green CA.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	07EA CP House		Ann Chapman	Ealing Civic S	498	Community Interest Group

Infrastructure Planning The NPPF and London Plan include a number of policies that set out requirements that Local Plan policies should provide a broad ‘context framework’ for development, including necessary infrastructure, development contributions, social infrastructure and consideration of development phasing where necessary infrastructure may not be available. We would again refer the Inspector to the detailed commentary on this aspect in the submission by Ealing Matters/SEC, in particular their analysis of the newly introduced infrastructure delivery plan (IDP) included in the evidence base for the Regulation 19 consultation. We would highlight the many existing problems with much of the infrastructure in Central Ealing, including an inadequate and failing sewage system, water supply problems, electricity supply and distribution problems leading to a lack of capacity for new developments and ongoing regular gas leaks. The disruption to the major (and other) road network caused by frequent, lengthy and poorly managed repair works is not acknowledged, nor is there acknowledgement that the much hyped Elizabeth Line, used as justification for proposed massive expansion in housing provision in Central and West Ealing and elsewhere served by the line, is already at capacity during some peak hours. Reductions in library facilities and opening hours and the recent closure of Ealing Town Hall and other community facilities compound the lack of social infrastructure for a growing population. None of this has been addressed with the input of the community affected. With specific reference to green space we note and welcome the removal of	Noted. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. IDPs are living documents, acting as a ‘snapshot in time’, and as different infrastructure providers respond to their own unique challenges, the information will naturally date and alter over time. The IDP will require updating on a regular basis to reflect this. The delivery of infrastructure is the responsibility of various different bodies, as detailed within the IDP, including those with a statutory duty to provide sufficient infrastructure to meet identified needs, as well as those who are responding to market conditions. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The planning system can be rightly called upon to fund physical infrastructure (i.e. buildings, roads, railways etc) the need for which is because of new development, but it is not there to deal with demand for services, which is the role of rates and taxes to fund. A lack of doctor appointments or school places as objections are rarely an infrastructure issue, but a result of the way operational activity is funded.	SP4.1 Good Growth		Ann Chapman	Ealing Civic S	498	Community Interest Group

Brent River & Canal Society (BRCS) welcomes the opportunity to feed back on the Reg 19 draft of improvements. BRCS is prepared to work with the Council to discuss and develop these modifications prior to the Inquiry so that an agreed version can be put before the Inspector. All comments and suggestions made below that are not resolved before the plan goes to the Inspector are to be taken as objections. BRCS is willing to be called upon by the Inspector during the examination stage of the process to provide evidence to support our objections. Green and Blue Environment – National and Regional Policy BRCS believes that the plan is fundamentally unsound because the reports within it are too heavily weighted towards housing and the built environment. Insufficient weight is given to Ealing's green and blue environment and biodiversity and key reports that should underpin open spaces policies are incomplete or missing. Ealing has not produced or updated crucial strategies and plans that it has committed to or has a statutory duty to do, as detailed below. Because of this missing or incomplete information, the plan fails the test of soundness in the following key areas: It does not meet the requirements of National Planning Policy Framework 14 - Meeting the challenge of climate change, flooding and coastal change. In particular the Council has not met its obligations to consider the effects of its proposed changes to Green Belt (GB) and Metropolitan Open Land (MOL) boundaries with regard to directing development away from areas of higher flood risk and of not increasing the risk of flooding elsewhere.	Regards flood risk, national policy tasks Local Planning Authorities with preparing a Strategic Flood Risk Assessment (SFRA), which assess the risk of flooding from all sources, now and in the future, whilst taking account of the impacts of climate change. The SFRA is a planning tool which supports and informs the preparation of the Local Plan and the determination of planning applications. It provides the Council with the evidence it needs to steer new development away from areas of greatest risk of flooding. In May 2018, the Council, jointly with neighbouring authorities in West London, published a new (Level 1) SFRA. This illustrates the extent and level of risk around the River Brent and beyond. The Council have used the findings of this Level 1 SFRA to steer development, including allocations to the lowest risk areas through the application of the sequential test. Where it is not possible to accommodate all allocations within areas of low risk of flooding, it is necessary to prepare a level 2 SFRA, as is the case in Ealing. Completed in January 2024, Ealing's level 2 SFRA has entailed undertaking a site-specific assessment of the individual allocations to provide the information needed to undertake the Sequential and Exception Tests, and the exercise identifies mitigation measures. As per national guidance the application of the Sequential and Exception Tests is documented through the Sustainability Appraisal process as part of the Integrated Impact Assessment. Forming part of Ealing's Development Plan the London Plan also	SP2.2 Climate action		Phil J Belman	Brent River &	501	Community Interest Group

Biodiversity and Climate Change The Reg 19 draft does not take account of key planning issues stemming from Ealing's Biodiversity Action Plans (2001 & 2022) delivery of which is fundamental to the Council's statutory biodiversity duties and to fulfilling its Climate and Ecological Emergency Strategy (2021). In the 2022 BAP the Council committed to set up the Ealing Biodiversity Partnership to review the BAP each year and to promote actions within it. Ealing has yet to do so and has missed the first two annual reviews. The Reg 19 draft is unsound because the Council has consistently failed to consult with partners and to monitor or deliver its BAP policies or to integrate them into this Local Plan. The 2022 BAP commits Ealing to produce an Ecological Networks Map but this has not been done. Ealing says that it will create an ecological network that operates more naturally and effectively needing more, bigger, better and joined-up sites. The Biodiversity Action plan (BAP) states 'the Local Plan and council strategic documents will uphold the BAP vision, aims and Habitat and Species Action Plans through strengthened plan-making and decision-making policies and processes that require the protection, conservation and enhancement of biodiversity in Ealing'. Since Ealing has yet to complete its Ecological Networks Map the Reg 19 draft fails the test of soundness in this regard. This map would inform in particular the designation of new MOL and the creation of new green corridors to extend and better connect existing sites. BRCS suggested such modifications in our Reg 18 response and we detail these in our submission on Nature	Ealing's BAP has informed the development of this Local Plan. The GLA has been appointed as the 'responsible authority' to produce the Local Nature Recovery Strategy (LNRS) for Greater London, with the boroughs supporting this process. The LNRS is programmed to be published in 2025. As well as informing the drafting of the Local Plan, the BAP and LNRS (once published) also function as material planning considerations. To this end both the BAP and the forthcoming LNRS are now referenced under policy SP2 and policy G6, directing applicants to have regard to each.	SP2.2 Climate action		Phil J Belman	Brent River &	501	Community Interest Group

SINC Review (overdue) The Council has not carried out its long overdue review of Sites of Importance for Nature Conservation (SINC's) as required by the London Plan (G6). The 'Ealing Local Plan (Reg 19) Sites of Importance for Nature Conservation: Initial Report' is not a SINC review and it is misleading to include it as if it is. The review process is laid down by the GLA and includes not just an evaluation of existing SINC's but, amongst other things, the setting up of an expert panel and the consideration of any new sites which meet the SINC criteria. Ealing has not yet done this and is still one to two years away from finishing this process. Since Ealing has yet to complete its SINC review the Reg 19 draft fails the test of soundness in this regard. It is known that some areas of GB or MOL proposed for de-designation already meet the criteria for SINC designation and would therefore be classified as such in the current review. Until this review is finalised, such de-designation proposals in the Reg 19 draft cannot be considered as based on sound evidence.	Noted. The principal survey work for the SINC review (conducted over 4 phases) was completed in 2023). Work is ongoing to compile a full set of supporting documents including mapping. Once complete, the Council intends to submit the survey data and recommendations to a Local Site Selection Panel. Should further new revisions arise from this process it is acknowledged that these may need to be consulted on as part of any proposed modifications.	SP2.2 Climate action		Phil J Belman	Brent River &	501	Community Interest Group
Green Space Strategy (overdue) Ealing published its last Green Space Strategy in 2012. This was due for review in 2022/23 but this has not yet been done. Until this review is complete, de-designation proposals for open spaces in the Reg 19 draft cannot be considered as based on sound evidence.	The absence of having prepared a GI strategy is acknowledged, although it is important to recognise that a GI strategy forms an umbrella strategy for a series of other plans, strategies and workstreams which have been published or actioned, and each of these have informed different aspects of the preparation of the Local Plan. These include: - Ealing's Indoor and Outdoor Sports Facilities Strategy published 2023 - Ealing's Biodiversity Action Plan published in 2022 - A SINC review - Local Nature Recovery Strategy – emerging and due to be published in 2025 - A Tree Strategy – 2013 - Green Belt and MOL review – Stage 1 (2022) and Stage 2 (2024) A number of these outputs will continue to evolve over the life of plan, following further updates, revisions etc. As well as informing plan preparation itself, the content of these outputs are also very much integral to the decision-making process itself. Recognising this, and with the intention of future proofing the Local Plan the plan provides appropriate hooks to these outputs (encompassing both current outputs and accounting for any future updates).	SP2.2 Climate action		Phil J Belman	Brent River &	501	Community Interest Group

Nature Management Areas The Reg 19 draft does not identify any of the Borough's Nature Conservation Management Areas as mapped in Ealing's 2004 Plan for the Environment. All of these are still extant, and will necessarily form the basis of the Ecological Networks Map and Local Nature Recovery Strategy when these are prepared. In order to deliver national and local targets, the new Local Plan should map and protect all the existing NCMA's and at the same time identify new ones and substantially extend and connect these areas. The term 'Nature Management Areas' (NMA's) would be appropriate for these extended and new NCMA's. BRCS suggested such modifications, see below, in our Reg 18 response. The Reg 19 draft cannot be considered sound unless it takes a proactive approach now by identifying and mapping areas to be set aside for nature management and recovery. Nature Management Areas Ealing has not prepared an Ecological Networks Map or a Local Nature Recovery Strategy in time for the Reg 19 draft. In absence of these key strategies, to be sound, the Local Plan needs to bring forward proposals that do create an ecological network that will operate more naturally and effectively. This requires the inclusion of existing and potential new green sites into coherent designated Nature Management Areas and the creation of additional green corridors better to connect sites. BRCS proposes 6 overarching NMA's: Brent River Park NMA To include the existing NCMA and to extend it to include the MOI	As a planning designation NCMA have not been identified or mapped since 2004. These were omitted from the 2012/2013 plan because ultimately their function and influence was more limited in a planning context. At the time the SINC network was extensively expanded, and so the designation became more redundant as many of the these areas were subsumed by an enlarged SINC network. Further extensions proposed as part of this latest local plan strengthens this decision further, and the majority of areas once designated as NCMA have now been absorbed into the SINC network. SINCS are a well established planning designation and arguably are a more effective planning tool. The SINC network doesn't operate in isolation either, with many areas including the Brent River Park being covered by a raft of other open space designations. The GLA has been appointed as the 'responsible authority' to produce the Local Nature Recovery Strategy (LNRS) for Greater London, with the boroughs supporting this process. The LNRS is programmed to be published in 2025.	SP2.2 Climate action		Phil J Belman	Brent River &	501	Community Interest Group

Ealing's Regional Park The Reg 19 draft refers to a proposed new Ealing Regional Park at SP2.2 but with no detail. In previous reviews of green spaces, the Brent River Park has been always been treated as a Regional Park. In it's report 'A background to Ealing's Parks and Open Spaces (Scrutiny Committee 1st July 2009) the BRP was described at 2.1.3 as 'acting as a Regional Park'. Plans for the Regional Park are still at an early stage but the Council has indicated that it will include and link up at least two NCMA's (the BRP and Horsenden Hill) into the RP. Ealing's proposed new RP is an opportunity significantly to raise the quality of open space provision inthe Borough by improving connectivity between formerly isolated sites and setting higher standards for site management, staffing and infrastructure, particularly in improving public rights of way and access, signage and delivery of BAP targets through better site management and the creation of new green corridors. To be sound, the Local Plan needs to provide a coherent plan for what is to make up the RP and to include all six of the below suggested NMA's in the RP.	Noted. These are all good points and should be addressed in the forthcoming publication of a strategy for the new Regional Park.	SP2.2 Climate action		Phil J Belman	Brent River &	501	Community Interest Group
Rights of Way Improvement Plan (overdue) Ealing did not fulfil its statutory duty under S60 of the Countryside and Rights of Way Act 2000 to publish a Rights of Way Improvement Plan by November 2007 or to review that plan every 10 years. A network of public rights of way (of which Ealing has many) is key to accessing open spaces within the Borough, yet no consideration is given to such routes in the Reg 19 draft. Previous local plans mapped for example a network of proposed and existing footpaths within the Brent River Park, but these are not shown in this draft. Without a strategic approach based on evidence, the Reg 19 Plan is unsound because it has not properly considered public access to open space including in its proposed changes to GB and MOL boundaries. To be sound, a map showing all existing and proposed Rights of Way should be included in the Local Plan.	Active Travel features as a core principle underpinning the plan. The establishment and operation of Rights of Way are governed by its own statutory framework which operates outside of planning. Whilst Rights of Way may be material to planning decisions, it is not the function of the Local Plan to confirm this network. It may not always be possible to align work streams. In such instances then the priority would be to ensure that the Local Plan contains the appropriate hook.	SP2.2 Climate action		Phil J Belman	Brent River &	501	Community Interest Group

Requirement to manage, improve, protect and extend GB and MOL A fundamental flaw of Ealing’s approach to the Reg 19 draft is that previous Local Plans (for example the 2004 Plan for the Environment Ch 3.1), the London Plan (1.2.6 & GG2.F, G1) and the Council's Ecological & Emergency Strategy and Biodiversity Action Plans require the Council to manage, improve, protect and extend all MOL and Green Belt land within its custodianship, while these policies also require isolated sites to be connected into a network of green areas. Government has a wider target of setting aside 30% of the UK’s land area for biodiversity by 2030 and the London Mayor has committed to make more than half of London green by 2050. There is no part of the Reg 19 draft that attempts significantly to increase GB or MOL. Instead of seeking to improve, protect and extend GB and MOL the Reg 19 draft proposes deregistering underperforming sites. It is unsound in this regard as it does not carry through policies to manage, improve, protect and extend open spaces as is required by the London Plan (e.g. 8.2.2, 8.3.4, 8.4.3, 8.4.4) and its own local policies.	Protecting and improving the natural environment is a key theme of the new Local Plan. Policy 'SP2.2 Climate action' sets out the council's priorities for maintaining, enhancing, and expanding the network of green infrastructure.	SP2.2 Climate action		Phil J Belman	Brent River &	501	Community Interest Group

Enabling development At 5.65 – 5.66 the Reg 19 draft proposes a local policy departure from the London Plan for enabling development. The draft and the Atlas of Change regards such enabling development in some circumstances as justifying a change in a site’s designation, for example by removing it from GB or MOL. The Reg 19 draft is unsound in this regard, as enabling development does not have to be carried out by releases of land from GB or MOL. It can and should be carried out by releases of Council land (as was done with for example Dickens Yard) that do not have open space designations. Development of green space is in direct conflict with the London Plan and with local strategies and policies.	Noted. The drivers for reviewing Ealing’s Green Belt and MOL designations was not to identify additional land to accommodate development, but rather to ensure that this land is afforded the correct designations. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Where changes have been proposed to the designation of GB and MOL in the majority of cases these sites continue to be covered by other appropriate policy designations such as Public Open Space, Community Open Space or Site of Importance for Nature Conservation (SINC), and such policies continue to protect these sites from inappropriate development. Whilst proposals may be presented as enabling development, the application of this label is sometimes used loosely. Local policy ENA therefore seeks to define what is meant by enabling development in an Ealing context, and it establishes a number of key tests/principles which proposals must satisfy if an applicant is seeking to make the case for enabling development. The intention of this policy is not to promote or facilitate enabling development. It is recognised that it should be used sparingly, but if is engaged proposals must satisfy a number of key principles. Firstly it establishes that the enabling works must be led by the designation and the associated outcomes. Sites may be subject to multiple designations and applications will typically be assessed against a suite of policies, each with separate objectives and with the potential to compete for enabling support. This policy	Policy ENA: Enabling Development – Ealing LPA – local policy		Phil J Belman	Brent River &	501	Community Interest Group

Adopted Policies Map - Schedule of Proposed Changes As noted above, Ealing has still to: 1) update its Green Space Strategy 2) publish its statutory Rights of Way Improvement Plan 3) carry out a review of and update its list of SINC's 4) prepare an Ecological Networks Map 5) prepare a Local Nature Recovery Strategy In light of these missing key strategies, any proposed removals of open space designations cannot be underpinned by proper evidence and are premature until such evidence can be taken into account. Additionally, in the reports it has presented, Ealing has not taken account of or given proper weight to the reasons such land was designated originally (in many cases the land usage is unchanged since designation) nor has it given regard to its obligations to manage, improve, protect and extend GB and MOL.	Proposed GB/MOL boundary changes reflect the current reality and use of sites. Ensuring GB and MOL sites have correct, up-to-date, and defensible boundaries is important as incorrect boundaries can undermine the integrity of the wider GB/MOL parcel. In terms of the Gurnell Leisure Centre site, the council is keen to meet residents' needs by providing a modern new leisure centre to replace the old one which was built in the 1970s and is now past its expected lifespan. The council carried out a review of options for the future of Gurnell informed by an extensive listening exercise, including an in-depth survey of local people. The only realistic way of providing a modern sports and leisure centre is to have some enabling development on the site. In accordance with the new local plan's 'Policy ENA: Enabling Development – Ealing LPA – local policy' the quantum of residential development should be limited to the amount absolutely necessary to financially secure the delivery of the replacement leisure centre. The design principles for the site • The design should seek to minimise the impact on the openness of the site • Incorporate a comprehensive package of open space enhancements, including improvements related to accessibility (including a new pedestrian bridge	SP2.2 Climate action		Phil J Belman	Brent River &	501	Community Interest Group

The Green Belt and Metropolitan Open Land Review report which is cited to support these removals does not adequately consider the benefits and justifications for MOL designation of sites. For example within the BRP, sites proposed for removal along Uxbridge Road (Map 9) in Southall are substantially in the same state as when the park was first created. Designation serves the purpose of maintaining the open nature of the park and views into it by limiting the type and height of structures even on Previously Developed Land (PDL). It can render available brownfield sites within NMA's where future rewilding projects funded by BNG or CIL might realistically return land to open space usage, as for example was carried out at Fox Meadow, Hanwell (formerly an industrial site under concrete) and now an SINC approved for designation as part of a statutory Local Nature Reserve. At Gurnell, within the BRP (Map 24), a substantial removal of MOL is proposed. Previous attempts to remove this area were refused by the London Mayor and there is little difference in the Council's reasoning in the Reg 19 draft. The Council conducted a 'Sounding Board' process on its plans for Gurnell in which it consulted with many local groups including BRCS. All groups bar one signed a Minority Report after this process in which they disagreed with the Council's proposals for a substantial housing development on the MOL and the removal without replacement of the largest visitor car park in the BRP. The Green Belt and Metropolitan Open Land Review does not mention the Minority Report or its content and refers erroneously to part of the site as PDL, even though it contains no built structures and is included in Ealing's list of parks and open spaces, both precluding it from classification as PDL. Additionally	Proposed GB/MOL boundary changes reflect the current reality and use of sites. Ensuring GB and MOL sites have correct, up-to-date, and defensible boundaries is important as incorrect boundaries can undermine the integrity of the wider GB/MOL parcel. In terms of the Gurnell Leisure Centre site, the council is keen to meet residents' needs by providing a modern new leisure centre to replace the old one which was built in the 1970s and is now past its expected lifespan. The council carried out a review of options for the future of Gurnell informed by an extensive listening exercise, including an in-depth survey of local people. The only realistic way of providing a modern sports and leisure centre is to have some enabling development on the site. In accordance with the new local plan's 'Policy ENA: Enabling Development – Ealing LPA – local policy' the quantum of residential development should be limited to the amount absolutely necessary to financially secure the delivery of the replacement leisure centre. The design principles for the site state that the design: • Should seek to minimise the impact on the openness of the site. • Incorporate a comprehensive package of open space enhancements, including improvements related to accessibility (including a new pedestrian bridge over the river connecting to Longfield Playing Field), outdoor sporting facilities, landscaping, flood mitigation, wayfinding and biodiversity. In terms of new MOL designations, the Green Belt and	SP2.2 Climate action		Phil J Belman	Brent River &	501	Community Interest Group
I have been living here many years with the Parkway across the road as a wonderful feeling of healthy green open space which allows us to breathe. Any development would dramatically damage much for all of us who live around the Parkway. Not only children to play, people to walk (and in summer have picnics), residents to walk their dogs, plus be seriously detrimental to the wildlife that surrounds us. Please listen to Northolt residents for whom this area is home and who love, enjoy and for whom the Mandeville Parkway is essential to their lives.	Regards Mandeville Parkway (02NO) policy requires that new development should primarily be limited to infill on Lewes Close and redevelopment of the garages at the end of Thirsk Close and next to Redcar Close. New development should not compromise the openness or value of the existing public open space and should lead to enhancements.	02NO Mandeville Parkway		Felicity FitzGerald		502	Individual

We are a greening group, aiming to encourage ‘residents’ engagement with the outdoors through clean-up, greening and community activities – ie residents of the Council Housing Estate itself as well as freeholders and leaseholders embedded across the entire Racecourse Estate. Its origin was a Labour compulsory purchase of the then ‘Northolt Park Racecourse’, alias the Ascot of the 1930’s of which Mandeville Parkway and Northolt Park are the only surviving green open spaces remaining – it is our cultural heritage and sense of place, vital to our mental welfare and sense of community. In respect of the proposed plan for 02NO - is it sound? Our conclusion is ‘NO’ because: Positively UNprepared 1. The planning application referred to (221003FUL) was rushed through (originally with a tall building) and reviewed, only to increase the ‘grab’ onto the green spaces and the demolition of garages (small storage facilities for local businesses & residents) 2. Consultation with local population happened after the design process – and invited tweaking only – we did not feel ‘listened to’ nor part of the design process. 3. The map of the current plan 02NO includes the whole Mandeville Parkway being subject to development, including the Lewes Close housing – this is different from the above planning application and from the submitted plans with Reg 18. 4. The proposed development on Mandeville Parkway is just residential – where is the evidence of retail & service job creation, as part of the Spatial Strategy for Northolt 5. No infrastructure relating to communal/shared workplaces 6. No evidence of addressing the needs of the older, disabled and	Noted. The whole of the Parkway will not be developed. Any proposed development should not result in the loss of public open space and should provide opportunities for protecting and enhancing the existing public open space, making it more accessible for local residents.	02NO Mandeville Parkway		Paul Capon and Odile Wythe	Greenshoots	503	Community Interest Group

1). The Plan itself is verbose and repetitive. It is simply impenetrable to the vast majority of Ealing residents unfamiliar with planning jargon or issues. At 512 pages with multiple linked documents most residents will give up before they even start, the whole purpose seems to try to overload any member of the public who is interested. 2). Ealing’s housing target of more than 40,000 homes over the next 15 years is excessive and undeliverable. But if it were to be delivered, it would create unmanageable population growth of more than 80,000 people (more than the population of Guildford) according to GLA projections. “The borough of Ealing is already over-crowded. Hospitals and doctors’ surgeries are stretched to breaking point. Public transport is over-crowded; roads are congested and polluted. Electricity (given the push to electric vehicles) and water supplies are under severe pressure but the main thrust of this plan is to build, build. build and build more whatever the consequences will be for the infrastructure and current residents of the borough, 3). The infrastructure plans to support this very high growth rate are sketchy at best. Where are the plans for new sewers, electricity and other services. 4). The plan’s proposals for wholesale redevelopment of relatively new and serviceable buildings will exacerbate climate change. Friends of the Earth have commented: “As for action on climate change and achieving the council’s stated aim of ‘Net Zero’ – forget it! Building tower blocks causes far more CO2 emissions than conventional low rise and renovations.” Two of the largest emitters of CO2 are steel and cement production and that is what tower	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy. The case for enabling development exists entirely independently of Policy ENA, which serves to limit and define the scope of enabling schemes.	General		David Harvey		504	Individual
An 18 storey tower at Westway Cross would be totally out of place and dominate the adjoining areas of MOL. West Way Cross- P247 still has the quite ridiculous quote from very ill informed consultants: Providing better and safer active travel routes to the centre will reduce car reliance and traffic congestion and will also enable the better use of part of the large and currently UNDERUTILISED car parking area. Have they ever visited- the car park is certainly not under-utilised and you cannot carry large amounts of shopping on push bike !	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The site allocation proposes to create a masterplan that ensures an access strategy and cohesive street layout that establishes a hierarchical network of streets for pedestrian, cycle and car users visiting the retail, employment and residential uses on site. It also proposes to improve vehicular movement through the site with new north-south routes connecting Rockware Avenue and Lyon Way to Green Park Way.	04GR Westway Cross		David Harvey		504	Individual

05GR Former Greenwich School of Management site This site consists of the GSM block and the Ferrero headquarters with a car park at the rear, it is not used as one site. The Ferro building is a relatively modern stylish building (ex Glaxo headquarters) why knock it down and why should the company give up their UK headquarters or car park. Has anybody spoken to Ferrero? (Pie in the sky thinking).	Noted. The site allocation prooses an employment-led masterplan that should consider phasing and ownership, and explore opportunities for building retention, retrofit, infill and redevelopment to provide residential, education, office and community uses.	05GR Former Greenwich School of Management		David Harvey		504	Individual
8}. Some of the vast amount of consultant submissions are out of date : e.g. Black Horse Oldfield Lane North had been closed and boarded up for over a year with James Murray MP running a campaign to save it as a pub. 9) Ealing has been recently talking about plans for a regional park. We have seen no firm plans and maps in the plan. We have however seen proposals to close Perivale golf course and rebuild Gurnell leisure centre on MOL and a flood plain. 10 Mistakes and inconsistencies: (with interactive links) a) Greenford map - (P227 Fig G1) Sudbury Town Station incorrectly marked as Sudbury and Harrow Road. b) Greenford Map- (P 227 Fig G1) Border between Perivale and North Greenford wards extends north to Whitton Drive to Include the Horsenden Hill Activity Centre and Sudbury Golf Club course in Perivale ward. This does not agree with the council document GiS map (see link c)- wards from May 2022. (c) https://maps.ealing.gov.uk/Webreports/Elections/New_Wards_2022.html On this map the boundary to North Greenford is the canal with a slight deviation to include Horsenden Farm area in Perivale. There is a similar and other problems with the reg 19 “Interactive Map”: https://maps.ealing.gov.uk/map/Aurora.svc/runscript=%5cAurora%5cFinal_Reg19_Local_Plan.AuroraScript%24&nocache=504339599&resize=always&margin_bottom=1 If Ealing Wards in the boundaries section is switched on it shows the	Comments noted.	Policy G1: Greenford Spatial Strategy		David Harvey		504	Individual

The set of documents produced by the London Borough of Ealing (LBE) are over 500 pages to read. It is not easy to find a simple set of sub-documents on the same subject in order to establish the full guidelines and any changes they contain. It is therefore very difficult for the average person to comment. The Brunswick Panel however notes there is scant reference to management of local heritage assets in the new draft document. The National Planning Policy Framework (NPPF) in paragraph 20 states - Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for conservation and enhancement of the built and historic environment. Chapter16 expands upon this strategic framework - ‘Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account: a) the desirability of sustaining and enhancing the significance of heritage assets b) the wider social, cultural, economic and environmental benefits that conservation ... can bring; c) the desirability of new development making a positive contribution to local character and distinctiveness; d) opportunities to draw on the contribution made by the historic environment to the character of a place. London Plan 2021. Point 3.5.11. page 124. describes the value of	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on design, heritage and culture. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. Neither the Mayor of London nor Historic England have raised objections to this approach. Delivering good design, design scrutiny and maintaining design quality are important. The Local Plan at Policy SP3.3 D seeks to ensure that new development meets the highest design standards, responds positively to the local character and recognises the role of heritage in place-making. There are numerous other references to the importance of heritage and conservation throughout the plan including at Policies SP2.2 B (iii), SP2.2 D, SP2.2 F (i) and (vi), SP3.1 C, SP4.1 A, SP4.1 D–F. There are numerous other references to the importance of heritage and conservation throughout the plan. The plan also is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Rosanna Fullerton	Brunswick Co	505	Community Interest Group

We understand you represent Ealing Residents. Despite on going consultations it appears you are still not listening to those you represent in connection with our open spaces. Sport facilities are rare in the Borough especially in the Ealing Broadway district where its becoming more and more built up . Crime is on the increase because there is no outlet for the younger generation. Therefore it makes no sense to lose the Metropolitan status of Barclays Sports Ground when there are other more suited sites identified already in the borough and more suitable . Losing this green space would be a tragedy for Ealing Broadway and the borough and should be seen as an asset to the borough and the proposed regional park. * I object to the de-designation of part of Barclays Sports Ground as MOL * I object to allowing residential development on Barclays Sports Ground * I support the representations by Ealing Matters, Save Ealing Parks and CPRE	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled.	21EA Former Barclays Sports Ground		Dymphna Kerr		507	Individual
As a young person in the borough I want to ask YOU the PLANNERS the question - why are you DESTROYING our green spaces and our future well being? You are the ones who will be responsible to adding to more CO2 gases in an already highly polluted environment . The Barclays site is next to a polluting road and adding more buildings will make it worse. Ealing Council do not care about young people like me - or what we want. I play for Ealing Hockey club we can use this facility and can be used across the ages as it did before , Its good for our health and the environment . If you start with the bulldozers its lost for ever, there are kids my age doing drugs because there is nowhere to go . You see them in Ealing Broadway shopping centre . The only people who win are the developers and those who make money out of digging up green fields. My opinion matters and I object to Barclays sports Ground land being used for residential use when its a valuable sports facility - to change it to residential you are not listening to the youth of this borough and our future generations who need this outdoor space and sports facilities like these for our mental and social welfare.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet.	21EA Former Barclays Sports Ground		Lucy Kerr		508	Individual

There still seems to be emphasis on building and increase of hardstanding surfaces and lack of emphasis or inclusion of incorporating wildlife corridors through new developments to conserve and enhance the natural environment. Vast areas of flats are being built but more green spaces and connectivity for wildlife is required which can be put in place now to improve and maintain Ealing’s green-ness and connectivity for wildlife. Greenspaces and good ecosystems are essential for the environment and for well being of people. Green corridors are already being cut off, by building in back gardens which prevents wildlife from moving from garden to garden. I understand that the Sites of Importance for Nature Conservation (SINC) has not fully been completed yet and therefore is not taken fully into account in decisions affecting de-designation of Green Belt and Metropolitan Open Land. (MOL) It could therefore result in loss of SINC. Although some MOL may currently have hardstanding surfaces and appear insignificant in terms of ecological site, they could alternatively be reverted back to ecologically friendly open land and therefore provide opportunities to conserve and enhance the natural environment for the future of the borough. Once green spaces are built on, they are then usually lost forever and therefore should be preserved as much as possible.	Noted. The principal survey work for the SINC review (conducted over 4 phases) was completed in 2023. Work is ongoing to compile a full set of supporting documents including mapping. Once complete, the Council intends to submit the survey data and recommendations to a Local Site Selection Panel. Should further new revisions arise from this process it is acknowledged that these may need to be consulted on as part of any proposed modifications.	SP2.2 Climate action		Marion Taylor		510	Individual

Section 2 We object to the proposal to de-designate part of Barclays Sports ground as MOL, and to enable residential development on site 21EA, because this proposal does not satisfy the soundness tests as set out below. We argue that the Site Selection Report regarding site Ealing – 21EA contains multiple factual errors that greatly inflate the site’s suitability, while in reality the site is not suitable for the proposed scheme. By being factually incorrect, the Site Selection Report regarding Ealing – 21EA is not sound. Residential development on 21EA should not be allowed; therefore, the proposal to de-designate part of MOL20 should be dropped, as well. 5.1 Health and safety. Reg 19 ranking: green, proposed correction: red. {Figure: current traffic on Park View Road near Ada Lovelace School is already chaotic and poses a health and safety risk for the schoolchildren. All mitigatory measures (improved lights, signage prohibiting U-turns, road bumps) have already been implemented. Any further traffic increase on this road is unsustainable and will multiply the health and safety risks for the school.} 5.1a The site is adjacent to Ada Lovelace School and very close to St Augustines Priory school. Residential development will cause severe safety issues for the schools. Traffic is already a serious health & safety concern for Ada Lovelace School. Traffic on Park View Road (along Barclays Sports Ground) becomes extremely dense and dangerous during school drop off / on times. It already exceeds the capacity of the road. The school was forced to take extra measures to mitigate this risk even at the current traffic levels: increased lighting, ban on U-turns, etc. All sources of mitigatory measures have already been used to mitigate the current situation and there is	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. School capacities do change over time and any development would need to mitigate any adverse impacts regards the availability of school places as part of any planning obligations should development be consented. There are no physical vehicular access issues for this site. Traffic congestion associated with the ‘school run’ is a borough wide issue which can be mitigated by effective school travel plans and initiatives like the Ealing School Streets scheme which aim to change cultures and behaviour.	21EA Former Barclays Sports Ground			Dmitry Tonkonog	Save Ealing P	511	Community Interest Group

I have lived in Ealing for over 25years and have always loved living here. It is a vibrant, multicultural community with the emphasis on the word community. Whilst I applaud Ealing council's approach to devise this plan, there are notable flaws that significantly undermine the quality of life for all residents. Namely: Lacks a clear strategy for why Ealing needs so many apartments in high towers that are clearly designed for commuters and not for the people of Ealing. This plan has no evidence of need and shows a continuing Ealing's infrastructure will fail to support the proposed 80,000 new residents. The plan also grants a 'green light' to ultra high without recognising the growing evidence that developing high density towers as a way of providing housing is environmentally and socially unsustainable. The vibrant community of Ealing will be quashed into a dormitory town. Services are already at breaking point and this plan is reckless in the extreme. A clear example of the council's lack of foresight is allowing the gurnell swimming pool to be closed. West Ealing station is already very busy at peak times. Continuing to build in this fashion suggests a total disregard for the economic and health welfare for the people of our borough. It would drive out locals and replace them with commuters looking for 'dormitory' accommodation. It would also make it impossible to have multiple generations living together as these towers are aimed essentially at young, affluent and childless people. Is this what the council wants? Please reconsider the Plan.	Noted. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Helen Blackholly		512	Individual
The proposed use of site Ealing EA 21, the former Barclays Sports Ground, is described as a "leisure-led scheme with enabling residential use and facilitating access to sports and play pitches". If there is to be any enabling residential development on the former Barclays Sports Ground, it should be restricted to the site of the former and now derelict clubhouse in the north-west corner which is proposed for de-designation as Metropolitan Open Land (MOL). Residential development on any other part of the former Barclays Sports Ground would be unacceptable because it would reduce the amount of space available for sports and leisure use. We consider that the draft Local Plan is unsound in that it does not specify where the residential development should be located.	The design principles for 21EA state that any development should: "Limit the quantum of residential development to the amount absolutely necessary to financially secure the delivery of the replacement leisure centre and limit the amount of development on open space." It goes on to say that it proposes to: "Focus built development around the existing previously developed land and minimise encroachment into usable green space with future development located on the site of the existing club house building and immediate hardstanding only." This is also reflected via the proposed amendments to the MOL boundary which seeks to avoid introducing a policy conflict via the allocation. Whilst the allocation itself encapsulates the whole site, as detailed above the associated design principles direct built development to the north west corner. The value of allocating the wider site is in ensuring that the scheme is considered comprehensively.	21EA Former Barclays Sports Ground		Anthony Lewis	Ealing Cricket	515	Community Interest Group

There appears to be a large gap in the draft Local Plan because it hardly mentions Ealing’s heritage or its Conservation Areas, even though there were relevant policies in the previous Local Plan. The Borough has a rich architectural heritage reflecting the development of Ealing, especially in the mid-late nineteenth century and the early twentieth century. There are 28 Conservation Areas in the borough, with a 29th under active consideration. Paragraph 196 of the National Planning Policy Framework (NPPF) says that “plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats”. London Plan Policy HC1B says that “Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings” and goes on to explain in detail how this should be achieved. By ignoring these nationwide and London-wide policies, the draft Local Plan is unsound in relation to heritage and Conservation Areas. We have seen representations submitted by other community groups including Ealing Civic Society and Ealing Matters, and fully support what they have written about the lack of policies relating to heritage matters and Conservation Areas.	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan. The London Plan includes a suite on policies on design (D1-D14) and heritage and culture (HC1-HC7) and these are all used in the determination of planning policies. There is no need to repeat or duplicate policies and there are inherent risks of so doing. There are also many references to heritage in the 7 town plans and, where appropriate, in individual site allocations. The plan is also informed by a best practice Character Study and this also guides proposed site allocations and detailed policies on height.	SP4.1 Good Growth		Anthony Lewis	Ealing Cricket	516	Community Interest Group

Policy SP2.2 Climate Action/Policies-SP2.SP3.SP4.3.37.A1.E1.A6.H1. Site 01HA & Policy S1 B. (i) (ii) (v) As there does not seem to be a chapter or policy re actual transport and accessibility, the only Policy that I can include this response to Annex 1 of reg.18 from London Transport is this one although I have already covered the fact that 20 minute neighbourhoods do not exist in reality & although we do have access to public transport it is using the term access in its broadest form i.e. it is there on the map. Also I am not sure -are we now talking about the whole of the borough & not just Ealing as in (v) & (vi)? The borough does not have to slavishly follow the London Plan re parking spaces & cycle hoops- it can have Local Policies. I would also like to point out that probably when this document goes before the Inspector in 2024 the Borough will be experiencing a double whammy in that the Piccadilly Line is going to often be closed (we have already had 14 weekends of update work) to enable work connected to the new stock & the Elizabeth Line too whilst they sort out the track problems This was my response to Annex 1 re Transport & Accessibility-Many Local Plans have this heading as Policy. I have been a member of Transport for All for over 15 years and during that time I have been part of various campaigns connected to accessibility and the London transport system. I have attended numerous TfL/GLA/Crossrail/MTR/government meetings re accessibility over the years and was part of the campaign in 2013 to get all Crossrail stations accessible and advised (for free) Crossrail on matters such as lift size, ticket offices and signage. Ironically I have found using Crossrail trains very problematic as they are far too long for me to use without help (not easy to find) and the distance	Noted. Ealing is bringing forward a new Transport Strategy, which will include specific priorities for each of the seven towns, acknowledging their very different transport contexts and requirements. This Strategy will provide more detail on Ealing's approach to transport, including accessibility and cycling infrastructure. The Cycle Network Plan, which will be a component of the new Strategy, is submitted as a suggested addition to the Local Plan evidence base. Investment in cycling infrastructure and station step-free access is determined by Transport for London, through the Mayor's Transport Strategy, and its target of 80% of journeys being made by walking, cycling and public transport by 2041.	SP2.2 Climate action			Susan New	517	Individual

Policy SP1 - 20 minute neighbourhoods. My neighbourhood is Northfields & ironically in 1980 when I moved here, able bodied, I even had a 10 minute neighbourhood-2 banks, 2 POs, 4 butchers, a hole-in- the-wall greengrocer, fishmonger, a small supermarket, paint shop etc etc but now just cafes, restaurants, an expensive bakery, cheese shop, hairdressers & estate agents. I am on a limited budget & so I now have to get a bus to shop & it takes far longer than 20 minutes. Even the bus stop nearest my GP has gone. And then when I get to West Ealing with its cheaper foodstuffs- most of the shops there are now empty. A promised retail unit at street level of a new block of flats that replaced BHS is now a gym. And exactly what is modern infrastructure- most of our buses are Enviroo400s, most bus stops do not meet guidance access standards despite saying that they do and loads of Countdown is missing along with basic bus route information and maps. On my trundles to bus stops with no information I have to pass at least 30 empty cycle hoops and 3 electric charging points with electric vehicles like Range Rovers & Teslas & even the odd Jaguar I-Pace which are so heavy due to the size of the batteries that, as a pedestrian, I know if one hit me I would not survive. The Council is installing more charging points & charging points are being installed near every new development and so car use will not be reduced- they will just be either hybrid or electric cars. And we, the underclass, are left at filthy bus stops, often in the rain & wind, staring into the distance just waiting for an overcrowded bus to turn up. As was mentioned at a recent GLA transport Committee meeting	Noted. These matters have been raised with Transport for London, with a view to improving bus stop and service provision.	Policy SP1: A Vision for Ealing		Susan New		517	Individual

Policy SP2: Ealing is bereft of anything ‘high quality’ from pavements to roads. There is street clutter everywhere, dangerous and often filthy pavements and roads that are in such bad shape that a bus ride might actually cause a fractured bone. Developments often avoid S106 pavement improvement monies or they are never collected and we don’t have CIL. I don’t wish to repeat all the points I made in SP1 but they also apply to SP2. No mention of car clubs and exactly where are the people going to live who need cars for their work such as carers, council officers who need to visit families and numerous other people. The Arup evidence mentions intergenerational living in Southall as if it was a new phenomena-it was ever thus and one only has to visit a hospital to see how important car use is to such families as they struggle to get elderly relatives into the facility. I have often seen very elderly people struggling to get on a bus with a walking aid as most of the buses are so badly designed it is not an easy thing to do. We have quite a few refugees and asylum seekers in Ealing & some of the early Somali refugees came to live in flats near me and what did the women do-learn to drive & get a car. Quite impressive and the easiest way to ferry a large family around. Logistics network-if only. Most of the logistics sites now have tower blocks built on them & the canal could have been used for transportation but all the places that were docks cannot be used as they too now have tower blocks built on them.	Noted.	Policy SP2: Tackling the climate crisis		Susan New		517	Individual
Policy SP3: Yet more cycling! Access to healthy food-one cannot get through a day without somebody pointing out that it is easier for the wealthy to get access to healthy food than the less well off. I am envious of people who can pop off to Waitrose in their car & can afford to buy responsibly sourced food but I can’t. It is cheaper to do a weekly shop & we do have 5 branches of Lidl in Ealing & the busiest are the 2 with car parks but of course both of these car parks are down to be removed. Also in many major developments a small supermarket was promised & then never appears along with the play areas etc etc. I have to carry my food in a small backpack & so actually getting any food is quite frankly incredibly boring & time consuming given the amount of time I have to wait at bus stops. ‘Active Travel’-mentioned 100s of times in this document but I took part in the online zoom ‘haveyoursay’ on the Ealing Travel Strategy-a mixture of cyclists, pro & anti LTNers & others & near the end a participant said was a civilised conversation we had participated in but everyone thought that the expression ‘Active Travel’ was discriminatory i.e. those people who could not cycle were somehow second class & not trying to be healthier.	Noted.	Policy SP3: Fighting inequality		Susan New		517	Individual

Policy SP4: Cycling yet again! The Borough is a suburb that attracts families-it is not trendy Hackney or Spitalfields. People tend not to work in the borough unless at home. Even the Council itself-only 33% live in the borough & only 18% come into work here. The West London Orbital only serves a tiny part of the borough-Acton Main Line & South Acton-and is not of a major benefit to most residents as I don't see that many people will use it especially via South Acton. There was another scheme put forward in 2008 and would have been even more beneficial rather like the tram (of which I was a major supporter in a camp of one). West London Orbital 2008 https://www.railnews.co.uk/news/2008/07/01-tfl-new-tube-line.html We did have bus stations but they disappeared hence I believe that routes had to become longer and longer so that buses could reach an actual facility or stand. We could have an excellent bus facility at Ealing Broadway Station in the old BBC car park-first proposed in 2004 & now is deemed too expensive to lease. It would appear that the 607 is now part of the so-called Superloop-express bus- east-west. Well it is not my idea of an express bus as a. it takes ages and is often overcrowded especially from Acton to Shepherd's Bush {images of buses} and b. it is a badly designed bus with a step up to most of the seating (even a young person tripped on it recently) & only 4 priority seats and very few people choose to go upstairs. And some stops do not even have Countdown. My idea of an express bus is the Glider in Belfast not just a rebrand of what we have already. https://www.infrastructure-ni.gov.uk/articles/belfast-rapid-transit-glider-introduction <u>Working with neighbouring authorities is a good idea but it seems to</u>	Noted.	Policy SP4: Creating good jobs and growth		Susan New		517	Individual
Policy A1-Acton Spatial Strategy: Bus infrastructure should also include accessibility for passengers as many of the Acton stops are overcrowded and not accessible despite TfL saying that 98% of stops are. So called rationalisation has meant that too many buses stop at one stop. I don't understand the bus infrastructure relating to Acton Town Hall & Acton Old Town Hall as we only have Acton Old Town Hall & the layover was for the 427 that TfL mistakenly has withdrawn leading to massive overcrowding on the 207 route. The E3 stop which served the Old Acton Town Hall should be reinstated to its original site in Winchester Street.	Noted. These matters have been raised with Transport for London, with a view to improving bus stop and service provision, particularly along the Uxbridge Road.	Policy A1: Acton Spatial Strategy		Susan New		517	Individual
Policy A6: Step free access was first mentioned in 2013 at an Access Committee meeting (disbanded in that year) but the Council has never asked for enough money re S106 monies for lifts to be installed. Too little too late.	Noted.	Policy A6: North Acton and Park Royal		Susan New		517	Individual

EA04: Ealing Broadway Station. Sustainable transport should also be accessible transport and having been part of the campaign in 2013 to get all Crossrail stations accessible Ealing Broadway is a dismal failure in every respect. I also helped with access issues for the whole line with John Goldsmith who then worked for Crossrail. My tiny team (unpaid) covered all major disabilities and PRM needs. This is an extract from a local web site. ‘None of which has anything to do with the council. Indeed the only Elizabeth line station with which they were involved directly in the design, Ealing Broadway, is an absolute disaster for disabled travellers, anybody involved in the final stages of that should hang their heads in shame’. A great deal of money has been wasted on York stone paving which looks filthy-even after a few weeks, as that is the nature of major station public realm. Cycle stands have taken precedent over putting in a disabled drop off point, the platform to train height is too high & Crossrail refused to put in humps, the canopies are too short, the toilets are not finished and the other part of the station still looks like a hangar from WW11. The old BBC car park (a development site) should be used for bus layovers & driver facilities as the area is so constricted now that buses like the 65 block areas where other buses pull in so making some buses even more inaccessible than usual as they cannot pull into the kerb. Shuttle buses also block bus stops leading to buses blocking the road as they cannot reach a bus stop. (Image of bus) ~~This shuttle bus is blocking the temporary bus stop for the E2 & E8~~	Noted. The relevant matters have been raised with Transport for London.	Policy E2: Ealing Metropolitan Town Centre		Susan New		517	Individual
EA05/EA06: If the Central Chambers were demolished and the car park leased this area could form an interchange fit for purpose where there could be facilities for both drivers & passengers not that dissimilar to Hammersmith (a brilliant interchange) & this was suggested in 2004 & then nothing-as usual.	Noted.	Policy E2: Ealing Metropolitan Town Centre		Susan New		517	Individual

HI/01HA: Given that the number of units that Ealing is supposed to provide Ealing Hospital is the only hospital in the borough & it needs to expand and therefore the car park is the only area it can expand into and still provide parking facilities. It does not even have a maternity unit or paediatric services. It is not just disabled people who need parking and given its proximity to Southall it is important to retain parking as the intergenerational families in Southall use cars to transport their ailing relatives and also to get access to the rather paltry A & E services. The bus services are completely inadequate to provided comfortable transport to this hospital. I use them and even getting the bus to lower for me to get on or off is a major matter. And I would suggest this is the last place to have a floating bus stop as proposed but I suppose if one gets mown down by a cyclist one will not have far to go to get treatment.	Noted.	01HA Land to the front of Ealing Hospital		Susan New		517	Individual

Policy S1 Southall Spatial Strategy and Southall generally: As I don't live in Southall it would seem somewhat of a cheek to make comments about the area & so these are some quotes from a Southall Resident in response to the Local Plan. It is interesting that the dreaded phrase Active Travel comes in upTfl's document but not cycling. 17. People will be travelling on buses and trains for the thousands of jobs that are in the pipeline and actually being developed. They will Not be cycling. As the Council states 86% of Southall people identify as 'non-white' and the diverse immigrant communities have their own cultures and cycling is not part of it. The Council are spending millions on cycle lanes imposing a cultural change on the people on the basis they have health issues and overweight, but still fail to understand that they happily walk, but do Not cycle Ealing Council refers to the Shaping Ealing survey, saying that Southall is concerned most about "walking and cycling". At the presentation by the engagement officer at Southall Town hall 28 /07/22? I explained issues around Ealing's belief that Southall is 'cycling' everywhere. It was pointed out by everyone present at SCA that we don't cycle everywhere. It was pointed out the Shaping Ealing question was loaded. There should have been 2 separate questions: one for walking and one for cycling. Ealing would have learnt that the public realm for walking is the issue: broken, uneven and filthy narrow pavements are a safety hazard. We easily step off the kerb to walk safely in the road side gutter. • We stand on the cycle lane at the floating bus stops. The cycling policy is not working. • People are buying electric or hybrid cars. They have started using	Noted.	Policy S1: Southall Spatial Strategy		Susan New		517	Individual

Conclusion Quote from Disability Rights UK re Transport & Accessibility: "Disabled public transport passengers are consistently and disproportionately impacted by increasingly regular failings in the provision of services. We must change the piecemeal approach in the industry from the top to bottom. I have found by both experience and example of others how bad and disengaged the situation really is. Particularly lately on multi operator journeys I expect something to go wrong. It's just waiting to see how badly it goes wrong. Train companies need to take responsibility as a form of duty of care to say they will no longer accept "failed assists", or service glitches as Disabled people have a right to travel. Bus companies and operators need within commercial responsibility to align their policies more consistently to provide some confidence in services rather than keep saying this route is changed or is no longer operating. DR UK know that so many Disabled people put up with appalling service because they just don't know that they are entitled to more and they don't know where to go to complain. But let's be clear, most Disabled people don't want hassle, they don't want compensation, we want to get a decent bus or rail journey. An important access issue is that the transport industry is still procuring vehicles off the shelf which are not disability assessed which means that there is frequently a costly set of changes to make them at best basically accessible. Transport comms groups are good at saying 'sorry' and we know that behind closed doors companies bleat about disability access costs, but they must remember that we need something to happen and this is partly down to the DfT and Government ministers to say that this grudging service provision must not continue and clearly understand that many households	Noted. Public transport provision is a key priority for Ealing, working with Transport for London, and the forthcoming new Ealing Transport Strategy will provide details on the transport contexts and requirements of each of the seven towns, including accessible public transport services.	Policy E2: Ealing Metropolitan Town Centre	SP2.2 Climate action	Susan New		517	Individual

Policy H16-Large scale Purpose Built Shared Living: What I don't understand is why there are not two different policies re PBSA as they are supposed to serve a different purpose-one is Co-Living which is supposed to be for people who I assume are working & the other is student accommodation. Some applications come under student accommodation & others under Co-Living. I don't quite see why large scale purpose built shared living is restricted to the Ealing Metropolitan Area unless it takes over sites like the Revolution site in the Uxbridge Road & the empty hotel site opposite. There is already a co-living enormous development in the OPDC or is it North Acton-The Stay Club- and that seems quite attractive and then is an 81 bed development that is nearly built near the NatWest but it is very cramped & also the old Lamerton site & Sandringham Mews is destined for Co-Living (the latter would have been better for social rent larger units as they are near a park & other amenities) but the policy says that there are no identified needs for shared living in Ealing (Borough or Ealing ?) Southall would seem to be an ideal place for some PBSA student accommodation as many students at local higher education institutions live in Southall. If Co-living is to work it must offer amenities and not just be like a hostel. Even co-living is not cheap at £275 & £305 a week. Just changing old office space into shared living will not work unless really good amenities are provided. The London Plan states that the whole city needs 3500 units for students but the Borough alone plus parts of the OPDC which was N.Acton seems to have built, be building or developers want to build over 2000 units of student accommodation in west London. To me it is better to have all the Co-living & student accommodation in high rise blocks in clusters such as in North Acton-away from residential	Noted. There are already two separate policies for students and co-living and their parent policies are in the published London Plan (2021) at H15 and H16. The London Plan is an integral part of Ealing's local development plan. Large scale purpose built shared living depends for the amenity of its residents upon access to excellent public transport connections and a wide range of local amenities. Within the borough this type of development is therefore directed to Ealing Metropolitan Town Centre.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation			Susan New	517	Individual

Leader's Forward-0.1-0.14: The Leader of the Council states that the Local Plan by necessity is a technical and highly specific document however to make it easier to actually read, and he thanks us for reading it, it would have helped if it did not look like a brochure for developers with idealised photos of the Borough only seen on sunny days as all the photos slow down the process of actually going through over 500 pages of it as we do not all have computers that can cope with so much visual information. If I had the time or the skills I would have produced a series of photos based on Banksy's Dismaland which show a more realistic version of the Borough e.g. instead of a sunny version of Perceval House-one which showed, before they were moved on, the homeless encampment on the steps, me at the bus stop in West Ealing in the close proximity of the drug addled or drunk or my standing in the rain with 25 other people at a bus stop with no Countdown just hoping a bus might appear, empty cycle hoops, fly tipping, lime bikes blocking the pavements, people living in rundown shipping containers & so on & so forth. 'This Local Plan shows what Ealing has to offer the world' would seem to be a phrase for developers not for the residents of Ealing-Ealing as in Borough or Ealing as a town? The whole document is inconsistent in sometimes it is the Borough & sometimes Ealing. The seven towns does not work as a concept and should just be 'districts' as in the UDP or if Council insists on this concept the terminology must be consistent which it isn't. Even the foreword could be reduced to one page as we seem to be back to the old mantra of 'Make Ealing a Better Place' & people understood that this was the whole borough not just the 'town' of Ealing. And although it is not mentioned in the foreword the whole document just has a few main themes. affordable homes. Active Travel (mainly	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council's ambitions and plans for each of the seven towns that make up the borough. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. The Local Plan is also based on an extensive technical evidence base. How the Local Plan is produced and much of the policy content required is prescribed in local plan making regulations set by the Government.	General		Susan New		517	Individual

Monitoring Framework: What monitoring? The last AMR was for 2014/2015 and I am someone who asked every year for one to be produced, after 5 years of asking for one I passed the onerous task of trying to get the Council to produce one to somebody younger and with more tech. skills. Residents have produced their own spreadsheets of which developments have been passed at the Planning Committee and the number of units proposed & a few years ago it would appear that the Borough was already up to 30,000 units-way above what was then proposed in the Core Strategy. This was a response re a request for an AMR from 2021: " Dear {name redacted}, I can provide an update on the AMR. Firstly I wanted to apologise for the ongoing delay in publishing a new AMR. We had hoped that we would have completed the exercise and published the report by the end of June, but unfortunately a number of sections still remain incomplete. I don't know the extent to which colleagues have previously outlined some of the difficulties we have had in compiling some of the data which inform a number of key sections in the report, and so perhaps it would be helpful for me to briefly explain why obtaining this information has been such a challenge, and therefore the reason for the delays. Although large sections of the AMR have now been drafted, two key components are incomplete. These are the 5 year land supply and housing trajectory which identify future supply and delivery. In respect of 'future years', both are informed by a number of sources, and perhaps the most significant component is the approvals pipeline. For previous AMRs and Five Year Land Supply statements, the live approvals data would have been extracted from the London Development Database (LDD) maintained by the GLA. The LDD has now been replaced by the Planning London DataHub, which went	Noted. The key components of thje AMR relate to data on housing and are specified in the regulations. A 5YHS and Housing Trajectory was published in November 2023. A further update, including the most recent monitoring period 2023-24, will be published in early 2025.	General		Susan New		517	Individual

The document is extremely hard for the average Ealing resident to read and understand, making the representation form almost impossible to complete. I fully support the comments made by Ealing Matters about the shortcomings of the plan in general. In particular, I would like to say that the ambition to house an additional 80,000 residents will have major detrimental effects on the existing population in terms of lack of provision for additional infrastructure when services, particularly GP surgeries, are already almost at breaking point. In summary, the plan needs to be scaled back and more consideration given to the quality of life for the new and existing residents.	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	General		Cathy Grant		518	Individual
Tall buildings – Hanwell is predominantly low-rise, with small Victorian houses. Buildings over 6 storeys will dominate the area and change the character. They will also create wind tunnels, as has already happened on the Boston Road in front of Hanwell Square.	Noted. The Local Plan expects a lower quantum of residential led development within Hanwell reflecting fewer development opportunities than say Ealing or Southall. This is reflected in the number of development sites (8) of which half are considered to be potentially appropriate for a tall building (mostly in the district town centre). As specified in Policy H2 future development will be character led.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Cathy Grant		518	Individual
01HA - Ealing Hospital. The hospital site (the car park) is NOT suitable for a building of 12 storeys and there are likely to be privacy issues with it being so close to the hospital. The development is overly dense for an area with little infrastructure.	Noted. Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study. Heights are to range up to a maximum of 12 storeys (42m) stepping down from the recently redeveloped high rise high density residential development at St Bernard's Gate. Key infrastructure required includes: Green links to Capital Ring/MOL (Fitzherbert Walk/River Brent). Public realm, landscaping and greening improvements. Flood risk mitigation (fluvial and surface water). Health facilities.	01HA Land to the front of Ealing Hospital		Cathy Grant		518	Individual

02HA – Gray’s Garage. Again, no infrastructure proposed and no parking provision.	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to the heritage aspects of the adjoining St Mark’s Church & Canal Conservation Area to the south and the Hanwell Clock Tower Conservation Area to the north-east. It is proposed that a mixed-use development that provides residential, commercial space and public open space should come forward therefore ensuring some employment opportunities in the future. Key infrastructure required includes public realm improvements and measures to improve permeability and active travel.	02HA Gray’s Garage		Cathy Grant		518	Individual
03HA – George Street car park. This is the only car park in Hanwell and is vital for local businesses. A tower would dominate the conservation area around the clocktower and the surrounding small houses.	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to heritage aspects of the adjoining St Hanwell Clock Tower Conservation Area to the east. The design principles for the site seek to ensure that the height of any development proposals takes into consideration the 2 storey terraced cottages fronting the site, with scale and massing responding sensitively to the low-rise surrounding housing. They should reflect the fine-grained character of neighbouring streets. A mews style development is proposed to reflect existing adjacent residential development, with tree planting and soft landscaping to improve the public realm. The site also benefits from a relatively good public transport accessibility level.	03HA George Street Car Park		Cathy Grant		518	Individual
04HA – Lidl and Poundstretcher. Again, no proposals for medical, education or social facilities for the additional population.	It is intended that a supermarket will be reprovided on the site. Key infrastructure required includes public realm, landscaping and greening improvements and measures to improve active travel.	04HA Site of Lidl and discount store		Cathy Grant		518	Individual
05HA – Marshall site. 8 storeys is too high when the surrounding streets are all low-rise dwellings	Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study. It is proposed that a new community space on the southern part of the site is provided.	05HA Marshall Site, Gold’s Gym & Garages on Montague Avenue		Cathy Grant		518	Individual

06HA – Tile shop on Boston Road. Takes away local business. Again no proposals for meeting medical, social or educational needs of the additional residents.	It is proposed that affordable and assisted housing be reprovided alongside the provision of new residential and community uses. In addition, Chris Payne House will be retained.	06HA Tile Depot & Lambourn Close		Cathy Grant		518	Individual
I would like to raise objections to some items in the Ealing Local Plan. The infrastructure plans to support the housing target of more than 40,000 home in the next 15 years are not adequate to support the growth in population. The borough is struggling with adequate transport links, adequate charging facilities for electric vehicles, maintaining roads, parks, cycle ways, leisure facilities and other public spaces, providing adequate sewer and waste water management, managing fly tipping and other public nuisance behaviour, providing enough GPs, providing enough preschool places and even the ability to deal with the queries and concerns of the current residents. Without having plans to address these issues it is too soon to commit to such a large increase in population. I also object to the Local Plan allowance for tall building heights, especially in Ealing and Acton. Highrise living or working is not carbon neutral if you factor in the carbon expending on producing the concrete for the buildings. Equally they are not environmentally efficient. It places an undue burden on neighbourhoods that stand in the shadows of the buildings. The Ealing Local Plan should have greater provision for preserving the existing heritage of the borough and the Metropolitan Open space.	Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. Infrastructure needs are modelled variously upon population or household projections depending upon the type of provision, with health, for example, based upon GLA population projections. The local plan is subject to binding housing targets and it is not the role of the LPA to produce population projections. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Marina Kalkanis		519	Individual

I wish to register my serious concerns re the potential negative effects this Ealing Plan would have on the Ealing area, if allowed to go through. It seems a badly presented Plan offering poor evidence based analysis and success monitoring measures. How is Ealing's infrastructure going to support 80.000 new dwellers ? The kind of high density housing that Ealing is committed to developing is not what local people want, it would negatively impact the quality of life and break up communities, once this happens, there could be no going back. In this regard, I fully support Ealing Matters' concerns and urge this Plan not be accepted.	Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth.	General		Mary Karelia		520	Individual
I have considered the Ealing Local Plan contents and frankly am extremely disappointed with the proposals. Please take this email as my objection to its adoption and I would refer you to the points raised by Ealing Matters as echoing my own.	Noted.	General		Stephen Yates		521	Individual
Thank you for consulting us on the Ealing Local Plan update. This email forms for the basis of our response. Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure. {Comments dealt with separately}	Noted.	General		Grace Lewis	Network Rail	522	Statutory Body

Development Site: ACT6 Acton Crossrail Station and 239 / 265 / 267 / 305 /307 Horn Lane Acton W3. This site is allocated within the Ealing local plan. The site is allocated for the consolidation of industrial, aggregates and waste facilities to the north, safeguarding of the rail sidings and the introduction of commercial and residents uses to the south of the railway. It is now unlikely that the land to the south reserved for residential and commercial use will ever come forward for development. On this basis the site is not considered suitable, available or deliverable for a residential scheme and therefore the site should be removed from the local plan as an allocation. As the site is former BR land, Network Rail are looking to provide an access through the site in order to allow for continued maintenance of the railway. Network Rail's operational requirements are necessary to maintain operation of the railway and therefore it is foreseen that that is unlikely to change. Removal of Allocation AC12 It has been acknowledged from the local plan update that allocation AC12 has been removed from the plan.	Noted. The current adopted plan will be replaced once the new Local Plan has been adopted which is expected to occur in Summer/Autumn 2025, subject to the independent examination process and adoption process thereafter. The proposed allocation AC12 has been removed because it is acknowledged that there are significant issues that would likely prevent delivery over the plan period including the need for safeguarding land for the railway, waste and aggregate functions. It should be noted that Policy A2 B says: "B. To explore the potential for mixed use development at Acton Sidings through either consolidation or suitable off site reprovision of the existing waste and aggregates facilities." The council would welcome a further opportunity to discuss future possibilities for development of at least part of this site and is part of a consortium of boroughs now preapring a revised West London Waste Plan. It is acknowledged that any development is unlikley to happen in the short to medium terms but we want to maintain a watching brief in the event that corcumstances do change in the longer term.	Policy A4: Acton Main Line Station and Environs		Grace Lewis	Network Rail	522	Statutory Body

Site Allocations: Acton: • 07AC – Dean Court • 04AC – Builders Merchants Bollo bridge Road Ealing • 1EA – Broadway Connection and Arcadia Shopping Centre • 5EA – Perceval House • 15EA – Waitrose Ealing • 16EA – West Ealing Station Approach • 18EA – Access House and T Mohan West Ealing Greenford • 04GR – Westway Cross • 03GR – 370-388 Oldfield Lane North Hanwell • 07HA – Copley Close Estate Northolt • 01NO – Car sales Site and Northold Leisure Centre Perivale • 03PE – Alperton Lane North • 04PE – Alperton Lane South and Metroline Depot Southall • 01SO – Southall Crossrail Station and Gurdwara (Network Rail owned) • 02SO – Southall Sidings • 11SO – The Green Quarter • 17SO – Great Western Triangle All applications should consider noise and vibration from the operational railway and should ensure this is mitigated. This should include closed windows on the railway side, high quality noise installation, and vibration mitigation in the foundation design. Where residential development is proposed adjacent the	Noted and acknowledged. A suggested modification is proposed for the supporting text for Policy DAA in Chapter 5 to ensure any impacts are properly considered.	Policy DAA: Design and Amenity – Ealing LPA – local policy		Grace Lewis	Network Rail	522	Statutory Body

Level Crossings Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings listed above. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail. Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that they safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission. Level crossings can be impacted in a variety of ways by planning proposals: • By a proposal being directly next to a level crossing • By the cumulative effect of development added over time • By the type of crossing involved • By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing	Noted and acknowledged. Two major railway projects are being actively promoted where this may be a significant consideration - the West London Orbital Railway and a Brentford to Southall link. In both cases there is and will continue to be active dialogue with Network Rail to consider any impacts and agree how these can be successfully mitigated. These schemes are referred to in Policy SP4.1 F and Table SS1.	SP4.1 Good Growth		Grace Lewis	Network Rail	522	Statutory Body

Please find attached representations on the Regulation 19 Local Plan consultation, which are submitted on behalf of Ealing Matters. We would be grateful for your acknowledgement of safe receipt. They are: 1. Legal non-compliance of the plan 2. Policy SP2.2 Tackling the climate crisis 3. Policy SP4.1 Infrastructure 4. Policy SP4.3 Genuinely affordable housing 5. Policy DAA: Design and Amenity – Ealing LPA – local policy 6. Policy DAA: The need for policies on local heritage 7. Policy DAA: The need for a policy on amenity and play space 8. Policy D9 Tall Buildings London Plan – Ealing LPA – local variation 9. Policy HOU: Affordable Housing – Ealing LPA – local policy 10. Policy H16: Large Scale Purpose A558Built Shared Living – London Plan – Ealing LPA – local variation 11. Policy ENA: Enabling Development – Ealing LPA – local policy 12. MOL11/Development site 19EA 13. Monitoring framework 14. The Plan’s format and presentation In response to the request at Para 0.41 of the Plan that submissions put in by groups indicate how many people they represent and what mandate they have to speak on behalf of them, we advise as follows. Ealing Matters is a borough-wide alliance of more than 70 residents’ associations and community groups. Our aims are to raise	Noted. Responses to each of the submissions are provided separately.	General		Will French	Ealing Matte	523	Community Interest Group

1. Legal non-compliance of the plan The Plan has not been produced in accordance with legislative requirements. In particular: 1. This plan is the second to have been prepared by LBE under the Planning and Compulsory Purchase Act 2004. The first was adopted in 2012. The Act and its associated Regulations make no provision for sequential plan-making. To the contrary, Regulation 10A provides that plans must be reviewed at least every 5 years to take into account changing circumstances affecting the area or changes in national policy. Notwithstanding many changes both in local circumstances and national policy, Ealing's 2012 Plan has never been reviewed. Progress on its implementation has not even been reported on – see 4 below. Instead, para 0.49 provides that under the current exercise, the 2012 Plan as well as a suite of DPDs and the Southall OAPF are to be ditched with no consideration for their performance or their continued relevance. Planning Authorities have no incentive to take ownership of their plans if they can set them aside at will and without ever accounting for what they have achieved. Southall's Opportunity Area Planning Framework requires particular mention. This RTPI award-winning plan was jointly drawn up by LBE and the GLA after a wide ranging local consultation exercise called 'Southall's Big Conversation'. The OAPF was adopted as an SPD by the Council as 'a development framework within which proposals are assessed to secure the highest quality development and ensure a comprehensive approach to the revitalisation of Southall'. The	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan. This provides a strategic framework for Ealing that includes, for example, housing delivery targets and detailed development management policies. Ealing does seek to not repeat or duplicate policies in the London Plan. Regards the Southall OAPF, it was adopted in 15th July 2014 and is now over 10 years old. As the new Local Plan has adopted a town based approach including a chapter on Southall it will be superseded and replaced. Until the new Local Plan is adopted it remains in use. It can be found here: https://www.ealing.gov.uk/info/201164/local_plan/1783/southall_opportunity_area_planning_framework and is clearly signposted from the Local Plan landing page on the council's web site.	General		Will French	Ealing Matte	523	Community Interest Group

1. Legal non-compliance of the plan 2. Regulations 18.1 and 18.2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that a Local Planning Authority must notify persons, including residents ‘of the subject of a local plan which the local planning authority propose to prepare’, and to invite them ‘to make representations to the local planning authority about what a local plan with that subject ought to contain’. Ealing Council did not invite any representations under Regulation 18 about what the plan should contain and so there was no opportunity for residents to make representations as to the things that should be in it. Ealing Council’s Shaping Ealing survey, which preceded the Regulation 18 consultation, garnered many thousands of responses, but it too did not invite residents to make representations regarding the content of the plan. Had they been invited they may well for example have proposed, as Regulation 18 entitles them to, that the plan include planning frameworks for parts of the Borough such as Ealing, Southall and Acton which are proposed to be subject to major change, or that it respond to London plan policies by including policies on the conservation and enjoyment of the historic environment, or on amenity and play space standards in large developments, or on tourism and the night economy, the strategic opportunities of the River Brent and our canal network, or on bio-diversity and access to nature or on back garden developments.	Noted. This is simply not true. The plan has been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. The Reg 18 version makes clear that: "All consultation feedback received will be considered and inform an amended version of the Local Plan, called the Proposed Submission Local Plan (Regulation 19). We invite everyone with an interest in the future of Ealing to provide comments on the Local Plan..." (Para 0.11). Subsequently, a consultation update was published setting out the key issues raised in the consultation and some broad metrics. It also provides details of the 48 public events conducted during the consultation including workshops, walking tours and other events that included both in person and online events at different days of the week and different times of the day. A summary of the key changes made in the Reg 19 Local Plan is provided at Paragraphs 0.20 to 0.25 and Table 1. These included significant changes based on the feedback received including major changes in scope, approach and detail including the withdrawal of over a third of the proposed Development Sites and amendments to boundaries of over a quarter of the remaining sites.	General		Will French	Ealing Matter	523	Community Interest Group

1. Legal non-compliance of the plan 4. The plan is not based on information that Government legislation and regulations require it to be based on: - Section 35 of the 2004 Act requires planning authorities to prepare and publish Authority Monitoring Reports (AMRs) over no more than a 12-month period which describe 'the extent to which the policies set out in the local development documents are being achieved'. Regulation 34 of the Town and Country Planning Regulations 2012 requires that AMRs showing progress with policy implementation must be published every year. No AMRs for Ealing to inform this plan with regards essential housing delivery data have been published since the year 2013-2014. - With an 'interim' and incomplete AMR covering the years between 2014/15 and 2018/19 published in 2021, no AMRs of any description covering the past 4 years inform this draft plan. - Regulation 3 of the Town and Country Planning (Brownfield Land Register) Regulations 2017 requires local planning authorities in England to prepare, maintain and publish registers of previously developed (brownfield) land. These should form part of the SHLAA. Ealing has not produced a brownfield land register since 2017. Information on brownfield sites required by the Regulations is not therefore available. {Suggested modification:} I am not sure. I do not know how the very serious omissions described above can be legally remedied. I want Ealing to have an up to date development plan, but I am disturbed that this one has not been prepared in accordance with legislation	Noted. Section 35 of the Planning and Compulsory Purchase Act 2004, has been amended by Section 113 of the Localism Act. The 2011 Localism Act removed the requirement to publish/submit reports annually, and renamed Annual Monitoring Reports as Authority Monitoring Reports. Ealing published an Interim AMR in October 2021. The key components of the AMR relate to data on housing and are specified in the regulations. A 5YHS and Housing Trajectory was published in November 2023. A further update, including the most recent monitoring period 2023-24, will be published in early 2025.	General			Will French	Ealing Matte	523	Community Interest Group

2. Policy SP2.2 Tackling the climate crisis Tackling the climate crisis is a high priority for many people, but Policy SP2.2 is not likely to do this in planning policy terms because it is aspirational and because its land-use policies too vague are unspecific. The objective for the Borough to be carbon neutral is a most worthy one, but there is no evidence base at all to demonstrate how it can be achieved and no monitoring framework is proposed to measure whether the policy is succeeding. Furthermore, the plan's overall focus on the widespread redevelopment of buildings that were erected relatively recently (i.e. in the past 40 years) is fundamentally at odds with best practice guidance for carbon reduction being promulgated by UK professional bodies like RIBA and RICS. These highlight the construction industry's huge environmental impact, and urge us to 'think reuse first, new build second'. They show that the construction industry is responsible for: • 35-40% of the UK's total emissions • almost all the planet's carbon-hungry cement • 50% of its steel production • 25% of all plastics And they argue that tearing down and replacing existing buildings is particularly wasteful. Almost two-thirds of all UK waste is construction debris. More than 90% of the resulting waste material is recovered, but most is recycled into a less valuable material which	Noted. Policies in the Local Plan (and indeed the London Plan) must be read as a whole. Policies in Chapter 3 provide a strategic policy framework for Ealing LPA and set overall objectives. Detailed DM policies are set out in Chapter 5 and includes a whole suite of policies on climate action most of which go beyond the current scope of the London Plan although are based on a common evidence base that the Mayor of London helped procure and coordinate. In particular, this includes Policy WLC on the whole life carbon approach. Applicants will be required to undertake an optioneering exercise as part of the Whole Life Cycle Carbon Assessment, which seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option. The findings of this optioneering exercise should be considered alongside other planning considerations to determine the most appropriate option, including consideration of a retrofit first approach. The 'options' considered should include reuse/refurbish options, alongside any new build options if pursued. All options evaluated should be capable of comparison reflecting the same best practice standards.	SP2.2 Climate action			Will French	Ealing Matte	523	Community Interest Group

3. Policy SP4.1 Infrastructure NPPF Para 20. Requires that: ‘Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat). NPPF Para 34 requires that: ‘Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).’ London Plan Policy D1.B states that: ‘In preparing Development Plans, boroughs should plan to meet borough-wide growth requirements, including their overall housing targets, by: 2. assessing the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth; London Plan Policy S1.A states that: When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. London Plan Policy D2B Infrastructure requirements for sustainable densities states: ‘Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the	Noted. It should be noted that the housing target is set out in Policy 4.3 A and the the Mayor of London has raised no objections in his statement of general conformity regarding infrastructure delivery. Infrastructure needs are modelled variously upon population or household projections depending upon the type of provision, with health, for example, based upon GLA population projections. The local plan is subject to binding housing targets and it is not the role of the LPA to produce population projections. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. IDPs are living documents, acting as a ‘snapshot in time’, and as different infrastructure providers respond to their own unique challenges, the information will naturally date and alter over time. The IDP will require updating on a regular basis to reflect this. The delivery of infrastructure is the responsibility of various different bodies, as detailed within the IDP, including those with a statutory duty to provide sufficient infrastructure to meet identified needs, as well as those who are responding to market conditions.	SP4.1 Good Growth		Will French	Ealing Matte	523	Community Interest Group

4. Policy SP4.3 Genuinely affordable housing This representation on SP4.3 Genuinely affordable homes should be read in conjunction with Ealing Matters’ comments on Policy HOU: Affordable Housing – Ealing LPA – local policy. Issue 1: The title of Policy SP4.3 Genuinely affordable homes is misleading and its content vague. The policy fails to define what LBE means by or to quantify its targets for genuinely affordable homes despite all paragraphs of the policy seemingly deriving from LBE’s aspiration to build them. In fact, only paras C. and D. specifically refer to affordable housing (though not genuinely affordable housing), so it is by no means clear how LBE’s aspiration will be met. The remainder of this representation relates to para A, LBE’s housing supply target. {Suggested Modification: Accept that it is impractical for the Borough to accommodate unmet housing need from neighbouring areas, and focus on identified local housing need only. That would reduce the total and affordable housing targets to a level that is deliverable, while remaining in general conformity with the London Plan 2021. A new London Plan is already in its early preparation stages. This would be a timely moment to engage with the Mayor of London and argue for such a reduction.	Noted.	SP4.3 Genuinely affordable homes		Kay Garmeson	Ealing Matte	523	Community Interest Group

4. Policy SP4.3 Genuinely affordable housing This representation on SP4.3 Genuinely affordable homes should be read in conjunction with Ealing Matters' comments on Policy HOU: Affordable Housing – Ealing LPA – local policy. Issue 2: Policy SP4.3 A. is not legally compliant as Ealing Council has failed to make publicly accessible the results of its assessment of land availability as required under National Planning Practice Guidance, Housing and economic land availability assessment, July 2019. Information on indicative site capacities has been and continues to be withheld despite requests from Ealing Matters for these data as part of its Reg 18 response (EM6 para 4.3) and at a subsequent meeting with the Council (EM5 item 4.d). Issue 3: This policy is not effective as the housing supply target identified at SP4.3 A. is not deliverable over the Plan period. The 2021 London Plan marked an effective doubling of LBE's housing supply target from 2019-20 although the justification in terms of Ealing's site availability is not known. Whereas LBE delivered surplus new housing against its previous annualised target of 1,297 units per annum (+26%), it has fallen short of its new annualised target of 2,157 units per annum for the four years since the new London Plan was adopted and is projected to continue to fall short for the next two years. {Graph showing Ealing Net housing completions by town} This means that, LBE will have to concentrate its housing delivery into the last thirteen years of the Plan, and implies an annual completion rate of more than 2,000 units per year for a decade and	The housing supply target referenced at policy SP4.3 derives from the London Plan. Paragraph 13 of the NPPG advises that 'where a spatial development strategy has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to re-visit their local housing need figure when preparing new strategic or non-strategic policies'. The LPA targets established in the 2021 London Plan are supply based, and a direct output of the 2017 Pan London SHLAA and are not informed by individual borough need figures, although the overall need figure for London established in the GLA's SHMA, has clearly been a primary driver for finding capacity. For that reason the London Plan's LPA delivery targets represent the London need figure apportioned to LPA's based on their identified potential capacity. Whilst the 2021 London Plan targets cover the 10 year period between 2019/20 and 2028/29, it has been decided that for the purpose of this exercise that the Council will roll forward the London Plan target in annualised form to cover the latter period of the trajectory, i.e. 2029/30 – 2037/38. Further background information regarding the SHLAA and target setting can be found within the GLA's SHLAA report, which should be read alongside the London Plan panel report: Strategic Housing Land Availability Assessment London City Hall. It should noted that Ealing officers did make extensive representations on the London Plan targets whilst the plan was being developed and examined, and this did result in some adjustments.	SP4.3 Genuinely affordable homes		Kay Garmeson	Ealing Matte	523	Community Interest Group

4. Policy SP4.3 Genuinely affordable housing This representation on SP4.3 Genuinely affordable homes should be read in conjunction with Ealing Matters' comments on Policy HOU: Affordable Housing – Ealing LPA – local policy. Issue 4: We also believe that LBE will not be able to satisfy its objectively assessed need for affordable homes within its overall housing target. LBE's overall housing target at SP4.3 A., would require 66% of all housing units to be affordable and 46% to be offered as social rent tenure to satisfy identified affordable housing need according to Figure 5 of LBE's Local Housing Need Assessment updated in November 2022 and reproduced below. {Figure 5 of LBE's Local Housing Need Assessment} The only data on the share of affordable housing completed in LBE to which Ealing Matters has access is from the London AMRs 10-16 (2012-13 to 2018-19), which show that affordable housing units as a share of total net conventional completions for the period were 22%. LBE has not published equivalent figures for affordable housing since then. {Suggested Modification: Accept that it is impractical for the Borough to accommodate unmet housing need from neighbouring areas, and focus on identified local housing need only. That would reduce the total and affordable housing targets to a level that is deliverable, while remaining in general conformity with the London Plan 2021. A new London Plan is already in its early preparation stages. This would be a timely moment to engage with the Mayor of London and argue for such a reduction.	Noted. The targets are set in the London Plan and it is a matter of conformity that Ealing meet them.	SP4.3 Genuinely affordable homes		Kay Garmeson	Ealing Matte	523	Community Interest Group

4. Policy SP4.3 Genuinely affordable housing This representation on SP4.3 Genuinely affordable homes should be read in conjunction with Ealing Matters' comments on Policy HOU: Affordable Housing – Ealing LPA – local policy. Issue 5: LBE's total housing target at SP4.3 A. from 2019-20 to the end of the Local Plan period (which its housing trajectory places at 2037-38) would amount to 40,983 housing units. This figure is many thousands greater than the Local Housing Needs Assessment identifies as necessary to fulfil Ealing's own objectively assessed housing needs as set out in Figure 4 below. (While the LHNA figures cover a slightly different time period (2021-2041), it should be noted that they also include the area of LBE administered by OPDC, which has its own planning target. In other words, the figure of 31,837 should be reduced by around 22% pro rata to take account of this.) {Figure 4 from ORS Housing Model} Many thousands of housing units have been added to Ealing's locally identified need in order to meet the wider needs of London. On the basis of our analysis of total and affordable housing delivery, we believe that it is not practical for LBE to meet the unmet need from neighbouring areas that the housing target set out in SP4.3 A. presupposes. The references in brackets refer to the following evidence, which can be provided on request: EM5 Minutes of a meeting between community groups and Ealing Council, 23 January 2024 EM6 Ealing Local Plan Regulation 18 Consultation, 30 November – 8 February 2023. Submission by Ealing Matters	The housing supply target referenced at policy SP4.3 derives from the London Plan. Whilst the responsibility for establishing housing need continues to rest with the local planning authority, this is now effectively constrained to a minimum figure that is determined centrally by Government (via the standard method). The only scope for deviation is essentially upwards. The position is complicated further in a London context where need is established at a strategic level and apportioned to individual London authorities via a spatial development strategy. Whilst this strategy remains current then authorities are expected to default to planning against the figures in table 4.1 of the London Plan. Paragraph 13 of the NPPG clarifies the status of the SDS in establishing need stating that: 'where a spatial development strategy has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to re-visit their local housing need figure when preparing new strategic or non-strategic policies'. The LHNA remains significant however in understanding the type and nature of need.	SP4.3 Genuinely affordable homes			Kay Garmeson	Ealing Matte	523	Community Interest Group

5. Policy DAA: Design and Amenity – Ealing LPA – local policy Note that this representation concerns the need for the plan to work with communities to understand local aspirations and to reflect them better to achieve well-designed and beautiful places The National Planning Policy Framework Chapter 12 establishes that ‘creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.’ NPPF Para 132 states ‘Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.’ London Plan Policy D1A: London’s form, character and capacity for growth (Defining an area’s character to understand its capacity for growth) requires that ‘Boroughs should undertake area assessments	NPPF requirements noted refer to the whole plan and broader expectations for character and design are set out in strategic policies rather than the development management section of the plan.	Policy DAA: Design and Amenity – Ealing LPA – local policy		Will French	Ealing Matte	523	Community Interest Group

6. Policy DAA: The need for policies on local heritage Note that this representation concerns the need for the plan to contain polices for the conservation and enjoyment of the historic environment Please note that this objection needs to be read in the context of Chapter 3 policies SP2.2 B (iii), SP2.2 D, SP2.2 F (i) and (vi), SP3.1 C, SP3.3 D, SP4.1 A, SP4.1 D–F. London Plan Policy HC1B: Heritage, Conservation and Growth requires that ‘Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by: 1) setting out a clear vision that recognises and embeds the role of heritage in place-making 2) utilising the heritage significance of a site or area in the planning and design process 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.' NPPF Chapter 16: Conserving and enhancing the historic environment requires at Para 190 that: ‘Plans should set out a	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on design, heritage and culture. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. Neither the Mayor of London nor Historic England have raised objections to this approach. The local plan at Policy SP3.3 D seeks to ensure that new development meets the highest design standards, responds positively to the local character and recognises the role of heritage in place-making. There are numerous other references to the importance of heritage and conservation throughout the plan including at Policies SP2.2 F (vi), SP2.2 G (vi), SP3.1 B, SP4.1 A, SP4.1 E, SP4.2 H-I. The plan is also informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The Site Selection reports also informs any Development Sites whose narrative in the plan includes both contextual considerations and design principles to guide any future development proposals. Regards the conservation area appraisals, much work has been done to update them and this has involved extensive and detailed consultation with local amenity groups other interested parties. This body of work is separate from the Local Plan and the council is currently recruiting a new dedicated Conservation Officer whose first key task will be to complete and implement the review, taking	Policy DAA: Design and Amenity – Ealing LPA – local policy		Will French	Ealing Matte	523	Community Interest Group

7. Policy DAA: The need for a policy on amenity and play space Note that this representation concerns standards for the provision of amenity and play space in new development. London Plan Policy S4A Play and informal recreation requires Boroughs to ‘prepare Development Plans that are informed by a needs assessment of children and young person’s play and informal recreation facilities. Assessments should include an audit of existing play and informal recreation opportunities and the quantity, quality and accessibility of provision.’ Para 5.4.6 of the supporting text describes the London Plan’s approach to off-site provision. London Plan Policy D6 sets out minimum housing space standards. This includes at AF9, minimum standards for amenity space but indicates that borough development plan documents may have higher standards. London Plan Policy Table 3.2(iv) and (v) Qualitative design aspects to be addressed in housing developments sets out how private and communal amenity spaces should be addressed London Plan Policy H16 on Large-scale purpose-built shared living with its supporting text sets out considerations for amenity space that should apply in shared living developments Table 7D.2 of Ealing’s current Development Management Plan document (adopted in December 2013) sets out the space provision requirements for new developments. These will cease to apply once the new plan is adopted: {Table 7D.2 from Adopted DM Policies, 2013} Unlike in Ealing’s current Plan, the Regulation 19 Plan fails entirely to consider standards for or the design of amenity and play space							
	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and was published in 2021. This contains Policy S4 which deals with play and informal recreation and is used to help determine planning applications in Ealing. There is no need to repeat or duplicate these policies. Indeed, there are inherent risks in doing so. The use of quantitative amenity standards such as those currently set out in Adopted Policy 7D are considered to be less effective relative to more recent policy interventions including the Urban Green Factor tool, which allows officers to assess both the quantity and quality of provision together, and this leads to better outcomes in terms of the provision of urban greening in new developments.	Policy DAA: Design and Amenity – Ealing LPA – local policy		Will French	Ealing Matte	523	Community Interest Group

8. Policy D9 Tall Buildings London Plan – Ealing LPA – local variation Tall buildings are very controversial in Ealing which is essentially a low-rise residential suburb where tower blocks are widely seen as an alien urban form. Table DMP1 of the plan provides thresholds for what the Borough considers to be tall buildings across 59 different areas of the Borough. The thresholds range from 6 storeys in many parts of the Borough to 21 storeys in Ealing Town Centre. The justificatory text (para 5.14) explains that the policy ‘builds upon comprehensive evidence developed in line with the London Plan’. This evidence is not specified, but it is understood to relate to a series of reports by Allies and Morrison which culminated in a final report dated December 2023. It should be noted that the Allies and Morrison’s reports, which were not prepared with any form of public engagement and were only published in final form as part of this Regulation 19 consultation, appear to be the only evidence speaking to this part of the Plan. What’s more, they contain no proper recommendations and nowhere does LBE set out what conclusions it has drawn from them to explain how it has used the research to inform Policy D9. We have four concerns with this tall building policy. These arise from the fact that Policy D9 is not clearly written (or otherwise presented) and is not unambiguous. This means it fails to meet the test in NPPF Para 16(d) and is unsound. The policy is also not justified because is not based on clear evidence.	Heights boundaries will be set out on the interactive policies map. The policy clearly sets out that 6 storeys constitutes a tall building across most of the borough. The consultation version Tall Buildings Study was subject to some transcription errors which have now been corrected in the submission version.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Will French	Ealing Matte	523	Community Interest Group

8. Policy D9 Tall Buildings London Plan – Ealing LPA – local variation							
3. A few details in Table DMP1 of policy D9 depart significantly and with no justification from the tables in the Allies and Morrison report on which the policy is understood to be based. While in most parts of the Borough the thresholds are the same in both documents, in three areas they differ greatly and for no apparent reason. These three areas are identified on the table below:							
Neighbourhood Building Strategy	Map Area	Allies & Morrison Tall Policy D9 Table DMP1: Prevailing height (storeys)	Proposed Tall Building Threshold (storeys)	Heights boundaries will be set out on the interactive policies map.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		
West Acton 14	A2	2.3	6	The policy clearly sets out that 6 storeys constitutes a tall building across most of the borough.		Will French	
Horn Lane 14	A4	2.9	6	The consultation version Tall Buildings Study was subject to some transcription errors which have now been corrected in the submission version.		Ealing Matte	
Ealing Town Centre E14 21		4.4	9				
Allies and Morrison’s strategy report explains the methodology for their classification. This is based on the prevailing heights in each sub-area as well as on considerations of sensitivity (especially heritage), suitability and appropriate locations. Page 9 of their report says the prevailing heights of the two areas in Acton are 2.3 storeys and 2.9 storeys respectively while in Ealing Town Centre it is 4.4 storeys. Ealing Town Centre, (in which there is just one 21 storey building) is also notable for being largely protected by several							

8. Policy D9 Tall Buildings London Plan – Ealing LPA – local variation 4. Careful study of the Allies and Morrison’s Tall Buildings Strategy throws up other inconsistencies that are carried forward into the Plan document itself and also render it unsound. At p3 of their study, Allies and Morrison helpfully clarify the London Plan’s requirements for tall buildings. To demonstrate general conformity with the London Plan, they say Boroughs, in their Development Plans, should: 1. define what is considered to be a tall building – that is, a threshold height above which new buildings will be considered to be tall; 2. identify locations where tall buildings may be an appropriate form of development. 3. within areas where tall buildings may be an appropriate form of development, define maximum heights for new development. This Allies and Morrison proceed to do, using their ‘character and context-led approach to identifying locations that may be appropriate for tall buildings’. Their findings are reported in both the main study and in their two appendices. They explain on page 4 of their study that: i. ‘in identifying locations that might be appropriate for tall buildings, it follows that in all other locations beyond these – that is, the vast majority of the Borough – tall buildings are not considered to be an appropriate form of development’. (para 3). Policy D9F of the Regulation 19 plan dilutes this advice by saying that tall buildings may be appropriate outside identified locations. It states that ‘tall	Heights boundaries will be set out on the interactive policies map. The consultation version Tall Buildings Study was subject to some transcription errors which have now been corrected in the submission version.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Will French	Ealing Matte	523	Community Interest Group

9. Policy HOU: Affordable Housing – Ealing LPA – local policy This representation should be read in conjunction with Strategic Policy SP4.3. London Plan Policy H4 A states that ‘the strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable.’ As shown below, LBE’s stated aim to address only locally identified need for affordable, while working to an overall housing target designed to serve the wider needs of London, would mean that only 40% of housing delivered in the Borough would be affordable. By failing to comply with London Plan Policy H4 A, Policy HOU: Affordable Housing – Ealing LPA – local policy is not sound. Policy HOU A. states that ‘Affordable housing contributions must address identified needs in Ealing’, and HOU B. states that ‘Development should meet identified local needs for tenure and mix.’ Figure 4 from the Local Housing Need Assessment (LHNA) November 2022 below shows Ealing’s locally identified housing need, which in total amounts to just under 32,000 units. Within this, the figures show that 53% of units should be affordable (using the broadest definition), and 39% affordable as social rent. {LHMA, Figure 4} However, LBE’s stated intention at Strategic Policy SP4.3 is to meet its 21,570 10-year housing supply target required by the London Plan for 2019-20 to 2028-29, and to carry this rate of supply forward for the rest of the Local Plan period. Rather than Ealing’s locally	The Local Plan is subject to a binding London Plan housing requirement.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Kay Garmeson	Ealing Matte	523	Community Interest Group

10. Policy H16: Large Scale Purpose A558Built Shared Living – London Plan – Ealing LPA – local variation Policy H16 is an inappropriate strategy, and therefore not justified, for the following reasons: Issue 1: Chapter 5 para 5.19 of Ealing’s Local Housing Need Assessment (LHNA) November 2022 quotes London Plan Guidance on Large-scale Purpose-built Shared Living (LSPBSL), January 2022 as saying: Whilst LSPBSL provides an additional housing option for some people, due to the unique offer of this type of accommodation, it does not meet minimum housing standards and is not therefore considered to meet the ongoing needs of most single person households in London. Para 5.20 goes on to say that: Given that Ealing is projected to see a decline in single young person households, then the household projections would envisage little role for this type of dwelling,.... And in para 5.21: Purpose built co-living could meet the needs of some single people and couples as a short-term lifestyle choice, but these individual people and couples will be looking to move to permanent accommodation of one form or another. The LHNA thus serves the same need as HMOs, but whereas the latter can be converted back to single larger household accommodation, LSPBSL cannot. It concludes that there is a risk of	Heights boundaries will be set out on the interactive policies map. The policy clearly sets out that 6 storeys constitutes a tall building across most of the borough. The consultation version Tall Buildings Study was subject to some transcription errors which have now been corrected in the submission version.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Kay Garmeson	Ealing Matte	523	Community Interest Group

11. Policy ENA: Enabling Development – Ealing LPA – local policy Proposed Policy ENA lacks reasoned justification, and therefore does not comply with section 8(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is for this reason neither legally compliant and it is also sound. Historic England summarises enabling development as ‘development that would not be in compliance with local and/or national planning policies, and not normally be given planning permission, except for the fact that it would secure the future conservation of a heritage asset.’ The NPPF uses the term only in Chapter 15 in connection with conserving the historic environment, saying that ‘Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.’ Application of the concept of enabling development to permit development on MOL sites thus appears a novel idea. Its use to develop Metropolitan Open Land in general would depart considerably from the principles that apply in the context of protecting historic assets. Unlike our historic assets, MOL will continue to exist only until it is built on. Enabling development policies do not appear to feature in the NPPG and in the NPPF’s terminology they seem to constitute neither a strategic policy (para 20ff), nor a non-strategic one (para 28ff). MOL falls under the aegis of the London Plan which safeguards it to	Policy ENA clarifies rather than expands the scope of enabling development, which is a case that is available to development whether or not a policy exists. As the policy makes clear, only development that is 'demonstrably led by the objectives of the designation in question' can qualify as enabling development. The policy further clarifies that the benefits should be to the designation itself and must outweigh any harm, as well as being the minimum necessary to deliver the identified benefit.	Policy ENA: Enabling Development – Ealing LPA – local policy		Will French	Ealing Matte	523	Community Interest Group

12. MOL11/Development site 19EA NPPF para 142 states that ‘the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence’. It goes on to say in para 143 that Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Para 154 states that ‘a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt’, but names three exceptions that are relevant to this site: ‘b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; d) the replacement of a building provided that the new building is in the same use and not materially larger than the one it replaces.’	Issue 1: It is acknowledged that the proposal to de-designate part of this as MOL was first introduced at Regulation 19 stage, and was necessary to remedy the policy conflict between the MOL designation and the proposed site allocation. Despite this the wider site had nonetheless been identified as a proposed allocation since the Regulation 18 stage, and this had elicited a number of responses. Issue 2: The need to demonstrate very special circumstances is relevant only in a Development Management Context. In the context of plan making it is necessary to establish if exceptional circumstances exist to justify release. In respect of Gurnell this is addressed in section 2.2 of the Stage 2 Green Belt and MOL review. Issue 3: This site and wider parcel are considered to meet the qualifying criteria for designation as MOL as detailed in London Plan policy G3, and reflected through its current designation as MOL. Whilst the performance of MOL parcels against the defining criteria varies, the decision to pursue release in respect of Gurnell Leisure Centre is not led by any specific deficiencies regarding the sites MOL status, but rather it is driven principally by non-MOL factors. Largely reflecting location, the site is not considered to meet the purposes at paragraph 143 of the NPPF which are relevant only to the process of defining Green Belt. Issue 4: As noted this site has been subject to a more detailed assessment as part of the level 2 SFRA. It is noted too that this site triggered the need for an exception test. The level 2 assessment concludes that this site can pass the second part of the exception	19EA Gurnell Leisure Centre		Kay Garmeson	Ealing Matte	523	Community Interest Group

13. Monitoring framework LBE has persistently failed to comply with national planning policy with regard to the review and monitoring of its current Local Plan. • The NPPF December 2023 (para 33) states that: Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; There has been no published review of the current Plan since its adoption in 2012 even though LBE's annualised housing targets increased massively over the last 12 years (from 890 to 1,297 in 2015-16 and then to 2,157 in 2019-20). • The Planning and Compulsory Purchase Act 2004 Provision 35 states at point 2.(2)(b): Every local planning authority must prepare reports containing such information as is prescribed as to – (a) the implementation of the local development scheme (b) the extent to which policies set out in the local development documents are being achieved. And at point 3.(3): A report under subsection (2) must –	Noted Section 35 of the Planning and Compulsory Purchase Act 2004, has been amended by Section 113 of the Localism Act. The 2011 Localism Act removed the requirement to publish/submit reports annually, and renamed Annual Monitoring Reports as Authority Monitoring Reports. Ealing published an Interim AMR in October 2021, a Housing Supply Topic Paper in November 2022 and a 5 Year Housing Land Supply position statement and trajectory in November 2023. A revised 5 year housing land supply position statement and housing trajectory will be published in early 2025. The decision to place the monitoring framework in the appendix is a reflection of the cross cutting nature of monitoring covering many aspects of the plan. It is not considered that this downgrades its status in anyway. The indicators described in the monitoring framework will be defined further via future AMRs and other monitoring reports / outputs, and will need to respond to the available data sources. As noted in the framework, new and additional measures may be identified over-time, and these will be reported through the AMR. Again it is difficult to define these at this stage, as this is contingent on the availability of data which can evolve overtime. The process of monitoring the Local Plan is not confined solely to the output of an AMR. The process of monitoring is an ongoing exercise and beyond the AMR itself the Council is required to	General		Kay Garmeson	Ealing Matte	523	Community Interest Group

14. The Plan’s format and presentation This representation concerns the presentation of the Plan, which Ealing Matters considers to be unsound as it fails to comply with key areas of national planning policy and guidance with regards to its accessibility. • NPPF Paragraph 15 requires plans that are succinct. • NPPF Paragraph 16 requires plans that contain policies that are clearly written and unambiguous and serve a clear purpose so it is evident how a decision maker should react to development proposals. • NPPG Guidance on Plan making (Paragraph: 002 Reference ID: 61-002-20190315) requires that ‘all plans need to be as focused, concise, and accessible as possible’. • NPPG Guidance to Authorities on keeping communities informed of evidence gathering and plan-making (Paragraph: 035 Reference ID: 61-035-20190723) expects authorities ‘to be mindful of the need to produce concise visual evidence, written in plain English to help ensure that it is easily accessible to local communities, to avoid them becoming disengaged with the process. Many Ealing residents have told Ealing Matters that they find the plan very hard to read or even to find what they want to know in it. In Ealing Matters’ view the Plan is not written with its end users in mind. This is unfortunate, as it is in everybody’s interests for plans to be easily accessible to everyone and that they should contain clear policies to describe how the Borough will change. Inclusion of a ‘Wayfinding Guide’ at the start does not improve	Noted. The Local Plan is by necessity a technical and highly specific document. It should also be borne in mind that the London Plan is an integral part of Ealing LPA's local development plan and it is important that the relationships between the two plans is clear. Repetition and duplication of policies in the London plan is unnecessary and can, if wording differs even slightly, have unintended consequences. The use of maps, illustrations and diagrams seeks to improve accessibility to a wider audience. Upon adoption of the plan it is the intention to produce a digital online version of the plan that will provide helpful links to the NPPF, London Plan and guidance, as appropriate.	General		Will French	Ealing Matters	523	Community Interest Group

I am a resident in {redacted}, W5. I understand that the council intend to de-designate the Barclay Sports Ground as MOL and further to grant permission for building development on the land. I wish to strongly object to any such developments. There has already been a development of a large secondary school on part of the Ground which has resulted in a lot of extra vehicular traffic in the area before the start of the school day and once again at the end of the school day. Park View Road, which was once a pleasant and quiet residential road, becomes a car park at these times with cars parked on both sides of the road. Any further development in this area which would increase traffic is unjustifiable given the degradation in the environment due to the school. The council boasts of its "green" agenda and commitment to improve the environment in Ealing. Any building development on the Sports Ground would be contrary to this philosophy. A positive step in improving the environment would be to make the Sports Ground part of the proposed Regional Park scheme, which would preserve a precious green space with the potential for sports.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt" category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons.	21EA Former Barclays Sports Ground		Henry Stemplewski		524	Individual
I do not agree with this development as it affects the local area and security of our homes along with adding more vans, cars rubbish and litter. Reducing open spaces danger to nature and wild life. Flora and fauna.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled.	21EA Former Barclays Sports Ground		Daniel Hanley		525	Individual

As local residents to the Barclays Sports Ground, we object to the de-designation of part of Barclays Sports Ground as MOL. We object to allowing residential development on Barclays Sports Ground, the surrounding residential roads are already heavily congested with Ada Lovelace School traffic. We support the representations by Ealing Matters, Save Ealing Parks and CPRE. We believe Barclays Sports Ground should become part of the proposed Regional Park. We think that the proposed development budget of between £22 million and £87 million is not justified. NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground		Giles & Anushka Carter		526	Individual

* I object to the de-designation of part of Barclays Sports Ground as MOL (MOL20) * I object to allowing residential development of the size suggested on Barclays Sports Ground (21EA) * I support the representations made by Ealing Matters, Save Ealing Parks and CPRE NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. School capacities do change over time and any development would need to mitigate any adverse impacts regards the availability of school places as part of any planning obligations should development be consented. There are no physical vehicular access issues for this site. Traffic congestion associated with the ‘school	21EA Former Barclays Sports Ground		Mark Grafton		528	Individual

I have been a resident of Ealing for 40+ years and worked in the Borough for many years before my retirement. It used to be a lovely place to live and work but I fear current and future planned developments are in danger of spoiling this. Nothing in this Local Plan has reassured me. I found the full plan as provided by the Council somewhat impenetrable and am relying to a great extent on comments received from Ealing Matters and Stop the Towers. I do hope that the Council will carefully consider the comments of these bodies, who clearly have the interests of current residents at heart. My main concern is the plan to provide an additional 40,000 homes over 15 years, indicating population growth of 80,000+. Where does this figure come from? Is it even achievable? How many of the new homes will be for current residents of Ealing living in sub standard housing or homeless? How many will be “affordable”? Assuming the not all the new housing will be for current residents where will the other people be moving from? - other London Boroughs, outside London, abroad? and who will they be? - families, students, single people? Where will they live and what kind of housing? Why will they want to come to Ealing? Will they take up jobs in the Borough or commute into London? Ealing is already being spoilt by the number of new and planned high rise developments and these are to get higher and bigger, even apparently encroaching on Metropolitan Land. This population increase will put huge demands on local infrastructure, services and amenities - doctors, hospitals and schools, which already appear to be stretched. As far as I can tell the Plan does not answer these issues. I hope that these concerns and all those raised by community and residents’ bodies will be addressed by the Council in due course.	The Local Plan is based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	General		Pamela Walker		531	Individual

With reference to the proposal to develop Downs Barn Farm The original consultation was never advertised and this consultation is monstrous and it was never transparent and local residents were only able to disagree with it after the original consultation had been carried out and put forward as a suitable site. Now with the proposed development of the white hart roundabout will create more anti social activity in area. These proposals will not have any positive effect on the area it will be the opposite. Attraction of more people with no good intentions are not required we have enough already. As it states in Local Plan Northolt is in the 10/20% deprived areas. Cosmetic surgery at the white hart will not improve anything. Moving the proposed Travellers site further along Sharvel Lane will not change or the improve the way in which the travelling community treat local areas/people. The potential of harassment, foul language and total disregard for the general public goes without saying. There were other proposed sites that would have been more suited to the lifestyle of the travelling community which were obviously not chosen -why Marnhams Fields looked perfect. All a complete waste of council tax money going through idiotic processes for which the outcome is already decided with no consideration given to the residents whose council tax will be used to provide the site	Noted.	09NO Kingdom Workshop, Sharvel Road			Pamela Hanley	532	Individual

The very extensive Reg 19 of a draft is affecting all aspects of life in Ealing. My comments below comprise only a broad outline of many serious concerns. The draft plan identified over 100 potential building sites within the borough – with nine sites in the Ealing town centre area (which includes West Ealing) as being as high as 21 storeys (73.5 metres). This is a huge number of very tall buildings in an area which has never yet, seen a 21-storey building. Ealing is currently a reasonably pleasant suburban area but there is a high risk that this could change with many sensible and elegant Victorian and Edwardian houses being surrounded by high-rise developments The draft plan appears to be favouring developers and does not give local people confidence that Ealing Council aims for sensible and sustainable development which maintains and respects the character of the area. I think the comments quoted below from the Ealing-wide residents group, Save Ealing's Centre, are very appropriate. "SEC holds that redevelopment of this site should accord with the 2013 site brief which required that 'the height, scale and massing of new development must reflect the historic character of the surrounding residential areas on Hastings and Drayton Green Road. New development along Hastings Road must be low rise and not overlook the adjacent two storey terraced residential properties on this side, to create a harmonious streetscape and respect the current building line.' We see no reason to depart from this principle. In particular, we do not accept that it is appropriate for the height of a development to be as high as 13 storeys as is now proposed. It should remain within the 7-storey tall building threshold which Policy D9 proposes."	Noted. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation	Kostas Evangelidis		533	Individual

(1) SAVOY CIRCUS, EAST ACTON To quote from your Infrastructure Delivery Plan (IDP) document: "Within the context of limited and diminishing funding, establishing a reliable and concise IDP will ensure any investment decisions are based on a sound understanding of infrastructure requirements and growth. This will offer greater certainty to service providers, funders and developers about how infrastructure will be funded and delivered, enabling growth and encouraging investment." I do not think that you are doing that, at the short southern side of the triangular Savoy Circus gyratory, immediately to the south of the A40 Western Avenue in East Acton. I invite the Planning Inspectorate to visit this site. The considerations there are: - FIRSTLY, you should acknowledge that this gyratory will have to handle nearly all HS2 passenger road traffic from central London to the new £1.7-billion Old Oak Common HS2/Great Western Main Line (GWML) railway station. That is to be the terminus of the HS2 route to Birmingham, Liverpool, Manchester and Glasgow for the foreseeable future, and for an unknown proportion of your Local Plan period. (Note there is no right-turn for westbound A40 traffic at Savoy Circus, except by turning south and then using the gyratory to travel north.) 'Traffic' means taxis, buses and informal 'kiss-and-drop' delivery of passengers to the station. There is currently to be no eastern all-modes road access via Scrubs Road to the HS2 station: Old Oak Common Lane is to be the only	Savoy Circus: The extent to which the Savoy Circus will be affected by HS2 and other developments is still not fully understood, and is being explored through strategic modelling commissioned by the OPDC and through wider work being undertaken to understand flows in this area. The Local Plan does not include all roads which could benefit from widening, as there is very significant need and the proposals would extend beyond the lifetime of the Local Plan. North-south cycle route: We confirm the stated policy to prioritise a new north-south cycle route linking North Acton with Acton Town Station, Acton Town Centre, Horn Lane, Acton Main Line, and Gypsy Corner. While there are significant challenges to developing some sections of the route, other sections will be delivered following work around the North Acton gyratory, including Portal Way, and around North Acton station. This route ambition is included in the Cycle Network Plan. North Acton station: The design for the new station at North Acton is not yet finalised, and options are still under consideration to safeguard the north-south pedestrian and cycle bridge.	Policy A6: North Acton and Park Royal		John Cox		534	Individual

I am disturbed by the lack of evidence for the recommendations in the plan. I would like to see limits to the height of buildings, some interest in the necessary infrastructure and an assessment of the likely increase in population.	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Nina Padwick		535	Individual

This is the response to Ealing Council's draft local plan from Stop The Towers (STT) a residents' group covering all of Ealing. It is a non-party political community association representing local people in the area as described above and active membership currently stands at over 1700 people. STT was set up over 5 years ago in response to the rapidly rising number of planning applications for large high density developments of residential flats in West Ealing. Our view is that the Local Plan is not legally compliant due to its lack of a coherent argument and evidence base that links the actions of the plan with its stated objectives and its lack of meaningful consultation. The Plan presents a huge amount of information and yet there is no understandable narrative as to how the Plan will deliver its objectives. Having consulted experts in the field we conclude this is a failure of the plan not our ability to understand its language. We also support the analysis done and conclusions reached by trusted local organisations including Ealing Matters, West Ealing Neighbours and Save Ealing's Centre (SAC), Friends of The Earth which can be summarised as: It has not been positively prepared. It does not 'provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.' The plan assumes that there must be massive housing development in Ealing and explores only variations on this theme. The biggest feature of the plan is the development of around 40,000 new dwellings and there is no evidence that Ealing or London	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. Policies writing has been informed by an extensive evidence base and early stakeholder consultation. This included the development of three 'reasonable alternative' spatial options to enable a preferred spatial option to be identified. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The plan does NOT give blanket approval to developments under 6-7 storeys. The definition of Tall Buildings is derived from London Plan Policy D9. This does not mean that all buildings up to this height are automatically acceptable; such proposals will still need to be assessed in the context of other planning policies to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Denise Colliver and Justine Sullivan	Stop The Towers	538	Community Interest Group

Statutory Process ahead of adoption of the LB Ealing Council New Local Plan (LP) (1). I refer to the above-mentioned matter and would be most grateful if you would kindly consider this representation that is made with the view that local planning policies should be sufficiently flexible to support and meet the needs of the local community particularly in the following regards: - (1.1). in the best public interest (1.2). with the needs of the ageing society in mind (1.3). with the needs of people suffering disabilities in mind (1.4). according also with the cultural and religious needs of a major local demographic that being ethnic minorities who as part of their traditional value set can prefer multigenerational living whereby elderly relatives are supported and cared for, who in return help out with caring for grandchildren, all of which helps to ease many financial burdens that are otherwise placed upon the State. (1.5). to strengthen inter-generational relationships and help support the financial circumstances of all families (regardless of ethnicity as the practice of multigenerational living is now increasingly being adopted by endogenous households), where grandchildren are often supporting their elderly grandparents and moving into their homes so to do, helping with their changed needs for additional privacy and space (due to reaching adulthood), which they cannot afford to facilitate due to unaffordable house prices, space which is available at their grandparents homes but which is sparse at their parents homes. (2). With all the above in mind, it is requested that local planning policies need to be sufficiently flexible to promote, facilitate and enable all the above needs to be met please, whereby it is submitted that as the proposed new Local Plan (LP) fails in the above	Specialist housing is best covered by an overall thematic policy rather than multiple references in specific parts of the borough. While there is no target identified beyond the London Plan benchmark for older persons housing and the exact quantum of different types of multigenerational housing is not readily able to be determined, the plan is supportive of delivery where it supports overall housing needs.	SP3.3 Healthy lives	Policy S1: Southall Spatial Strategy	Shelly Chahal	Planning Ref	539	Community Interest Group

Thank you for the opportunity to provide comments on the London Borough of Ealing Local Plan. We welcome the opportunity to engage with planning authorities on plan and policy document development. In addition, we welcome the opportunity to engage as early as is practicable with the planning application process. The three key factors we analyse when reviewing the proposed sites and number of homes include; • If any of the sites for allocation are within a groundwater Source Protection Zone (SPZ) • the location of any existing water network or other interests in the proposed area • whether the current infrastructure in the area is sufficient to meet additional demand requirements for new developments. We have considered your consultation documents and the files that you have shared with us and have provided comments on above factors. Groundwater Source Protection Zones (SPZ) We have reviewed the sites for potential allocation and no groundwater Source Protection Zone (SPZ) have been identified in your area. Existing water network We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites. This may affect development potential in some cases, as no development will be permitted within a specified distance of these services. Where there is potential to impact the existing water	Noting the proximity of select development sites to significant mains water apparatus and infrastructure, it is recommended that the following additional text is added to each of the 16 mentioned sites under the 'contextual considerations' section: 'Significant water main apparatus and infrastructure have been identified within the vicinity of this site, and applicants are advised to engage with the relevant water supplier at the earliest opportunity.' Projected residential delivery over the life of the plan is detailed in the Council's 5 year Housing Land Supply Position Statement and Housing Trajectory. Disaggregated housing capacity figures by town are detailed at table 8. Although site capacity figures are omitted from the Regulation 19 plan itself, these sites and the assumed capacity figures form a key input into the housing trajectory and position statement. Further detail (at ward or site level) can be supplied on request, to inform any future supply and demand modelling. The London Plan which forms part of Ealing's Development already specifies through policy SI 5 that development proposals are expected to minimise the use of mains water in line with the Optional Requirement of the Building Regulations (achieving a mains water consumption of 105 litres or less per head per day. Policy SI 5 also requires development proposals to incorporate a range of water saving and recycling measures, to achieve lower water consumption rates. Commercial developments are also expected to achieve an excellent standard for the 'Wat 01' water category.	SP4.1 Good Growth		Amy Pryor	Affinity Water	540	Statutory Body

Royal Botanic Gardens, Kew (RBGK) is pleased to respond to the consultation on the Regulation 19 version of London Borough of Ealing’s (LB Ealing) draft New Local Plan. The Royal Botanic Gardens, Kew (RBGK) is a world-famous scientific organisation, internationally respected for our outstanding collections as well as our scientific expertise in plant and fungal diversity, conservation and sustainable development in the UK and around the world. In addition to our scientific and research function, Kew Gardens is a major international and a top London visitor attraction. Kew Gardens’ 330 acres of landscaped gardens, and Wakehurst, Kew’s wild botanic garden in Sussex, attract over 2.5 million visits every year that is supported by the vital work of donors, members and commercial activity. Our site at Kew Gardens is on the south bank of the River Thames in the north of the London Borough of Richmond (LBRuT). Kew Gardens is a UNESCO World Heritage Site (WHS) and of exceptional heritage significance. Kew Gardens is within a Conservation Area, is a Grade I listed Registered Park and Garden and is home to over 46 listed buildings, such as the Grade I listed and scheduled monument Kew Palace, amongst many other sensitive designations, including its designation as Metropolitan Open Land (MOL). RBGK notes LB Ealing’s draft New Local Plan and takes particular interest the Tall Buildings Development Management Policy (Policy D9), which it notes is a local variation of the relevant adopted London Plan (2021) policy. RBGK generally supports the approach set out in the draft Plan which seeks to differentiate between different areas of the borough that are and are not appropriate for	Noted, support welcomed.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Reuben Briiggs and Henry Brown	Royal Botanic	541	Community Interest Group

I would like to say that I support all the points and concerns raised by Ealing Matters. I found the proposed plan verbose and very difficult to read, which may be was the purpose of such a flaccid document...I have lived in Ealing Broadway for more than 30 years and have seen many changes in the Borough. It is difficult to get a Doctors appointment and the schools are already oversubscribed so how can a massive target of more than 40,000 homes be proposed without any related infrastructure? This immense number would impact unfavourably on the local communities and change their makeup for ever. The impact on local transport would be great and would make Ealing more of a dormitory town. Municipal open land is essential to communities for wellbeing and should be preserved at all costs not built on in a haphazard manner to meet vague targets. Affordable family homes should be built appropriately with open space and families should not be crammed into high rise developments. Tall buildings seem to be appearing in inappropriate places and height is excessive in relation to terraced 1930's housing. Being too close to suburban housing affects light and can feel very threatening when viewed from below. There is no clear idea of what is proposed for Ealing town centre. Previous proposals have been to destroy heritage buildings to replace them with very bland meaningless architecture. We need to preserve our historic buildings for the future. We need to attract a range of shops to serve the community rather than just cafes and charity shops so the centre is used more effectively. Thank you for the opportunity to comment.	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns.	General		Marion Griffin		542	Individual
Hello, My main objections to the plans are to the 15 storeys (!) tower block on the Morrisons Acton site and also more of those in West Ealing. The development of the Old Actonians Sports Ground is another. Thank you.	Noted.	01AC Acton Gateway (Morrisons)	23EA Old Actonians Sports Ground	Jolanta Glaser		543	Individual

EA15 Waitrose: STT considers that the arrival of the Elizabeth Line required the Council to prepare an area strategy for sites around West Ealing Station to ensure the widest public benefits would accrue from this major infrastructure investment and requested that the Planning Department should create a Supplementary Planning Document. Unfortunately this did not happen, allowing developers to come in with piecemeal proposals. It has resulted in a wholly avoidable legacy of distrust on the part of the local community. Even now opportunities exist to repair relationships through an area based plan involving both the community and key landowners, including the John Lewis Partnership. The current Waitrose store has only existed for 18 years, and the one it replaced was only 14 years old. We have very major concerns about the sustainability of Waitrose's slash and burn business model and its impact on climate change. It really should stop. Reducing the maximum height to 13 storeys is an improvement but STT think this would still be excessive and that it should be restricted to around 10 storeys. This would still exceed the tall building threshold of 7 storeys in West Ealing. As Allies and Morrisons say in their Tall Building Strategy (page 4) 'it follows that in all other locations beyond (areas identified as suitable for tall buildings) – that is, the vast majority of the Borough – tall buildings are not considered to be an appropriate form of development'. STT has commented elsewhere on the Waitrose proposals and we believe our comments need to be taken on board in the preparation of a more appropriate scheme for this site than has so far been presented. Consideration of the appearance of the development when viewed from residential	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities. Key infrastructure requirements for this site allocation include measures to improve active travel including Jacobs Ladder footbridge and Green Man Lane.	15EA Waitrose, West Ealing		Denise Colliver and Justine Sullivan	Stop The Tow	538	Community Interest Group

EA16 West Ealing Station Approach: This site, although close to West Ealing Railway Bridge, it is not actually the approach to the new West Ealing Station which is 100 metres down Manor Road on the other side of the railway so this site name is misleading and inappropriate. Why not call it ‘Hastings Road West’? Ideally due to its proximity to the Station it should form part of an area based plan strategy. However STT does not agree that this site is actually a ‘town centre’ as it is separated from the other West Ealing Town Centre plots by Drayton Green Road and it is adjacent to two storey residential homes. STT holds that redevelopment of this site should accord with the 2013 site brief which required that ‘the height, scale and massing of new development must reflect the historic character of the surrounding residential areas on Hastings and Drayton Green Road. New development along Hastings Road must be low rise and not overlook the adjacent two storey terraced residential properties on this side, to create a harmonious streetscape and respect the current building line.’ We see no reason to depart from this principle. In particular, we do not accept that it is appropriate for the height of a development to be as high as 13 storeys as is now proposed. It should remain within the 7 storey tall building threshold which Policy D9 proposes. Adequate provision for parking including that of deliveries and services must be made. Adherence to all planning policies and guidance should be mandatory. Overall we feel that despite the word-count and number of documents this does not come near to meeting the threshold for a coherent and valid local plan. It appears to have one objective only, which is to build tower blocks of flats and has been developed without the engagement of local communities and disregards the significant evidence that the plan will	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	16EA West Ealing Station Approach		Denise Colliver and Justine Sullivan	Stop The Tow	538	Community Interest Group

12. Energy The June 2022 ‘West London Electrical Energy Constraints’ report by the GLA revealed that parts of Ealing are at full capacity with regards electrical connections for residential developments of over 25 homes. For large residential developments, electrical connections cannot be guaranteed by SSE/National Grid before 2030. This fact needs to be spelt out in the LP. 13. Water London is facing a water crisis due to a combination of factors such as loss of green space, growing population and climate change. London has experienced water shortages in recent years. London has been described as ‘seriously water stressed’. Water demand is expected to exceed supply over the next 10 years – and severe water shortages could affect London by 2040. The precarious finances of Ealing’s water supplier Thames Water is concerning and should be flagged up in the LP. With £18 billion of debt, Thames Water is at risk of a disastrous corporate failure. 14. Health and Social Care There are no plans to create new GP surgeries which will be needed to service the 80,000+ new Ealing residents. The Ealing town most likely to be the most affected by this GP shortage in Acton – which has currently the most populous Primary Care Network in the whole of the borough. There are currently no residential beds in Ealing for those adult men given Section 2 Orders under the Mental Health Act for assessment. This is a massive unfitness for purpose as patients have to be securely diverted to West Middlesex Hospital or Charing Cross Hospital. Clearly with 80,000+ more Ealing residents more male patients will be Sectioned. The LP provides no plan to rectify this	The Infrastructure Delivery Plan (IDP) considered energy, water, and health infrastructure and was informed by engagement with key stakeholders including Scottish & Southern Electricity Networks, Affinity Water, Thames Water, and the NHS. The delivery of new energy, water, and health infrastructure is primarily the responsibility of these organisations. The council will continue to work closely with key partners and stakeholders to positively plan for meeting the borough's infrastructure needs.	SP4.1 Good Growth		Eric Leach	West Ealing M	227	Community Interest Group
15. 20-Minute Neighbourhoods It’s an interesting concept. It breaks down completely when I consider that I and my close friends know of no-one who walks 10 minutes to their work. I accept that those who work 2/3 days at home are partially compliant. A 10 minute walk to a sport or cultural venue is highly unlikely for most Ealing residents today or in 2039. There are no LP initiatives to add tens (or 100 or so) of sporting and cultural venues throughout the borough during the next 15 years.	A 20-minute neighbourhood would usually include access to public transport, health, education, employment, community, retail, culture, leisure, and green spaces. This plan aims to give people more choices about how they want to travel in their local community without a car if they want or need to. More options can benefit physical and mental health and help to create a stronger sense of community, boost the local economy, and increase resilience to the effects of climate change.	SP2.2 Climate action		Eric Leach	West Ealing M	227	Community Interest Group

16. Transport If 41,000 new homes are to be built in Ealing during the next 15 years, there have to be policies to cope with the increased traffic which will support these 80,000+ new residents. These policies include capacity planning for pedestrian space, public transport, private individual vehicular transport and commercial vehicular transport. Most of these new homes will be flats in tower blocks with little or no car parking space. Such residential enterprises will require significant local facilities for delivery and collection of individuals and goods. The areas where such transport planning is most needed is likely to be North Acton and central Southall. There's no sign of such planning in the LP. The new Crossrail/Elizabeth Line (EL) is currently unable to cope with the morning rush hour demands of commuters at Ealing Broadway Station (EBS), Hanwell Station and West Ealing Station (WES). The EL trains are so packed it's impossible for commuters to board the rush hour trains at these stations. Many more trains /hour are needed in rush hour. Nothing in the LP about this. Added to this, passengers alighting at EBS and WES are in danger of hurting themselves as a 12 inch vertical gap exists between the rail carriage floor and the platform. Evidence to support this is my broken foot bone incurred exiting a busy EL train at EBS on 27 February 2024. EL is unfit for purpose at EBS, WES and probably other stations for single parents with buggies, disabled passengers, those travelling with big cases and the elderly generally. There is nothing in the LP about closing this huge vertical gap at EL stations. The 5,295 new residents in the 2,118 rented homes at Greenford Quays will generate considerable traffic through Greenford Station and the shuttle to WES (and onwards to the city centre). More rail and station capacity will be needed to support	Ealing has not had sufficient funding to complete a Strategic Transport Study to support the development of the Local Plan. Modelling the whole borough transport network would be a very significant piece of work which Ealing has not had the budget for, in the context of 40%+ cuts to LIP funding from TfL since Covid. However, as part of the forthcoming Transport Strategy (still in draft), there will be a more substantial evidence base (though not up-to-date modelling for the whole borough) and the Strategy will specifically address the expected development in each town, noting possible transport pressures and proposed mitigations. Ealing has recently completed, in partnership with TfL, a piece of strategic transport modelling for Northolt, which explored the impacts of the Local Plan development scenario on the Northolt transport network. It is proposed to undertake a similar modelling exercise for Southall as soon as possible, to take account of the significant development proposals for Southall, including the Green Quarter. The Old Oak and Park Royal Development Corporation (OPDC) are in the process of completing a piece of strategic modelling with TfL, which will include their part of Ealing around North Acton and Park Royal. Issues with Elizabeth Line stations and trains should be addressed to Transport for London, Network Rail, and the train operating companies.	SP4.1 Good Growth		Eric Leach	West Ealing N	227	Community Interest Group
17. Climate Change/Carbon Neutral The target of the borough to be carbon neutral in less than 6 years is surely, clearly unattainable. Building 41,000 new homes by 2039 will come at a huge carbon price. 22. Consistent with National Policy? Just to pick one example. Ealing plans to become Carbon Neutral by 2030. This does not reflect national policy. The recent updated DEFRA 'Environmental principles policy statement' makes no mention of a 2030 Carbon Neutral policy. So not consistent with national policy		SP2.2 Climate action		Eric Leach	West Ealing N	227	Community Interest Group

11EA Sainsburys & Library, West Ealing: The plan does not comply with NPPF Chapter 8 paragraph 96 (b): Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which...(b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example, through the use of beautiful, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas. The current housing on site 11EA is built over Melbourne Avenue creating an overhang. This forms a dry, dark and dirty area which encourages anti-social behaviour. Groups loiter under there at night. Melbourne Avenue is the route to the main bus stops on Uxbridge Road from the south but it feels unsafe to walk through after dark and unpleasant at other times. This does not comply with either NPPF 96 (b) or promoting active travel as stated in the plans policy E2. The plan does not mention the current overhang or the issues this site currently creates for the safety and perceived safety of pedestrians. Nor how the future design needs to address these. {Suggested modification:} For site 11EA, the plan needs to recognise the current issues with the Sainsburys site. The design principles need to require designs which are inclusive and safe and do not allow crime and fear of crime to flourish as per NPPF 96 (b). The site design principles also need to include: respect for the street plan, a commitment to not create tunnels and to ensure the buildings overlook (not overhang) the pedestrian routes.		11EA Sainsbury's & Library, West Ealing		J Humphreys	West Ealing M	544	Individual
	However, as part of the forthcoming Transport Strategy (still in draft						
I believe this is a huge misleading and discriminatory document that the majority of residents will either be overwhelmed by or be unable to understand and is therefore undemocratic. I wholly endorse the comments made by Ealing Matters which is a very large group of residents, as detailed here: {link} The Local Plan gives far too much weight to developing green spaces for the benefit of favoured private investors and not to the health of local residents. The declassification of MOL in parks is a particular concern. I wholly endorse the response given by Brent River Park as detailed here: {link}	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document.	General		Sue Haddleton		545	Individual

Ealing 13EA 99-113 Broadway, West Ealing: The plan does not comply with NPPF Chapter 8 paragraph 96 (b): Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which...(b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example, through the use of beautiful, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas. Site 13EA 99-113 Broadway, West Ealing is subject to a planning application which seeks to build over the top of St. James’s Avenue and create an overhang similar to the one over Sainsburys. There is no mention of this in the plan, underlining the fact that the Council are turning a blind eye to this issue. Rather than learning lessons, they will replicate the mistakes. People will not leave their cars at home if they do not feel safe walking the streets or to a bus stop or station. {Suggested modification:} For site 13EA, the plan states a design principle of ‘pedestrian focussed side streets’. This needs to go further to reference designs which are inclusive and safe and do not allow crime and fear of crime to flourish as per NPPF 96 (b).	Noted. These are generic points and do not require inclusion in the policy. The inference should not be drawn that the plan promotes crime everywhere except where it is specifically stated to be against it.	13EA 99–115 Broadway, West Ealing		J Humphreys	West Ealing N	544	Individual

The plan does not comply with the NPPF Chapter 12 paragraph 132: Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Site 13EA currently has art deco buldings as did Woolworths (now knocked down despite a local petition) and the nearby site on the corner of Eccleston Road. These are key buildings which add to the particular character of West Ealing. This is not recognised in the contextual considerations or the design principles section of the site. The site is on the corner of the Broadway and St. James’s Avenue. The Victorian church next to the site, St. James’s, is not recognised in the contextual or the design principles. {Suggested modification}: For site 13EA: Insert a contextual consideration: Development should fully understand and respond to the built character of the area and its heritage. Insert a design principle: Respect and respond positively to the built character of the area and its heritage. Elsewhere: Insert both the above statements in the considerations for developments in West Ealing.	Noted. These are generic design statements that do not require restatement in the allocation. All development proposals must comply with latest design guidance provided by the Greater London Authority (GLA), the council’s Ealing Character Study and Housing Design Guidance.	13EA 99–115 Broadway, West Ealing		J Humphreys	West Ealing N	544	Individual

Having advised on urban development for the World Bank and United Nations in the Global South, I had assumed that planning policies and practices in the UK were soundly based on empirical evidence and were consistent with social and environmental policy objectives. It is therefore with profound disappointment that I find the Reg19 Local Plan for Ealing does not justify these assumptions and that the plan is, in many respects, therefore unsound. When Peter Mason became Council Leader in May 2021, he said: “From now on, communities will be in the driving seat when it comes to regeneration in Ealing. Local communities need to lead the process of changing our Borough.” However, , the plan is so long and full of jargon as to be inaccessible to the untrained reader, rendering community engagement, let alone leadership, impossible. This raises serious concerns regarding the objectives and soundness of the plan. These concerns are increased by the lack of empirical evidence for the proposals on housing in terms of both the number of units proposed and the forms of development which are indicated. In terms of the number of residential units proposed, the plan is unsound in terms of unproven need for the provision of 2,769 new homes to accommodate approximately 50,000 people and the ability to deliver this number. The Council has failed to produce annual Monitoring Reports or statements of land availability statements and has failed to achieve previous annual delivery targets. The second concern relates to the large proportion of sites that are defined, without clear evidence of suitability, as suitable for tall buildings. Table DMP1 of the Plan provides thresholds for what are defined as tall buildings across the 59 zones defined in the borough	Ealing is subject to binding housing targets driven by central and regional government assessment of housing needs across London, these are unrelated to any considerations of Council budget. Tall buildings allocations are similarly evidence based and follow on from the Character Study and the requirements of the London Plan. Whole life carbon assessments will take into account the net effects of development.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Geoffrey Payne	Geoffrey Pay	547	Individual

I am writing to express my concerns about elements of the Ealing Council Local Plan. I support Ealing Matters' concerns about the plan and have copied them into this email. My following feedback relates to intentions for Hanwell: H1 C Tackling the Climate Crisis. Sustainability clearly has not been considered. (iv) It is unclear what the plan is for Brent Valley Park. H1 D Heritage assets within Hanwell are poorly protected in relation to the development sites. H1 E 1. There is a lack of sufficient information about how the Council proposes to enhance "the critical mass of services and employment in Hanwell" e.g. We took part in the Hanwell walkabout and no attempt had been made to liaise with the companies operating in Trumpers Way. 2. The plan refers to integrated development of the area around Ealing Hospital. I assume this refers to the car park. This is straightforward overdevelopment and is not justified. Where would the essential and heavily used car park be located to guarantee accessibility? Table H1: The delivery phasing column is mainly TBC and so not positively prepared or effective. This is an essential part of the plan. Has anything been discussed with providers and what assurance can the council provide that ideas are deliverable?	On climate action, the plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. On the regional park, this is set out in Policy SP2.2 G (vi) and in the Infrastructure Delivery Plan. On Policy H1 E there is an extensive evidence base that supports the approach to be taken. There has been liaison with landowners/site operators at Trumpers Way and there were some in attendance on the walkabout. Regards mixed development, this is development for a variety of activities on single sites or across wider areas such as town centres. Regards tall buildings, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The Local Plan expects a lower quantum of residential led development within Hanwell reflecting fewer development opportunities than say Ealing or Southall. This is reflected in the number of development sites (8) of which half are considered to be potentially appropriate for a tall building (mostly in the district town centre). As specified in Policy H2 future development will be character led. Finally, the Local Plan will shape and guide future development and is by necessity a technical and highly specific document.	Policy H1: Hanwell Spatial Strategy		Margaret Anthony		548	Individual
01HA Ealing Hospital frontage: The proposal is not justified. The location is not suitable, it would block light and access to a heavily used hospital. Car parking is essential for equal access to the hospital.	Noted. Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study. Heights are to range up to a maximum of 12 storeys (42m) stepping down from the recently redeveloped high rise high density residential development at St Bernard's Gate. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments. Car parking for the hospital will be reprovided.	01HA Land to the front of Ealing Hospital		Margaret Anthony		548	Individual

02HA Gray's Garage: Gray's is an established local employer. Employment opportunities will therefore be removed with no proposals for replacement. There are no infrastructure proposals to support increased residential buildings. There are no sustainability plans to mitigate the impact of construction or increased population.	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to the heritage aspects of the adjoining St Mark's Church & Canal Conservation Area to the south and the Hanwell Clock Tower Conservation Area to the north-east. It is proposed that a mixed-use development that provides residential, commercial space and public open space should come forward therefore ensuring some employment opportunities in the future.	02HA Gray's Garage		Margaret Anthony		548	Individual
03HA George Street Car Park: This proposal would remove the last remaining car parking provision for local small businesses in the area. It would also completely overshadow the nearby cottages which would become essentially unsellable.	The site is not in principle appropriate for a tall building and the overall scale and design of future development proposals should be responsive to heritage aspects of the adjoining St Hanwell Clock Tower Conservation Area to the east. The design principles for the site seek to ensure that the height of any development proposals takes into consideration the 2 storey terraced cottages fronting the site, with scale and massing responding sensitively to the low-rise surrounding housing. They should reflect the fine-grained character of neighbouring streets. A mews style development is proposed to reflect existing adjacent residential development, with tree planting and soft landscaping to improve the public realm. The site also benefits from a relatively good public transport accessibility level.	03HA George Street Car Park		Margaret Anthony		548	Individual
04HA Lidl and discount store site: There is no proposal for infrastructure to support an increased local population. There is no consideration for sustainable construction.	It is intended that a supermarket will be reprovided on the site. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	04HA Site of Lidl and discount store		Margaret Anthony		548	Individual
05HA Marshall site and area: The proposal for an 8-storey building represents overdevelopment and is not consistent with the local area. The proposal is not inclusive, with no provision for children, the elderly or the disabled. Again, there is no reference to sustainability in construction.	Design principles seek to ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy which is informed by a best practice Character Study. It is proposed that a new community space on the southern part of the site is provided. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	05HA Marshall Site, Gold's Gym & Garages on Montague Avenue		Margaret Anthony		548	Individual
06HA Tile Deposit: The proposal would reduce employment opportunities in Hanwell. There is no mentioned provision of infrastructure required to make the proposal inclusive and accessible.	It is proposed that affordable and assisted housing be reprovided alongside the provision of new residential and community uses. In addition, Chris Payne House will be retained. Policies OEP, ECP, WLC and SI 7 in Chapter 5 of the Local Plan follows current best practice in energy and carbon emission and will be applied to any future major developments.	06HA Tile Depot & Lambourn Close		Margaret Anthony		548	Individual

07HA Copley Close: This proposal is overdevelopment, the space is not suitable for a building of seven stories. This is evidenced by the reference to a problem of parking on the pavements (for which there is no suggested mitigation).	This site is part of a larger estate regeneration project, much of which has already been completed and is subject to a masterplan. The allocation already notes that cars are parked along the length of Copley Close with many parked on pavements. It also notes that the public realm is poor quality and pedestrians and cyclists are not prioritised. Future development will seek to tackle these issues. Key infrastructure requirements for the site include the need for health facilities.	07HA Copley Close Estate		Margaret Anthony		548	Individual
Site 1.4 Acton Vale Industrial Park & Westgate House (06AC) As owner occupiers of premises at {redacted} Agnes Road we understand and support the principle of bringing forward brownfield land for development to provide new homes. However, the proposal for new residential block of up to 7 storeys on this site presents a challenge to the amenity of residents along the south-east side of Agnes Road that does not appear to have been addressed in the council's plan. In particular, numbers 27 to 37, Agnes Road have sub-standard rear gardens due to the historic boundaries, presumably related to the original assembly of land now forming the Acton Vale Industrial Park. The development of new and taller buildings within the western rectangular extension of the Industrial Park has potential to cause serious harm to the setting, amenity, privacy and receipt of daylight of the existing houses. We would suggest that this could be mitigated by identifying all or part of this rectangular area for return to the Agnes Road houses as garden land, and requiring the set-back of any new development to at least the line of the rear garden extents to the north. We consider that the Plan would be made sound in respect of this site proposal if these matters were directly addressed in the version of the Plan to be issued to the Secretary of State. We are willing if necessary to attend at the plan inquiry to elaborate on these representations.	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development are noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House		Malcolm and Flora McCorquodale		549	Individual

I am a local resident who has lived in the LBE since 1981. I submitted comments in relation to the previous Draft, Reg. 18, and have similar comments in respect of this Final Draft, as follows: 1. The LPFD is a dense document for those of us who are lay people in planning and development matters. I question whether it really is Sound, complying with the evaluation criteria, viz. positively prepared, justified, effective, consistent with national policy. 2. Whilst from my lay person's perspective, the aims may appear laudable, i.e. Tackling the Climate Crisis, Fighting Inequality, and Creating Good Jobs and Growth, the LPFD lacks details as to how these aims can be achieved. There is reference to the Evidence Base but I am unclear as to how that ties in with detailed facts and figures regarding how these aims will be achieved. 3. Again, the idea of "20-Minute Neighbourhoods" has some merit, but detail is lacking. 20 minutes' walk differs according to age and general mobility. Whilst there are references to LBE's exploring how to assist small businesses, and new start-ups, there are no concrete proposals. 4. Both the initiative at 3 above, and the 7 Towns plan, are reminiscent of the past before Local Authority reforms in the 1960s, and recall my childhood in the 50s and 60s (albeit in East London), where butchers, bakers, greengrocers, grocers, hardware, confectionery shops, etc., were within easy reach of communities with no cars - before supermarkets and the proliferation of coffee shops. I question how this can be achieved within the next few years as 2030 is only 7 years away, and this initiative could help towards easing the climate crisis if residents are not using cars for, essentially, unnecessary journeys.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. Regards 20 minute neighbourhoods, the key aim is to create complete and connected places, with 800m generally used as the length of an average 10-minute walk. A 20-minute neighbourhood would usually include access to public transport, health, education, employment, community, retail, culture, leisure, and green spaces. This plan aims to give people more choices about how they want to travel in their local community without a car if they want or need to. More options can benefit physical and mental health and help to create a stronger sense of community, boost the local economy, and increase resilience to the effects of climate change The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The Local Plan sets out a policy framework for the next 15 years and it is anticipated that over time there will be changes to the business cycle that will affect the rate and level of development.	General			Jeannette W Hallam (Miss)		550	Individual

I am a resident of Ealing living near Ealing Common. I am glad to see that some areas designated at Metropolitan Open Land have now been taken off the list to be developed. However, I'm shocked that the council is still earmarking others for building. I would like to make representations about the following: Morrisons Acton site - this is an unsuitable site for use as a tall building of 15 storeys. It's in the heart of Acton town centre next to the parish church of St Mary's and the Market Square (The Mount). This area with its several heritage buildings (especially the church) would be totally dominated by a tower of this height and there would be loss of character of the town centre. The location is already partly at the highest point of Acton and would be a 'sore thumb' sticking out of the landscape visible for miles around. Redevelopment should not dwarf the church. By comparison, the existing Steyne flats are built away from the centre in the dip of the Bollo Brook valley so their height is not as evident as it would be if at a higher point as on the Morrisons site. any building here should be low rise. Friary Road: No tower block should be higher than 15 storeys. The block of 21 storeys proposed at Friary Road is not acceptable. No building of that height is acceptable anywhere in the borough.	The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. It is acknowledged that the site is surrounded on three sides by Acton Town Centre Conservation Area and is opposite the tower blocks of council owned Steyne Estate, currently undergoing infill development. Policy A1 N (iv) recognises the role of heritage in place making and conserving and enhancing the historic centre at Acton District Centre.	01AC Acton Gateway (Morrisons)		Caroline Walker		551	Individual

Paragraph 1.2.1 on neighbourhood planning This paragraph reads in full 1.21 For the purposes of neighbourhood planning, all the policies in Ealing’s Local Plan are considered to be strategic policies. This approach of simply deeming all local plan policies to be ‘strategic’ without any evidence has become a hallmark of those planning authorities which wish to minimise the scope for neighbourhood planning in their area. This tactic is designed to maximise the scope for use of the basic condition on ‘general conformity’ to block neighbourhood forums from coming forwards with any variation or fine-tuning of local plan policies. NPPF paragraph 21 states Plans should make explicit which policies are strategic policies . These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross boundary issues), to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies. LB Ealing has made no effort to ‘limit’ the extent of ‘strategic’ policies within its Draft Local Plan. It is not evident that any thought or officer time has been given to questioning which policies should be deemed ‘strategic’. NPPF paragraph 28 reads Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles	Noted. For the purposes of neighbourhood planning, all the policies in Ealing’s Local Plan are considered to be strategic policies. A key overarching objective is to ensure. that the unique characteristics and cultural identities of each of Ealing’s seven towns will be respected and enhanced, through the application of locally sensitive Good Growth principles (Policy SP1). The plan also seeks to ensure an inclusive economy by spreading the benefits of new growth more equally across the borough’s neighbourhoods (Policy SP2.1 A). Each of the site allocations are equally sttraetgic because the delivery of those sites is essential to meet the required housing targets set by the LPA in the London Plan (Policy SP4.3 A).	General		Henry Peterson	Old Oak Neig	552	Community Interest Group

Policy D9: Tall Buildings London Plan – Ealing LPA – local variation This draft policy is presented as a variation of Policy D9 in the 2021 London Plan. The London Plan policy was itself modified following a Direction issued by Secretary of State Robert Jenrick to the Mayor of London in December 2020 . Ealing’s proposed ‘variation’ must be examined against this background. We argue that the ordinary meaning of the words in London Plan Policy D9, read as a whole, in the light of its context and objectives, sets out a clear process for the grant of planning permission for tall buildings. It gives primacy to the planning judgment of the local planning authority at the plan-making stage in terms of the definition and location of tall buildings. This makes it essential that Local Plans as prepared by local planning authorities in London are clear on ‘suitable locations’ and on ‘appropriate heights’ as referred to in D9 Part B. Different local plan policies and site allocations on tall buildings may co-exist across London, but these need to be made explicit within individual local plans (and during preparation of these documents) so that Londoners can participate in plan preparation and can also understand the implications of such policies and site allocations for tall buildings once a local plan is adopted.	Site allocations are shown on maps in the local plan document. These and the TB threshold maps (DMP1) will be added to the interactive policies map.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Henry Peterson	Old Oak Neig	552	Community Interest Group

Inadequate LB Ealing response to representations made at Regulation 18 stage This is a representation on the procedure adopted by LBE in its handling of representations made during the consultation on the Regulation 18 draft of the Local Plan. The Regulation 18 consultation took place between December 2022 and February 2023. The Old Oak Neighbourhood Forum submitted a 7 page response (re-attached) covering a series of points which we considered needed to be taken into account in a subsequent Regulation 19 draft plan. We have been unable to find on the LBE website any ‘consultation statement’ with details of all representations received, and the Council’s response to these. We have found only a REGULATION 18 CONSULTATION UPDATE document listing respondents, and a Summary of Regulation 18 Issues and Responses. We do not consider these documents to be adequate in meeting the requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012. As we understand the statutory requirements, the Council will be required (as part of the submission of a revised Regulation 19 Draft Plan to the Secretary of State) to provide a ‘Regulation 22’ statement. How is the question of feedback to respondents on the Regulation 18 consultation to be addressed? We also understand that the 2012 Regulations require plan making authorities to demonstrate transparently that consultation responses have been noted, understood and, where applicable, taken into account in formulating the content of the plan under preparation.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19). Regards the scheme of delegation between Ealing Council and the OPDC, this is a not a matter that can be included in the Local Plan although Policy A6 emphasises the importance of working collaboratively withthe OPDC.	General		Henry Peterson	Old Oak Neig	552	Community Interest Group

Draft Policy A6 North Acton and Park Royal - effectiveness Draft Policy A6 is the one point in the Draft Local Plan at which the Council sets out some aspiration for the eastern part of the Borough, for which the OPDC has been the planning authority since 2015. In our response to the Regulation 18 version, we commented on the lack of basic information in the draft Local Plan on the impact and consequences of having a Mayoral Development Corporation act as planning authority for the eastern end of the Borough. Our experience since 2015 as a neighbourhood forum ('interim' until designation in 2017) is that local residents still struggle to understand the relationship between OPDC and Borough. This is for several reasons: • most people do not appreciate the role of 'planning authority' as compared with 'highways authority'. Planning consents issued by OPDC have impacted on parking and highways issues in the surrounding area. Sorting out resultant problems were slow. A potential 4 year complete closure of Old Oak Common Lane is a recent example of public uncertainty as to the roles of all the agencies involved. • The extent of regular liaison between OPDC and the 'host Boroughs' remains opaque and non-transparent. The original Mayoral response to the 2014 consultation on establishing a MDC envisaged a multi agency chief officer group, operating as a body with agendas and minutes available to the public. Such a body has never been established. • Public perceptions of the workings of OPDC have changed (for the worse rather than the better) since 2017. The Corporation is viewed <u>by our Forum members as an organisation which claims to 'engage'</u>	Noted. Regards the need for better clarity of the scope and purpose of Ealing's Local Plan and the different roles and responsibilities between Ealing Council and the OPDC, this is acknowledged. A suggested modification is proposed and further changes are also proposed to "grey" out the OPDC area in maps used throughout the document so that the risk of any confusion can be reduced including on the front cover. Regards Policy A6, the OPDC have argued that a policy entitled North Acton and Park Royal is confusing for readers as the majority of these locations sit wholly within the OPDC area. The policy has a different role to the other area specific policies as its focus is on collaboration commitments and not the development of land. It has therefore been agreed that the policy title will be amended to: "Cross-Boundary working with OPDC in North Acton and Park Royal" Regards the scheme of delegation between Ealing Council and the OPDC, this is a not a matter that can be included in the Local Plan although Policy A6 emphasises the importance of working collaboratively with the OPDC.	Policy A6: North Acton and Park Royal		Henry Peterson	Old Oak Neig	552	Community Interest Group
The development of Old Actonians Sports Ground. This is a valuable local community sports hub - it hosts many teams and is a valuable green space. It is not right that any of this land is taken out of this use.	The policy seeks to ensure that development proposals support the overriding objective to enhance the outdoor leisure offer, minimise the reduction of any usable recreation space and secure the long term future of these activities.	23EA Old Actonians Sports Ground		Caroline Walker		551	Individual
The extensive building of tall blocks of 15 storeys plus in West Ealing including Waitrose site, 99-113 Broadway, Sainsbury's/West Ealing library, 66-86 Broadway. Tower blocks in general are an eyesore in any local historic town centre. They will always be a fire risk. Our Victorian town centres - even when rundown due to historic underfunding - do have heritage value. Tower blocks simply devalue them visually even further. Please take my representations seriously. The fact that I haven't commented on other areas does not mean that I agree with what is proposed in these other areas.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Caroline Walker		551	Individual

I am writing to express my extreme alarm and concern with regard to the final draft of the Local Plan for final consultation, with its deadline today (10 April). It strikes me this Plan has been poorly thought through, with little regard for the consequences and impacts on our local environment, current demographic, infrastructure implications, green spaces and sustainability! Speaking as a social scientist, there seem to be few tangible stated measures of what success of any of these plans will look like, and how they will be assessed, monitored and maintained. I've time only to pick out a few features that seem very poor. Ealing's current and previous demographic has been to house and let flourish over a lifetime whole families with children with often with several generations living together. The emphasis of all the tower block plans appears to be on much smaller units designed for childless couples, those wanting a pied a terre mid-week home close to the city, and those not particularly looking to enrich and integrate with their local community. Affordability to those wishing to rent or buy under the proposed plan also seems far from planners' minds. The tower blocks in particular, have been the focus of alarm for a while, and I can only add my support to current concerns, including that high-rise buildings have a much higher carbon impact than low-rise builds and a shorter design lifespan, and your emphasis is clearly on packing in as many high-rise tower blocks as can be fitted in small spaces. Where is Ealing's commitment to achieving net zero impact and planning to mitigate the climate emergency?? Pressure on infrastructure in Ealing is at breaking point in many aspects of our health service capabilities, gp and dental appointments, school and college places, and transport services (e.g. the Elizabeth Line already runs full at peak times). How would Ealing	Noted. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	General		Claire Corbett		553	Individual

I object to the draft local plan for the following reasons 1.Ealing’s housing target of more than 40,000 homes over the next 15 years is excessive and undeliverable. But if it were to be delivered, it would create unmanageable population growth of more than 80,000 people according to GLA projections. 2. Certain areas should not have tall buildings, particularly West Ealing and Hanwell. 3. The infrastructure plans to support this very high growth rate are sketchy at best. 4. The plan’s proposals for wholesale redevelopment of relatively new and serviceable buildings will exacerbate climate change. 5. Valuable areas of MOL are to be lost. A new policy of ‘enabling development’ will justify developing them in the Council’s interests. 6. There are no policies to protect the Borough’s heritage. 7. Tall building heights, especially in Ealing and Acton, are excessive and unjustified. 8. There is no vision or strategy for the near total redevelopment of Ealing Metropolitan Town Centre that the Plan envisages. 9. The Plan’s 82 individual development sites have the potential to have considerable impact on the Borough and the proposals for them are totally insufficient. 10. Ealing’s proposals for monitoring the plan are no more adequate now than they have been over the past 10 years.	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the	General		Simon Baker		554	Individual

Introduction: My family faced discrimination in the 1940s, poor housing and poor health – my parents were 18 months in Harefield Sanatorium with TB. Eventually they were housed in a Council House, but next to a pig farm and factory chimney belching pollution 24x7. So, they needed to get out for health reasons. Scrimping and saving over a long period they were able to move to their forever home which was derelict at the time (where we presently live). I have serious MH and physical comorbidities which are affected by deteriorating environmental noise aviation – creating a dual domino effect and justifiable fear of a premature end. Specific Comment on the Local Plan: It is disappointing to see no reference to mental health in the Development Management Policy document (Chapter 5). Whilst there is reference to noise as an adverse impact from development it would be helpful if the policy reflected the impact that aircraft noise has on residents in the Borough, particularly those with physical and mental health issues, and even comorbidities – dual conditions. Some mental health conditions such as psychotic depression carries the elevated suicide risks. When one’s safe home, one’s forever home is threatened, very life is under threat, any loss needs to be adequately ameliorated. The Problem of Noise: Noise pollution has a particularly negative impact on those people with serious mental illness (SMI). What vulnerable people need is control over being able to ‘turn the noise off’, and to feel safe in their homes. This is a basic human right, along with clean air, and is especially crucial for those people with SMI who are particularly vulnerable to noise. Indeed, Public Health	Fighting inequality is one of three cross cutting objectives identified in the Council’s Council Plan, and the planning system is well placed to influence the determinants of health. To this end protecting and enhancing the physical and mental health of all is a key priority for the Local Plan as reflected through the spatial strategy at chapter 3. Housing and the built environment more generally are recognised to be key determinants of health and wellbeing. With respect to development management policy it is noted that the London Plan forms part of Ealing's Development Plan, and the Council has made a conscious effort to avoid repeating provisions contained in this document in Ealing's Local Plan as well. This is deemed to be unnecessary and potentially unhelpful, and future development proposals will continue to be tested against a suite of policies in the London Plan including D14 Noise, D13 Agent of Change, GG3 Creating a healthy city, SI 1 Improving air quality, T2 Healthy Streets, and other London Plan policies (i.e. S2 Health and social care facilities, H12 Supported and specialised accommodation), which are considered to provide good policy provision already for managing developments which have the potential to impact (both positively and negatively) health and wellbeing.	SP2.2 Climate action		Christopher Keady		555	Individual

As residents of Ealing and near Barclays Sports ground we strongly object to the de-designation of part of Barclays Sports Ground as MOL. The proposed development budget of between £22 million and £87 million is simply not justified and the loss of this green lung to Ealing Broadway and North Ealing would put the area under huge strain on existing residents health and safety. * NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. * The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs. Flooding is also a huge concern as this has increased, there is a natural spring which exists adjacent to the Barclays Sports Ground. Ealing Council has a responsibility and a duty of care to reject this proposal as it has no justification or benefit.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt”	21EA Former Barclays Sports Ground		D T Mullin		556	Individual

The plan also grants a ‘green light’ to developing towers by re-defining what a tall building is without an assessment of the local and wider impact of this kind of ultra-high density housing. I understand that the development of high density towers as a way of providing housing is environmentally and socially unsustainable. It would have a massive negative impact on the quality of life in Ealing. The plan aims to bring another 80,000 people into the Borough without addressing the issue of how this will impact quality of life and the ability of infrastructure to cope. This is reckless in the extreme, once the plan is accepted the changes and impacts will be irreversible. At the moment, I cannot get a face to face Doctor’s appointment, and have not been able to for well over a year. I am also concerned about the Dental surgeries, schools, etc. I am very aware, having lived in the Borough for over 35 years, of the sheer mass of people now living here. I cannot see how we have the infrastructure to support any more of an influx. Not to mention how dreadful this all looks on the landscape. The housing targets it sets could have a huge negative impact on the Borough in terms of its health, education and transport infrastructure as well as access to amenities and green spaces. It aims to increase the population of Ealing by around 80,000 people without any analysis of the infrastructure needed to support this increase or a plan to deliver this new infrastructure. It also fails to show any analysis of the risks associated with this massive population increase or how they will be monitored and managed. Services are already at breaking point and this plan is reckless in the extreme.	Noted. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. Infrastructure needs are modelled variously upon population or household projections depending upon the type of provision, with health, for example, based upon GLA population projections. The local plan is subject to binding housing targets and it is not the role of the LPA to produce population projections. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient.	General		Joyce Harley		557	Individual

EA15 Waitrose. STT considers that the arrival of the Elizabeth Line required the Council to prepare an area strategy for sites around West Ealing Station to ensure the widest public benefits would accrue from this major infrastructure investment. Unfortunately this did not happen and it has resulted in a wholly avoidable legacy of distrust on the part of the local community. Even now opportunities exist to repair relationships through an area based plan involving both the community and key landowners, including the John Lewis Partnership. The current Waitrose store has only existed for 18 years, and the one it replaced was only 14 years old. We have very major concerns about the sustainability of Waitrose’s slash and burn business model and its impact on climate change.I can remember when the last one was replaced ed by the c current one. I cannot see that this is green at all! It really should stop. While I applaud the proposed reduction in the maximum height to 13 storeys but think this would still be excessive and that it should be restricted to around 10 storeys. This would still exceed the tall building threshold of 7 storeys in West Ealing. As Allies and Morrisons say in their Tall Building Strategy (page 4) ‘it follows that in all other locations beyond (areas identified as suitable for tall buildings) – that is, the vast majority of the Borough – tall buildings are not considered to be an appropriate form of development’.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	15EA Waitrose, West Ealing		Joyce Harley		557	Individual

West Ealing Station Approach. This is another site close to West Ealing Station that should form part of an area based plan strategy. Redevelopment of this site should accord with the 2013 site brief which required that ‘the height, scale and massing of new development must reflect the historic character of the surrounding residential areas on Hastings and Drayton Green Road. New development along Hastings Road must be low rise and not overlook the adjacent two storey terraced residential properties on this side, to create a harmonious streetscape and respect the current building line.’ We see no reason to depart from this principle. In particular, we do not accept that it is appropriate for the height of a development to be as high as 13 storeys as is now proposed. It should remain within the 7 storey tall building threshold which Policy D9 proposes. I passed this site on the 8th April and was horrified at the size of the pile driving equipment. That suggests to me a very high structure that will look dreadful in the neighbourhood and also, I reiterate, how on earth do we have the infrastructure in place to support this proposed influx on population. We are overloaded as it is ...	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	16EA West Ealing Station Approach		Joyce Harley		557	Individual

Please note my objection to the proposed Local Plan for Ealing. As a long term resident and an employee in the Borough I see it as a poorly conceived plan that will have a significant negative impact on our local community and on the existing residents of the Borough. So many of the existing structures (residential/ education/medical/roads) need the Council's intervention NOW. We are the permanent council tax payers, and the quality of life, cleanliness, security of our streets and institutions should be the top priority of the Borough Council, any/ all of whom serve in a temporary capacity and may even lose their seats before the outcome of this poor proposal is reviewed. In particular- the proposal to build tall high density housing blocks is outdated in terms of community life, is dangerous (Grenfell Tower)and there is insufficient sewage structure underground to deal with this kind of mass housing. Ealing Council seem to pay lip service to objections that they don't want to hear. Why would the increase of 80,000 homes (the size of Guildford) not be considered an overdevelopment of a single Borough in London? Why is the green space of Perivale Golf course being developed? What policy is in place in the proposed Local Plan to protect the Borough heritage? Ealing has been a garden Borough. Has lockdown not shown the importance of outdoor communal areas? The Local Plan group need to listen to the voters and to protect Ealing as the place of residence for the existing voters.	Noted. Regards Perivale Golf Course, it is not being redeveloped but has be converted into a park providing a more accessible space for a wider section of the local community. Regards heritage, it should be borne in mind that the London Plan is an integral part of Ealing's local development plan and includes a suite of policies on heritage and culture (Policies HC1-HC7). Nonetheless, the local plan at Policy SP3.3 D seeks to ensure that new development meets the highest design standards, responds positively to the local character and recognises the role of heritage in place-making. There are numerous other references to the importance of heritage and conservation throughout the plan. Regards green space, the plan emphasises the importance of maintaining, enhancing and expanding the network of green infrastructure and the creation of new parks, such as in Perivale, is a good example.	General		Angela Frain Bell		558	Individual

3a. Establishing exceptional circumstances In the Ealing Green Belt and MOL Review Stage 2 document (Feb 2024), the council sets out its justification that exceptional circumstances exist to allow for the de-designation of seven MOL and Green Belt areas across Ealing. While the primary focus of our comments is for the Gurnell Leisure Centre area, our comments also apply to the other six areas listed in the document. Ealing Council's approach to establishing exceptional circumstances has three flaws. 1. Page 7 says "Objectively assessed need for housing or other uses, which cannot be reasonably or adequately met elsewhere." This consideration is predominantly about Ealing's housing plans driven by affordable housing goals. One problem here, is that opportunities to meet these high goals are being passed up in our urban areas around Ealing. Evidence shows that Ealing Council allow developers to deliver low affordable housing levels (20%-35%) while opting to contribute financially in lieu of housing units. This is particularly prevalent in the North Acton OPDC area with the high-rise developments of 1-6 Portal Way. For example, in the development for 4 Portal Way, the developer provided 28% affordable housing and covered a gap of 7% by a £6.15M financial contribution. We are providing an actual picture of the development brochure as evidence. {Extract from brochure on Portal way, North Acton} We argue that housing can be reasonably or adequately met elsewhere. It can be met within the dozens of planning applications across the borough that are in more urban areas. The problem is that Ealing Planning have been and continue to approve applications with low affordable housing levels in urban areas. Therefore, this consideration does not pass the NPPE test for justified and should be	Noted. 1. Section 2.2. of the Stage 2 Green Belt and MOL review details the rationale for concluding that exceptional circumstances exist is this instance. Reference in particular is made to an earlier Alternative Sites Assessment which demonstrated that there are no other sites or combination of sites within the borough that are more suitable to deliver a new leisure centre and / or the requisite enabling residential development. 2. The existing leisure centre building and supporting facilities is deemed to be inappropriate development, although it is recognised that it may in part complement or support appropriate outdoor activities. Given the inherent policy conflict the retention of an MOL designation 'washing over' inappropriate built development (existing or proposed) is considered to be unhelpful, particularly in the context of future proposals. 3. In the context of defining MOL and considering release it is accepted that land containing only a hard surfaced area should not be treated equally to land containing permanent built structures. The actual use of these hard surface areas is a relevant factor. It is accepted too that land comprising open car parks / hard surface areas may still qualify as MOL. The decision to recommend release of the car park is not based on its performance as MOL, but rather a preference to focus development on that side of the site.	19EA Gurnell Leisure Centre		Chris Sinnock	Save Gurnell	361	Community Interest Group

3b. Boundary changes – Gurnell Leisure Centre We strongly object to the removal of Gurnell’s MOL status as it is not in line with the NPPF and therefore not sound: • This site serves the following MOL purposes outlined in NPPFR paragraph 143: - o a) to check the unrestricted sprawl of large built-up areas. - o b) to prevent neighbouring towns merging into one another. • The site sits on the boundary of Perivale and Ealing, and any development on the site would see these areas start to merge into one another. • It would also constitute the sprawl of the built-up area of Ruislip Road East and Gurnell Grove north into the MOL • Removal of the MOL status would allow inappropriate development on the site. • By NPPF definition, the car park is not previously developed land. On page 12, section 2.2.8 says “the build footprint should principally focus on existing previously developed land.” This would mean that only the existing footprint is the leisure centre itself which could be replaced in line with NPPF policy. Therefore, the other areas that have been identified are not compliant with NPPF policy. • Section 2.2.6 on page 12 argues that enabling housing is required to financially secure viability of the replacement leisure centre. There are several problems with this: - o While there is a requirement for 50% affordable housing on public land, the redevelop plans for Gurnell are likely to be 30-35%, according to the council’s publicly shared information. This is not in line with policy. Also, it’s not guaranteed and could be decreased depending on financial viability. - o The enabling housing is only one avenue of funding for the Gurnell	Noted. This site and wider parcel are considered to meet the qualifying criteria for designation as MOL as detailed in London Plan policy G3, and reflected through its current designation as MOL. Whilst the performance of MOL parcels against the defining criteria varies, the decision to pursue release in respect of Gurnell Leisure Centre is not led by any specific deficiencies regarding the sites MOL status, but rather it is driven principally by non-MOL factors. Largely reflecting location, the site is not considered to meet the purposes at paragraph 143 of the NPPF which are relevant only to the process of defining Green Belt. The release of the leisure centre including car park and wider boundary corrections (Peal Gardens & Enterprise Lodge) are not considered to undermine the integrity and function of the wider MOL network. A continuous and substantial open corridor would be maintained east west through the Brent River Park. The proposed boundary adjustments are considered to result in a better defined and defensible edge to the MOL. In the context of defining MOL and considering release it is accepted that land containing only a hard surfaced area should not be treated equally to land containing permanent built structures. The actual use of these hard surface areas is a relevant factor. It is accepted too that land comprising open car parks / hard surface areas may still qualify as MOL. The decision to recommend release of the car park is not based on its performance as MOL, but rather a	19EA Gurnell Leisure Centre		Chris Sinnock	Save Gurnell	361	Community Interest Group

4. Inclusion of Gurnell within the Development sites list Ealing Council's justification of including Gurnell in the Development Sites List has changed between Stage 1 and Stage 2. • In Stage 1, the justification was based on the housing need and the financial contribution to rebuilding the leisure centre. • In Stage 2, the justification is based on speculation that the area will be de-designated and lose its MOL protection. In addition to our previous arguments in this document, we want to also challenge the site suitability assessment that was conducted. Again, comparing the assessments of Stage 1 and Stage 2, we can see that the assessor has changed their assessments to match the speculative de-designation. The table below outlines the key issues with the assessment: Area: Missing information Issues: Planning history – There should be a brief summary of the context of planning application 201695FUL. In 2021, it was a leisure-led scheme with enabling residential development. The reason for the refusal was for inappropriate housing development on MOL which serves as evidence that this site is actually not appropriate for housing. Area: Tree Preservation Order Issues: • This criterion does not fairly measure the impact of the site with respect to trees. Just because there is no TPO for the trees impacted doesn't mean that the trees in this site have no value or can easily be replaced. • <u>A redevelopment of this site would cause a loss of around 160</u>	The rationale for allocating Gurnell as a development site has not changed between Regulation 18 and Regulation 19. The purpose of the allocation is to ensure that proposals to secure a replacement leisure centre and associated outdoor leisure facilities, are achieved in a way which minimises the impact on the openness of the site. The allocation addresses the potential role of facilitating development, defining certain key tests / principles which must be satisfied.	19EA Gurnell Leisure Centre		Chris Sinnock	Gurnell Grov	361	Community Interest Group
The Grove Community was established on Gurnell Grove estate over 7 years ago. It works within the heart of the Gurnell Grove estate to bring the local community together, create relationships and enhance feelings of aspiration, healing and hope. The Grove Community response to the emerging Ealing Local Plan (Regulation 19 Consultation) echoes that of the Gurnell Grove Residents' Association as below. The Grove Community is looking to enhance amenity within the Gurnell Grove estate and would hope that Ealing Council would seek to work closely with The Grove Community to support what it is already doing and hopes to achieve in the future.	Noted.	19EA Gurnell Leisure Centre		Denise Colliver	The Grove Co	559	Community Interest Group

I object to the de-designation of part of Barclays Sports Ground as MOL. The proposed development budget of between £22 million and £87 million is not justified. NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. I object to allowing residential development on Barclays Sports Ground. The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. Vehicular access to the site is not safe for the traffic which it will generate at the moment Park View Rd is a school road and is dangerous it already has severe traffic problems during school runs and being so near to the A406. I support the representations by Ealing Matters, Save Ealing Parks and CPRE.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt"	21EA Former Barclays Sports Ground			Gabriel Kerr	560	Individual

I choose to live in a low rise environment. I define a home as a dwelling with a front garden, and front door leading to a rear door and garden. The scale and density of these houses is proportionate and harmonious. That’s why people choose to buy properties and live in Ealing. The Local Plan does not appear to address any of my above definitions of a home and an environment. On the contrary it seems a paeon to developers of high rise flats. The plan is impenetrable to the residents you are elected to serve. Examples of ‘shovel ready’ Ealing developments in Dickens Yard, and West Ealing and Hanwell are singularly grim. The tyranny of off-book sales to overseas investors, absent landlords and sublets coupled with expensive under-performing service management companies is not addressed in this lengthy plan. Or indeed the impact on heritage and infrastructure. I do wish Ealing Council could try harder by addressing the concerns of the taxpayer. I fear the people behind this plan fail to engage with folk such as myself and others like me. As a prime example consider the size and scale of the development at W Ealing station on a plot of land no bigger than a tennis court. This is not NYC or Hong Kong.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		David Peter Jerome		561	Individual
Please look again, all aspects seem to me poor and ill thought out for the future of the Borough of Ealing.	Noted.	General		Claire Aston		562	Individual

The Gurnell Grove Residents' Association are writing to submit our feedback on the Ealing draft Local Plan Stage 2 (Regulation 19.). Please note our points below. Gurnell Grove Residents' Association (GGRA) was not contacted by LBE regarding this consultation and only found out about it the afternoon that the consultation closes. This demonstrates the appalling level of community engagement when their own Resident Involvement team who are aware of the Residents Associations linked to Council owned estates are not asked to contact the Residents Associations about this important document affecting the future of the borough and the future of Gurnell Grove residents. Gurnell Grove Residents' Association support the concerns raised by Ealing Matters and many other residents groups regarding the weaknesses of this emerging Ealing Local Plan and the poor community engagement as part of the Regulation 19 consultations. The detail of the document at over 500 pages, 38 appendices plus the planning jargon it is written in make it inaccessible for the average person to digest and comprehend the full implications of the plan. Gurnell Grove is built on the edge of The River Brent flood plain, overlooking Brent River parkland and meadows. This provides important amenities and green space for the residents. LBE proposals to declassify part of the Brent River Park from remaining Metropolitan Open Land is of great concern. The Gurnell leisure centre plus its adjoining car park were built on MOL because they enhance the public's access to leisure facilities, including the BMX	Consultation on the Local Plan was extensive generating an unprecedented level of feedback. The Council has sought to ensure that engagement is as accessible as possible, but it is important to recognise that the process is prescribed. The allocation is clear that any proposal will need to incorporate a comprehensive package of open space enhancements. As noted the allocation advises that the site is not in principle suitable for a tall building, and references the threshold for this area as being 6 storeys. Any proposals which exceed this would need to be treated as a departure. The allocation notes that whilst the built footprint of any future development should be principally be focused on the existing previously developed land, the arrangement and form of any blocks should seek to avoid introducing a hard edge/barrier between Ruislip Road East and the Parkland to the north. It also goes on to state that freestanding blocks are supported to maintain a degree of visual permeability and connectivity north / south through the landscape.	19EA Gurnell Leisure Centre		Gurnell Grove Residents' Association	Gurnell Grov	563	Community Interest Group

Ealing Town Centre The NPPF Para 90(a) requires planning authorities to ‘support the role that town centres play at the heart of local communities’ London Plan Policy SD9B, Town centres: Local partnerships and implementation states ‘The development of Town Centre Strategies is encouraged, particularly for centres that are undergoing transformative change, have projected declining demand, (or) have significant infrastructure planned’. Paras 2.9.1 and 2.9.2 elaborate: ‘A strategy should be developed for town centres that are experiencing significant change, such as projected declining demand, or significant planned infrastructure, ... Town Centre Strategies should be tailored to each town centre. A clear vision should be developed with the local community, taking account of the town centre’s strategic role, opportunities for growth, potential to support regeneration, spatial characteristics, economic challenges, and location in inner or outer London. Strategies should also consider the role of the night-time economy, as well as the cultural, heritage and tourism characteristics of the area. Town Centre Strategies should cover a broad remit, co ordinating a tailored approach to planning, environmental health, licensing, Healthy Streets, transport strategy, highways management, logistics and servicing, regeneration, air quality, investment and projects. They should be developed with input from relevant stakeholders, including TfL, commercial landlords and investors, Business Improvement Districts and business associations, social infrastructure providers, Historic England, and community and amenity groups.’ (our emphasis)’	Noted. Regards the designation for the Ealing Metropolitan Town Centre, this is derived from the London Plan and Ealing's Local Plan sets out a spatial policy for the town centre at Policy E2. This takes a holistic as well as a character led approach recognising the different attributes and characteristics of individual parts of the centre. Policy E2 G emphasises the importance of strengthening the local character and distinct offer of West Ealing, including food offer, retail, convenience and leisure while realising the potential of identified Development Sites to improve the quality of built environment and deliver new houses and jobs. The alleged decline of the centre is not accepted and is a matter of perception. A report into the business health of 1,000 retail centres across the UK has seen Ealing Broadway including its shopping centre rise in recent years and is now ranked at number 64. Compiled by Newmark Retail, its annual Vitality Rankings for 2024 looks at various factors to determine its ranking including retail unit vacancy rate, space being adapted for other uses, shopper spend per annum and footfall figures. See: https://www.nmrk.com/insights/market-report/newmark-retail-vitality-rankings-2024 In 2022 Ealing Broadway was ranked at number 73 while in 2019 it came in at 173. The policy is supported by technical evidence including a Town Centre Health Check. Regards a strategy for Ealing Town Centre Strategies, the council has already produced a community-led 20-Minute Neighbourhood Framework for Ealing which complemebnst work around the Local Plan. Throughout July to December 2023, an extensive engagement period took place for the framework to understand the local needs	Policy E2: Ealing Metropolita n Town Centre		Tony Miller	Central Ealing	487	Community Interest Group

Development Sites This representation covers all of Chapter 4’s development sites within the area covered by the Central Ealing Neighbourhood Plan and should be read alongside CENF’s response on Ealing Town Centre and in the context of our representations on tall buildings, heritage, design and infrastructure planning. An overriding concern regarding Central Ealing is the absence of an overall master plan for effective development of this flagship Town Centre. Rather, development sites are arbitrarily identified without any reference to one another and with no basis for their selection and definition. Many sites are identified as suitable for residential development but without any indication of the quantum of development proposed for them individually or overall. The ‘evidence base’ commissioned by the Council and prepared by Allies and Morrison could provide this context but is flawed in that it has again been produced in a vacuum without local input or the opportunity to comment. Furthermore, it is not clearly set out where, how and why the report’s findings have informed the Plan or, alternatively, have been ignored. Unaddressed concerns on specific development sites follow {dealt with in separate rows} {Suggested modification:} The missing engagement with Ealing’s communities to hear and properly respond to concerns should be undertaken before this part of the plan is adopted. Engagement should include open discussion of the Allies and Morrison tall buildings findings and their application to the development sites and also the requirements of a Central Ealing master plan.	Noted. It should be noted that it is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA’s housing requirements when viewed at an aggregated level. The Tall Buildings Study did look at the impact of neighbouring development sites so that the impact of 'clusters' could be considered holistically. The plan has been shaped by three rounds of public and stakeholder consultation.	Policy E2: Ealing Metropolitan Town Centre		Tony Miller	Central Ealing	487	Community Interest Group

Please note that this representation should be read in the context of other references in the plan to Ealing Metropolitan Town Centre including those at Chapter 3 Para 3.62, and sites 01EA to 16EA. The NPPF Para 90(a) requires planning authorities to ‘support the role that town centres play at the heart of local communities’. London Plan Policy SD9B, Town centres: Local partnerships and implementation states The development of Town Centre Strategies is encouraged, particularly for centres that are undergoing transformative change, have projected declining demand, (or) have significant infrastructure planned. Paras 2.9.1 and 2.9.2 elaborate: ‘A strategy should be developed for town centres that are experiencing significant change, such as projected declining demand, or significant planned infrastructure, ... Town Centre Strategies should be tailored to each town centre. A clear vision should be developed with the local community, taking account of the town centre’s strategic role, opportunities for growth, potential to support regeneration, spatial characteristics, economic challenges, and location in inner or outer London. Strategies should also consider the role of the night-time economy, as well as the cultural, heritage and tourism characteristics of the area. Town Centre Strategies should cover a broad remit, co-ordinating a tailored approach to planning, environmental health, licensing, Healthy Streets, transport strategy, highways management, logistics and servicing, regeneration, air quality, investment and projects. They should be developed with input from relevant stakeholders, including TfL, commercial landlords and investors. Business Improvement Districts and business associations	Noted. Regards Ealing and West Ealing as separate centres, the designation for the Ealing Metropolitan Town Centre is derived from the London Plan and Ealing's Local Plan sets out a spatial policy for the town centre at Policy E2. This takes a holistic as well as a character led approach recognising the different attributes and characteristics of individual parts of the centre. Policy E2 G emphasises the importance of strengthening the local character and distinct offer of West Ealing, including food offer, retail, convenience and leisure while realising the potential of identified Development Sites to improve the quality of built environment and deliver new houses and jobs. Regards heritage, it should be borne in mind that the London Plan is an integral part of Ealing's local development plan and includes a suite of policies on heritage and culture (Policies HC1-HC7). Nonetheless, the local plan at Policy SP3.3 D seeks to ensure that new development meets the highest design standards, responds positively to the local character and recognises the role of heritage in place-making. There are numerous other references to the importance of heritage and conservation throughout the plan. The plan is also informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Regards a strategy for Ealing Town Centre Strategies, the council has already produced a community-led 20-Minute Neighbourhood Framework for Ealing which complements work around the Local Plan. Throughout July to December 2023, an extensive engagement	Policy E2: Ealing Metropolitan Town Centre		Will French	Save Ealing C	564	Community Interest Group

Please note that this representation covers all of Chapter 4's development sites within Ealing Metropolitan Town Centre. It should be read alongside SEC's general response on the Metropolitan Town Centre, and its overarching concerns about the extent of comprehensive redevelopment envisaged in both Ealing and West Ealing Town Centres and the absence of any clear vision for what will replace them once they have been redeveloped. It should be read too in the context of the Ealing Matters representations on (i) tall buildings, (ii) the need for a heritage policy, (iii) design (iv) infrastructure planning and (v) embodied carbon and fighting climate change. A general concern covering all of the sites in the Metropolitan Town Centre is the failure to include any indication as to the quantum of the development proposed for them, such as for example, how many homes they are expected to produce. This does not conform with the National Planning Practice Guidelines on assessing land availability (Paragraph: 026 Reference ID: 3-026-20190722) which requires that the standard outputs of assessment of land availability must include each site's potential type and quantity of development, and that the assessments must be made publicly available. The inadequate detail on the assessed potential of the sites makes it difficult to conceive what their impacts on the existing built environment or on existing infrastructure might be. They are details that must be provided as they are in plans in other London Boroughs. While they do not feature in the plan itself our comments have been drafted in the light of the work provided in the evidence base by	Noted. The designation for the Ealing Metropolitan Town Centre is derived from the London Plan and Ealing's Local Plan sets out a spatial policy for the town centre at Policy E2. This takes a holistic as well as a character led approach recognising the different attributes and characteristics of individual parts of the centre. Policy E2 G emphasises the importance of strengthening the local character and distinct offer of West Ealing, including food offer, retail, convenience and leisure while realising the potential of identified Development Sites to improve the quality of built environment and deliver new houses and jobs. It should be noted that is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA's housing requirements when viewed at an aggregated level. The plan has been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation	Policy E2: Ealing Metropolit n Town Centre		Will French	Save Ealing C	564	Community Interest Group

01EA Broadway Connection and Arcadia Shopping Centre. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development This means it does not conform with the National Planning Practice Guidelines on assessing land availability. We note that this site, which has had a long and highly controversial planning history, has doubled in extent since the Regulation 18 plan was consulted on with no pre-announcement to the communities who have been long involved with it. Planning consent was granted earlier in 2024 on the Eastern half of the site in the face of criticism from local groups, Historic England, GLA officers and the Metropolitan Police, but their comments are not reflected in the site proposals. The entire site was the subject of a 3-week public inquiry after which the Secretary of State overturned LBE’s planning agreeing with the Inspector that that the bulk, massing and certain aspects of the design of the scheme would be inappropriate in its surroundings. It would fail to preserve or enhance the character and appearance of the Town Centre conservation area and the setting of the Haven Green conservation area, as well as harming the setting of the Grade II* listed Church of Christ the Saviour.’ The entire site also is covered by an existing SPD that was consulted on and approved in 2012 after the Secretary of State’s decision. This set out principles for its development including on pedestrian movement, sight lines and visual impact and built form and height. The current document ignores the contents of the SPD and its principles. We are also concerned that this is not one of the sites Allies and Morrison’s have considered and does not appear for instance in	Noted. It is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA’s housing requirements when viewed at an aggregated level. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	01EA Broadway Connection & Arcadia Shopping Centre			Will French	Save Ealing C	564	Community Interest Group

02EA Ealing Broadway Shopping Centre and Crystal House. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability. The idea of redeveloping this major town centre asset less than 40 years after its opening by the late Queen is very hard to contemplate. It is a locally cherished, award winning shopping centre that was locally listed in Ealing’s 2004 UDP. It is also a very busy centre that continues to meet the needs of the Ealing community. Again, there has been absolutely no local engagement with any proposals for its redevelopment despite the fact it seems unavoidable and that its impact would be considerable. If it were to proceed, demolition and redevelopment of the site would have a transformative effect on the Town Centre. Allies and Morrison’s considerations of the possible height and massing of a new development are buried deep in the evidence base in the Appendix to their Tall Buildings Study 2024 as Cluster A. This study has never been discussed locally. It must be brought to the open and the public must be given a fair opportunity to comment on it. Moreover, it is widely recognised that building materials like steel and concrete are major generators of CO2 and that the battle against climate change mean that we should be thinking in terms of refurbishing and reusing solid buildings like the Broadway centre and not wastefully redevelop them. The Borough can never hope to meet its aspiration to be carbon neutral by sanctioning the constant redevelopment of still viable and well performing buildings.	Noted. It is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA’s housing requirements when viewed at an aggregated level. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The plan has also been shaped by three rounds of public and stakeholder consultation. The plan also follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient.	02EA Ealing Broadway Shopping Centre & Crystal House		Will French	Save Ealing C	564	Community Interest Group
03EA Sandringham Mews We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability. This is a sensitive site at the heart of the town centre. SEC notes that consent has recently been granted to construct buildings from 3-8 storeys over the southern half. Inclusion of the wider site into Cluster A creates additional issues that need to be examined in connection with the rest of that Cluster. As we say above, this should be part of a properly prepared SPD.	Noted. It is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA’s housing requirements when viewed at an aggregated level.	03EA Sandringham Mews		Will French	Save Ealing C	564	Community Interest Group

04EA Eastern Gateway We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability. Consent to redevelop this site with a 6-storey building was granted in 2021 and we note that the pre-commencement conditions have now been discharged. We are therefore unclear why this site should be included in the Plan but would object to a further height extension as suggested in this draft plan.	Noted. It is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA's housing requirements when viewed at an aggregated level.	04EA Eastern Gateway		Will French	Save Ealing C	564	Community Interest Group
05EA Perceval House We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability. Consent to redevelop Perceval House including a 26-storey residential tower was granted in 2021 in the face of very strong local opposition and HE's objections to its impact on designated heritage assets. SEC is pleased that the Council is not to proceed with it. We note that the maximum height of new development is proposed to be reduced to 21 storeys but continue to think this would have an excessive and detrimental visual impact on important heritage assets. If a new scheme is to emerge it needs to take greater heed of the Ealing Town Centre Neighbourhood Plan as well as Historic England advice and the design principles of the NPPF, and the London Plan.	Noted. It is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA's housing requirements when viewed at an aggregated level. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	05EA Perceval House		Will French	Save Ealing C	564	Community Interest Group
06EA 49-69 Uxbridge Road. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability. This is another property that should be refurbished rather than redeveloped for climate change reasons. We note, and generally support a reduction from the Regulation 18 proposals to the proposed maximum height. We have some concerns about the proposal to improve permeability to Mattock Lane as we think care has to be given to possible impacts on the Ealing Green CA and Walpole Park. We think this needs fuller discussion.	Noted. It is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA's housing requirements when viewed at an aggregated level. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient.	06EA 49-69 Uxbridge Road		Will French	Save Ealing C	564	Community Interest Group

07EA CP House We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability. Consent to redevelop this site for a 12-storey office development was granted in 2022 in the face of SEC objections that the height and bulk would impact detrimentally on the Ealing Green CA and Walpole Park. This has not yet been implemented. We note, and would support, the proposed reduction in the maximum height to 10 storeys as we think this would reduce the impact on Walpole Park and the Ealing Green CA.	Noted. It is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA's housing requirements when viewed at an aggregated level.	07EA CP House		Will French	Save Ealing C	564	Community Interest Group
08EA Craven House We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability. This long vacant site has consent (164805FUL) for a 10-storey office building which SEC was concerned would create over-dominant views along Uxbridge Road since the building frontage would project forward and be much closer to Uxbridge Road than the adjacent buildings, disrespecting the established building line along the north side of Uxbridge Road. SEC believes any redesign of this scheme needs to take our concerns into account. We note and support the Regulation 19 proposal that no scheme should be taller than the 10 storeys in the consented one.	Noted. It is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA's housing requirements when viewed at an aggregated level.	08EA Craven House		Will French	Save Ealing C	564	Community Interest Group
09EA 66-86 Broadway. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability. We do not understand the justification for redeveloping this relatively recently redeveloped site which seems to be functioning perfectly satisfactorily and we are concerned that the draft plan offers very little guidance as to what form of redevelopment of this site would be appropriate. We note that the maximum height of a development has reduced to 10 storeys which we continue to think is excessive in light of the Allies and Morrison advice which sets the tall building threshold at 7 storeys.	The site represents both capacity for additional development and a poor quality of existing environment. Design guidance and evidence on density is proportionate to the provisions of the policy for this site.	09EA 66–86 Broadway, West Ealing		Will French	Save Ealing C	564	Community Interest Group

10EA Lidl We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability. Lidl Supermarket is a popular store serving the West Ealing community. The draft plan offers no guidance as to what redevelopment would be appropriate beyond the suggestion that it is appropriate for a tall building. We continue to think that a development of 8 storeys would be excessive and that it conflicts with the Allies and Morrison advice which sets the tall building threshold at 7 storeys.	Noted. It is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA's housing requirements when viewed at an aggregated level.	10EA 59–65 Broadway, West Ealing (Lidl)		Will French	Save Ealing C	564	Community Interest Group
11EA Sainsbury's & Library. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability. This major site with its multiple uses plays an important role in the lives of the West Ealing Community. It would involve redevelopment of relatively recently built buildings which the planning authority ought to be discouraging in its fight against climate change. We note that this is one of the sites examined as Zone C in Allies and Morrison's 'Tall Buildings Strategy' which envisages building heights of up to 13 storeys. In contrast, the draft Plan indicates that the maximum height is 16 storeys with no justification or explanation why. We note that Cluster B also considers topics including 'movement' form of development', 'public realm' and 'relationship to surroundings' that are not discussed in the Regulation 19 plan. SEC objects that this is insufficient guidance for the future of such an important site in the Local Plan. If redevelopment is to be countenanced it should only be after a proper scoping out exercise in which the local community should be consulted, followed by the adoption of a site brief as a SPD.	The site represents both capacity for additional development and a poor quality of existing environment. Design guidance and evidence on density is proportionate to the provisions of the policy for this site. The plan sets out a carbo optioneering approach to the assessment of carbon impacts that will ensure the best approach to redevelopment and reuse.	11EA Sainsbury's & Library, West Ealing		Will French	Save Ealing C	564	Community Interest Group
12EA Chignell Place We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability. The draft plan offers no guidance as to what redevelopment of this site would be appropriate, except for a height of up to 13 storeys. This is excessive for this location. With sensitive receptors adjacent and nearby, and as a WENP designated site a site brief should be prepared for this site in which the public needs to be involved.	Noted. It is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA's housing requirements when viewed at an aggregated level.	12EA Chignell Place, West Ealing		Will French	Save Ealing C	564	Community Interest Group

13EA 99-113 Broadway We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability. Although included in Cluster B of the Guidance for Study Sites' the draft plan itself offers no helpful guidance as to what redevelopment of this site would be appropriate for, except for a height which has been reduced since the Regulation 18 plan without explanation from 13 to 12 storeys. This remains excessive in this location as the Allies and Morrison study with its 7-storey tall building threshold would support. If development of this site is envisaged it should only be after a wider SPD has been prepared for West Ealing on which the public has been consulted.	Noted. It is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA's housing requirements when viewed at an aggregated level.	13EA 99–115 Broadway, West Ealing		Will French	Save Ealing C	564	Community Interest Group
14EA 131-141 Broadway. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability. The draft plan offers no helpful guidance as to what redevelopment of this site would be appropriate, but we support the reduction since the Regulation 18 plan of the maximum height to 6 storeys. If development of this site is envisaged it should only be after a wider SPD has been prepared for West Ealing on which the public has been consulted.	Noted. It is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA's housing requirements when viewed at an aggregated level.	14EA Western Gateway, 131–141 Broadway, West Ealing		Will French	Save Ealing C	564	Community Interest Group

15EA Waitrose. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability. SEC considers that the arrival of the Elizabeth Line required the Council to prepare an area strategy for sites around West Ealing Station to ensure the widest public benefits would accrue from this major infrastructure investment. Unfortunately, this did not happen, and it has resulted in a wholly avoidable legacy of distrust on the part of the local community. Even now opportunities exist to repair relationships through an area-based plan involving both the community and key landowners including the John Lewis Partnership. The current Waitrose store has only existed for 18 years, and the one it replaced was only 14 years old. We have very major concerns about the sustainability of Waitrose's slash and burn business model and its impact on climate change. It really should stop. We applaud the proposed reduction in the maximum height to 13 storeys but think this would still be excessive and that it should be restricted to around 10 storeys. This would still exceed the tall building threshold of 7 storeys in West Ealing. As Allies and Morrisons say in their Tall Building Strategy (page 4) 'it follows that in all other locations beyond (areas identified as suitable for tall buildings) – that is, the vast majority of the Borough – tall buildings are not considered to be an appropriate form of development'. SEC has commented elsewhere on the Waitrose proposals and we believe our comments need to be taken on board in the preparation of a more appropriate scheme for this site than has so far been presented. Consideration of the appearance of the	Noted. It is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA's housing requirements when viewed at an aggregated level. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities. Key infrastructure requirements for this site allocation include measures to improve active travel including Jacobs Ladder footbridge and Green Man Lane.	15EA Waitrose, West Ealing		Will French	Save Ealing C	564	Community Interest Group

16EA West Ealing Station Approach. We object to the appraisal of this site as the assessment provides insufficient detail on the quantity of assessed development. This means it does not conform with the National Planning Practice Guidelines on assessing land availability. This is another site close to West Ealing Station that should form part of an area-based plan strategy. (Having said that, SEC does not understand why this site has been given this name. It is nowhere near the approach to the new West Ealing Station which is 100 metres down Manor Road on the other side of the railway.) SEC holds that redevelopment of this site should accord with the 2013 site brief which required that ‘the height, scale and massing of new development must reflect the historic character of the surrounding residential areas on Hastings and Drayton Green Road. New development along Hastings Road must be low rise and not overlook the adjacent two storey terraced residential properties on this side, to create a harmonious streetscape and respect the current building line.’ We see no reason to depart from this principle. In particular, we do not accept that it is appropriate for the height of a development to be as high as 13 storeys as is now proposed. It should remain within the 7-storey tall building threshold which Policy D9 proposes.	Noted. It is not the function of a 5 year housing land supply (or a housing trajectory) to determine whether a site should be allocated in the local plan. Neither do they automatically determine the development quantum for a given site. The role of such an assessment is to demonstrate that within the plan area and over its lifetime that there is an adequate supply of sites to meet the LPA’s housing requirements when viewed at an aggregated level. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	16EA West Ealing Station Approach		Will French	Save Ealing C	564	Community Interest Group

We are writing to strongly object to the consultation and proposals put forward for the Barclays sports ground: * we strongly object to the de-designation of part of Barclays Sports Ground as MOL * we strongly object to allowing residential development on Barclays Sports Ground We fully support the representations by Ealing Matters, Save Ealing Parks and CPRE. We propose and agree that: * Barclays Sports Ground should become part of the proposed Regional Park * The proposed development budget of between £22 million and £87 million is not justified for the above proposal and this should not be allowed. * NPPF article 140 says that Green Belt (and MOL) boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The New Local Plan contains neither sufficient justification nor evidence of exceptional circumstances; for example, even the development budget is not justified. * The Site Selection Report exaggerates the suitability of Barclays Sports Ground for the development. For example, it gives top ranking to the “Distance to nearest infant/primary school” criterion – but the closest school (Montpelier) is oversubscribed and the development is likely fall outside of the catchment area. It also gives top ranking to “Vehicular access to the site”, however, Park View Rd is a school road already with severe traffic problems during school runs. * We live on Woodville gardens and have seen the damage and traffic chaos caused by the school children - including noise and litter pollution. Keep the land as a green space.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The boundaries of the proposed Regional Park have not been finalised yet. However, the former Barclays Sports Ground is physically disconnected from the Brent River Park, which will form the core of the proposed Regional Park. Therefore, its inclusion is likely to be difficult for practical reasons. The council have further reviewed the proposed costs of development and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m (based on 2023 prices) plus potentially any additional costs associated with site specific issues that might be identified once surveys have been completed.	21EA Former Barclays Sports Ground			Parneet and Raminder Boparai	565	Individual

I am writing to register my strong objection to parts of the draft new Local Plan. I have been a resident of Ealing for almost 7 years, spending almost 6 of them in my current home on Woodville Gardens, overlooking the former Barclays Sports Ground, moving here specifically to enjoy the unique and protected outlook over designated Metropolitan Open Land. My enjoyment of the view has been curtailed slightly by the building of the Ada Lovelace school on the lower section of the space but I am fortunate enough to live in one of the few houses along Woodville Gardens that retained a long view across the playing fields of Ada Lovelace, over the Barclays Sports Ground and all the way up to St Augustine’s Priory School. As I am significantly physically disabled and suffer from extreme anxiety, I very rarely leave the house so it is important to me that I am able to enjoy a peaceful and extended view of nature from my home. My sitting room and bedroom, the two rooms I spend the vast majority of my time in, both directly overlook the former Barclays Sports Ground. I do not have the luxury of being able to enjoy visiting the borough’s parks very often, due to my physical and mental limitations, so this is of extreme importance to my life. Woodville Gardens is in close proximity to the North Circular road, known for being one of the most congested and heavily polluted roads within London. This is heavily mitigated by the open land which absorbs a lot of the pollution and creates a pocket of cleaner air. I am, therefore, extremely concerned at the plan to remove the Metropolitan Open Land designation from the former Barclays Sports Ground, development on which would have a direct and significantly negative impact on the quality of my life. Metropolitan Open Land is scored against four criteria. These are:	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet.	21EA Former Barclays Sports Ground		Robin Foreman Quercus		566	Individual

I'm writing to object to the Ealing's Local Plan Regulation 19. I do not believe that the plan passes the test of soundness for the following reasons: * It is a 517-page document which I have found extremely difficult to read and understand and seems to have been written and formatted to be impenetrable to the average lay person. Therefore it is impossible for me to understand how this document enables any Ealing resident to participate in Peter Mason's assertion that the future of Ealing "absolutely should be shaped and controlled by all of us" (0.1) * The proposals to increase the local population by over 50,000 and to develop tower blocks are entirely at odds with "the three core priorities to the Local Plan ... to tackle the climate crisis, create good jobs and fight inequality ". I have been completely unable to understand from the document how these 'core priorities' can ever be realised or coexist with proposals to accommodate an increase in population of that margin, over that time, developing tower blocks. How tower blocks are to be defined, or the lack of clear definitions is deeply worrying * The areas of MOL to be lost show an abject failure to protect natures and green spaces, which are critical to the well-being of all residents As a working mother of two, born in Ealing, now raising my children here, I am deeply concerned about the future of my home borough and the future well-being of my family, as presented in this practically impenetrable Local Plan.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy.	General		Tania Payne		567	Individual

Thank you for your consultation on the above document. We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural, and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. Our waterways should be acknowledged within the plan, as significant blue/green infrastructure, which can serve as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a contributor to water supply and transfer, drainage and flood management. The waterway network forms part of the historic environment, the character, cultural and social focus of the plan area. The Canal & River Trust, own and manage the canal network through Ealing which includes the Grand Union Canal (GUC) and the Paddington Arm of the Grand Union Canal. The canals often straddle administrative boundaries, and the entirety of the canal corridors through Ealing are designated within one of three conservation areas: Canalside, Norwood and St Marks Church and Canal conservation area (CA).	Noted.	General		Anne Denby	Canal & River	568	Community Interest Group

Based on the documents and information available the Trust considers that without amendments the Plan would be unsound in relation to the proposed development site 13SO-Endsleigh Industrial Estate. Our full comments on this and other matters within the Plan which we consider could be made clearer are outlined below: The draft Local Plan (LP) acknowledges and recognises the importance of the canal network and the role it can play in supporting sustainable communities. However, it is disappointing to note that opportunities to strengthen references to the canal network throughout the LP and include a canal specific policy have not been included. Maps There is still a lack of introduction/background on the canal network within this section to set the scene and highlight the canals potential in meeting the aims and vision of the LP. Furthermore, considering that some sections of the canal network are coincident with the administrative, Town Plan area boundaries and conservation area designations, the canal corridor still remains somewhat lost on the maps and figures within the Plan. The importance of the canal to the LP area would be more apparent and unambiguous if it were more clearly shown on maps throughout the LP. The inclusion of a canal specific policy would also give more prominence and legibility to the canal network within the borough and ensure that there is no ambiguity within the plan policies, making it clear and evident to decision makers how they should react to any future development proposals which may impact on the	There are already frequent references to the canal network throughout the plan, and primarily in chapter 4 comprising the town plans. These policies recognise the canal network as a key asset, recognising their multifunctional role and benefits. These policies identify specific town based opportunities / priorities to be secured / facilitated via future development. Example town based policies include G1, H1, N1, P1 & S1. Further detail is also included in specific allocations. These include the identification of opportunities / priorities to improve crossings, walking and cycling enhancements, wayfinding improvements, recreational and leisure opportunities, upgraded towpaths, and the identification of heritage sensitivities. The canal and river network are included both on the existing context and spatial strategy maps for each town. Each respective spatial strategy map also identifies proposed active travel routes and green links / connections many of which link to or originate from the canal network.	General		Anne Denby	Canal & River	568	Community Interest Group

Canal-specific policy / Policy G4 Policy SP2. Part D has been amended and now seeks to ensure that blue spaces are able to fulfil their full potential to be multi-functional in use and in positively contributing to achieving multiple benefits. This is reflective of London Plan Policy SI 14 which sets out the strategic role of the waterways and states that development plans should address the strategic importance of the waterways and seek to maximise their multifunctional social, economic, and environmental benefits. The multi-functional opportunities and planning considerations that relate to canals are sufficiently different to other forms of green infrastructure that a specific policy on canals in local plans is justified. For example, whilst an area of public open space may predominantly be managed for recreation, a canal corridor provides, amongst other things, recreation opportunities, an active travel corridor, a space where people can live or undertake business on moorings, a waterborne freight route and a nature corridor. It is also the case that their physical fabric and structural integrity is more susceptible to the impacts of development adjacent. The Trust considers that a specific policy on canals should be included in the local plan. However, in the absence of this, Policy G4 should supplement policy SP2 by providing greater detail on how blue spaces will be supported to fulfil their potential as multi-functional spaces. London Plan Policy SI 14 states that development plans should seek to maximise the multi-functional social, economic, and environmental benefits of waterways. However, policy G4 currently focuses predominantly on the protection of environmental	The need for strong focus on waterways is accepted, but given the extensive coverage already included in the London Plan (namely SI 14, SI 15, SI 16, SI 17 and others), we don't believe that there is a need for a standalone DM type policy. Local variation policy G4 is also a DM policy, and again we don't feel that this is necessarily the right place. This would be better addressed via the spatial strategy and town plans. There are already frequent references to the canal network throughout the plan, and primarily in chapter 4 comprising the town plans. These policies recognise the canal network as a key asset, recognising their multifunctional role and benefits. These policies identify specific town based opportunities / priorities to be secured / facilitated via future development. Example town based policies include G1, H1, N1, P1 & S1. Further detail is also included in specific allocations. These include the identification of opportunities / priorities to improve crossings, walking and cycling enhancements, wayfinding improvements, recreational and leisure opportunities, upgraded towpaths, and the identification of heritage sensitivities.	Policy G4: Open Space – London Plan – Ealing LPA – local variation		Anne Denby	Canal & River	568	Community Interest Group

Green Belt and Metropolitan Open Land The LP proposes some changes to Green Belt and Metropolitan Open Land (MOL) boundaries and where this is not connected to a proposed site allocation, the LP states that the changes are proposed to ensure that sites have correct, up-to-date defensible boundaries as incorrect boundaries can undermine the integrity of the wider MOL parcel and the council’s ability to protect it from inappropriate development. London Plan Policy G3 is clear that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified. Para 8.3.3 states that in considering whether there are exceptional circumstances to change MOL boundaries alongside waterways boroughs should have regard to Policy SI 14, Waterways-strategic role and Policy SI17, protecting and enhancing London’s waterways and the need for certain types of development to help maximise the multifunctional benefits of waterways including their role in transporting passengers and freight. As set out above, policies that are overly restrictive in the extent to which they seek to preserve and enhance openness (which is a central principle of Green Belt and MOL DM policies) may preclude development that is beneficial to the continued management and use of the canal network, such as moorings or facilities to support watersports, for example. Whilst some of the proposed MOL boundary changes would affect sections of the canal corridor the justification for these changes is not fully apparent and it is not clear that exceptional circumstances have been established to warrant these changes.	Comments noted. GB/MOL boundary corrections aim to ensure that all GB and MOL sites have correct, up-to-date, and defensible boundaries. In terms of the Blair Peach site, the school clearly does not meet GB criteria and the allotments have Community Open Space designation which protects them from inappropriate development. Unlike the school and allotments (which are opposite an industrial estate on Hillingdon's side), the towpath is an extension of the green open space on Hillingdon's side. This provides the justification for maintaining its designation.	SP2.2 Climate action		Anne Denby	Canal & River	568	Community Interest Group

Infrastructure Delivery Plan The Trust welcome the repeated references to the 20-minute neighbourhood and promoting active travel/infrastructure as a key theme throughout the LP, also supporting health and wellbeing and social cohesion, reducing health inequalities, and inclusive public spaces. The LP acknowledges the canal as an active travel route and supports improving it, access, and connection to it which is positive. The LP now includes an Infrastructure Delivery Plan (IDP) which outlines the infrastructure projects that would be required to deliver planned growth across the borough. It is noted that canal towpath improvements are referred to for the Hanwell and Northolt sections which is positive though the extent of the improvements and how the costings have been reached are not clear. The reference to towpath improvements though is not consistent and appears to be missing from the Greenford section and the Southall section where it is most urgently needed. It is not clear if the intention is for this to be covered by the green corridor links described between locations and the canal and this should be clarified within the document, particularly as it is referenced within the Southall TPA section. In addition, there are also references to the potential for new pedestrian/cycle crossings of the canal. As per our previous response, any proposals for crossing of the canal would need to consider the impacts on the canal corridor and its users, for example character and appearance, heritage, canalside habitat, navigational safety, and structural integrity. Any crossings would also need to include pedestrian and cycle	Comments noted. Towpath improvements are sought all the way along the canal throughout the borough. The whole towpath route is designated as a green link, as the council would like to see its full length eventually upgraded to be a suitable walking and cycling route. The council would be keen to discuss any proposed new canal crossings with the Trust.	SP4.1 Good Growth		Anne Denby	Canal & River	568	Community Interest Group

Chapter 3 – Spatial Strategy Policy SP.1 – As above, the Trust welcome the repeated references to the 20-minute neighbourhood and promoting active travel/infrastructure as a key theme throughout the LP, also supporting health and wellbeing and social cohesion, reducing health inequalities and inclusive public spaces. Figure SS3 (Page 91) –does not show the canal as either a “green link” or an “active travel route”. The LP and IDP do seem to indicate that the towpath is intended as an active travel route and, as there is a designated TfL Cycleway all the way through Ealing borough along the Paddington Arm, it does seem the route should also be identified within the “Active Travel route” designation. Furthermore, if the intent is for the towpath along the Grand Union Canal south of Southall through Hanwell to also be of the same standard, it would seem appropriate that this should also be included. This could be clearly set out within a canal specific policy and/or the supporting text, though as a minimum the spatial strategy map and those within the individual Town spatial strategies should be updated to clearly identify the canal corridors as “green links” and “active travel routes”.	The need for strong focus on waterways is accepted, but given the extensive coverage already included in the London Plan (namely SI 14, SI 15, SI 16, SI 17 and others), we don’t believe that there is a need for a standalone DM type policy. There are already frequent references to the canal network throughout the plan, and primarily in chapter 4 comprising the town plans. These policies recognise the canal network as a key asset, recognising their multifunctional role and benefits. These policies identify specific town based opportunities / priorities to be secured / facilitated via future development. Example town based policies include G1, H1, N1, P1 & S1. Further detail is also included in specific allocations. These include the identification of opportunities / priorities to improve crossings, walking and cycling enhancements, wayfinding improvements, recreational and leisure opportunities, upgraded towpaths, and the identification of heritage sensitivities. The Cycle Network Plan route map is replacing the previously proposed primary and secondary active travel routes. In the Cycle Network Plan, the whole length of the canal towpath is designated as a green route, to make it clear that Ealing would like to see the whole towpath improved.	Policy SP1: A Vision for Ealing		Anne Denby	Canal & River	568	Community Interest Group

Chapter 4 -Town Plans The Grand Union Canal and the Paddington Arm of the Grand Union Canal pass through most of the Town Plan areas (TPA). As highlighted above the canal network also often straddles or is in close proximity to the TPA boundaries. It is important that the LP takes full consideration of, and appropriately addresses this overall but also within each of the TPA. As above, the importance of the canal to the LP and TPA would be more apparent if it were shown clearly on all maps. As outlined previously, the Trust welcome the repeated references to the 20-minute neighbourhood and promoting active travel/infrastructure and the acknowledgment of the canal as an active travel route providing support for improving it, access, and connection to it. The LP though refers to the ‘severance’ caused by the canal in a number of places (i.e. pg 229 4.3.8). While this can be true, the language is harsh and could lead to a view of the canal as a negative feature, especially as this is generally stated first in the relevant sections with the benefits of the canal often not highlighted for several points. The LP also does not seem to consistently refer to the canal as a “green link” and “active travel route” and the difference between a ‘primary’ or ‘secondary’ active travel routes and the expectations for them is also not clear. Furthermore, there is no detail on the ‘green connections’ identified on the maps or consideration as to whether any improvements may be required at these points, the impacts of any works and how they would be funded. The Trust should be identified as a key stakeholder. and	Noted. Support for active travel welcomed. The Cycle Network Plan route map is replacing the previously proposed primary and secondary active travel routes. In the Cycle Network Plan, the whole length of the canal towpath is designated as a green route, to make it clear that Ealing would like to see the whole towpath improved. The council acknowledges the key role of the C&RT as a stakeholder and the need to engage on any future plans or proposals that may involve new canal crossings.	Policy SP1: A Vision for Ealing		Anne Denby	Canal & River	568	Community Interest Group
Greenford Town Plan : The canal follows the TPA boundary, and it is positive that it is recognised as a highquality green space. The Trust would welcome improved access to the canal/GUC Cycleway in several locations, including through providing accessible gradient access, wayfinding, and better connection to the wider active travel network. (e.g. accessibility at Oldfield Lane from the highway to the new ramp, through Greenford Park industrial estate, Brick Lane footbridge (Taylor Woodrow)). It is not clear if these would be covered by the intentions indicated within Policy G.1. As set out above, we have concerns that policy G4 may adversely affect the delivery of such improvements where planning consent would be required and there could be an impact on visual openness.	Noted.	Policy G1: Greenford Spatial Strategy		Anne Denby	Canal & River	568	Community Interest Group

04GR- Westway Cross- whilst this site is set back substantially from the canal corridor it should consider the potential to result in increased footfall along the towpath and provide any necessary mitigation to address this. The key infrastructure requirements for this site include 'measures to improve active travel' . As we have highlighted elsewhere there should be consistent references throughout the LP that the canal corridor is a “green link” and “active travel route” to ensure future decision makers are clear that such infrastructure requirements also relate to the canal corridor.	Noted.	04GR Westway Cross		Anne Denby	Canal & River	568	Community Interest Group
Hanwell Town Plan : As we have highlighted elsewhere sections of the canal network are coincident with the administrative, Town Plan area boundaries and conservation area designations and as such the canal corridor becomes somewhat lost on the maps and figures within the Plan. Figure H1 shows the alignment of the canal, and it is highlighted as being a designated conservation area along its length. However, other plans seem to show its alignment slightly differently, particularly around the Hanwell flight where the river and canal diverge and the section of the canal at the southernmost part of the Hanwell area, again where the river and canal diverge, is also missing on some plans. These should be amended accordingly. It is encouraging that Policy H.1 continues to refer to 'heritage led' regeneration along the GUC, though further detail as to what this will entail would be beneficial, as would an explicit mention of the Hanwell Flight as a Scheduled Monument and its heritage significance. The Trust is developing a project to submit for a Lottery Bid with an aim to remove Hanwell Flight from the heritage at Risk Register and this will require co-ordination and support from the Council. Policy H1 Part C iv) refers to the potential for widening the canal towpath and provision of additional crossings. The Trust welcome the support for towpath improvements, including path widening (where possible) and improved surfacing to improve the accessibility of the towpath and access to it. As advised previously, any proposals for crossing of the canal would need to consider the impacts on the canal corridor and its users, for example character and appearance.	Noted.	Policy H1: Hanwell Spatial Strategy		Anne Denby	Canal & River	568	Community Interest Group

HA4-7 - These sites are all set back from the canal corridor though they have the potential to significantly increase the local population and result in increased footfall along the towpath. Within the key infrastructure requirements for these sites, it should be clarified that ‘active travel’ improvements could also include any necessary mitigation to the towpath to support this increased footfall.	Noted.	Policy H1: Hanwell Spatial Strategy		Anne Denby	Canal & River	568	Community Interest Group
Northolt Town Plan: As we have highlighted elsewhere sections of the canal network are coincident with the administrative, Town Plan area boundaries and conservation area designations and as such the canal corridor becomes somewhat lost on the maps and figures within the Plan. This issue is clearly evident within this TPA. The canal is identified within figure N1, albeit overlaid with the conservation area designation. However, within figure N2 the canal is shown to be outside the Northolt area. There is also a new addition of a development site, 10NoAirways Estate which although included within this section appears to be located wholly outside the Northolt Town Plan area.	Noted.	Policy N1: Northolt Spatial Strategy		Anne Denby	Canal & River	568	Community Interest Group

04NO-Northolt Driving Range - The site boundary as shown appears to include land within the ownership of the Canal & River Trust which is currently leased to a Third party who provide boating services and leisure and residential moorings. The land within the Trust’s ownership is not available for development. Any proposals for this site would need to consider the existing moorings and the existing boat business, which includes activities such as chandlery and boat repairs. The London Plan acknowledges the importance of such sites to the waterway network and Policy SI 15, Water transport is clear that existing boatyard sites should be protected. The contextual considerations state that consideration should be given to impacts on the canal though there is no mention of the existing moorings and boat business nor is the canal identified as a designated conservation area and part of the Blue Ribbon Network in the site constraints. The proposed use is stated as ‘employment-led, mixed use’ though there is no indication on the level of employment that would need to be provided for it to be truly ‘employment-led’ or any detail on the quantum of proposed residential for this site which would assist in setting realistic design principles for the site. The Design principles require consideration for the potential for residential development along the canal where it can mediate between any industrial provision and the surroundings though this shows no regard to the existing boat business or the need to ensure the existing use does not have any unreasonable restrictions placed on it in accordance with the principles of the agent of change (NPPE	Comments noted. The site boundary will be amended to remove land within the Canal and River Trust's ownership. The "Canalside, northwest part Conservation Area" was omitted in error and will be added to site constraints. The "Blue Ribbon Network" will be added as a constraint. Suggest adding a new 'contextual consideration': <u>"Any development proposals should consider impacts on the exisiting canal moorings for residential amenity and protect operations of the boat yard business."</u> Suggest amending the fourth 'Design Principle' as follows: <u>"Improve connections to the active travel network including pedestrian routes to and through the site and connections to green space, and explore improved access to the canal including an accessibe ramp from Rowdell Road link/Bridport Road."</u> We do not consider it necessary to provide levels or employment of the quantum of residential development as this will be agreed as part of the masterplan process. The design principles and masterplan approach will ensure that any proposals are truly employment-led and will consider the impacts of heights, scale and massing from the canal conservation area. All proposals will be	04NO Northolt Driving Range		Anne Denby	Canal & River	568	Community Interest Group

10NO- Airways Estate: this is a new proposed development site which is located to the north of the Paddington Arm of the Grand Union canal. The canal is within a cutting at this point and is below the level of the site. It is important to ensure that any development does not adversely affect the stability of the cutting slope, as this could significantly increase the risk of damage to the adjacent canal. Land stability is a material planning consideration and is referred to in paragraphs 180 & 189-190 of the NPPF, as well as being the subject of more detailed discussion in the current National Planning Practice Guidance. We consider therefore that this advice and guidance clearly identifies that the planning system has a role to play in minimising the risk and effects of land stability on property, infrastructure, and the public. The Trust’s strong preference would be that the canal specific policy that we have proposed should include a requirement for new development to protect the structural integrity of canal infrastructure. In the absence of this, a policy ‘hook’ requiring the physical protection of waterways should be inserted into policy G4 and a specific reference to the requirement should be included in the development guidance for this site. As per other development sites adjacent to the canal corridor it should be clarified that active travel improvements include the towpath and form part of the key infrastructure requirements.	Noted. Given the potential risk noted in respect of this site, it is recommended that a further bullet point is added to the end of the 'Contextual Considerations' section of this allocation as follows: 'The site is bounded to the south by the Grand Union Canal. The canal is within a cutting at this point and below the level of the site. Any development should not adversely affect the stability of the cutting slope, as this could increase the risk of damage to the adjacent canal'.	10NO Airways Estate		Anne Denby	Canal & River	568	Community Interest Group

Perivale Town Plan: Policy P.1 still refers to the provision of ‘new and improved’ canal crossings in addition to the provision of an ‘enhanced canal crossing that will connect the eastern edge of Horsenden Hill with an active travel route through Horsenden Hill to provide a connection to Sudbury Hill’. No further clarity has been provided as to whether this relates to Ballot Box Bridge or is proposed to be in addition to this and there is no indication as to where there is considered to be a need for further canal crossings. It is therefore difficult to determine whether the principle of additional crossings would be acceptable to the Trust. As advised previously, any proposals for crossing of the canal would need to consider the impacts on the canal corridor and its users, for example character and appearance, heritage, canalside habitat, navigational safety, and structural integrity. As set out above, we would also encourage the council to consider the impact of policy G4 on such proposals and, whilst we are not advocating additional bridges over our canals, we suggest that inconsistencies between the aspirations of the IDP and policy G4 provides further evidence of the need for changes to policy G4. Any crossings would also need to include pedestrian and cycle access to/from the canal towpath via a suitable graded access to improve walking and cycling connectivity with the towpath. It is likely that in the absence of properly designed access points informal access would be created by those wishing to access the canal corridor. This would adversely impact on visual amenity and could lead to adverse impacts on structural integrity.	Comments noted. The council is keen to engage with the Canal & River Trust as bridge/crossing proposals are further developed.	Policy P1: Perivale Spatial Strategy		Anne Denby	Canal & River	568	Community Interest Group

Southall Town Plan : The canal forms the southern and western town boundaries and as a result is somewhat lost on the map at Figure S1. As we have commented elsewhere the importance of the canal to the TPA would be more apparent if it were more clearly shown on maps within the LP and this should be addressed accordingly. S.1 Southall spatial strategy, this policy still seeks to support the provision of a north-south connection through Southall connecting to the Grand Union canal to the south via King Street. The policy refers to towpath enhancements, as do Policies S4 and S5. However, for clarity, it would be extremely beneficial to include references to the stretch of towpath and accesses proposed to be supported for enhancements. Amendments to include reference to towpaths should also be included within Table S1 and the relevant section within the IDP. The Trust would suggest west of Norwood Road to Bull’s Bridge, and east of Glade Lane to Windmill Lane (Three Bridges) should be identified for improvements as this would support the aims of improving the active travel network in Southall and support the aims of the Let’s Go Southall project. It would also build in the work being delivered by the Southall Wellbeing Way project and extend the improvements to connect with key crossing points at and west of Norwood Road in particular. S5: East Southall – it is not clear if the reference to the canal tow path (vii) relates to the Grand Union Canal mainline, Maypole Dock or both. This should be clarified within the	Policy 'S5: East Southall' refers to Maypole Dock but development site 'Southall – 09SO Havelock Estate' also includes the canal.	Policy S1: Southall Spatial Strategy		Anne Denby	Canal & River	568	Community Interest Group
S5: East Southall – it is not clear if the reference to the canal tow path (vii) relates to the Grand Union Canal mainline, Maypole Dock or both. This should be clarified within the supporting text. In addition, whilst Maypole Dock is linked to the Grand Union Canal mainline it is not owned by the Trust. There are currently boats moored along Maypole Dock and limited access. Any development or proposals to improve access will need to consider these existing moorings and this should be referenced within the supporting text.	The policy refers to Maypole Dock but development site 'Southall – 09SO Havelock Estate' includes the canal.	Policy S5: East Southall		Anne Denby	Canal & River	568	Community Interest Group

09SO:Havelock Estate – It is understood that redevelopment proposals have already been approved and partially implemented though the timeframe for progress on later phases of the development is not clear. There are some improvements to the Havelock Road canalside space being delivered by the Southall Wellbeing Way project, along with towpath improvements adjacent to the Havelock Estate and wellbeing opportunities. It is not clear if this is Canalway Park referenced or if that is the new park within the new housing area. Further clarity on this should be provided. The design principles for this site state that designs should concentrate building height in prominent locations such as the canalside. Whilst this may provide scenic views for those within the development, it needs to be ensured that the character and appearance of the canal corridor is also maintained. The canal is a designated conservation area and retains a landscaped character. Developments should therefore also be required to consider the impacts on users of the waterway and any key views along the canal corridor or from nearby assets, such as locks and bridges	Comments noted. The intention is to connect all green spaces in the area.	09SO Havelock Estate		Anne Denby	Canal & River	568	Community Interest Group
11SO – The Green Quarter (Southall Gas works) - this site has already been partially developed and has contributed to towpath improvements with canalside public realm to be delivered in later phases. Two new bridge connections are also to be delivered.	Noted.	11SO The Green Quarter (Southall Gasworks)		Anne Denby	Canal & River	568	Community Interest Group

13SO-Endsleigh Industrial Estate – the site boundary for this proposed development site has been extended and now includes Adelaide Dock. Adelaide Dock is a major and essential operational base owned and managed by the Canal & River Trust. The land the Trust own here is not available for development. The dock is an extremely important part of the canal infrastructure and essential for the continued operations of the Trust in ensuring safe navigation and undertaking our statutory duties throughout the canal network in Ealing and beyond. The only land access to the Dock is via the existing road through Endsleigh Industrial Estate. It is extremely important that this existing, essential Dock Yard use is protected, and we are opposed to any scheme which may affect its continued operation. The Trust utilise the site for major deliveries as well as boat removals with substantial cranes having access to load and unload boats from the water. There is a dry dock at the yard and lock gates are delivered to this site when they need to be replaced. The Dock is where the Trust mobilise the boats for the London weed removal project and also the key disposal site for London weed, and as a result during the summer months there can be foul odours. Without the annual completion of our weed removal projects, there would be a significant risk to the navigability of the canal network in London. Adelaide Dock is the only facility available to the Trust in west London that can accommodate these uses and could not foreseeably be replaced if it was lost. There is noise associated with	Noted. Suggest the following be added to the proposed allocation: In 'Contextual Considerations' add the following after the first bullet point: <u>"Adelaide Dock Yard is owned and managed by the Canal & River Trust who must be consulted on any development proposals. It provides essential operational services for the maintenance of the Canal including deliveries and boat removals and is a key disposal site for London weed removed annually. Any development proposals must ensure the continued operation of the dock and its many functions."</u> In 'Design Principles' add the following after the 5th bullet point: <u>"Development will need to take into account the 24 hour/7 days a week operation of Adelaide Dock and address potential issues such as noise, access and odour resulting from the dock's operational requirements."</u>	13SO Endsleigh Industrial Estate		Anne Denby	Canal & River	568	Community Interest Group

14SO-Witley Works - this site is located further to the east of Adelaide Dock and does not currently utilise the same access as the Dock Yard. The design principles also appear to be very similar to those set out for site ref:13SO and seek a co-ordinated layout and servicing arrangement with that site, though how this would be achieved is not clear as the sites are physically separated from one another with intervening residential development. It is positive to note that the design principles require enhancement of the towpath, and any development should be required to support towpath improvements west of Norwood Road to extend the Southall Wellbeing Way surfacing and access from Norwood Road. Any proposed development is also required to achieve a more engaged and active frontage to the canal corridor which is positive. The development site here should also be required to consider the potential for incorporating mooring and boating facilities, by measures such as providing electricity, water and space for waste/recycling and cycle storage. Any access to the canal from the site though would require separate commercial agreements with the Trust and the need to engage with the Trust at an early stage could also be included to ensure applicant’s/developers are aware at the earliest possible stage. Whilst separated from the Adelaide Dock Yard any development should still be required to consider any issues such as access, noise, odour etc to ensure the continued operation of the Dock Yard is not adversely affected.	Comments noted. Suggest the following modifications: Add the following as a 2nd bullet point to 'Contextual Considerations' : <u>"Development proposals will need to consider the continued operations of the adjacent Adelaide Dock Yard and ensure they are not adversely affected by engaging with the Canal and River Trust at the earliest possible stage."</u> Add the following after the 4th bullet point: <u>"Development proposals should consider the potential for incorporating mooring and boating facilities and should achieve a more engaged and active frontage to the canal corridor."</u> <u>"Development will need to take into account the 24 hour/7 days a week operation of the adjacent Adelaide Dock and address potential issues such as noise, access and odour resulting from the dock's operational requirements."</u>	14SO Witley Works		Anne Denby	Canal & River	568	Community Interest Group

15SO- Monorep site – As identified in the LP the site is within the St Marks Church and canal Conservation area and is adjacent to the Grade II listed Bridge 204, Glade Lane Bridge, walls, gates, sluices, and lock no.90. The reference in the contextual considerations to 'Lock 90, Hanwell Flight' though should technically be ‘Norwood Top Lock’ as it is not part of the Hanwell Flight, nor in Hanwell. The canal is also in a cutting at this point and as part of the Design Principles any development should be required to consider the potential impacts to the canal heritage and infrastructure. The current Design principles require improvement to the pedestrian link from Glade Lane, improvements to providing an accessible route to the towpath avoiding the steep ramp under Glade Lane bridge at Top Lock could also be included and the requirement to support these enhancements should be included in the key infrastructure requirements for the site for clarity. The site was also sold by the Trust and any future applicant/developer is advised to contact the Trust’s Estates Team to discuss any restrictive covenants which may be in place.	Comments noted. Lock 90 is listed by Historic England as "Walls, Gates, Sluices and Bridge at Lock (90)", with its statutory address being in "Glade Lane". The reference to 'Hanwell Flight' will be removed and replaced with 'Glade Lane' in line with Historic England's record. However it should be noted that the listing 'details' on the Historic England website gives the address/reference as "GLADE LANE 1, 5010 (Grand Union Canal) Hanwell. To address the other comments, we suggest: Amending the 2nd Design Principle as follows: Development proposals for this site should capitalise on the site’s location next to the Grand Union Canal and situation within the St Mark’s Church and Canal Conservation Area, <u>whilst considering the potential impacts of development on the canal's infrastructure and heritage.</u> Amending the 8th Design Principle as follows: Improve the pedestrian/cycle link from Glade Lane to the canal, <u>including an accessible route to the towpath, enhancing to enhance connectivity to the site.</u> Add the following to 'Infrastructure Requirements':	15SO Monorep Site		Anne Denby	Canal & River	568	Community Interest Group
19SO – Cranleigh Gardens industrial Estate & Kingsbridge Crescent - some development proposals for this site have already been considered/submitted to the Council with the scheme for the northern part of the site already being built out. The requirement for any further development to consider access to the towpath and support towpath improvements to mitigate increased use is positive. Any access to the canal from the site though would require separate commercial agreements with the Trust and the need to engage with the Trust at an early stage could also be included to ensure applicant’s/developers are aware at the earliest possible stage.	Comments noted. Suggest the following be added to 'Contextual Considerations': <u>"Development proposals should include early engagement with the Canal and River Trust to secure separate commercial agreements for access to the canal from the site. "</u>	19SO Cranleigh Gardens Industrial Estate & Kingsbridge Crescent		Anne Denby	Canal & River	568	Community Interest Group

20SO – Hambrough Tavern – it is understood that a recent scheme for a tall residential-led development on this site did secure improvements to the canal corridor. It is therefore positive to note that the need to support improved canal access, public realm, and landscaping improvements, which would aid in designing out antisocial behaviour issues, have also been included within the key infrastructure requirements for this site.	Support welcomed	20SO Hambrough Tavern		Anne Denby	Canal & River	568	Community Interest Group
I object to site 21EA the (Former Barclays Sports Ground) being de-designated as MOL and being used for residential development and am of the strong view that the land should become part of the propose Regional Park. The New Local Plan does not contain sufficient justification or evidence for the plan to alter the MOL status of site 21EA. For example: 1. The NPPF states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)” (Paragraph 159), and that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding (Paragraph 162).” I am a long standing resident of Ealing borough living at the bottom of Park View Road. In recent years I have seen increasing issues with surface water flooding in my area due to significant rainfall and insufficient drainage. Removal of green land, and replacement with concrete, will only exacerbate this issue. I have not seen any evidence of this having been considered appropriately. 2. The Site Selection Report either exaggerates the suitability of site 21EA or shows that the site is not suitable for residential development. For example - “ Site is less than 1000m from the nearest infant/primary school.” The nearest schools are Montpelier and Holy Family (on other side of Hanger Lane) both of which are severely oversubscribed. My children have not been able to attend Montpelier despite having been on a waiting list for some time and despite being “less than 1000m” away! GPs, secondary schools (including Ada Lovelace) “less than 1000/2000m” away are also oversubscribed!	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. School capacities do change over time and any development would need to mitigate any adverse impacts regards the availability of school places as part of any planning obligations should development be consented. There are no physical vehicular access issues for this site. Traffic congestion associated with the ‘school	21EA Former Barclays Sports Ground		Nina Major		569	Individual

We have only seen the plan in detail very recently. It is lengthy and not easy to assimilate the detail. A summary and an index would have helped. We have been very thankful for the online comments from Ealing Matters and STT as a starting point for us to list comments on a Plan which addresses the proposed changes to the seven areas which make up the London Borough of Ealing. The proposals describe what is hoped to be achieved but there seems to be little attention to the negative side of things. • The proposal to double the population over the next 15 years seems unworkable in terms of making the Borough an attractive place to live. The new six story flats in Acton offer the possibility of community within an estate and offer housing to more occupants than traditional housing but building Tower Blocks will do more to isolate occupants. They are not an attractive addition to the landscape. • There is little reference to work on improving the infrastructure which is manifestly in need of such work, especially in the light of the above. Health services, education, public libraries and the facilities they offer in terms of social support are overcrowded or in short supply now and more and more people coming to live in Ealing will create more pressure. • More people will bring more cars to our roads which are already in a poor state of repair in much of Ealing. • There will be more demand for water which in the light of Climate Change is under further threat in the light of a possible increase in the number of droughts we shall experience.	Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General			Jill and Stuart Steele	570	Individual

I've read some of the new Local Plan that you're seeking residents' comments on. I found it very long-winded and pretty impenetrable - for example, the bits I am particularly interested in on development in South Acton where I live (pp92-3), refer to other documents/plans that I don't have, or to terms I don't understand - e.g. the Acton Gardens masterplan and the South Acton LSIS. If you want us to properly understand your documents you need to spell out what these are and mean for the local area. Having read this section, I still don't know what your plans are for this area. I think (but can't be sure) that they imply you will continue with the recent policy of building very large tower blocks (i.e. above 8 storeys) that are not in keeping with the Acton Gardens development, and have been rejected by hundreds of local residents every time you have sought comments on individual planning applications. If that is the case, I am totally opposed to the plan. On page 108, you suggest more excessive tower blocks could be built in Acton Gardens - between 8 and 15 storeys. That is not acceptable. If, in fact, you are proposing a new approach, please let me know what it is. My view is that you should be building more low-rise accommodation for families, which you say is one of your priorities in paragraph 4.1.19 (but only one of several). I also think your plan doesn't properly address the concerns around economic growth in Acton set out in the context for Acton in the plan. In South Acton you have been building new tower blocks where businesses used to operate. More residences equals more commuters into central London, not more quality jobs for people living in Acton. Why not build a small industrial and craft centre where start-up local businesses can set up? People want to feel part	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. Housing tenures and sizes are set out in the SHMA/LHNA and implemented by Policy HOU. Major development will be subject to carbon optioneering, and much of the existing stock offers the scope to significant improvement through reuse/redevelopment. Support for the approach to 20 minute neighbourhoods is welcomed.	Policy A1: Acton Spatial Strategy		Tim Cole		571	Individual

We object to the proposed Local Plan Proposals on the following grounds; 1. Ealing's housing target of more than 40,000 homes over the next 15 years is excessive. It would create unmanageable population growth of more than 80,000 people according to GLA projections. 2. The infrastructure plans to support this very high growth rate are completely inadequate. 3. The plan's proposals for wholesale redevelopment will exacerbate climate change. 4. Valuable areas of Metropolitan Open Land are to be lost. A new policy of 'enabling development' will justify developing them in the Council's interests which is totally unacceptable. 5. Tall building heights, especially in Ealing and Acton, are excessive, unjustified and would totally alter the generally low rise pleasing character of the town centres. 6. There is no strategy for the virtually total redevelopment of Ealing Metropolitan Town Centre that the Plan proposes. 7. The Plan refers to over 80 individual development sites which would have a major impact on the Borough and the proposals for them are totally insufficient. 8. The Borough's proposals for monitoring the plan are completely inadequate. 9. There are no policies to protect the Borough's heritage.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. But it also sets out the challenges faced and the council's ambitions and plans for each of the seven towns that make up the borough. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. The Local Plan is also based on an extensive technical evidence base. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19). It is imperative that the council has an up to date Local Plan and there are potentially severe consequences of failing to have one. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs.	General		Roger and Margaret Evans		572	Individual

I am writing to express my strong support for the conversion of the currently unused Ealing site 21EA, the Former Barclay Sports Ground into a sports facility, particularly advocating for the inclusion of a hockey pitch. As a member of the local community, I believe this initiative holds immense potential to benefit our neighborhood in numerous ways. First and foremost, establishing a sports facility, such as a hockey pitch, would provide a much-needed recreational outlet for residents of all ages. In today's fast-paced world, it's crucial to have accessible spaces where individuals can engage in physical activity and maintain their health and well-being. A hockey pitch would not only cater to enthusiasts of the sport but also attract newcomers, fostering a sense of community and promoting an active lifestyle. Furthermore, converting the unused ground into a sports facility has the potential to revitalize the area and transform it into a vibrant hub for social interaction. Such spaces often serve as gathering points for families, friends, and neighbors, strengthening bonds within the community and promoting a sense of belonging. Additionally, the presence of a well-maintained sports facility can enhance the overall aesthetic appeal of the neighborhood and contribute to a positive perception of the area. Moreover, investing in sports facilities aligns with broader societal goals, including promoting youth development and fostering talent. Providing young individuals with access to high-quality sporting infrastructure not only encourages them to pursue their passion but also instills values such as teamwork, discipline, and resilience. By nurturing the next generation of athletes, we not only contribute to their personal growth but also enhance the overall sporting landscape of our community. In conclusion, I strongly believe that converting the unused Ealing site 21EA, the Former Barclay Sports Ground into a	Noted. Support welcomed. The council’s Sports Facility Strategy 2022–2031 identifies the site and the wider sports ground as an opportunity to secure new community provision including identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine’s via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.	21EA Former Barclays Sports Ground			Heman Parekh	574	Individual

The plan gives insufficient weight to the green environment. It is too heavily weighted towards housing and the built environment. There is no joined-up approach to the management of parks, open spaces, water courses and biodiversity. The de-designation of Metropolitan Open Land (MOL) removes protection from vital open spaces. Metropolitan Open Land is a designation which protects open land within London, preserving it for recreation, nature conservation and scientific interest. With the predicted increase in rainfall, Ealing Council should be converting hardstanding on MOL into green space, rather than building on it. Proposals for 6 new areas of MOL, which would have been hugely beneficial, have since been removed from the Local Plan.	Maintaining, enhancing, and expanding our network of green infrastructure is a key objective of the new Local Plan. This is outlined in Policy SP2: Tackling the climate crisis and is a recurring theme throughout the new Local Plan. Only a very small percentage of the borough's MOL is proposed for de-designation, with the specific reasons for these proposals outlined in the Green Belt and MOL Stage 2 Review. In most cases, MOL boundary adjustments relate to previously developed "grey belt" land that does not meet MOL criteria. The Green Belt and MOL Stage 1 Review considered possible new MOL allocations but the assessment of these sites against the London Plan's MOL criteria confirmed that none of these sites are appropriate for MOL designation.	SP2.2 Climate action		Rex Baker		575	Individual

I am writing to register my views under the Regulation 19 consultation regarding the Local Plan that Ealing Council has produced. I support the views expressed by Ealing Matters (cc'd) and endorse their concerns about the Plan itself. In particular, I am concerned at the lack of thought and/or process that appears to have gone into this. It is simply unrealistic – never mind feasible – to think that the borough can accommodate a further 40,000 homes over the next 15 years. This is clearly excessive and undeliverable and flies in the face of what Ealing is all about. Even were this plan to be accompanied by the level of investment required to provide the infrastructure, transport links, schools, health facilities and everything else that will be needed to support perhaps 80,000 (or more) additional residents I do not see how this helps the existing population of Ealing. Rather than seeking to grow the borough in terms of population they should be focus on looking to the interests of the people they are here to serve today. Based on experience it is highly unlikely that the London Borough of Ealing has the capability (technical or otherwise) or the vision to deliver such a plan. Leaving aside the environmental impact of turning the borough into a huge building site (82 individual development sites if I understand the plan correctly) you are proposing to increase the population by more than the population of Guildford. There is little doubt in my mind that the council is putting its own interests way ahead of the residents you are here to serve. In particular, I and many resident object to the idea that Ealing somehow becomes a designated dormitory town for a massively increased itinerant or temporary (student) population that brings nothing to the borough for anything other than the short term. The argument that the University of West	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns.	General		Colin Tipping		576	Individual

I am writing on behalf of the Pitshanger Community Association. In drafting this response, I should say that we support Ealing Matters' concerns about the plan. The Local Plan is an important document as it will affect every aspect of our lives in the Borough but is a hard and heavy read - the complete set of documentation would take days to read, let alone digest in the margins of our work and personal lives. It requires anyone reading it have some understanding of the planning policy frameworks. It even says that comments should be based on knowledge of planning frameworks. As the majority of those in Ealing are not familiar with planning jargon or issues, this suggestion will surely inhibit people from contributing. Without the knowledge and communication skills of organisations like Ealing Matters and Stop the Towers, many individuals would not know where to begin to start. Ealing's proposals for monitoring the plan are no more adequate now than they have been over the past 10 years. Given the lack of knowledge or progress on several high-development projects across the Borough, we are not convinced that the Council will achieve its target of 40,000 plus homes over the next 15 years. Ealing Council should, through proper monitoring and building control, hold developers to account for progress in their projects rather than agreeing to more proposals to build high-rise tower blocks in the Borough. The Local Plan aims to increase the population of Ealing by around 80,000 people but fails to set out how the Council will support this increase or develop a plan to deliver this new infrastructure. It also fails to show any analysis of the risks associated with this large population increase or how the increase will be monitored and managed.	The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. A 20-minute neighbourhood would usually include access to public transport, health, education, employment, community, retail, culture, leisure, and green spaces. This plan aims to give people more choices about how they want to travel in their local community without a car if they want or need to. More options can benefit physical and mental health and help to create a stronger sense of community, boost the local economy, and increase resilience to the effects of climate change. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy. The case for	General		Debbie Edwards	Pitshanger Co	578	Community Interest Group

My family and I have lived in close proximity to Barclays Sports Ground. I do not understand why, having encouraged the unnecessary overdevelopment of the southern section of the site with the huge Ada Lovelace school, which, according to the latest data on demographic trends within the borough will soon prove to be surplus to requirements, the de-designation of the rest of the site as MOL is now being considered. Yet again it appears Ealing Council is completely out of touch and placing political ideology over the actual needs of its residents. * I object to the de-designation of the site as MOL * I object to allowing residential development on Barclays Sports Ground * I support the representations by Ealing Matters, Saving Ealing and CPRE	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. The Green Belt and MOL Stage 2 Review outlines the reasons and exceptional circumstances for any changes to GB/MOL boundaries. In the case of the former Barclays Sports Ground, the main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt" category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet.	21EA Former Barclays Sports Ground		Jayesh Popat		585	Individual

I wish the following information to be drawn to the attention of the inspector as a matter of fact: The absence of policies in the Local Plan relating to heritage matters and Conservation Areas may not be surprising given that the Council abolished its conservation officer post in mid-2019 and, despite assurances to the contrary given by the Development Management team that conservation/heritage expertise would be “embedded” in the cadre of planning officers, we have seen no evidence of this in practice. We consider that this state of affairs is scandalous in a local authority with 28 conservation areas with a 29th under active consideration and a rich history of heritage, not only in Ealing itself (e.g. the Grade I listed Pitzhanger Manor and its entrance arch), but in each of its “seven towns” ranging from the Grade I listed Wharncliffe Viaduct in Hanwell to the Grade I listed St Mary’s Church in Northolt...By comparison, Harrow, which has 29 CAs, has a Conservation Team led by a Principal Conservation Officer. Hillingdon has 31 CAs and a Conservation Team. Hounslow has 26 CAs and a Conservation Team. Brent has 22 CAs and a Principal Heritage Officer. Hammersmith and Fulham has 44 CAs and has an Urban Design and Conservation Team. Ealing is unique amongst the six West London boroughs in having no Conservation Officer, let alone a Conservation Team. We are long overdue to have the Conservation Officer post reinstated, not least to finish and implement the work that {name} carried out so expeditiously in 2023 in his Conservation Area review.	Regards heritage, it should be borne in mind that the London Plan is an integral part of Ealing's local development plan and includes a suite of policies on heritage and culture (Policies HC1-HC7). Nonetheless, the local plan at Policy SP3.3 D seeks to ensure that new development meets the highest design standards, responds positively to the local character and recognises the role of heritage in place-making. There are numerous other references to the importance of heritage and conservation throughout the plan. The plan is also informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Regards the conservation area appraisals, much work has been done to update them and this has involved extensive and detailed consultation with the ECS and other interested parties. This body of work is separate from the Local Plan and the council is currently recruiting a new dedicated Conservation Officer whose first key task will be to complete and implement the review, taking into account public and stakeholder consultation earlier in the year.	SP3.3 Healthy lives		Robert Gurd	Ealing Cricket	586	Community Interest Group

Section 3 We object to the proposal to de-designate part of Barclays Sports ground as MOL, and to enable residential development on site 21EA, because this proposal does not satisfy the soundness tests as set out below. Ealing Green Belt and Metropolitan Open Land Review Stage 2 February 2024 paragraph 1.1.7 states that: we will only proceed with our recommendations for specific GB and/or MOL sites ... for a small number of sites (or parts of sites) that do not contribute to the Green Belt/MOL objectives It is nowhere justified in the Reg 19 Local Plan that some parts of Barclays Sports Ground do not serve the purposes of MOL: there is no assessment of the site in respect of its MOL objectives. Thus, the proposal to de-designate part of Barclays Sports Ground as MOL is not justified and not sound (because it is inconsistent with the above cited paragraph). In particular, Ealing Green Belt and Metropolitan Open Land Review Stage 2 February 2024 section 2.3 on Former Barclays Sports Ground, does not assess Barclays Sports Ground in terms of its MOL objectives. The Reg 18 consultation documents did attempt an evidence-based assessment of MOL sites in terms of their contribution to MOL objectives. It was argued in many responses, including the response by Save Ealing Parks, that that assessment was flawed. In fact, MOL20 (including Barclays Sports Ground in its entirety) does contribute very highly towards the MOL objectives, as demonstrated in Save Ealing Parks' Reg 18 submission. We request that our Reg 18 assessment of MOL20 in terms of its MOL objectives be included as part of our Reg 19 submission. A495	The council is only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land that does not meet the criteria for MOL designation. The former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, including hockey. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. The main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt" category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled.	21EA Former Barclays Sports Ground		Dmitry Tonkonog	Save Ealing P	588	Community Interest Group

Section 4 We object to the proposal to de-designate part of Barclays Sports ground as MOL, and to enable residential development on site 21EA, because this proposal does not satisfy the soundness tests as set out below. Ealing Green Belt and Metropolitan Open Land Review Stage 2 February 2024, Section 2.3.5 says that: The proposed use of the site is as a leisure-led scheme with enabling residential use and facilitating access to sports and play pitches. This description is extremely unclear: 1. It is not clear what ‘leisure-led scheme’ consists of, what would be its budget, and why this budget could not be funded by means other than “enabling development” 2. The size, number of homes, and any other parameters of the “enabling residential development” are not clear. Further to this, in an email dated 27 Feb 2023, Save Ealing Parks asked Ealing Council (addressed to Planning Department and Steve Barton, with a subsequent reminder, made during the Reg 19 consultation period) the following questions, among others: 3. Does Reg 19 documentation provide any evidence that the extensive budget (£22 million and £87 million) related to Barclays Sports Ground can be raised by development on the de-designated piece of the Barclays Sports Ground only? For comparison, Gurnell Leisure centre redevelopment projects have a similar budget, and the proposed enabling development is a large-scale housing estate (300-600 homes). 4. What percentage of the £22-87 million budget is expected to be spent on the leisure led component versus the enabling residential	The council is only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land that does not meet the criteria for MOL designation. The former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, including hockey. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. The main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled. We have reviewed the infrastructure costs further and have identified that the consultants that produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around	21EA Former Barclays Sports Ground		Dmitry Tonkonog	Save Ealing P	588	Community Interest Group

Section 5 We object to the proposal to de-designate part of Barclays Sports ground as MOL, and to enable residential development on site 21EA, because this proposal does not satisfy the soundness tests as set out below. Ealing Council’s BIODIVERSITY ACTION PLAN 2022 – 2027 states, page 5 states that: Green spaces and green infrastructure in Ealing range from parks and open spaces, to ...brownfield sites ... All these places create crucial green networks, corridors and stepping-stones of different habitat types for wildlife to live in and move through the borough. Barclays Sports Ground, including its Clubhouse and the carpark, are part of the larger MOL20, which includes ancient woodland and SINC sites (Hanger Hill Wood and Fox Wood) and therefore unquestionably form part of an important green network. (We note, by the way, that the Clubhouse is not a brownfield site because it is not listed on Ealing Council’s map of brownfield sites.) It must be taken into account that the Clubhouse and the associated hard standing have been used for its intended purpose for over 20 years, and rewilding has essentially already been naturally allowed to occur on the hard standing over this time. Loss of this part of MOL to development, as opposed to regenerating/rewilding/retaining for MOL purposes, goes against the Biodiversity Action Plan. Therefore, the proposal to de-designate part of Barclays Sports Ground is inconsistent with Ealing Council’s own policies, and is therefore not sound.	Noted. The council is only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land that does not meet the criteria for MOL designation. The former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, including hockey. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. The main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled.	21EA Former Barclays Sports Ground		Dmitry Tonkonog	Save Ealing P	588	Community Interest Group

I am a resident at Northfields and part of Ealing Friends of the Earth as well as Parents For Future West London. I am concerned about the climate crisis, protecting the environment and providing a liveable future for our children. Ealing FoE are separately making a comprehensive response to the plan. But as an individual I wanted to raise one specific point. Will Ealing Council incorporate moving toward a 15 minute city in their policy plans, as others have done including Canterbury, Ipswich and Birmingham? A 15 minute city reimagines the public space to prioritise people not driving, reclaiming car dominated space, upgrading walking and cycling infrastructure to better serve the daily local trips of people of all ages, abilities and backgrounds, and expanding green space in every neighbourhood. Although various policies may touch on these elements, the cohesive idea of the 15 minute city is one the public can understand and get behind as a positive shift. The heavily congested traffic in the area is a huge barrier to reducing carbon emissions and the progress to net zero, not to mention the shift towards heavily polluting SUVs. And traffic is much worse during school term time, despite many good schools being within walking distance in most of Ealing. We must highly curb use of the car for those who are able to use other transport and active transport. And incentivise walking, cycling, use of outdoor spaces. Walking streets dominated by thousands of cars with my 3 year old girl leaves me constantly vigilant for her safety and concerned for the air pollution from emissions. Can Ealing Council lead the way, given its bold claims on progress towards net zero by 2030. That must be backed by decisive	The key aim is to create complete and connected places, with 800m generally used as the length of an average 10-minute walk. A 20-minute neighbourhood would usually include access to public transport, health, education, employment, community, retail, culture, leisure, and green spaces. This plan aims to give people more choices about how they want to travel in their local community without a car if they want or need to. More options can benefit physical and mental health and help to create a stronger sense of community, boost the local economy, and increase resilience to the effects of climate change. Ealing’s proposals to reduce traffic in and through the borough are present in various documents: the previous Transport Strategy 2019-22, the current Climate and Ecological Emergency Strategy, and the 20-minute neighbourhood plans which are being produced for each of the seven towns. The new Transport Strategy, which will be published next year, will build on these plans with further details on transport and active travel policies. The 20-minute neighbourhood plans show our ambitions for prioritising walking and cycling in each town centre, using routes which will better connect residential areas, high streets, new developments, amenities and services.	SP2.2 Climate action		Jon Rowe		589	Individual

I write re the Council's plan to calm the traffic between Lammas Park and Walpole Park in W5. My house is opposite the entrance to Lammas Park, with windows looking up Culmington Road. I am therefore well placed to see just how bad the situation has become. I understand that the planned calming measures will be between the two parks, i.e. on Culmington Road. May I point out that I see a very large percentage of vehicles passing outside my house do a U-turn right on the junction where I live? This may not have become evident in your traffic flow measurements. In my opinion It would be wise therefore for the calming measures to start on Church Lane to avoid so many vehicles getting as far as Beaconsfield Road, as It is not just cars, but large good vehicles that constantly try to turn round. A couple of day ago I watched an extra huge lorry try to do a U-turn. He managed to turn round, but it was only by doing a 20-point or so turn. (By the time he had turned, he had quite a large audience.) I fear that, if the calming measures start at the Beaconsfield Rd junction, we will have even more vehicles attempting U-turns in the junction. Vehicles should be discouraged to enter Church Lane from South Ealing Road. Thank you for your attention.	The proposals for Culmington Road aim to make it easier for pedestrians to walk between Lammas Park and Walpole Park, rather than to calm traffic. They will also focus on improving the public realm. The proposals are still at an early stage, and no decisions have been taken as to which measures will be implemented. The data recently captured included traffic counts but also pedestrian and cycle flows, to help us understand how all modes are moving in this area. Once the proposals are ready to share with residents, we will be engaging to gauge views on them and gather feedback.	Policy E4: Southern Ealing and Ealing Common		Maggie Campbell Pedersen		590	Individual
It has recently come to my attention about a possible redesignation of various grounds, most specifically the Barclays Sports Ground, to enable possible multi-storey residential development. As a local long term resident I object to any potential de-designation of any part of Barclays Sports Ground as MOL (MOL20) and strongly object to any contemplation of allowing residential development on Barclays Sports Ground (21EA). Ealing is busy enough, noisy enough, and clogged enough as it is, and allowing any substantial residential development will make life intolerable. I state that I support the representations made by Ealing Matters, Save Ealing Parks and CPRE in this matter.	Noted. The council are only proposing to remove the MOL designation from a small part of the MOL site. This part of the site is previously developed land does not meet the criteria for MOL designation. More importantly, the former Barclays Sports Ground is not currently used for sports and it has not done so for years. The council is aiming to bring sports uses back to the site, with the provision of open-air sports facilities, and hockey in particular. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Some residential enabling development is likely to be necessary to achieve these goals. In accordance with the new Local Plan's enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled.	21EA Former Barclays Sports Ground		Christopher Bennett		591	Individual

Our comments on the proposals are summarised as follows: 1. The Plan itself is deliberately verbose and repetitive so as to cloud many issues of concern to the residents of Ealing 2. Ealing’s housing target of more than 40,000 homes over the next 15 years is excessive and undeliverable. If it were to be delivered, it would create unmanageable population growth of more than 80,000 people (more than the population of Guildford) according to GLA projections. This would have a massive negative impact on the quality of life in Ealing. The plan does not address how this will impact quality of life and the ability of infrastructure to cope. The housing targets could have a huge negative impact on the Borough in terms of its health, education and transport infrastructure as well as access to amenities and green spaces. It fails to show any analysis of the risks associated with this massive population increase or how they will be monitored and managed. Services are already at breaking point and this plan is ill-considered. 3. The infrastructure plans to support are not substantive. 4. The plan’s proposals for wholesale redevelopment of relatively new and serviceable buildings contradict the aim of climate change policies. Ealing Council has declared a climate emergency and yet this plan fails to drive action on achieving net zero or mitigating the impact of climate change. The Plan promotes the building of towers which have high carbon impacts in their build and during their lifetime use, they also have typically short design lives meaning their net impact is much higher than low-rise buildings with longer lifespans. There is ample evidence of strategies and approaches to that built environment that can deliver net zero; the Plan ignores these in favour of vague policy ‘commitments’ on net zero and it is a	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. Infrastructure needs are modelled variously upon population or household projections depending upon the type of provision, with health, for example, based upon GLA population projections. The local plan is subject to binding housing targets and it is not the role of the LPA to produce population projections. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Andrew Ohl		592	Individual

Friends of the Earth (FOE) is a large national and international organisation which campaigns on a wide range of environmental issues. The biggest ongoing issue for FOE is climate change, followed by biodiversity. Friends of the Earth England, Wales and Northern Ireland has several hundred local groups which consist of volunteers. Ealing Friends of the Earth (EFOE) is one of such groups and covers the Borough of Ealing. A significant proportion of the population is concerned about climate and biodiversity (wildlife, nature, conservation, etc). Insofar as there is only a handful of other groups in LB Ealing which major on these issues, EFOE can be regarded as a representative of a significant proportion of the borough's citizens. Accessibility of Plan (Whole Plan) With over 500 pages and many hundreds more of supporting evidence, making comments, whether of a strategic or detailed nature, is a formidable task. Not only are there hundreds of pages of local plan; we are asked to read the London Plan in conjunction with it and to take note of NPPG! The Plan is impenetrable and inaccessible to the great majority of the populace. People who work full time or have children are unlikely to have time to get to grips with the Plan. There is a view widely held among those volunteers most active in responding to the Plan that it has been made deliberately impenetrable in order to dissuade responses. We recognise that the Local Plan is a complex entity and requires a considerable volume of documentation. It is therefore necessary for it to be carefully structured so as to make it as accessible as possible. There should be a carefully composed Executive Summary which highlights and summarises all the key and strategic issues so that even the busiest people have time to	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. It is also supported by an extensive technical evidence base. The importance of climate action is a key policy plank in the Local Plan and Policy SP2.2 acknowledges the role the Local Plan will play in contributing to Ealing's ambition to become carbon neutral by 2030. Although planning is uniquely well placed to secure a low carbon approach to the design of buildings, it is important to recognise that this influence is largely limited to shaping those developments which require planning permission and trigger certain policies. Whilst this influence is not solely limited to new build schemes, as developments involving the change of use or conversion of existing buildings may also require planning permission and trigger such policies, overall these developments effect a relatively small portion of the total building stock. In respect of homes at least new net additions to our current stock comprise only around 1.5% of our overall housing stock. There remains a large existing and ageing building stock in Ealing, and which is often inefficient from an energy performance standpoint. Tackling this through retrofit solutions remains a priority. Whilst planning is less well placed to facilitate this, in the way it would be where new additions to the building stock are being created, it can still secure planning gains/monetary contributions which can be ploughed into retrofit type projects.	General		Nic Ferriday and Donald Power	Ealing Friends	594	Community Interest Group

Importance of climate change (Whole plan) Climate change is probably the biggest issue in the world. Every person and every species is threatened. Most people now recognise that climate change is real and that something needs to be done - radically and urgently. One would hope that the Ealing Local Plan would address the issue with vigour and determination. (Subject of course to it being relevant to spatial planning.) Carbon neutral (Para 2.26 etc) Para 2.26 says “Ealing Council declared a climate emergency in April 2019, committing to treat the climate and ecological emergency as a crisis requiring immediate climate action. The aim is to become carbon neutral as a borough and an organisation by 2030. The Local Plan has a unique role within the council’s climate change agenda ..”. Unfortunately, there is not a shred of evidence that Ealing will achieve this aim or get anywhere near it. Nor is there any evidence that Ealing council is trying to achieve it. Para 2.26, without the caveat that carbon neutrality manifestly will not be achieved, is misleading and disingenuous. It will convey to the reader that climate change is somehow being addressed in the Plan and thereby does not need comment or challenge. This means that responses will be suppressed or distorted. Given the potential impact of the omission from the Plan, it cannot reasonably be regarded as sound (justified). Because it is misleading it fails to comply with the duty to co-operate. Effectiveness of consultation - climate change aspects ~~We do not consider the consultation has been at all effective in~~	Noted. Climate action inequality is one of three cross cutting objectives identified in the Council’s Council Plan. Although planning is uniquely well placed to secure a low carbon approach to the design of buildings, it is important to recognise that this influence is largely limited to shaping those developments which require planning permission and trigger certain policies. Whilst this influence is not solely limited to new build schemes, as developments involving the change of use or conversion of existing buildings may also require planning permission and trigger such policies, overall these developments effect a relatively small portion of the total building stock. In respect of homes at least new net additions to our current stock comprise only around 1.5% of our overall housing stock. There remains a large existing and ageing building stock in Ealing, and which is often inefficient from an energy performance standpoint. Tackling this through retrofit solutions remains a priority. Whilst planning is less well placed to facilitate this, in the way it would be where new additions to the building stock are being created, it can still secure planning gains/monetary contributions which can be ploughed into retrofit type projects. Regards consultation, the Local Plan is by necessity a technical and highly specific document. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council	SP2.2 Climate action		Nic Ferriday and Donald Power	Ealing Friend	594	Community Interest Group

Policy SP2.2 is a huge disappointment. Instead of real policies, it is just a collection of vague generalisations and platitudes. It is littered with words such as: “Promote, contribute, support, work in participation with, facilitate, encourage, ensure” without there being any substance. One apparent and potentially very significant policy is actually not a policy. SP2.2 B(v) says “Reducing the number of motor vehicle trips in and through Ealing”. There is not, as far as we know, any such policy. (There may be some action to address a specific sector, like cars outside a school, but that is very different to the words of the policy.) B(v) as written is highly misleading. SP2.2 is so inadequate that tinkering with the words will not suffice. The entire text should be deleted and replaced only by genuine and relevant policies. (Relevant means it is about climate change and is relevant to a spatial strategy.) It is not the job of respondents to re-write whole sections of the plan. (We pay, via Council Tax, full-time staff to write, listen to the community and amend the plan.) Appendix 1 (separate document entitled ‘Appendix 1 – Climate Change Policies Needed’; file name ‘Reg 19 EFOE response App1.docx’) addresses some of the issues that we consider should be covered by policies. These policies could be part of the Plan itself or be separate or stand-alone policies. But if they are, they must be referenced out and must - given the importance of climate change - carry at least equal weight to Plan policies. The weaknesses described above mean that the plan is not sound (justified). Because B(v) is misleading, there is a failure to comply with the duty to co-operate.	Noted. The Local Plan is by necessity a technical and highly specific document. Regarding SP2 B(v) Ealing’s proposals to reduce traffic in and through the borough are present in various documents: the previous Transport Strategy 2019-22, the current Climate and Ecological Emergency Strategy, and the 20-minute neighbourhood plans which are being produced for each of the seven towns. The new Transport Strategy, which will be published next year, will build on these plans with further details on transport and active travel policies. The 20-minute neighbourhood plans show our ambitions for prioritising walking and cycling in each town centre, using routes which will better connect residential areas, high streets, new developments, amenities and services. Notwithstanding this, TfL have sought better clarity on this policy and a suggested modification has been proposed and is supported by the council: “Reducing the number of motor vehicle trips in and through Ealing <u>in line with targets for sustainable modes, and supporting low-car and car-free development where appropriate.</u>”	SP2.2 Climate action		Nic Ferriday and Donald Power	Ealing Friend	594	Community Interest Group

Policy OEP: Operational Energy Performance – Ealing LPA– local policy This is a potentially a significant policy in terms of the quantity of CO2 emissions it would lead to, allow or save. The policy is apparently only the “local policy”, which is presumably variations from the London Plan. Without detailed study of the latter it is impossible to assess the significance of these variations. Context for tables of Space Heating Demand (5.50) and Energy Use Intensity (5.51) is needed. These targets might be what would be achieved anyway (ie without policy OEP). Or they might lead to a better performance. Without knowing this, we are unable to assess the value of the policy and cannot therefore support or oppose it. The policy will not mean much to a lay reader or non-specialist environmentalist because it does not relate the targets in the tables to the actual impact on emissions. We note that offsetting is a “last resort”. We support that view because studies show that only a small proportion of offset schemes genuinely offset the polluting activity in question. But no information is given as to what the ‘tariff’ is and how developers would be prevented from saying they can’t achieve the targets and instead opting for offsets. Or, worse, say they will meet the targets and then simply fail to do so. Based on the above, we consider this policy unsound (not justified) because there can be no confidence it will be effective. It also fails to comply with the duty to co-operate because it, as presented, does not enable a properly informed assessment (by diligent volunteers) of the efficacy of the policy.	Noted. The policy is underpinned by evidence - namely the 'Delivering Net Zero' study which will provide answers to all of the points raised.	Policy OEP: Operational Energy Performanc e –Ealing LPA –local policy		Nic Ferriday and Donald Power	Ealing Friend	594	Community Interest Group
Policy ECP Embodied Carbon– Ealing LPA – local policy 476 This, like Policy OEP, is potentially a significant policy in terms of the quantity of CO2 emissions it would lead to, allow or save. The policy has similar shortcomings to those of OEP (as well as some different ones). We would be pleased to provide detail if this policy is to be addressed at the Examination. We consider this policy unsound (not justified) because there can be no confidence it will be effective. It also fails to comply with the duty to co-operate because it, as presented, does not enable a properly informed assessment (by diligent volunteers) of the efficacy of the policy.	Noted. The proposed embodied carbon policy introduces stepped embodied carbon limits for different building types/use. These are based on LETI best practice targets.	Policy ECP: Embodied Carbon – Ealing LPA – local policy		Nic Ferriday and Donald Power	Ealing Friend	594	Community Interest Group

Policy WLC: Whole Life Cycle Carbon Approach – Ealing LPA – local policy 477 This, like Policy OEP and EPA, is potentially a significant policy in terms of the quantity of CO2 emissions it would lead to, allow or save. The policy has similar shortcomings to those of OEP (as well as some different ones). We would be pleased to provide detail if this policy is to be addressed at the Examination. We consider this policy unsound (not justified) because there can be no confidence it will be effective. It also fails to comply with the duty to co-operate because it, as presented, does not enable a properly informed assessment (by diligent volunteers) of the efficacy of the policy.	Policy WLC 'Whole Life Cycle Carbon Approach' introduces locally the requirement for applicants to undertake an optioneering exercise as part of the Whole Life Cycle Carbon Assessment. The requirement to prepare Whole Life Cycle Assessment for referable applications is currently a feature of London Plan policy SI 2. Local Policy WLC extends this requirement to all major developments. The optioneering exercise seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option. The findings of this optioneering exercise should be considered alongside other planning considerations to determine the most appropriate option, including consideration of a retrofit first approach, and different building forms (heights). The 'options' considered should include reuse/refurb options, alongside any new build options if pursued. All options evaluated should be capable of comparison reflecting the same best practice standards. The intention is to prepare additional guidance to support the implementation of carbon optioneering.	Policy WLC: Whole Life Cycle Carbon Approach – Ealing LPA – local policy		Nic Ferriday and Donald Power	Ealing Friend	594	Community Interest Group
Policy SI 7: Reducing Waste and Supporting the Circular Economy – Ealing LPA – local variation 478 This, like Policy OEP, EPA and WLC, is potentially a significant policy in terms of the quantity of CO2 emissions it would lead to, allow or save. The policy section is so short it can only be regarded as a 'throwaway'. There is insufficient detail for any informed assessment to be made. We consider this policy unsound (not justified) because there can be no confidence it will be effective. It also fails to comply with the duty to co-operate because it, as presented, does not enable a properly informed assessment (by diligent volunteers) of the efficacy of the policy.	It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on sustainable infrastructure. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. The Mayor of London has not raised objections to this approach. Therefore this policy must be read in conjunction with its parent policy SI 7 in the London Plan and this additional clause extends the scope of circular economy statements to all major applications and not just referable applications to the Mayor of London.	Policy SI 7: Reducing Waste and Supporting the Circular Economy – Ealing LPA – local variation		Nic Ferriday and Donald Power	Ealing Friend	594	Community Interest Group

Open space (Policies G4 G5, G6, Atlas of Change and the Interactive Policies Map) Nature, biodiversity and green open space have always been a major concern of Friends of the Earth. Greenspace is a significant topic area in the Plan and Ealing Friends of the Earth would have liked to make detailed comments. Unfortunately, lack of volunteer resources prevents us doing so. In lieu of this we wish to place on record that we support the submission of the Brent River & Canal Society (BRCS) in respect of policies and strategic issues. (We have not studied the individual site proposals and so cannot unequivocally support BRCS comments on those. However, we have no reason to suppose we would, given study, not agree with BRCS.) We comment on one issue. We are strongly opposed to de-designation of any Green Belt or MOL. Even if the council says it has no plan for building on de-designated land, there is no assurance that the land will not actually be built on some time after being de-designated. Lack of biodiversity value is a poor argument for de-designation. All green space has value for wildlife as well as flood alleviation and carbon sequestration. Land with currently relatively low wildlife value can be improved at negligible or zero cost.	Noted. The Local Plan establishes a framework for maintaining, enhancing and expanding the network of green infrastructure in the borough. The drivers for reviewing Ealing's Green Belt and MOL designations is not to identify additional land to accommodate development, but rather to ensure that this land is afforded the correct designations. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Where changes have been proposed to the designation of GB and MOL in the majority of cases these sites continue to be covered by other appropriate policy designations such as Public Open Space, Community Open Space or Site of Importance for Nature Conservation (SINC), and such policies continue to protect these sites from inappropriate development. Only very limited releases have been considered and only where these are considered necessary to enable enhancements to the green network. A number of the recommended changes proposed at Regulation 18 are now not being pursued, as detailed in the stage 2 report.	Policy G4: Open Space – London Plan – Ealing LPA – local variation	Policy G5: Urban Greening – London Plan – Ealing LPA – local variation	Nic Ferriday and Donald Power	Ealing Friend	594	Community Interest Group

Population increase (Whole Plan) The council anticipates 43,000 extra housing units, many of which will be in huge tower blocks. But these flats won't meet the genuine housing need, which is for 'affordable' housing. These extra housing units will directly generate a massive increase in population of the borough. As the council has not come clean on this crucial issue, we have estimated the population increase. We conclude that the policies in the plan will increase the population of the borough by an astonishing 88,000 people between 2021 and 2038. See App 2 (separate document entitled 'Appendix 2 – Population increase'; file name 'Reg 19 EFOE response App2.docx') for derivation of this figure. 88.000 is more than the entire population of St Albans or Harrogate! Though an approximate estimate, it is not an unreasonable one. We are advised that: "... a report in the London Datastore. Section 13.2 is about population change at borough level based on GLA housing-led projections, which, the report says, are recommended for most uses, especially those at borough level. ... It therefore seems logical to use the population projection from the Housing Targets Scenario to estimate population growth in the borough by 2041, i.e. +80,317." We do not reproduce or further comment on the GLA forecast because the Inspector will be familiar with it. We consider the entire Plan is unsound (not justified) because population and population increase, which are hidden from the reader, need to underpin virtually every aspect of the Plan. Because the increase in population is hidden there is a failure to comply with the duty to co-operate.	Infrastructure needs are modelled variously upon population or household projections depending upon the type of provision, with health, for example, based upon GLA population projections. The local plan is subject to binding housing targets and it is not the role of the LPA to produce population projections. Housing development does not produce people. The people who move into a development already exist; many will be in the local area; others will move into it. Those that move into an area may increase demand in that area, but it follows that demand in the area that they move from will reduce. It is for those sectors (health, education, police etc) to manage that.	General		Nic Ferriday and Donald Power	Ealing Friend	594	Community Interest Group

Infrastructure and effects on citizens (Policy SP4, Table SS1, etc) The borough of Ealing is already over-crowded. Hospitals and doctors’ surgeries are stretched to breaking point. Public transport is over-crowded; roads are congested and polluted. Green open space is threatened by de-designation and building. Electricity and water supplies are under severe pressure. Sewage is regularly discharged into our waterways. An increase in population of 88,000, or indeed far less, will almost certainly threaten vital services. Table SS1 (p84) shows what infrastructure is planned. It makes dismal reading. Of 31 schemes identified, there is only some sort of plan (date given) for 9 schemes. There is no plan for the remaining 22 (marked as “tbc”). Even for the 9 it is not obvious that the scheme is intended to support a massive population increase or will do so anyway. The conclusion to be drawn from the entries in the table is that while there are some schemes identified, there can be no confidence that their provision will be adequate to meet a population rising by 88,000 by 2038. Or to any intermediate rise. There can thus be no confidence that provision of schools, hospitals, GPs, or public transport will be adequate. Water, sewerage and electricity are not even mentioned in the table, so there can be even less confidence that provision will be adequate. We know, from the frequent licensed discharges, that Thames Water’s Mogden plant cannot even cope properly with today’s sewage. Even if the relevant authorities manage to massively ramp up services, there will be a price to pay because existing citizens will have to pay, through higher bills, for the capital expenditure needed to serve the extra population. Also, there will inevitably be adverse environmental consequences of ramping up services. ~~A plan which will cavalierly generate a huge population increase.~~	Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The planning system can be rightly called upon to fund physical infrastructure (i.e. buildings, roads, railways etc) the need for which is because of new development, but it is not there to deal with demand for services, which is the role of rates and taxes to fund. A lack of doctor appointments or school places as objections are rarely an infrastructure issue, but a result of the way operational activity is funded. Housing development does not produce people. The people who move into a development already exist; many will be in the local area; others will move into it. Those that move into an area may increase demand in that area, but it follows that demand in the area that they move from will reduce. It is for those sectors (health, education, police etc) to manage that.	Policy SP4: Creating good jobs and growth		Nic Ferriday and Donald Power	Ealing Friend	594	Community Interest Group

Quality and integrity of Plan (Whole plan) Academic and research papers have at least 3 protections in order to facilitate their quality and integrity: Authors are shown by name The paper is peer-reviewed Potential conflicts of interest are noted. None of these are incorporated in the Plan process. Ealing Council is totally and hopelessly conflicted. It has already decided on the policies it wants. It alone presents and consults upon the Plan and it will inevitably and maybe sometimes unconsciously slant the consultation to gain support and stifle opposition. The council then collates and summarises the responses and presents them to the planning inspectorate. Finally, the council uses council taxpayers' money for staff and perhaps barristers to refute the public's responses. In short, a very one-sided process. Much of the potential bias could be removed by having an independent body to review the draft Plan, present it to the public, analyse the responses and present them to the planning inspectorate. We consider the Plan unsound (not justified) because, without involvement of an outside body, the process will be heavily biased. It fails to comply with the duty to co-operate because of that bias. Next steps (Whole plan) In view of the gravity and range of issues raised in our response to the Plan, Ealing Friend of the Earth would like the opportunity to appear at the examination in public. In the meantime, we would be pleased to work with the council to resolve as many differences as possible, thereby expediting the	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. It is supported by an extensive and technical evidence base. The plan has been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19). Therefore, consultation on the Local Plan was extensive generating an unprecedented level of feedback. The Council has sought to ensure that engagement is as accessible as possible, but it is important to recognise that the process is prescribed.	General		Nic Ferriday and Donald Power	Ealing Friend	594	Community Interest Group

Policy ENA: Enabling Development – Ealing LPA– local policy We are strongly opposed to this policy. The policy has already been invoked in the case of the Gurnell Leisure Centre to justify building flats on supposedly protected MOL. If the policy is regularised by the Plan, it would undoubtedly be used to justify further building on MOL or Green Belt. Building on Green Belt and MOL is contrary to a whole raft of statutory and discretionary national, regional and local policies on open space, wildlife, biodiversity and nature conservation. For this reason we consider the policy unsound (unjustified). We support the more detailed submission on ENA made by Ealing Matters.	Noted. The drivers for reviewing Ealing's Green Belt and MOL designations was not to identify additional land to accommodate development, but rather to ensure that this land is afforded the correct designations. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Where changes have been proposed to the designation of GB and MOL in the majority of cases these sites continue to be covered by other appropriate policy designations such as Public Open Space, Community Open Space or Site of Importance for Nature Conservation (SINC), and such policies continue to protect these sites from inappropriate development. Whilst proposals may be presented as enabling development, the application of this label is sometimes used loosely. Local policy ENA therefore seeks to define what is meant by enabling development in an Ealing context, and it establishes a number of key tests/principles which proposals must satisfy if an applicant is seeking to make the case for enabling development. The intention of this policy is not to promote or facilitate enabling development. It is recognised that it should be used sparingly, but if is engaged proposals must satisfy a number of key principles. Firstly it establishes that the enabling works must be led by the designation and the associated outcomes. Sites may be subject to multiple designations and applications will typically be assessed against a suite of policies, each with separate objectives and with the potential to compete for enabling support. This policy	Policy ENA: Enabling Development – Ealing LPA – local policy		Nic Ferriday and Donald Power	Ealing Friends	594	Community Interest Group
EA15 Waitrose. The arrival of the Elizabeth Line required the Council to prepare an area strategy for sites around West Ealing Station to ensure the widest public benefits would accrue from this major infrastructure investment. Unfortunately this did not happen and it has resulted in a wholly avoidable legacy of distrust on the part of the local community. Even now opportunities exist to repair relationships through an area based plan involving both the community and key landowners, including the John Lewis Partnership. The current Waitrose store has only existed for 18 years, and the one it replaced was only 14 years old. The proposed reduction in the maximum height to 13 storeys remains excessive and exceeds the tall building threshold of 7 storeys in West Ealing.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	15EA Waitrose, West Ealing		Andrew Ohl		592	Individual

EA16 West Ealing Station Approach. The redevelopment of this site should accord with the 2013 site brief which required that 'the height, scale and massing of new development must reflect the historic character of the surrounding residential areas on Hastings and Drayton Green Road. New development along Hastings Road must be low rise and not overlook the adjacent two storey terraced residential properties on this side, to create a harmonious streetscape and respect the current building line.' There is no reason to depart from this principle. The height of the development is 13 storeys and should remain within the 7 storey tall building threshold which Policy D9 proposes.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	16EA West Ealing Station Approach		Andrew Ohl		592	Individual
Our comments on the proposals are summarised as follows: 1. The Plan itself is deliberately verbose and repetitive so as to cloud many issues of concern to the residents of Ealing 2. Ealing's housing target of more than 40,000 homes over the next 15 years is excessive and undeliverable. If it were to be delivered, it would create unmanageable population growth of more than 80,000 people (more than the population of Guildford) according to GLA projections. This would have a massive negative impact on the quality of life in Ealing. The plan does not address how this will impact quality of life and the ability of infrastructure to cope. The housing targets could have a huge negative impact on the Borough in terms of its health, education and transport infrastructure as well as access to amenities and green spaces. It fails to show any analysis of the risks associated with this massive population increase or how they will be monitored and managed. Services are already at breaking point and this plan is ill-considered. 3. The infrastructure plans to support are not substantive. 4. The plan's proposals for wholesale redevelopment of relatively new and serviceable buildings contradict the aim of climate change policies. Ealing Council has declared a climate emergency and yet this plan fails to drive action on achieving net zero or mitigating the impact of climate change. The Plan promotes the building of towers which have high carbon impacts in their build and during their lifetime use, they also have typically short design lives meaning their net impact is much higher than low-rise buildings with longer lifespans. There is ample evidence of strategies and approaches to that built environment that can deliver net zero; the Plan ignores these in favour of vague policy 'commitments' on net zero and it is a	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. Infrastructure needs are modelled variously upon population or household projections depending upon the type of provision, with health, for example, based upon GLA population projections. The local plan is subject to binding housing targets and it is not the role of the LPA to produce population projections. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Maddie Ohl		595	Individual

EA15 Waitrose. The arrival of the Elizabeth Line required the Council to prepare an area strategy for sites around West Ealing Station to ensure the widest public benefits would accrue from this major infrastructure investment. Unfortunately this did not happen and it has resulted in a wholly avoidable legacy of distrust on the part of the local community. Even now opportunities exist to repair relationships through an area based plan involving both the community and key landowners, including the John Lewis Partnership. The current Waitrose store has only existed for 18 years, and the one it replaced was only 14 years old. The proposed reduction in the maximum height to 13 storeys remains excessive and exceeds the tall building threshold of 7 storeys in West Ealing.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	15EA Waitrose, West Ealing		Maddie Ohl		595	Individual
EA16 West Ealing Station Approach. The redevelopment of this site should accord with the 2013 site brief which required that 'the height, scale and massing of new development must reflect the historic character of the surrounding residential areas on Hastings and Drayton Green Road. New development along Hastings Road must be low rise and not overlook the adjacent two storey terraced residential properties on this side, to create a harmonious streetscape and respect the current building line.' There is no reason to depart from this principle. The height of the development is 13 storeys and should remain within the 7 storey tall building threshold which Policy D9 proposes.	Noted. This site was appraised as part of the Tall Buildings Study that has informed the plan making process. Plan formulation is tested against the background of current national and strategic London Plan policy, which positively promotes maximisation of new dwellings provision site optimisation and a preference for tall buildings typologies in sustainable locations like these, whilst having regard to existing townscape character and safeguarding residential and or relevant amenities.	16EA West Ealing Station Approach		Maddie Ohl		595	Individual

I am a long time resident and particularly cherish the attractiveness of our residential areas and our wonderful green spaces and parks. I have enjoyed the wonderful wild-flower plantings in our local parks in previous years and regret seeing them becoming rather a mess this year. Maybe if they had actually been native wild-flowers rather than a mix with garden species they would have been more self-perpetuating? I believe that there is a dire shortage of housing and that Ealing should do its part to provide affordable housing for the current generation. I am not against high-rise housing per se and guess that it is inevitable but hope that it is better designed than the last wave, which deteriorated into ‘Concretre jungles’. And is not plonked in the middle of old, well-established and well-designed parts of parts of Ealing where it is totally out of keeping. I understand that school population is starting to fall again but not sure if this is happening in Ealing. So schools may cope with an increased number of residents, but the ability of Doctors surgeries etc should also be considered when numbers are talked about. We should not be building on our parks or recreation grounds that are still used as such. And particularly we should not be building new sports facilities in places that would be destroying thriving natural habitats that have become the homes of many rare and declining wild-life species. These would be affected by building works and by the proximity of eg. Floodlights and noisy crowds. I anplaud the Beaver Proiect and the support given to the Ealing	Noted. The emerging Local Plan seeks to secure the maximise level of affordable housing which is viable. Going forward the new Local Plan will provide a framework to better manage proposals. The consideration of proposals for tall buildings and intensification will follow a character-led approach based upon the comprehensive Ealing Character Study and associated Tall Building Strategy. This adopts a general rule of thumb which assumes that a doubling of the prevailing building heights in an area represents the threshold limit above which developments would be defined as tall. The Council has prepared an Infrastructure Delivery Plan forming a key element of the Local Plan's evidence base which sets out the infrastructure that will be required to support the planned growth across the borough. The Local Plan does not propose or establish any LTNs.	SP2.2 Climate action		Susan Tripp		596	Individual

We welcome and support the vision for Ealing and the three Strategic Priorities which reflect the core themes of the Local Plan. The strategic policies in this section are supported, however, we ask that under Policy SP .3: Fighting inequality, additional wording is included to fully capture the challenges and opportunities and secure improved outcomes for Ealing’s communities. Proposed amendments to SP 3.3 Healthy Lives: Clause C Ensuring new development meets the highest design standards, responds positively to the local character, <u>support health and wellbeing</u>, and recognises the role of heritage in place-making. Clause G. Working closely with National Health Service (NHS) partners to identify need and opportunities for new health infrastructure and health services within and around developments, particularly within Acton, ~~and~~ Southall, <u>Ealing, Greenford and Northolt</u>. Clause H Implementing the Health Impact Assessment (HIA) process for major ~~or~~ <u>and</u> strategic Developments. We would welcome discussion with the Council in relation to how the health and wellbeing benefits set out in HIAs can be secured and monitored effectively. To take this forward we are keen to continue the discussions with Ealing planners and public health regarding the NHS HUDU Health Impact Assessment tools. This would include ~~reviewing how local priorities and monitoring mechanisms could be~~	Comments noted and accepted.	SP3.3 Healthy lives		Mary Manuel	NHS London	116	Statutory Body

Proposed amendments to SP 3.3 Healthy Lives: Clause I Meeting the needs for specialist housing where this can complement conventional supply in appropriate locations. Specialist housing covers a very broad range of housing types, for example, interim and permanent supported housing for those with mental health difficulties, learning disabilities or substance misuse as well as different accommodation designed for older people and students. We would also ask that where such specialist housing is developed, the infrastructure capacity and specialist support is also planned for and enhanced working with partners to ensure these individuals are supported. The diversity of need and solutions may be better addressed through an additional clause or sub-clauses within the policy. The words ‘where complementary’ we suggest are deleted as it is unclear how this would be assessed and risks specialist housing, for many of the most vulnerable people within the community, not being provided. For supported housing and specialist housing for older people where easy access to services is very important to maintaining independence then locations close to town centres and relevant services is important. This may be less true of other types of specialist housing. We support the policies to secure an increase in genuinely affordable housing, and housing to meet the needs of Ealing’s communities. However, we note there appears to be no reference to housing for key workers. For many key services including health and	Noted, however the policy is based upon assessed needs as set out in the LHNA while providing for discretion where the LPA may want to support other housing types, so the current wording better fits the needs of the policy	SP3.3 Healthy lives		Mary Manuel	NHS London	116	Statutory Body

Chapter 4 -Town Centres and Development Sites We support the focus on Ealing’s ‘towns’ and broadly support the analysis of key issues and opportunities and spatial strategy and town specific policies. However, there are opportunities which appear to have been overlooked and potential to strengthen the policies to achieve the vision/s set out in the draft document. Requirement for Additional Infrastructure Rather than comment on specific draft site allocations at this stage we would welcome the opportunity to discuss with the Council those sites which may be suitable for health infrastructure to cope with the increasing demand but also to improve the quality of existing estate where necessary and include the opportunity to co-locate with other social and community infrastructure to support communities. As outlined earlier there are additional ‘towns’ where the need for increased health infrastructure is recognised but not referenced in the draft document and there will be other opportunities for enhancing the neighbourhood approach to health and wellbeing identified as the ICB’s strategies and the ‘Ealing Place’ work develops with the Council, NHS and community partners. All developments should mitigate their impact on health infrastructure through contributions secured within the relevant S106 agreement	Noted.	SP4.1 Good Growth		Mary Manuel	NHS London	116	Statutory Body
Policy A.1: Acton Spatial Strategy Clause K (iii) Addressing GP capacity as a result of population growth in Acton (including North Acton) should be broadened out to reflect the requirement for increased capacity across different types of health infrastructure and not only GP capacity. The approach where possible is for greater integration of health and wellbeing services.	Noted and accepted.	Policy A1: Acton Spatial Strategy		Mary Manuel	NHS London	116	Statutory Body
Policy E.2: Ealing Metropolitan Town Centre Clause B refers to improving key health determinants including accessibility to and provision of healthcare facilities, deficiency in green open space and improving air quality within the town centre. While we support this, we suggest this approach is adopted across the Local Plan building on the work in the Ealing Health Study.	Noted and accepted.	Policy E2: Ealing Metropolitan Town Centre		Mary Manuel	NHS London	116	Statutory Body

Within both the Greenford and Northolt Town sections there is reference to “a high proportion of the population that is classified as being in bad or very bad health.” It would be helpful to review whether there are any further opportunities for the draft policies to address the wider determinants as they impact health in these and other towns and how this can be effectively monitored, and improvements secured through the local plan. Many of the clauses within Policy G1: Greenford Town Spatial Strategy, as with other sections, refer to the improvement of health and wellbeing outcomes through the development that is anticipated and the application of policies in the emerging Local Plan. Again, we suggest that there is further detail as to how the policies will translate into improved health outcomes and the reduction in health inequalities to ensure opportunities are maximised and adverse impacts minimised. Reference to aspirations/ambitions such as improving active travel to schools should be a key priority to enhance health, wellbeing and safety (4.3.50) while in supporting text it would be helpful to consider if this could be translated into a borough wide policy and for the monitoring framework to track progress towards this.	Comments noted. Given the strategic nature of the Local Plan, we believe further details on health and wellbeing, and the monitoring of the impact of Local Plan policies would be better covered in a follow up to the Ealing Health Study. We would be keen to work with NHS partners on this.	Policy SP3: Fighting inequality		Mary Manuel	NHS London	116	Statutory Body

Hanwell – Site 01HA Land to the front of Ealing Hospital. This site is strategically important to the NHS. We are concerned that wording within the allocation does not reflect the potential requirements of the NHS over the plan period, the current context and that elements within the design principles are inconsistent with the approach taken in other site allocations. Proposed Use The proposed use set out should be broadened to reflect the potential requirements of Ealing Hospital given the scale of population growth and pressure on the NHS. "Residential and reprovide <u>car parking and infrastructure</u> for the hospital." Contextual Considerations The first bullet point incorrectly refers to the Three Bridges medium secure unit as being part of the site, whereas it forms part of the adjoining St Bernard’s site. This should be amended as set out below together with additional bullet points. • The site forms part of the wider Ealing Hospital, which includes an accident and emergency department, ~~the Three Bridges medium secure unit~~, Meadow House hospice, and other departments and facilities. • <u>West London NHS Trust and NWL share an entrance to the St Bernard’s and Ealing Hospital site and any development would need to ensure adequate access to both sites with this shared access maintained.</u> • <u>Any development would need to ensure that it does not adversely impact the accessibility of the site for emergency and other hospital related vehicles and patients given the existing already heavily</u>	Comments noted and accepted.	01HA Land to the front of Ealing Hospital		Mary Manuel	NHS London	116	Statutory Body
Southall – 07SO The Limes, Maypole Court, Banqueting Centre The reprovision of a health centre on this site is supported. However, under design principles while it sets out no/low parking for residential development there needs to be sufficient parking provision for emergency vehicles, and parking for staff and community based teams associated with the health centre. An additional bullet point should be added as set out below. • <u>Adequate parking for emergency vehicles and for the effective operation of the health centre and associated infrastructure to include parking for community-based teams, other staff and patients.</u>	Noted.	07SO The Limes, Maypole Court, Banqueting Centre, 13 – 19 The Green		Mary Manuel	NHS London	116	Statutory Body

Policy DAA – Design and Amenity- Ealing LPA – local policy. We suggest that this policy could be more ambitious and while we support the general approach that development must take responsibility for mitigating adverse effects upon its neighbours and surroundings, we would hope that it could secure improvements, particularly to the health and wellbeing of areas where communities are facing particularly challenges including health inequalities. Consideration to an additional clause vi) contribute positively to health and wellbeing. We would welcome discussion as to how the local plan can help ensure that when new health infrastructure is provided it is affordable and sustainable to the NHS.	Accepted	Policy DAA: Design and Amenity – Ealing LPA – local policy		Mary Manuel	NHS London	116	Statutory Body
Policy E6: Locally Significant Sites (LSIS) London Plan Ealing LPA- local variation We support this policy and would emphasise the importance of clause G(iii) and delivering supporting infrastructure early as these areas will typically have little or no social infrastructure, and those moving into the first residential units may face adverse conditions and often the social rented homes are delivered first.	Noted. Support welcomed.	Policy E6: Locally Significant Industrial Sites (LSIS) – London Plan – Ealing LPA – local variation		Mary Manuel	NHS London	116	Statutory Body
Policy G5: Urban Greening – local variation We strongly support this policy and the recognition of its importance to physical and mental health and broader wellbeing.	Noted. Support welcomed.	Policy G5: Urban Greening – London Plan – Ealing LPA – local variation		Mary Manuel	NHS London	116	Statutory Body
Policy FLP – Funding – local policy We support this policy and will work with the Council to identify the health infrastructure required to support the local plan and phasing alongside new development. It is important that local priorities can be supported and understand how competing strategic and local priorities will be managed.	Noted.	Policy FLP: Funding – The Local Plan – Ealing LPA – local policy		Mary Manuel	NHS London	116	Statutory Body

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS). NHS Property Services NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care. General Comments on Health Infrastructure to Support Housing Growth The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to ~~funding the healthcare needs arising from new development.~~ Health	Noted.	General		Ellen Moore	NHS Property	600	Statutory Body
Draft Policy SP2.2 Climate Action Draft Policy SP2.2 seeks to take climate action by making the best use of land and investing in sustainable connectivity and supporting the delivery of Net Zero Carbon buildings. The NHS requires all new development projects to be net zero carbon, and NHSPS fully support policies that promote carbon neutral development. In considering the implementation of policies related to net zero, we would highlight that NHS property could benefit from carbon offset funds collected where on-site carbon mitigation requirements cannot be met. This would support the NHS to reach the goal of becoming the world’s first net zero healthcare provider. NHSPS considers Draft Policy SP2.2 to be sound.	Noted. Support welcomed.	Policy SP2: Tackling the climate crisis		Ellen Moore	NHS Property	600	Statutory Body

Draft Policy SP2.3 Thriving Communities Draft Policy SP2.3 seeks to safeguard, improve and facilitate the restructuring of existing social infrastructure, and protect and enhance community facilities. NHSPS supports the provision of sufficient, quality community facilities. As this Draft Policy does not set assessment criteria for planning applications which propose the loss of existing facilities, these applications will be assessed under London Plan Policy S1 and S2. As currently worded NHSPS considers Draft Policy SP2.3 to be sound. Should the Council or Inspectors propose the introduction of assessment criteria into Draft Policy SP2.3 during the course of examination in public, NHSPS requests that the policy is clear that where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it be accepted that a facility is neither needed nor viable for its current use, and the principle of alternative uses be supported with no requirement for retention of a community facility use on the land. NHSPS consider the inclusion of following wording would ensure the Plan is positively prepared and effective: <u>Where healthcare facilities are declared surplus or identified as part of an estates strategy or service transformation plan where investment is needed towards modern, fit for purpose infrastructure and facilities, there will be no requirement to retain any part of the site in an alternative community use.</u> The reason for this suggested wording is that where healthcare	Comments noted. This is already covered by London Plan policy S2 A 5).	SP2.3 Thriving communities		Ellen Moore	NHS Property	600	Statutory Body

Draft Policy SP3.3 Healthy Lives Draft Policy SP3.3 sets out the Council’s commitment to making sure that new developments promote healthier lifestyles and improve overall health and wellbeing. NHSPS welcomes and supports the inclusion of policies that support healthy lifestyles, and the requirement for Health Impact Assessment for major or strategic developments. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health. NHSPS considers Draft Policy SP3.3 to be sound. {Further comments on the IDP and viability assessment evidence bases}	Noted. Support welcomed.	SP3.3 Healthy lives		Ellen Moore	NHS Property	600	Statutory Body

Draft Policy HOU Affordable Housing NHSPS considers Draft Policy HOU to be sound, however as part of preparing additional guidance to inform detailed delivery of this policy and during future reviews of the Local Plan (once adopted), NHSPS request the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff. Housing affordability and availability can play a significant role in determining people’s choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council: ☐ Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners. ☐ Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments and any other relevant	Noted	Policy HOU: Affordable Housing – Ealing LPA – local policy		Ellen Moore	NHS Property	600	Statutory Body

Draft Policy FLP Funding Draft Policy FLP states the Council will follow the approach set out in the London Plan (2021) in respect of negotiations on planning obligations to reflect strategic and local priorities for the provision of infrastructure, and the Council will create a framework on developer contributions via an SPD. Supporting Paragraph 3.37 in an earlier section of the Draft Local Plan states direct provision of supporting infrastructure is also a key part of the planning system and in addition to proposed health infrastructure improvements, which is evidenced in Ealing’s comprehensive health evidence, all forms of social infrastructure have a role to play in the web of social and economic factors that directly influence health. NHSPS considers Draft Policy FLP to be sound as currently worded, provided the Council continue its engagement with the NHS to further refine the identified healthcare needs and proposed solutions to support the level of growth proposed by the Local Plan, as identified in the IDP, during the lifetime of the Local Plan. Further comments on IDP are provided in the relevant section below. Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new developments create a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site	Noted. Support welcomed.	Policy FLP: Funding – The Local Plan – Ealing LPA – local policy		Ellen Moore	NHS Property	600	Statutory Body

Thank you for consulting us on the above policy documents. We have reviewed the plan, Integrated Impact Assessment and relevant evidence bases and find the plan to be positively prepared and sound in relation to the Environment Agency’s remit. Please see our general comments below. General Comments We appreciate the positive changes made in response to our comments at the Reg18 stage of the new local plan. We note the following: {Specific comments in separate rows} I hope you find our comments helpful. We would be happy to discuss any of the above points or give further detail and support in the process. Please let me know if you have any questions.	Noted. Support welcomed.	General		Jan Harwood	Environment	605	Statutory Body
SP 2.2 Climate action C (ii) – Water Consumption We previously recommended that this policy should be expanded to include increased water efficiency in new development. The London Plan 2021 Policy SI5 addresses these concerns. Policy SP2.2 Climate action F (iii) – SuDS We recommend further clarification of this policy to set out the locations where types of SuDS will and will not be appropriate, to maximise their benefits and minimise risks. SuDS can help address climate change by reducing flood risk, ameliorating urban heating, enhancing biodiversity and relieving pressures on water resources. SuDS also have a lower embodied carbon than conventional drainage systems and can sequester carbon throughout their lives. Please note that in areas where land may be contaminated, or suspected of contamination owing to its past use, certain types of SuDS may not be appropriate.	Noted. Whilst the Council proactively encourages the deployment of SuDS it is reluctant to identify specific locations via this policy, as it would require a more sophisticated direction which may be difficult to articulate through this policy. The Council's view is that SuDS can be suitable in most locations in the authority, but the type SuDS deemed suitable in a area may vary from one site to another, and this is best assessed on a case by case basis. In practice the consideration of SuDS as part of the development management process is informed by the completion of a drainage strategy and proforma. The requirement on applicants to prepare and submit these is detailed in the West London SFRA, and relevant forms and checklist are accessible via this document. Separately we have identified and specified suitable locations and options for SuDS as part of further studies on Critical Drainage Areas. The Council are also developing a ‘SuDS Portfolio’ document that identifies suitable locations (and possible projects where funding is available). The Council's climate emergency strategy also includes an action to identify and implement SuDS (rain gardens) in the public highway where feasible based on a site specific assessment.	SP2.2 Climate action		Jan Harwood	Environment	605	Statutory Body

Ground Water Protection Additionally, we believe there remains a missed opportunity to provide greater protection of groundwater resources. Brownfield sites, especially those with industrial former uses, may be contaminated. London Plan policy SD1 refers only to Opportunity Areas with regards to contaminated land. Additionally, policy SI 5 section D of the London Plan states: “In terms of water quality, Development Plans should: 1) promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, and should take account of Catchment Plans” We would like to draw attention to the Old Oak and Park Royal Development Corporation Local Plan EU13 Land Contamination policy. We strongly recommend cooption of this policy to also apply to areas outside of the delegation agreement. Alternatively, we once again reiterate the following as the basis for a new policy in the absence of sufficient policy coverage from the London Plan (2021): • Specific National Planning Policy Framework (NPPF) paragraphs 174 and 183 should be considered • Relevant guidance such the Environment Agency’s Approach to Groundwater Protection and Land Contamination Risk Management (LCRM) should be promoted • The Approach to Groundwater Protection should be considered with regard to development proposals that we would object to in principle. • Policies should require developers to submit a Preliminary Risk	Noted. As referenced, Ealing is already bound by the provisions of the NPPF (notably paragraphs 180 and 189). The London Plan forms part of Ealing's Development Plan, and the Council has made a conscious effort to avoid repeating provisions contained in this document in Ealing's Local Plan. London Plan policies SD 1 and D10 are both relevant in an Ealing context. To provide further policy cover however it is proposed that additional text is added to para 5.5 (under policy DAA) "Nor should development activate or spread existing contamination."	SP2.2 Climate action	Policy DAA: Design and Amenity – Ealing LPA – local policy	Jan Harwood	Environment	605	Statutory Body

I am writing you to prevent Trinity Open space from construction and development. There are enough commercial development in our area. We need to preserve nature. Keep the beautiful flora and fauna of this place. Our children and teenagers spent their time there on sport and recreation activities distracted from smoking and drugs. We need green London. Thank you for consideration.	As detailed in the Atlas of Change amendments are proposed to the wider Metropolitan Open Land parcel (MOL 23) which encompasses Acton Park, the sports grounds and Trinity Way Recreation Ground, which involve a boundary adjustment of the MOL designation removing Trinity Way Recreation Ground from this designation. This amendment is viewed as a boundary correction and is informed by the Council’s Green Belt and MOL review. This review has set out to ensure that the network of Green Belt and Metropolitan Open Land in Ealing continues to be afforded the correct designation and protection. This is the first review of its type in Ealing which has been undertaken since these designations were first established, and the sites have been tested against the purposes and criteria contained in national and regional policy to establish whether the sites in full or part continue to meet these defining criteria. Sites that have incorrect and inconsistent policy designations are at greater risk of having their protected status challenged and ultimately this may facilitate development which is unplanned and piecemeal. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site. In the case of Trinity Way Recreation Ground whilst the wider parcel to the west is considered to continue to meet the relevant MOL criteria, the Recreation Ground itself was found to be physically and visually detached from the main parcel, and therefore when viewed in isolation it was found not to meet the criteria. The retention of an MOL designation over this site was not considered to be appropriate or necessary. Where changes have	SP2.2 Climate action		Alexei Bykov		612	Individual

Thank you for opportunity to provide comments to the Regulation 19 consultation stage of the new Local Plan. The following sets out Harrow’s formal response. Background This letter follows on from LB Harrow’s letter to you dated 8 th February 2023 in relation to your Regulation 18 stage (attached for your reference). This raised some issues around the need for further information and clarity in relation to sites close to the Harrow boundary in Greenford/ Northolt including the proposed de-designation of Site MOL2 and the following development sites: • GR08; Westway Cross Retail Park (residential-led mixed use) • GR09; Former Greenwich School of Management (employment-led mixed use) • NO02; Mandeville Parkway (residential and green space) • NO03; Northolt High School (retain school and residential) Proposed Changes It is noted that LB Ealing has made a number of significant changes between Regulation 18 and 19 in order to address concerns raised during the Regulation consultation. This is to be commended. The changes proposed are generally supported by the LB Harrow. It is noted that the net number of development sites has now been reduced from 118 to 82 sites. Those removed include Northolt High School from the above list. Further information has been added to development site schedules including updated proposed uses and indicative timetable for delivery, contextual information, design principles and key	Noted. Support welcomed.	General		Emma Talbot	Harrow Coun	614	Statutory Body

It is noted however that in relation to some GB/MOL sites that some boundary changes are being proposed by the LB Ealing. It is understood that these include a small number of sites (or part of sites) that do not contribute towards Green Belt/MOL objectives and which could be used to meet identified development needs and thus are identified for a change in designation, demonstrating the corresponding exceptional circumstances. In addition, to ensure defensible boundaries, some boundary corrections have been made that reflect the current reality and use of sites. In this regard there are two sites that are of interest to the LB Harrow, given their proximity to the Harrow boundary: 1) Site MOL2- As set out in Map 7 of the Atlas of Change it is proposed to remove part of the former Kellogg Tower site from this site. As set out in previous comments at the Regulation 18 stage, the LB Harrow objected in principle to proposed de-designation of GB/MOL sites, however it is noted that this part of the site is built-up and represents a relatively small area of the wider site. It would be useful to understand the specific reasoning for this change, including any proposed future use and connections to the Sudbury Hill Neighbourhood Centre (Policy G4), as this is not evidently clear from the local plan documentation. We would welcome further discussions on this when we next meet. 2) Site GB3- As set out in Map 3 of the Atlas of Change it is proposed to include an addition around Prior Fields. This is supported in principle.	Noted. Support welcomed for GB3. Regards MOL2, a meeting between Ealing and Harrow officers took place on 16.5.24 to clarify matters. A note of the meeting, prepared by Harrow, records; "LBH raised some initial concerns about site MOL2 at Reg 18, but noted in Reg 19 stage this has now been reduced to a much smaller area of site to include PDL land around Kellogg Tower. Improvements also being sought with Sudbury Hill Neighbourhood Centre. No further comments from LBH on this allocation."	SP2.2 Climate action		Emma Talbot	Harrow Coun	614	Statutory Body

Others changes/new additions incorporated into the Regulation 19 Local Plan are also broadly supported in principle by the LB Harrow. These include: • Strengthening policies around climate action (SP 2.2) • Making provision for the creation of a new Ealing Regional Park (in the Perivale area) (SP 2.2 G (v) and intention to create a new outdoor swimming facility in Ealing (SP 3.3 G) (although location not yet specified) • Setting out borough-wide infrastructure schemes which are necessary to support the planned growth (SP 4.1 G and Table SS1), including the proposed extension of Greenford Cemetery • Clarifying housing delivery targets in line with London Plan targets and the maximisation of affordable housing (SP 4.3). • Adding new spatial policies G6 and N4 which set out policies for the industrial estates in Greenford and Northolt. These include improving local infrastructure and re-designating the Northolt Driving Range as a new Strategic Industrial location (SIL) to deliver new industrial and commercial floorspace • Clarifying the need to meet an identified future need of six additional pitches for the Gypsy and Traveller community (SP 3.1 D) (although location not specified) • Adding Development Management Policy G4 to consider the impact of any development proposals upon the visual openness of green and open spaces • Clarifying in Development Management Policy G5 that Ealing will apply the Urban Greening Factor as set out in the London Plan with a target of 0.4 for residential development and 0.3 for commercial development. • ~~Adding Development Management Policy G6 to promote local~~	Noted. Support welcomed.	General		Emma Talbot	Harrow Coun	614	Statutory Body
NATS has no comments to make on the Local Plan.	Noted.	General		Sacha Rossi	NATS	634	Statutory Body
Allocation EA30 Twyford Abbey The LB Brent notes that EA30 has been removed from the Plan. In its stead appears paragraph 4.2.46 which supports policy E3. This notes that development at the Twyford Abbey site will be tested to ensure that they achieve the desired outcomes of securing further green infrastructure enhancements, public access for the site, and the future of the listed building. The LB Brent supports these aims for the site, and the wording as proposed.	Noted. Support welcomed. See separate Statement of Common Ground between Ealing and Brent Councils.	Policy E1: Ealing Spatial Strategy		Jordan Henderson	Brent Council	635	Statutory Body

I spoke with {redacted} at the end of last year about the Sandringham Mews development and our various concerns as residents of [redacted]. This included issues around the proposed reductions to the conservation status for 1-45 (odd numbers) Bond Street, which would mean that trees can be cut down, the right to demolish would be added and that the surrounding character and heritage would be removed. This change would also it seems affect the type of cladding allowed on buildings. We are extremely concerned about the changes which are planned / taking place and would like to speak to someone as a matter of urgency to understand what will happen. We live at this end of Bond Street and have a tree in our back garden. This plane tree should not be affected by the work and we would not want anything to be done to the tree. The height of the proposed building would potentially block light for the tree and all the residents in the flats in this area and it would be very helpful to speak to someone about this as well. In addition, we have been raising concerns for many years about the rodent issues behind all the Bond Street restaurants and Sandringham Mews. If there is work planned then we need to know what that entails. I would be grateful if someone could contact me as soon as possible so we can understand what is being planned, how that will affect us and the other residents here and to explain the current status of the situation.	Noted. The Local Plan sets out proposals at 03EA at page 176-7 of the plan. Any planning application for this site will require public and stakeholder consultation to be conducted.	03EA Sandringham Mews		Hema Music		646	Individual

London Wildlife Trust ('the Trust') has a few comments to make on the above, mindful that we responded to the Regulation 18 consultation version in February 2023. The Trust is a nature conservation charity that has aimed to protect and promote the wildlife of Greater London for over 40 years. We are supported by people who care about securing nature's recovery across the capital, including our 16,000 members. We work with many partners to make a city richer in wildlife that can also provide a range of benefits for the people who live, work and play here. The Trust is involved within the borough, partly through the long-term management of Gunnersbury Triangle LNR (that lies partly within Ealing) and most recently helping to broker and determine allocations of the Mayor of London's Rewild London Fund since 2022; including brokering funding to broaden the number of projects receiving fund in the 2023 round, such as the introduction of beavers into a compound in Paradise Fields, Greenford last autumn.. We have also been providing training for borough planning teams around London over the past year on the implementation of Biodiversity Net Gain in the capital. However, Ealing, so far, has yet to take up our offer. We welcome this opportunity to comment on the final proposals of the Local Plan and conscious that we are a little late in submitting these due other borough Local Plan consultations currently underway in London. Leader's foreword We welcome the acknowledgement of the need to tackle the climate crisis (para 0.5), but disappointed that no reference given to the nature crisis and green spaces and other natural assets the	Noted. Support welcomed.	General		Mathew Frith	London Wild	647	Community Interest Group

We also welcome and support the Review of Ealing’s SINCs (para 0.26), which has yet to be formally ratified by the London Wildlife Sites Board, but from what we know this is due to happen within at the next LWSB meeting, and when so will provide an updated and robust evidence to help determine planning decisions that may materially impact any SINC in the future. We welcome the fact that some of these changes have been made as a response to public and stakeholder feedback from the Regulation 18 consultation. Chapter 2: Setting the Scene Borough context We welcome the reference to green space and land designated as Green Belt and Metropolitan Open Land (para 2.18), but as we pointed out in our response to the Reg 18 consultation, there is no reference to the ecological context of the borough, such as the network of Sites of Importance for Nature Conservation including four statutory Local Nature Reserves and one of the oldest nature reserves in the country (Perivale Wood). These will provide the foundations for a Local Nature Recovery Plan to establish a nature recovery network within Ealing as the borough’s response to the nature crisis. This should help inform how the Plan addresses Biodiversity Net Gain, especially in terms of delivery of any offsite BNG units. Tackling the climate crisis We support the statement set out in paras 2.32 and 2.33.	Noted. Support welcomed.	SP2.2 Climate action		Mathew Frith	London Wild	647	Community Interest Group
Chapter 3: Spatial Strategy Vision We support Policy SP.1 A Vision for Ealing Delivering the vision	Noted. Support welcomed.	Policy SP1: A Vision for Ealing		Mathew Frith	London Wild	647	Community Interest Group
We support Policy SP2.2 Climate Action, in particular parts F ii), iii) iv) and v), G i) to vi), and H. We welcome the supporting paras 3.20, and 3.29-3.37.	Noted. Support welcomed.	SP2.2 Climate action		Mathew Frith	London Wild	647	Community Interest Group

Acton Town Policy A1: Acton Spatial Strategy We support this policy, especially; • Part C. “....Investment in sustainable connectivity is needed between neighbourhood centres, while Acton’s green routes link open spaces locally with opportunities to connect and enhance natural corridors and biodiversity.” • Part J. “Promote and enhance Acton’s parks including better accessibility and the creating green links to connect parks and open spaces.” • Para 4.1.28 “enhancing the functional use of green space adjacent to Haddon Court in East Acton.”	Noted. Support welcomed.	Policy A1: Acton Spatial Strategy		Mathew Frith	London Wild	647	Community Interest Group
Policy A4: Acton Main Line Station and Environs We support this policy, especially; • (v) Improvements to the green spaces at Friars Place Green, Friars Gardens and St Dunstans Gardens and designating them as a Local Green Space. • (vi) Greening opportunities along Horn Lane and better access and connections to local green spaces	Noted. Support welcomed.	Policy A4: Acton Main Line Station and Environs		Mathew Frith	London Wild	647	Community Interest Group
Acton Development sites Ealing Development Sites Greenford Development Sites Hanwell Development Sites Northolt Development Sites Perivale Development Sites Southall Development Sites We welcome the commitments in all the sites’ Design principles to enhance the existing quantum and quality of greening where possible.	Noted. Support welcomed.	General		Mathew Frith	London Wild	647	Community Interest Group
02AC Acton Gardens • Design principles: We support the commitments to Incorporate green open space and play space within Central Plaza designs; Where podium courtyards are integrated, provide landscaped amenity spaces on a deck over parking; Consider food growing opportunities and community gardening for residents; and Retain, and where possible expand, the allotments as a key feature of the estate.	Noted. Support welcomed.	02AC Acton Gardens		Mathew Frith	London Wild	647	Community Interest Group

03AC Ealing Common Depot We acknowledge this is adjacent to a SINC, and therefore support the Design principles: • Create a green link or wildlife corridor connecting the Green Corridor/Piccadilly and District Line SINC to Heathfield Gardens SINC, and use this as an opportunity to enhance the biodiversity on site through tree planting and soft landscaping	Noted. Support welcomed.	03AC Ealing Common Depot		Mathew Frith	London Wild	647	Community Interest Group
04AC Builders Merchants Bollo Bridge Road • Design principles: We support the commitments to: Contribute to improved site operation and reduction of the environmental impacts particularly the Green Corridor and SINC running along the railway line which is protected by Tree Preservation Orders.	Noted. Support welcomed.	04AC Builders Merchants Bollo Bridge Road		Mathew Frith	London Wild	647	Community Interest Group
07AC Dean Court We acknowledge this is adjacent to a SINC, and therefore support the Design principles: • Improve the quality of the public realm along Friary Road, including tree planting; Consider downgrading the vehicular section of Friary Road... to expand and enhance the existing green space; and Incorporate tree planting along the perimeter of the site, and especially to the north to screen the railway lines.	Noted. Support welcomed.	07AC Dean Court		Mathew Frith	London Wild	647	Community Interest Group
Policy E1: Ealing Spatial Strategy We support this policy, especially; • Part G. “The Brent River valley provides a green lung and flood protection corridor for Ealing and will be preserved and enhanced as part of the broader Regional Park strategy.” • Part I. “Introduction of green links as a chain of Ealing’s greenspaces and upgrading of existing wildlife corridors on Transport for London and National Rail sidings, both on the principal radial routes and the north-south Greenford Branch.” • Part M. “Increased urban greening along the A40, North Circular Road, Uxbridge Road, New Broadway/The Mall, and Argyle Road.” • Para 4.1.28 “enhancing the functional use of green space adjacent to Haddon Court in East Acton.”	Noted. Support welcomed.	Policy E1: Ealing Spatial Strategy		Mathew Frith	London Wild	647	Community Interest Group

Policy E2: Ealing Metropolitan Town Centre We welcome: - Part C. "Ealing Metropolitan Town Centre will be maintained and enhanced by: (i) Building upon its strong local character and mixed urban environment which integrates living, working, recreation and green spaces." - Para 4.2.37 "Urban greening has a particular role to play in managing the effects of climate change. Ealing Metropolitan Town Centre has a potentially very strong green network with major spaces such as Walpole Park and Dean Gardens closely accessible to the Uxbridge Road. While some areas of public green space deficit exist, these are typically well served by private green space. It is particularly important that new development reinforces this."	Noted. Support welcomed.	Policy E2: Ealing Metropolita n Town Centre		Mathew Frith	London Wild	647	Community Interest Group
Policy E4: Southern Ealing and Ealing Common We welcome and support this policy particularly in respect of: Para 4.2.48: "Green networks are especially strong, particularly routes through urban parks like Lammas Park and Walpole Park. These will be enhanced, along with active routes along main trunk roads and through Northfields and South Ealing centres. Provision will particularly be enhanced along the Uxbridge Road as part of a continuous route from Acton to Southall."	Noted. Support welcomed.	Policy E4: Southern Ealing and Ealing Common		Mathew Frith	London Wild	647	Community Interest Group
15EA Waitrose, West Ealing We acknowledge this is adjacent to a SINC, and therefore support the Design principles: Incorporate on-site amenity space, with planting that complements the adjacent SINC.	Noted. Support welcomed.	15EA Waitrose, West Ealing		Mathew Frith	London Wild	647	Community Interest Group
16EA West Ealing Station Approach We acknowledge this is adjacent to a SINC, and suggest the landscape improvements should aim to reflect an enhance this.	Noted. Support welcomed.	16EA West Ealing Station Approach		Mathew Frith	London Wild	647	Community Interest Group
19EA Gurnell Leisure Centre We acknowledge this is MOL and part of a SINC, and therefore support the Design principles: Incorporate a comprehensive package of open space enhancements, including improvements related to accessibility... landscaping, flood mitigation, wayfinding and biodiversity.	Noted. Support welcomed.	19EA Gurnell Leisure Centre		Mathew Frith	London Wild	647	Community Interest Group

21EA Former Barclays Sports Ground We acknowledge this is adjacent to a SINC and MOL and therefore support the Design principles: • [L]imit the amount of development on open space; Focus built development around the existing previously developed land and minimise encroachment into usable green space with future development located on the site of the existing club house building and immediate hardstanding only; Minimise the impact on MOL openness and function.	Noted. Support welcomed.	21EA Former Barclays Sports Ground		Mathew Frith	London Wild	647	Community Interest Group
23EA Old Actonians Sports Ground We acknowledge this is open green space and a SINC, and therefore support the Design principles: • Explore the opportunity to jointly manage Baron’s Pond and secure day time access to facilities for local schools; Given Barons Pond’s SINC designation, ensure any new built development is designed sensitively to minimise any potential impact on ecology; Given Gunnersbury Park’s Grade II* Registered Park and Garden status, ensure that any negative impacts on this important heritage asset are avoided.	Noted. Support welcomed.	23EA Old Actonians Sports Ground		Mathew Frith	London Wild	647	Community Interest Group
25EA Travis Perkins, Popes Lane We acknowledge this is adjacent to a SINC and MOL and therefore support the Design principles: • Careful landscape design is to include planting that reflects and reinforces the adjacent SINC, especially along the boundaries of the site.	Noted. Support welcomed.	25EA Travis Perkins, Popes Lane		Mathew Frith	London Wild	647	Community Interest Group

Policy G1: Greenford Spatial Strategy We support this policy, especially; • Part G. Greenford residents have access to an abundance of high quality green open spaces and water assets including the Grand Union Canal and River Brent. The functional role of these assets will be improved, to enhance their recreational and leisure functions. Improved accessibility, wayfinding, and signage will ensure that green and blue assets better connect and bring communities together, improving community cohesion and perceptions of safety. • Part H. vi) Maximising the benefits of the high-quality green open spaces in and around Greenford by improving accessibility, wayfinding, and signage; and (vii) Delivering urban greening through new developments and planting schemes, helping to address poor air quality across Greenford and improving local health outcomes. • Para 4.3.44. There is a significant amount of high-quality green open space across Greenford and right on its borders.... It is important to improve the accessibility, wayfinding, and signage to these sites, as well as enhance their functional role as high-quality leisure and recreation destinations.	Noted. Support welcomed.	Policy G1: Greenford Spatial Strategy		Mathew Frith	London Wild	647	Community Interest Group
04GR Westway Cross We acknowledge this is adjacent to Metropolitan/Borough SINCs and MOL and therefore support the following Design principle: • Create a public greenspace in the centre of the site, linked by a network of green pedestrian and cycle routes that connect to the SINC. These should be tree lined with bio-diverse planting and SUDS to function as green corridors for wildlife. However, the north-west of the site has been identified as an ‘in principle’ location for an up to 18-storey tower block, which would shade a significant part of Paradise Fields, including the ponds in which beavers were recently introduced. We believe that this is an inappropriate location for a building of such height because of the impacts of shade and light upon the biodiversity interest of the SINC.	Noted. Support welcomed. Regards tall buildings, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	04GR Westway Cross		Mathew Frith	London Wild	647	Community Interest Group
Policy H1: Hanwell Spatial Strategy We support this policy, especially: • Part C (iv). Recognising the importance of green infrastructure and the canal network in providing attractive routes around and through Hanwell and integrating these with the broader pedestrian network including widening the towpath of the Grand Union Brent Valley Park.	Noted. Support welcomed.	Policy H1: Hanwell Spatial Strategy		Mathew Frith	London Wild	647	Community Interest Group

01HA Land to the front of Ealing Hospital We acknowledge this is adjacent to a SINC and MOL and therefore support the Design principle: • Ensure tree planting along the northern edge of the site in particular to enhance the existing Green Corridor and create a buffer between the Uxbridge Road and the site.	Noted. Support welcomed.	01HA Land to the front of Ealing Hospital		Mathew Frith	London Wild	647	Community Interest Group
Policy N1: Northolt Spatial Strategy We support this policy, especially; • Part E. Promote improvements in green infrastructure by: (i) Enhancement of existing green routes to deliver a ‘green ring’ of pedestrian and cycle routes with better connections to the town centres. (ii) Delivery of a ‘green ring’ will incorporate measures to conserve local biodiversity, alleviate stormwater flooding and improve air quality, while also enhancing green spaces with improvements to support community recreation. (iii) Making the towpath adjacent to the Grand Union Canal a more popular route for leisure and commuter active travel, connecting residential neighbourhoods with employment sites.	Noted. Support welcomed.	Policy N1: Northolt Spatial Strategy		Mathew Frith	London Wild	647	Community Interest Group
01NO Car Sales Site and Northolt Leisure Centre The site includes part of a SINC, and whilst we recommend no development upon the SINC, we support the Design principle; • Reprovide biodiverse planting on site or on adjacent SINC land if there is any development on SINC land within the site boundary.	Noted. Support welcomed.	01NO Car Sales Site and Northolt Leisure Centre		Mathew Frith	London Wild	647	Community Interest Group
02NO Mandeville Parkway We support this Design principle, but suggest that commitments to enhance the open space’s biodiversity interest should be added: • Any proposed development should not result in the loss of public open space and should provide opportunities for protecting and enhancing the existing public open space, making it more accessible for local residents.	Noted and accepted. It is recommended that the text under 'Contextual Considerations' is amended as follows: 'Any proposed development should not result in the loss of public open space and should provide opportunities for protecting and enhancing the existing public open space, making it more accessible for local residents, and secure a net gain for biodiversity.'	02NO Mandeville Parkway		Mathew Frith	London Wild	647	Community Interest Group
05NO Medlar Farm Estate We support these Design principles: • Improve communal spaces within the estate with better pedestrian and cycle links to create better permeability through the site; Create green links through to Rectory Park, with tree planting and links to internal green spaces; Retain mature trees, especially the Medlar trees which give the estate its name.	Noted. Support welcomed.	05NO Medlar Farm Estate		Mathew Frith	London Wild	647	Community Interest Group

Policy P1: Perivale Spatial Strategy We support this policy, especially; • Part E. Perivale will benefit from better links to green and blue spaces, enhancing their appearance and functional role as places that connect people and communities. Improved public realm, greening and new green spaces will be required as part of any new development to both enhance the attractiveness of Perivale's streetscapes while helping to address poor air quality.	Noted. Support welcomed.	Policy P1: Perivale Spatial Strategy		Mathew Frith	London Wild	647	Community Interest Group
04PE Alperton Lane South and Metroline Depot We support this Design principle: • Explore opportunities for greening particularly adjacent to the river and green corridor.	Noted. Support welcomed.	04PE Alperton Lane South and Metroline Depot		Mathew Frith	London Wild	647	Community Interest Group
Policy S1: Southall Spatial Strategy We support this policy, especially; • Part G. (i) Adding to the network of green open spaces particularly in deficient areas in the western and southern parts of Southall. Improving the quality of green open spaces through a coordinated of environmental and safety enhancements, tree planting, greening and facility improvements including the creation of a Local Nature Reserve. • Part H. (vi) Making improvements to public realm and ecology along the Grand Union Canal towpath • Para 4.7.35. The quality of open spaces will also be improved by addressing safety and security (specific opportunities around the station), providing additional tree planting, integration of greenery into the streetscape, and providing more places to sit and relax. Additional tree planting and urban greening will be particularly focussed around Uxbridge Road, The Broadway, South Road, and Hortus Burial Ground. Opportunities will be taken to improve urban greening across Southall through, for example, the provision of rain gardens, growing spaces, and natural spaces.	Noted. Support welcomed.	Policy S1: Southall Spatial Strategy		Mathew Frith	London Wild	647	Community Interest Group
Policy S5: East Southall We support this policy, especially; • (iii) Providing a connected network of new green and open spaces to address deficiencies in the area including a new square, linear park or naturalised edges for SuDs and improving access to Glade Lane Park and boundary treatment of Hortus Cemetery.	Noted. Support welcomed.	Policy S5: East Southall		Mathew Frith	London Wild	647	Community Interest Group

11SO The Green Quarter (Southall Gasworks) We support these Design principles: • New development should be supported by an agreed masterplan that provides new housing and a range of new physical, social and green infrastructure necessary to deliver place shaping ambitions for this new and substantial development. • Create new public open spaces and children’s play areas linked with green routes to the canal and Minet Country Park beyond, with a new bridge crossing the canal, and improvements to the canal walk.	Noted. Support welcomed.	11SO The Green Quarter (Southall Gasworks)		Mathew Frith	London Wild	647	Community Interest Group
16SO Warren Farm and Imperial College Land We welcome and support the acknowledgment that the site is now important for biodiversity: • The land across the site is also overgrown and has become home to hundreds of plants, insects, mammals and birds. Given the size and openness of the site, coupled with the less intensive management regime in recent years, a number of rare and vulnerable species are present. Given this status the Council are currently pursuing a Local Nature Reserve status for an extensive part of the site, which will complement the existing SINC designation. And therefore support the following Design principles; • Development proposals should secure an appropriate mix and balance of uses... colocated with a nature reserve, accessible to the community. • The siting, scale, height and distribution of the built form should be designed to preserve the openness of the site and to protect ecological value.	Noted. Support welcomed.	16SO Warren Farm and Imperial College Land		Mathew Frith	London Wild	647	Community Interest Group
Policy DAA: Design and Amenity – Ealing LPA – local policy We support this policy, in particular the reference to adverse impacts and sensitive uses (supporting paras 5.5. 5.6).	Noted. Support welcomed.	Policy DAA: Design and Amenity – Ealing LPA – local policy		Mathew Frith	London Wild	647	Community Interest Group

Policy D9: Tall Buildings London Plan – Ealing LPA – local variation Whilst we welcome the overall strategic approach to tall buildings in the borough, we remain concerned that no reference is made to the particular impacts that tall buildings can have on biodiversity such as birds (daytime and nocturnal strikes), bats and nocturnal insects, in terms of their shading, lighting, wind tunnelling, facade treatments and location. The application of Biodiversity Net Gain is unlikely to address these matters.	The purpose of local policy D9 is to define what is considered a tall building in specific localities in Ealing. The Local Plan also defines specified locations and sites that may be suitable for tall buildings, informed by a range of sensitivity and suitability criteria. This sensitivity analysis accounted for proximity to nature (based on established open space / nature designations), and accordingly the identification of suitable locations has sought to avoid such conflicts. It is accepted that such an analysis may not pick up all potential conflicts, with nature existing beyond defined areas, and accordingly a further assessment of potential impacts will need to be considered as part of a detailed design assessment required to support any application. It is noted also that London Plan policy D9 (clause C) already addresses environmental impacts, although it is acknowledged that this appears to be limited to impact on humans. Paragraph 3.9.10 advises however that the impacts listed in this policy are not considered to be exhaustive, and other impacts will need to be taken into consideration. For example, the impact of new tall buildings in proximity to waterbodies supporting notable bird species upon the birds’ flight lines may need to be considered.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Mathew Frith	London Wild	647	Community Interest Group
Policy G4: Open Space – London Plan – Ealing LPA – local variation We strongly welcome and support this policy.	Noted. Support welcomed.	Policy G4: Open Space – London Plan – Ealing LPA – local variation		Mathew Frith	London Wild	647	Community Interest Group
Policy G5: Urban Greening – London Plan – Ealing LPA – local variation We strongly welcome and support this policy. The adoption of the London Plan’s Urban Greening Factor should be used where possible to secure net gains for biodiversity in addition to those through mandatory BNG. The Trust developed a guide with the GLA on how to use the UGF to this effect, given that securing BNG in many densely built parts of London will be challenging.	Noted. Support welcomed.	Policy G5: Urban Greening – London Plan – Ealing LPA – local variation		Mathew Frith	London Wild	647	Community Interest Group

Policy G6: Biodiversity and Access To Nature - London Plan – Ealing LPA – local variation We welcome and support this policy as far as it goes but there are aspects that appear to be missing (see below). We also support the ambition of the policy to achieve a minimum biodiversity net gain (BNG) of at least 20%, although the latest government guidance stipulates the need of a robust evidence base to justify when and where (geographically) this can be applied. Is this in place? We also support the aim to ensure any offsite BNG delivery is within the borough (part F iii); we presume there has been assessment that this can be achieved through the land the Council owns and manages (and/or that of willing private landowners), and that the required management of those offsite units to planned condition over the statutory 30 years can be met within the context of the other uses that land may also be used for. Our experience from speaking to other London borough planning teams is that there is an issue here that such land is often not easily available, and that a more strategic (Londonwide) approach that may be required. We have recommended to the Greater London Authority, following the training we have provided to 17 borough planning teams to date, that this an issue the GLA needs to consider to prevent offsite units being delivered outside of London due to lack of available land and the cost of managing those units to planned condition over 30 years. Site, habitat and species protection Whilst the thrust of Policy G6 is an addition to London Plan Policy G6, for matters of clarity for future users, it would be useful in the supporting text to state that the key purpose of G6 is to protect the existing sites of biodiversity interest in the borough, i.e. Sites of Importance for Nature Conservation	Noted. It is acknowledged that the National Planning Practice Guidance on BNG seeks to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission. Defra’s own Impact Assessment indicated that the majority of costs associated with biodiversity net gain are incurred to reach a no net less position. The costs associated with moving from 10 to 20% is therefore considered to be marginal. However, the NPPG was published after considerable delays and only on February 14th 2024 (with updates on May 1st 2024) . This was after the Regulation 19 Local Plan and associated evidence base had been finalised ahead of the Full Council meeting held on February 21st 2024 and the beginning of the consultation period that ran from February 28th 2024. The council now acknowledges that additional time and further evidence is needed to prepare evidence to justify a rationale for pursuing a higher BNG percentage target. Therefore, the policy has been modified accordingly and a revised policy potentially containing a higher target will be considered as part of the next Local Plan review.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation		Mathew Frith	London Wild	647	Community Interest Group
Whilst we consider the plan to be legally compliant and sound in terms of the matters within the interest and remit of Theatres Trust, we suggest that the effectiveness of the plan could be enhanced through some minor amendments: - Ealing – 06EA, 49–69 Uxbridge Road - We welcome the principle of improving permeability through this site to Questors Theatre. We recommend an additional design principle to make reference to the need for the design and layout of new development to avoid and mitigate against any impacts which could affect the future operation of Questors Theatre, should there be conflict on noise/amenity grounds. New restrictions on the theatre's operations must be avoided, as per paragraph 193 of the NPPF and Policy D13 of the London Plan.	Noted. The point is well made and is already covered by London Plan Policy D13. The London Plan is an integral part of Ealing's local development plan. Ealing's Local Plan does not duplicate or repeat London Plan policies as there is no necessity to do so.	06EA 49–69 Uxbridge Road		Tom Clarke	Theatres Trust	655	Community Interest Group

Policy E3 as it regarded the re-designation of the Hanger Lane Gyrotory SIL to LSIS LB Brent would like to reiterate that the neighbouring land to the north/west within Brent, Alperton South LSIS, is identified solely for industrial intensification. Therefore, any masterplanning process and proposed uses within that redesignated area need to be consistent with the Agent of Change principle. In particular potential 24-hour operation of the Alperton South LSIS should not be compromised. The Council therefore wishes to be engaged at an early stage within any masterplanning process that occurs for this area, whether that be led by LB Ealing or those proposing development within the area.	Noted. The area is currently devoid of conforming industrial uses except for a small area at the southwest corner of the site, the intention of the designation change is to facilitate the introduction of new industrial uses that will be inherently compatible with existing uses at Alperton, with any facilitating uses to be designed in a way that is compatible with the core industrial use. While it does not result in any change to the current plan wording Ealing is happy to agree that LB Brent is involved from an early stage in any future masterplanning in this area. See separate Statement of Common Ground between Ealing and Brent Councils.	Policy E3: Northern Ealing		Jordan Henderson	Brent Council	656	Statutory Body
Thank you for getting in touch to request LGT's input into the new draft Local Plan for Ealing. We have studied the new plan carefully. We are encouraged by the proposal to build a new site for 6 pitches at postcode UB5 6RB (currently occupied by Kingdom Workshop). We are also glad to see that the specifics of the site have been designed in consultation with Gypsy, Roma and/or Traveller (GRT) residents. I shall summarise our 4 concerns with the Local Plan, and provide 7 recommendations. Recommendations 1-5 will be pertinent to the Ealing planning team, while the 6th and 7th recommendations will be of shared relevance to all policy teams at Ealing Council, and other local officials, as appropriate. First concern: Inordinately long delivery timeframe for small new site. The new local plan proposes to provide, by 2027-28, one new site with six pitches in Northolt. The identified immediate need for six pitches reflects a housing emergency that impacts GRT people's access to health and education services in a discriminatory way. As a result of homelessness, lack of recognition of GRT needs for culturally suitable housing, and overcrowded conditions, the health and educational outcomes for GRT people are the worst of all recognized minority groups in London and the UK more broadly, as confirmed by official statistics. Providing six pitches in the next 18 months is the minimum that can be expected to counteract decades of official neglect. Second concern: Lack of plans for maintenance, repairs, and	Noted and support welcomed for development site 09NO. The need to deliver a new GRT site and to do so as quickly as possible is acknowledged. The site allocation sets out clear design principles for the site and detailed plans for a future site will ensure that appropriate standards and best practice is properly considered and that there is effective consultation with the GRT community. Regards issues around maintenance, repairs and improvements, this is not a matter that can be dealt with in the Local Plan as these are operational matters and these concerns have been passed to colleagues in the council's Housing Department. Regards need, a further evidence base report is currently being prepared by the Mayor of London and will inform a future review of the London Plan. This will also take account of the needs of GRT people living in brick and mortar. Regards a transit site, again this is not a matter for the Local Plan although it is noted that this is included in the Majority Party manifesto and this matter will also be referred to colleagues in the council's Housing Department to respond.	09NO Kingdom Workshop, Sharvel Road		Nancy Hawker	London Gyps	657	Community Interest Group

Thank you for your email. We do not have any significant concerns with the Local Plan, but perhaps a meeting might be useful to discuss any cross boundary issues. Would it be possible to meet next week?	Noted.	General		David Gawthorpe	Hammersmit	667	Statutory Body
Thank you for consulting Sport England on the Regulation 19 Ealing Local Plan response. As I am sure you are aware, Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national and local policy as well as supporting Local Authorities in developing their evidence base for sport. Sport England aims to ensure positive planning for sport and creating opportunities for physical activity by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need and strategies for all levels of sport and for all sectors of the community. To achieve this aim our planning objectives are to PROTECT sports facilities from loss as a result of redevelopment, ENHANCE existing facilities through improving their quality, accessibility and management and to PROVIDE new facilities that are fit for purpose and meet demands for sport participation and physical activity provision now and into the future. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Further detail on Sport England's role and objectives within the planning system can be found at https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport	Noted. Please see Statement of Common Ground between Ealing Council and Sport England.	General		Emma Cunnington and Mark Furnish	Sport England	669	Statutory Body

Sport England, working with Active Travel England and the Office for Health Improvement and Disparities, has produced the 3rd version of 'Active Design' (May 2023), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. Sport England would commend the use of the guidance in the master planning process. Sport England would encourage development in the London Borough of Ealing to be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist as part of the development site policies.	Noted. Please see Statement of Common Ground between Ealing Council and Sport England. Whilst the Regulation 19 plan doesn't specifically reference the 'Active Design' guide, the 10 key principles are reflected in the strategy. There are clear synergies between these principles and the concept of 20-minute neighbourhoods and Active Travel which are central themes of Ealing's strategy as introduced in chapter 3. It is accepted that the strategic policies of the plan could be more explicit in recognising the role of the built environment in supporting physical activity. Namely the plan could better identify its role in delivering places which provide opportunities for people to lead physically active lives. This could be teased out further under the supporting text to policies SP2 and SP3 including adding reference to 'active environments' and Active Design principles. Suggested modifications are proposed. To guide the Development Management process specifically, it is proposed that additional text is also added to the supporting text of policies DAA and S5 endorsing the principles of Active Design to facilitate the creation of active environments. Further detail is set out below against the respective representation.	General	Policy SP1: A Vision for Ealing	Emma Cunnington and Mark Furnish	Sport England	669	Statutory Body

The proposed use indicates a leisure-led scheme encompassing indoor and outdoor facilities, with enabling residential use. Any replacement or loss of the playing field and leisure centre would need to align with Sport England Policy and NPPF, paragraph 103, for this allocation to be sound. This should be made clear in the document. The provision for sport and physical activity on the site should be backed up by up-to-date evidence to determine strategic need. Sport England considers that any loss, including part of the open space land for sport and recreation should not be lost to residential development.	Noted. Please see Statement of Common Ground between Ealing Council and Sport England. The need to ensure that decisions taken around the replacement/loss of facilities are underpinned by robust evidence of supply and demand is accepted, as per paragraph 103 of the NPPF and clause C of London Plan policy S5. As with other policy areas, the Council has made a conscious effort to avoid repeating those provisions in our own Local Plan, as this is deemed to be unnecessary and potentially unhelpful, and future development proposals will continue to be tested against these policy provisions. To provide further comfort however it is recommended that a new bullet point is inserted at the outset of the Design Principles which references Sport England’s Playing Fields Policy, as follows: • ‘All proposals will need to be assessed and guided by Sport England’s playing fields policy.’ The preparation of this allocation itself has been informed by local evidence, namely The Ealing Sports Facility Strategy 2022-2031. This strategy identifies the importance of a replacement facility at Gurnell to meet both existing latent demand and potential future demand for swimming facilities within the Borough. The strategy recognises that a new Gurnell Leisure Centre will not just be a local asset but also a regionally significant facility through the provision of a 50m pool.	19EA Gurnell Leisure Centre		Emma Cunnington and Mark Furnish	Sport England	669	Statutory Body

The proposed use is stated Leisure-led scheme with enabling residential use and facilitating access to sports and play pitches. The residential use must not result in the net loss of playing field or impact the usability of the playing field, i.e. remove ancillary facilities, for the allocation to align with the NPPF, paragraph 103, and Sport England's Playing Field Policy. Sport England is also concerned with the description of 'leisure' which could be construed far wider than sport development therefore it considers that more clarity should be provided. Sport England are supportive of the use of the Sports Facilities Strategy to indicate the strategic need of sports such as hockey provision and football and cricket on the site.	Noted. Please see Statement of Common Ground between Ealing Council and Sport England. As existing, the site accommodates a disused pavilion/club house in the north-west corner of the site. The reference to 'ancillary' contained in the existing text refers to the current use, and specifically the pavilion/club house buildings which originally comprised ancillary changing facilities etc. The design principles clarify that priority is given to outdoor leisure activities, and to avoid fixing uses at this stage, it directs applicants to have regard to the latest Sports Facilities Strategy and updates. A suggested amendment to the first design principle is proposed. The distinction between 'leisure' and 'sports' is recognised, and in this instance emphasis should be placed on securing sports facilities. It is suggested therefore that all references to 'leisure' are replaced with 'sports'. It is noted that the third bullet point under 'Design Principles' references 'the delivery of the replacement leisure centre'. This should be corrected to refer to 'outdoor sports facilities' instead.	21EA Former Barclays Sports Ground		Emma Cunnington and Mark Furnish	Sport England	669	Statutory Body

Sport England objects to the loss of any of this site to residential development. Allocating any portion of this site for residential redevelopment would not be in line with the NPPF paragraph 103 or Sport England’s Playing Fields Policy. Sport England does note that the allocation refers to the retention of green space but while a playing field could be considered green space not all green spaces are playing field therefore the wording of the allocation represents a loss of provision. Part of the site is to be allocated for residential development to subsidise the refurbishment. It should be made clear in this policy that any development should accord with paragraph 103 of the NPPF and Sport England’s playing fields policy.	Noted. Please see Statement of Common Ground between Ealing Council and Sport England. The need to ensure that decisions taken around the replacement/loss of facilities are underpinned by robust evidence of supply and demand is accepted, as per paragraph 103 of the NPPF and clause C of London Plan policy S5. Despite the reference to residential development, the driver for allocating the site is not to unlock land for housing. The overriding objective instead is to secure the long-term future of this site for outdoor sports. To this end the allocation is clear that any development must not reduce sport and recreation capacity and where possible increase the amount of usable pitch/court space. With regard to the latter, the allocation promotes the consolidation/rationalisation of existing buildings, with the aim of increasing the area of the site which is usable as pitch/court space. As per other allocations the distinction between ‘leisure’ and ‘sports’ is recognised, and in this instance emphasis should be placed on securing sports facilities. It is suggested therefore that all references to ‘leisure’ are replaced with ‘sports’. To this end the following amendments are suggested: Under ‘Proposed Use’ - Enabling residential development with retention of green space to support improved sports facilities (primary use). Under ‘Key Infrastructure Requirements’ - Sports facilities. Greening and biodiversity measures. Under ‘Design Principles’ –	23EA Old Actonians Sports Ground		Emma Cunnington and Mark Furnish	Sport England	669	Statutory Body

The allocation states a proposed residential-led, mixed use scheme. A replacement gym, therefore, could arguably be considered to fall into the ‘mixed use’ element stated but to ensure that the allocation is sound Sport England recommends that the allocation makes clear that any replacement gym should be of equivalent size and quality as the existing facility otherwise the allocation may not be compliant with national policy unless the gym has been strategically identified as surplus to the local or wider borough needs.	Noted. Please see Statement of Common Ground between Ealing Council and Sport England. It is agreed that the allocation would benefit from more explicit reference to leisure/sport uses forming part of the ‘Proposed Use’. It is suggested that this be amended to read as: ‘Residential-led, mixed scheme including leisure/sport and community use’. In a Development Management context the existing London Plan policy S5 clause C already helpfully outlines key tests for managing any change in provision, similarly advising that any replacement provision should be equivalent or better in terms of quantity and quality. The site is already subject to various planning applications, including a proposal (215983FUL) to extend above the gym creating new residential accommodation, which has been approved pending the legal agreement being signed. The existing gym at ground and first floor level is to be retained as part of this scheme.	05HA Marshall Site, Gold’s Gym & Garages on Montague Avenue		Emma Cunnington and Mark Furnish	Sport England	669	Statutory Body

Sport England objects to the loss of the Boxing club/gym and driving range as it is not clear from evidence that these are surplus to borough wide needs and, therefore, this allocation would not be compliant with paragraph 103 of the NPPF or Sport England's Playing Fields Policy. Even if the site is not in active use, the lack of use should not be taken as necessarily indicating an absence of need in an area. Sport England would like to see wording in this policy to indicate that alternative sports and recreation provision in a suitable location of equal or better provision in terms of quality and quantity is delivered or strategic evidence is demonstrated to show that the golf driving range is surplus to current and future local need.	Noted. Please see Statement of Common Ground between Ealing Council and Sport England. This site originally accommodated a 38-bay floodlit driving range and golf shop which closed over 10 years ago. The buildings containing the earlier golf shop have reverted to a health and fitness facility (Pure Gym), with the driving range largely remaining unused save for some limited use for open storage on an ad hoc basis. The Ealing Sports Facility Strategy 2022-2031 identified that there is only one formal practice facility operating in Ealing at present, which is the floodlit 26 bay driving range at West London Golf Centre also located in Northolt but further west of the allocation site. However, there are additional practice facilities at a number of golf courses in the borough comprising practice putting and chipping greens and practice areas. In addition, a new golf course has opened very recently in Northolt on Wood End Road. Whilst the strategy seeks to maintain a core supply of golf facilities in the borough, this is not contingent on the retention of the allocation site for golf. The strategy advises that it would be appropriate to consider alternative outdoor sports and recreational facility options for the allocation site, that complement the adjacent outdoor facilities at Rectory Park and Northala Fields. To reflect specific needs this might also be extended to include consideration of indoor sports facilities as well. Regarding the existing indoor facilities Pure Gym operate three	04NO Northolt Driving Range		Emma Cunnington and Mark Furnish	Sport England	669	Statutory Body

The allocation suggests that the sports centre will not be retained. As stated in the NPPF, paragraph 103, and Sport England's Policy, a sports facility can only be lost if there is updated evidence to show that the site is surplus to requirements. There is no reference to the sports centre in the updated Sport Facility Strategy. There is no indication from policy that a replacement leisure centre will be delivered in an appropriate location with equal or better quality and quantity. The policy also doesn't reference the new Built Facilities Strategy or policy S5 Sports and Recreation. This should all be referenced to protect the use of sport and physical activity centres in the area.	Noted. Please see Statement of Common Ground between Ealing Council and Sport England. Southall Sport Centre closed at the end of March 2022, following the decision of the West London College to reclaim their campus. The Ealing Sports Facility Strategy 2022-2031 factored for this loss when assessing need for sports halls as part of the FPM analysis. The strategy identified that demand for sports halls is high in Southall with unmet demand equating to three courts. Recognising this need the Council are currently in discussions with another developer in the locality with the aim to secure a replacement facility which will have a sports hall, gym, women only gym and studio space close to the original location of the college. Whilst the reference in the allocation to 'community uses' is intended to also encapsulate leisure/sport uses, it is accepted that the allocation might benefit from more explicit reference to leisure/sport uses forming part of the 'Proposed Use'. It is suggested that this be amended to read as: 'Residential, education, community and leisure/sport use'. In a DM context the existing London Plan policy S5 clause C already helpfully outlines key tests for managing any change in provision, similarly advising that any replacement provision should be equivalent or better in terms of quantity and quality. It is not deemed necessary to repeat this policy or the local variation in the allocation itself.	04SO Southall West London College		Emma Cunnington and Mark Furnish	Sport England	669	Statutory Body

Sport England support this site's allocation for outdoor sports facility but has concerns regarding the location of the nature reserve and any loss of existing playing fields. There is also reference to relevant national and local policy in addition to information relevant in the Sports Facility Strategy. Sport England is concerned about the sites loss of playing field for alternative uses. The policy must comply with paragraph 103 of the NPPF and Sport England's Playing Field Policy.	Noted. Please see Statement of Common Ground between Ealing Council and Sport England. It should be noted that the site boundary has been extended between Regulation 18 and Regulation 19 to now also encompass land owned by Imperial College to the north. This extension should allow the site to accommodate a nature reserve without compromising the outdoor sports offer. Guided by ecological assessments it is now proposed that the new pitches are located on the Imperial College side, with the remainder of the site (the entirety of the existing green space at Warren Farm Sports Ground) being rewilded. An indicative masterplan for the new sports facilities was shared at a Cabinet meeting on the 6th March 2024, but the exact provision is to be decided once a development partner / operator has been selected.	16SO Warren Farm and Imperial College Land		Emma Cunnington and Mark Furnish	Sport England	669	Statutory Body
The protection of the existing Birkdale Court Outdoor Sports Facility and open space must be mentioned in the policy and any residential infill does not reduce the amount of playing field and sport facility provision on the site. The policy must comply with paragraph 103 of the NPPF and Sport England Playing Fields Policy.	Noted. Please see Statement of Common Ground between Ealing Council and Sport England. The open space currently comprises a small children's play area and communal amenity space serving the adjacent residential properties. The space is not managed formally for sports, and therefore has been mislabelled, and will need to be corrected. It is suggested that the text under 'Current Uses' is amended as follows: 'Golf Links housing estate, as well as Birkdale Court Outdoor Sports facility and open space.' Notwithstanding this error, the open space remains a valuable asset for recreation. Whilst it is envisaged that such space may ultimately be reconfigured, the design principles written into the allocation already provide a clear steer that any future development should seek to create more open space and play areas within the estate.	18SO Golf Links Estate		Emma Cunnington and Mark Furnish	Sport England	669	Statutory Body
Sport England would like to see a link between Policy G4 and Policy S5. This policy should indicate that playing fields function for sport should also be protected under this policy.	Noted. Please see Statement of Common Ground between Ealing Council and Sport England. Policy G4 is considered to be comprehensive covering the full range of green space types with reference to the main functions (including recreation) and the full set of designations. This policy suite encapsulates all existing outdoor leisure and sports facilities.	Policy G4: Open Space – London Plan – Ealing LPA – local variation	Policy S5: Sports and Recreation Facilities – London Plan – Ealing LPA – local variation	Emma Cunnington and Mark Furnish	Sport England	669	Statutory Body

• Paragraph 5.44 – Sport England would like to see revised wording for this as it currently is not considered in line with national policy. Indoor and outdoor sport facilities should be protected regardless of if they are active or not. The loss of any sport provision should be retained unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or, the loss would result in alternative sports and recreation provision in a suitable location of equal or better provision in terms of quality and quantity; or, the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. Sport England considers that a lack of use of a playing field should not be taken as necessarily indicating an absence of need in an area. Such land can retain the potential to provide playing pitches to meet current or future needs in the local area. Any loss of sport provision should be guided by the Council’s Indoor and Outdoor Sports Facility Strategy. • Policy S5 F. Sport England would recommend that affordable community access is secured through Community Use Agreements or another legally enforceable mechanism.	Noted. Please see Statement of Common Ground between Ealing Council and Sport England. The need to ensure that decisions taken around the replacement/loss of facilities are underpinned by robust evidence of supply and demand is accepted, as per paragraph 103 of the NPPF and clause C of London Plan policy S5. As with other policy areas, the Council has made a conscious effort to avoid repeating those provisions in our own Local Plan, as this is deemed to be unnecessary and potential unhelpful, and future development proposals will continue to be tested against these provisions. It is accepted that paragraph 5.44 should be amended to ensure that redundant facilities also fall within the definition as well. It is accepted that where reference is made to ‘need’ that this should be based on an understanding of existing and future needs as established at the time of the application. Amendments are proposed to Paras fo 5.45 and 5.46. The policy itself doesn’t specify the mechanism for securing community access, but Community Use Agreements are used in practice in Ealing. As detailed above various additions have been proposed to the supporting text of the spatial policies in chapter 3 supporting the	Policy S5: Sports and Recreation Facilities – London Plan – Ealing LPA – local variation	Policy DAA: Design and Amenity – Ealing LPA – local policy	Emma Cunningham and Mark Furnish	Sport England	669	Statutory Body
1.0 INTRODUCTION 1.1 Maven Plan have been instructed by the owner of Southall Community Centre, Diamond Property London Ltd, to make formal representations to the Council in respect of their draft (Regulation 19) Local Plan. 1.2 The representation follows on from an earlier representation made on the 8 February 2022 in respect of the draft (Regulation 18) Local Plan. 1.3 It is made in respect of the proposed Southall Site Allocation ‘07SO - The Limes, Maypole Court, Banqueting Centre, 13-19 The Green’ on page 422 of the draft (Reglation 19) Local Plan.	Noted	07SO The Limes, Maypole Court, Banqueting Centre, 13 – 19 The Green		Nick Sutton	Maven Plan obo Southall Community Centre, Diamond Property London Ltd	677	Developer

[SITE DESCRIPTION of Banqueting Centre]	Noted	07SO The Limes, Maypole Court, Banqueting Centre, 13 – 19 The Green		Nick Sutton	Maven Plan obo Southall Community Centre, Diamond Property London Ltd	677	Developer
[The site context]	Noted	07SO The Limes, Maypole Court, Banqueting Centre, 13 – 19 The Green		Nick Sutton	Maven Plan obo Southall Community Centre, Diamond Property London Ltd	677	Developer
[RELEVANT PLANNING HISTORY OF NEARBY SITES]	Noted	07SO The Limes, Maypole Court, Banqueting Centre, 13 – 19 The Green		Nick Sutton	Maven Plan obo Southall Community Centre, Diamond Property London Ltd	677	Developer
[Planning History of Banqueting Centre]	Noted	07SO The Limes, Maypole Court, Banqueting Centre, 13 – 19 The Green		Nick Sutton	Maven Plan obo Southall Community Centre, Diamond Property London Ltd	677	Developer
[Reference to representation made on REGULATION 18 CONSULTATION]	Noted	07SO The Limes, Maypole Court, Banqueting Centre, 13 – 19 The Green		Nick Sutton	Maven Plan obo Southall Community Centre, Diamond Property London Ltd	677	Developer

6.0 COMMENTS ON CURRENT DRAFT (REGULATION 19) LOCAL PLAN 5.1 The current Draft (Regulation 19) Local Plan allocates our client's land and the adjoining sites to the west (The Limes, Maypole Court, and 13-19 The Green) as Development Site 07SO (page 422). [Quotation from site allocation including Current use, Proposed use, Tall buildings, Relevant Planning History]	Noted	07SO The Limes, Maypole Court, Banqueting Centre, 13 – 19 The Green		Nick Sutton	Maven Plan obo Southall Community Centre, Diamond Property London Ltd	677	Developer
5.2 Our client has no objection to the site or adjoining sites to the west being allocated for mixed-use development. 5.3 However it should be made clear in the Site Allocation that this could occur as a comprehensive scheme or as a series of development proposals on each individual site as has already occurred through the submission of the 23-storey application at 13-15 The Green (Planning Reference: 216215FUL) and the proposal for up to 22-storeys on our client's land (Planning Reference: 223246FUL).	Support welcomed. The purpose of allocating the whole site is to allow for comprehensive rather than piecemeal development to come forward on this strategic site. This is to ensure development on the wider site can be optimised and allow for a holistic approach to placemaking. Whilst comprehensive development is preferable it does not prevent development coming forward on a phased basis providing it does not constrain the ability to optimise development on the site.	07SO The Limes, Maypole Court, Banqueting Centre, 13 – 19 The Green		Nick Sutton	Maven Plan obo Southall Community Centre, Diamond Property London Ltd	677	Developer

5.4 Moreover, our client objects to the wording under the ‘Tall Buildings’ section of the Site Allocation as it states the indicative height range should be a maximum of 18 storeys (63 metres). This runs contrary to the Council’s own Planning Committee recommendation to grant permission, subject to completion of a legal agreement, for a 23-storey building at 13-15 The Green (Planning Ref: 216215FUL) and the extensive pre application discussions and subsequent submission of a planning application on our client’s land for a 22-storey development (Planning Ref: 223146FUL). 5.5 Indeed the pre-application summary at Section 4.0 of this report demonstrates the building heights proposed on the site have been the subject of extensive dialogue with the Council, GLA, and various design and community review panels such that it would run contrary to that process and the surrounding site context to now adopt different buildings heights for this site. Indeed it would be unreasonable to rely on a borough wide design analysis to establish a maximum height for this site when there have been more detailed, site specific, Townscape and Visual Impact Assessments carried out for the approved and pending proposals across this site that have demonstrated the proposed heights are acceptable for their local context. We therefore request the wording under the ‘Tall Buildings’ section is changed to read “The site is in principle suitable for tall buildings up to a maximum height of 22	Policies in the plan represent updated and consistent evidence and should not necessarily be expected to align with historic planning permissions.	07SO The Limes, Maypole Court, Banqueting Centre, 13 – 19 The Green		Nick Sutton	Maven Plan obo Southall Community Centre, Diamond Property London Ltd	677	Developer

REPRESENTATION SUBMITTED ON BEHALF OF INVESTRA CAPITAL Thank you for providing us with the opportunity to submit this representation. We are instructed by our Client, Investra Capital, to submit representations to the following document: ‘Ealing’s Local Plan Final Proposals (Regulation 19), 28th February 2024’ (“the draft Local Plan”) in the context of their land ownership at The Arcadia Centre, The Broadway, Ealing, W5 2ND (“the site”), located within the London Borough of Ealing (LBE). These representations relate to the site at The Arcadia Centre, which forms part of the proposed site allocation ‘Ealing 01EA Broadway Connection and Arcadia Shopping Centre’, within the draft Local Plan. These representations also relate to the wider policies of the draft Local Plan. This letter should be read in conjunction with the previous representations (letter dated 8 February 2023) submitted to the Council in response to ‘Ealing’s Local Plan Initial Proposals (Regulation 18), November 30th 2022’	Noted	Policy SP1: A Vision for Ealing		Harriet Young	Investra Capi	678	Developer
Background Investra Capital is a bespoke real estate advisor who strives to make long-term improvements to the local surroundings in the areas in which they work, with emphasis placed on the well-being of the local community. Broadway Capital, the freeholder of the Site, as advised by Investra, have united as business partners to fulfil the potential of the Site by taking a comprehensive approach to mixed-use development. In order to realise the excellent opportunity this Site provides for the wider town centre’s benefit, it is recommended that this Site maintains a positive policy allocation for development in the New Local Plan.	Noted	01EA Broadway Connection & Arcadia Shopping Centre		Harriet Young	Investra Capi	678	Developer

The Site is situated in a designated Metropolitan Town Centre and has a high PTAL rating ranging between 6a/6b, partially due to its proximity to Ealing Broadway Station with District, Central and Elizabeth Line services. The adopted Ealing Local Plan (2013) sets out LBE’s allocated sites, in which the Site and adjacent land is allocated for retail-led mixed-use development within Site Allocation EAL3 (The Arcadia Site). The adopted allocation of this Site has been included for reference in Appendix 1. The Arcadia Shopping Centre currently forms part of this site allocation along with the neighbouring site, The Broadway Connection. The neighbouring site has recently been granted planning permission, dated 14 February 2024 (reference 223774FUL), for the partial demolition, refurbishment and development to provide between 2 and 21 storey office-led mixed use scheme with flexible retail, restaurant and café uses, a music venue and leisure uses at lower levels with a new area of landscaped public realm and pedestrian route and other associated works. Planning Policy Context The site is subject to the following key adopted (current) planning policy designations: Part of Site Allocation EAL3 The Arcadia Site	Noted	01EA Broadway Connection & Arcadia Shopping Centre		Harriet Young	Investra Capi	678	Developer

Ealing’s Local Plan Final Proposals (Regulation 19) We note that the key principles of the adopted Site Allocation is being carried over to the draft Site Allocation as set out in the draft Local Plan. We note the site is subject to the following key draft planning policy designations: • Site Allocation 01EA Broadway Connection and Arcadia Shopping Centre; • Ealing Metropolitan Town Centre; and • Primary Shopping Frontage. Having regard to the national planning context in preparing Local Plans, we have commented on the draft Local Plan, as explained below. For any specific suggested amendments, this is shown via a box, with the relevant reference to the draft Local Plan accordingly, as follows: Suggested amendments to draft Local Plan re: [reference inserted] Deletions shown as strikethrough text in red; and Additions shown as underlined text in green.	Noted	01EA Broadway Connection & Arcadia Shopping Centre		Harriet Young	Investra Capi	678	Developer
Policy E1: Ealing Spatial Strategy Draft Policy E1 outlines the Spatial Strategy for Ealing. The policy places particular emphasis on the efforts to fight inequality caused by housing affordability and access to the housing market by targeting the delivery of housing according to local needs and the character of different neighbourhoods. We strongly support the principle of Draft Policy E1, which prioritises the growth of Ealing Town Centres as a location for significant, high-density residential and employment growth and a range of commercial, retail, cultural and civic amenities, as well as hosting a large proportion of the borough’s knowledge intensive jobs.	Support welcomed	01EA Broadway Connection & Arcadia Shopping Centre		Harriet Young	Investra Capi	678	Developer

Draft Policy E2 Ealing Metropolitan Town Centre Our client strongly supports Draft Policy E2: Ealing Metropolitan Town Centre, which outlines how Ealing Metropolitan Town Centre would be the location for significant high-density residential and employment growth. Specifically, Part B of Policy E2 outlines that ‘Development will focus on delivering strategic [...] residential growth.’ We also strongly support Part C (iii) which outlines that the Metropolitan Town Centre will be maintained and enhanced by: ‘Optimising growth around Ealing Broadway and West Ealing stations to maximise their opportunities to bring people into the borough and reflect the critical mass necessary for their role within London’s office, business, and cultural hierarchy’; and Part G which highlights the importance of ‘Strengthening the local character and distinct offer of West Ealing [...] while realising the potential of identified Development Sites to improve the quality of built environment and deliver new houses and jobs’. Our Client fully supports the optimisation of growth around Ealing Broadway to ensure Ealing Metropolitan Town Centre as a strategically important and sustainable location for growth.	Support welcomed	01EA Broadway Connection & Arcadia Shopping Centre		Harriet Young	Investra Capital	678	Developer
Draft Site Allocation 01EA Broadway Connection and Arcadia Shopping Centre Fundamentally, our Client fully supports the inclusion of the Arcadia shopping centre within the site allocation. Our client supports the principle of re-development of the site for employment and mixed-uses suitable to the town centre as part of the draft Site Allocation 01EA (pp. 172 – 173). However, further corrections, clarifications and updates are required, as set out below.	Support welcomed	01EA Broadway Connection & Arcadia Shopping Centre		Harriet Young	Investra Capital	678	Developer

a) Land Uses The Draft Site Allocation 01EA outlines the proposed uses that could come forward on the site as “office and mixed-uses suitable to the town centre”. We understand the policy is designed to be flexible to allow a broad range of uses that could come forward on site, this is fully supported by our Client. Ealing Town Centre is currently undergoing a period of significant change, catalysed by the delivery of Crossrail, which has driven the redevelopment and optimisation of nearby brownfield sites to create highquality, high-density mixed-use developments in a highly accessible and sustainable location. There has been a substantial direction of growth and density along the Uxbridge Road Corridor, from Ealing Broadway down to West Ealing with notable developments including CP House, Dickens Yard, Perceval House, 55 West and Ealing Filmworks. These developments have created an established context for higher-density, mixed-use development in this part of the borough. The uses appropriate to Ealing town centre, were discussed with the Council at the Landowner and Developer workshop held on 6 December 2023, whereby it was agreed that a broad range of employment uses and types of residential alongside traditional town centre uses such as retail would benefit the town centre encourage the night time economy and assist in	We are unclear how the current wording would restrict development proposals for this site. We will add a definition of town centre uses to the glossary	01EA Broadway Connection & Arcadia Shopping Centre		Harriet Young	Investra Capi	678	Developer

b) Tall Buildings The Arcadia Centre’s strategic position between the new Crossrail Station and Ealing Town Centre, on the junction of The Broadway and Spring Bridge Road, presents an exciting opportunity to deliver larger scale buildings, contributing towards the emerging cluster of taller buildings. We fully support wording within the tall buildings section of the site allocation on the basis that buildings below 21 storeys or 73.5 metres are not considered to be tall buildings for the purposes of policy. It is agreed that ‘tall buildings’ will only be defined where the site seeks to deliver over the threshold of 21 storeys or 73.5 metres. Due to the changing context around the Arcadia Centre, there is a great opportunity to deliver a new buildings of greater architectural quality in lieu of the current building, which itself offers no great townscape or architectural benefit. To reflect the fact that an average floor to ceiling height has been taken to establish the 21 storey or 73.5 metre threshold and that different types of town centre uses will generate different requirements for internal floor to ceiling heights, it is necessary to slightly adjust the wording to reflect this as follows: <i>Tall Buildings</i> ~~The site is in principle suitable for a tall building. The~~	Noted. There was a transcription error in the Tall Buildings study that informed this site allocation and the threshold for a Tall Building in the town centre should be 9 Storeys. It is agreed that 21 storeys is a suitable appropriate height for this site in line with the scheme for Broadway Connection which was developed in parallel with the TB evidence.	01EA Broadway Connection & Arcadia Shopping Centre			Harriet Young	Investra Capi	678	Developer

Draft Policy D9 Tall Buildings London Plan – Ealing LPA – Local Variation The Policy D9 local variation defines the parameters of taller buildings across the borough in Table DMP1, stating that ‘tall buildings’ above this threshold should be located upon allocated development sites defined in the development plan’. Table DMP1 (Definition of Tall Buildings) and corresponding Figure DMP1 (Areas) of the draft Local Plan proposes to designate The Arcadia Centre as an appropriate location for tall building, stating a that a tall building will be one which is 21 storeys (73.5 metres). The site is located in Zone D of Ealing’s Tall Building Strategy (December 2023), however, the tall threshold defined at page 9, outlines Ealing Town Centre as capable of delivering up to 9 storeys, whereas the previous draft of this document stated 21 storeys. This is inconsistent with the draft Local Plan and the heights detailed at page 29 of the Tall Building Strategy, which outlines the prospective tall building heights as 9 – 21 storeys. As outlined in the Tall Building Strategy, town centres are suitable to accommodate tall building development for a number of reasons, including the opportunity to contribute to often rich townscape characters, where compact, high density forms of development are appropriate. Town centres also	The policy will clarified to state 21 storeys or 73.5m, whichever is less. The new wording of 'an appropriate' rather than 'maximum' heights ensures sufficient flexibility in the event of minor differences in against a specific height measure rather than in floors.	01EA Broadway Connection & Arcadia Shopping Centre	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation	Harriet Young	Investra Capi	678	Developer

Draft Policy HOU Affordable Housing – Ealing LPA – Local Policy Our Client strongly supports the delivery of new affordable homes to meet Ealing’s housing requirements. However, we consider draft Policy HOU should be amended to include reference to the threshold approach to viability in accordance with the London Plan Policy H5 (Threshold Approach to Applications). This will increase the principle of increased affordable housing, and the delivery of new homes to be genuinely affordable, subject to viability. Furthermore, Policy HOU requires affordable housing contributions from large scale purpose built shared living to be in the form of conventional housing units on site and meet a minimum 40% contribution. We consider that this proposed policy is inflexible and will constrain delivery of innovative housing delivery in the Borough by requiring two different housing types to be provided within the same building or site. There is no evidence to suggest this approach is deliverable and it therefore fails the tests of soundness. Suggested amendments to draft Local Plan re: Draft Policy HOU Affordable Housing – Ealing LPA – Local Policy: E. Affordable housing contributions from large scale purpose built shared living (PBSL) should be in the	The 40% threshold has been found viable by the whole plan viability assessment and is a necessary step to improve delivery against needs. The policy sets a threshold for fast track and schemes will be subject to viability assessment where they cannot meet this.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Harriet Young	Investra Capi	678	Developer

Draft Policy H16 Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – Local Variation Draft Policy H16 states development of large-scale shared living will only be permitted within Ealing Metropolitan Town Centre where it can be demonstrated that the scheme would not compromise the supply of Class C3 self-contained homes, not result in an overconcentration of similar uses and not be detrimental to local amenity and the mix and cohesiveness of community uses in the area. Our Client strongly supports the delivery of large-scale shared living in Ealing Metropolitan Town Centre and acknowledges that should a scheme come forward in the future, an Application will need to demonstrate that there is a need and demand for large scale purpose built shared living.	Support welcomed	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Harriet Young	Investra Capital	678	Developer

Draft Policy E3 Affordable Workspace London Plan – Ealing LPA – Local Variation We note that Draft Policy E3 requires Affordable workspace in Ealing to be provided on the basis of a levy on development of 10% of gross floor area in mixed use schemes, and 5% of net floorspace in office and industrial schemes. Where the total space provided by development is less than these thresholds then provision should be by means of offsite contributions. Affordable workspace will be provided at 80% discount for a period of 15 years. Where an offsite contribution is calculated it should be on the basis of the level of provision (5% or 10% of total development size) multiplied by the value of an 80% reduction in rent for 15 years. Whilst our Client supports the approach, this should be subject to viability. With regards to the offsite contributions, it is requested that further details should be set out. There are concerns that the current wording lacks flexibility and the policy could recognise different ways in which affordable workspace could be provided and that other forms of support for local start-ups and SMEs could be just as valuable and equivalent to a policy compliant provision of affordable workspace. Suggested amendments to draft Local Plan re: Draft Policy E3 Affordable Workspace London Plan – Ealing LPA – local	The policy has been subject to both specific and whole plan viability assessment. Development proposals that cannot meet the policy requirement can indeed submit viability evidence as mitigation.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		Harriet Young	Investra Capi	678	Developer

Public Examination On behalf of our Client we consider it is necessary we attend the oral part of the Examination in Public. We would be grateful if you could keep us updated. Conclusion In summary, our Client supports the principle of the Site Allocation 01EA for the redevelopment of the site which would provide significant benefits including employment and other town centre uses. With the suggested amendments we consider that the draft Local Plan would be sound. However, some of the policy items noted above in their current form would constrain potential redevelopment options and would therefore, not be effective in their delivery and would not be consistent with national policy. Therefore, it is considered that the draft Local Plan in its present form is not sound	Comments noted	General		Harriet Young	Investra Capi	678	Developer
British Land objects to the introduction of this new requirement for affordable workspace to be provided as a levy on mixed-use schemes, as well as on office and industrial development, requiring 10% and 5% of the proposed floor space respectively, to be given over to affordable workspace at an 80% discount (i.e. 20% of market rent) for a period of 15 years. Draft Policy E3 on Affordable Workspace is unsound, as it is neither consistent with national policy in the NPPF, nor is it justified based on proportionate evidence. Each are therefore addressed in turn.	Viability evidence is set out in both the AW study and the whole plan viability assessment.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		James Owens	British Land	680	Developer

The draft is not consistent with national policy in the NPPF. There is nothing within the NPPF which requires or even justifies affordable workspace being provided. The NPPF has a key objective of building a strong, competitive economy. Local policies which in effect impose a levy on economic development, to provide heavily subsidised space for others, will harm the viability of such development. This will result in less economic development coming forward, thereby directly undermining this objective within the NPPF.	Evidence of need is set out in the AW study	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		James Owens	British Land	680	Developer
Ealing’s Local Plan must also be in “general conformity” with The London Plan. Whilst the London Plan does contain an affordable workspace policy: London Plan Policy E3 – Affordable Workspace; Ealing Council is not applying this strategic policy correctly. It is quite clear from London Plan Policy E3, that it is when there are defined circumstances, that planning obligations may be used to secure affordable workspace “at rents maintained below the market rate for that space for a specific social, cultural or economic purpose”. The London Plan Policy defines those circumstances. Taking each aspect in turn, the defined circumstances when planning obligations for affordable workspace may be used, are as follows: 1) Where there is affordable workspace on site currently (except where it has been on a temporary basis pending redevelopment). 2) In areas identified in a Local Development Plan Document where cost pressures could lead to the loss of affordable workspace “such as in the City Fringe around the CAZ and in Creative Enterprise Zones”.	This is incorrect. Evidence of need is set out in the AW study and GLA has raised no issues of conformity with this policy.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		James Owens	British Land	680	Developer

Policy E3: Affordable Workspace - should be deleted in its entirety, along with the supporting text in paragraphs 5.27 and 5.28. Consequential deletions referring to this policy would also need to be made to: • The Contents pages. • Paragraph 0.25, 2.49, 2.50, 3.54, 4.1.30 and 4.2.15. • The fourth box/table after paragraph 0.62. • Policy SP4.2 part G. • Policy E2 (v). • Policy E6 (iii). • Table 1: Monitoring Framework.	Noted	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		James Owens	British Land	680	Developer
Greystar acknowledge that the draft plan will shape and guide future development in the area over the next 15 years from 2024 – 2039 and includes a strategic vision, spatial strategy and collection of seven Town Plans which provides place-based strategies to accompany development management policies which apply to the entire district. Greystar are supportive and appreciative of this engagement on the draft plan having initially responded to the Regulation 18 consultation last year in February 2023. This consultation remains of great interest to Greystar given their landholdings at the Former Glaxo Smith Kline Headquarters (now known as Greenford Quay) and have been redeveloping the site over the past 7 years in accordance with planning permission 164694FUL, as amended by 18488VAR. For context, the Greenford Quay scheme is a large mixed-use scheme comprising 2,118 homes, around 21,000sqm of flexible commercial floorspace, in addition to a new pedestrian bridge over the Grand Union Canal. The scheme was approved for heights ranging from 2 – 19 storeys and retained the Listed Glaxo House. In summary, Greystar supports many of the principles and	Support is welcomed.	General		Corin Williams	Greystar Euro	682	Developer

b. Greenford Town Plan Representations

Greenford Spatial Strategy (Policy G1)

Greystar supports the broad aims of Policy G1 and its emphasis on growing and intensifying development in its town centres, industrial areas and green spaces. In particular, Greystar support the addition of Point B to the policy which aims to reinvigorate Greenford District Centre as the “primary hub of the area” via a “masterplan led, mixed use redevelopment of the town centre with a more diversified retail offer with a wide range of community, cultural and civic assets”.

Given the proximity of the Greenford Quay site to Greenford Railway Station, the aim to improve connectivity to the rest of the borough via the provision of a more frequent and attractive rail service between Greenford and West Ealing is also supported.

Greystar also note the addition of Point I which relates to the creation of jobs. Whilst this inclusion is broadly supported, Greystar recommend that Point I(ii) which seeks to “explore opportunities to provide additional employment land, particularly adjacent to well established industrial clusters” should also consider sites that are easily assessable and have fit for local transport links. Point I(iii) could also be

Noted. Support welcomed. A modification to Policy G1 is proposed.

Policy G1:
Greenford
Spatial
Strategy

Corin Williams

Greystar Euro

682

Developer

b. Greenford Town Plan Representations Greenford Spatial Strategy (Policy G1) Whilst supportive of the overall aims of the policy, Greystar would like to highlight an inconstancy between the Greenford Spatial Strategy and Figure SS1 which supports the Borough’s overall Spatial Strategy on page 65 of the draft plan. Figure SS1 lists the level of development intervention expected by the council at each of the “town locations” in Ealing. Number (iv) states that Ealing Council will expect “delivery of significant levels of development in Greenford and Northolt town centres”. Section A of Policy G1 however states that “Moderate levels of mixed-use development will be directed to the areas of best connectivity”. In the interests for consistency, Greystar ask that Policy G1 is amended to express a requirement for “significant” levels of development in the areas of best connectivity so that it aligns with the Spatial Strategy for Ealing.	Noted. Support welcomed. This is a transcription error and a modiifcation to Policy G1 is proposed.	Policy G1: Greenford Spatial Strategy		Corin Williams	Greystar Euro	682	Developer
Additionally, Greystar would also like to comment on Figure G2 which maps out the Greenford Spatial Strategy and the relevant planning designations. Specifically, Greystar note that the area of the Greenford Quay site located to the south of the Grand Union Canal remains designated as Strategic Industrial Land (SIL) despite the two residential blocks known as Blocks 3 and 4 of Greenford Quay development having already being built out and occupied on this plot. Across the two blocks some 529 homes and 3,500sqm of commercial floorspace is provided on this plot. Therefore, it is clear that the site is no longer in use as industrial land and the principle of residential and commercial use on the site has been accepted. Greystar recommend that this area be removed from SIL in drafting the future iterations of the New Local Plan as it clearly does not function as SIL..	Comment noted and accepted.	Policy G1: Greenford Spatial Strategy		Corin Williams	Greystar Euro	682	Developer

Greenford Station Local Centre (Policy G5) The Greenford Quay development lies to the north of Greenford Station meaning that the aims and objectives of Policy G5 are particularly important in guiding the remaining phases of development. Greystar agree that this is a “Gateway” location and that it should be improved and enhanced by “promoting mixed-use development around Greenford Station”. As stated in our response to the Regulation 18 consultation, Greystar strongly support the principles outlined in Policy G5 which seek to improve and enhance this location. Some of the improvements will be funded partially by the financial contributions secured as part of the Greenford Quay planning permission and Greystar are currently engaged with the council on a number of improvements outside the station to ensure that the entrance to Greenford is as welcoming as possible and deserving of its Gateway status. Greystar support the additional detail provided to Point iii which seeks public realm improvements to the station forecourt and underneath the railway bridges. It is also important to highlight that Part iv of the policy outlines the Council’s intention to improve active travel routes in the area. Whilst supportive of this, Greystar find it prudent to highlight that a number of new cycle routes have already been	Support welcomed and comments on the delivery of new cycle routes noted.	Policy G5: Greenford Station Local Centre		Corin Williams	Greystar Euro	682	Developer

Greenford Development Sites It is noted that Ealing have brought forward 5 of the previous 10 draft allocations from the Regulation 18 Plan. These are agreed to be the most promising development opportunities in the area and together will ensure that Greenford continues to grow and develop over the plan period. Greystar acknowledge the continued consideration of Site Allocation GR09: Former Greenwich School of Management as a draft allocation and would like to outline their support for this development site and the intentions for its regeneration. However, to maintain consistency in the character of the local area, Greystar suggest that the height(s) of any development on this site is / are reflective of the heights of Blocks 6 (6 – 13 storeys) and 7 (6 – 14 storeys) at Greenford Quay. Greystar would also suggest that the heights on this allocation are design-led and that sufficient technical studies, including wind, and daylight / sunlight are prepared to ensure appropriate mitigation will be provided as part of any development proposals.	Support for the Former Greenwich School of Management is welcomed. The Tall Buildings Strategy and Site Guidance provides a detailed design analysis of, and spatial framework for this site (see Tall Buildings Strategy, Appendix Part 2, Dec 2023). The heights suggested took into consideration the overall tall buildings strategy for the area as well as the surrounding context and character. The indicative spatial framework is design led, using a townscape and character led approach to assess appropriate heights for the site. Any planning application that comes forward on this site will need to consider wind, daylight/sunlight and appropriate mitigation and we would expect it to take into account the site allocation's design principles and Site Guidance spatial framework.	05GR Former Greenwich School of Management		Corin Williams	Greystar Europe	682	Developer

Greystar would like to note that they are somewhat disappointed with the lack of amendments to the Regulation 19 Local Plan and the Tall Building Evidence Base following representations made on the Regulation 18 Plan, particularly as a number of concerns were raised with the approach to tall buildings and site allocations which have not been addressed. Greystar continue to welcome the generally positive approach to growth within the borough achieved by the Regulation 19 Plan, in line with London Plan’s approach to ‘good growth’. We are also supportive of the character-led approach to development which follows London Plan Policies D3 and D4. This is reflected in the spatial dimensions underpinning Ealing’s Spatial Strategy set out paragraph 3.6: ‘(i) Focus growth in opportunity areas and growth corridors; (ii) Focus growth within town centres first; and (iii) Prioritise strategic and local regeneration areas’. As such, we welcome the approach to managing growth set out in Draft Policy SP4.1. However, Greystar do not believe that these fundamental principles are reflected in the approach to height and density set out in the Draft Development Sites. We are concerned that the issues that we have identified with the Draft Development Sites indicate that, as a whole, the Borough is at risk of unnecessarily stymying its future development potential. While clearly the Plan is based on detailed analysis of the	Sites will now reflect 'an appropriate' rather than 'maximum' heights	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Corin Williams	Greystar Euro	682	Developer

Greystar supports LB Ealing's overall targets for affordable housing delivery and the aim to deliver good quality homes at affordable rents to enable local workers and students to live in the borough. However, Greystar has concerns with the requirement for 40% affordable housing provision to be eligible for the Fast Track route as such a large contribution is likely to create practical challenges and viability issues for developers. Greystar would also like to request further justification and viability evidence from the council as to how such as figure was agreed upon, especially as the figure is beyond the threshold outlined in the London Plan. Greystar note the changes to Policy HOU and the addition of Point E which relates to affordable housing contributions for Large Scale Purpose Built Shared Living (PBSL) accommodation. Greystar object to the inclusion of this point as whilst there is an understandable need for affordable housing in the borough, a blanket requirement for all PBSL accommodation to provide its affordable housing contribution in the form of conventional housing (C3) will not be workable in practice owing to the differing designs and layouts of the respective types of accommodation. Whilst this strategy may work on larger, multiple building sites where the residential contribution can be located in a single building, it will be extremely difficult from a practical perspective to provide	The 40% threshold has been found viable by the whole plan viability assessment and is a necessary step to improve delivery against needs. The policy sets a threshold for fast track and schemes will be subject to viability assessment where they cannot meet this. PBSL does not form a defined need in the LHNA and so affordable PBSL will not satisfy defined affordable needs.	Policy HOU: Affordable Housing – Ealing LPA – local policy			Corin Williams	Greystar Euro	682	Developer

Large Scale Purpose Built Shared Living (Policy H16) Greystar maintain their support for large-scale purpose built shared living accommodation and the necessity for developments of this use to be located in areas that are well connected to public transport, local amenities and employment opportunities. It is disappointing to see that the restriction that limits all developments of this type to Ealing Metropolitan Town Centre still remains as Greystar consider that each site should be judged on its individual merits and that limiting the spread of developments which are proven to assist students / young single professionals is likely to have a detrimental impact on their numbers within the District. As part of their response to draft Policy H16, Greystar have provided a table showing a number of co- living schemes that have been approved outside the Ealing Metropolitan Town Centre. This highlights that the restriction imposed by Policy H16 was contrary to many of the forthcoming co-living schemes in the borough. This table is featured below. Analysis has found 8 applications for co-living use outside the Ealing Metropolitan Town Centre showing that these areas remain viable and sustainable locations for co-living use. SiteEPA Ref.No of Units The Castle Hotel Victoria RoadW14465OPDFUL462 300 Western AvenueW925745ULH64	PBSL does not form a defined need in the LHNA and so it does not perform against defined housing needs. It is for every PBSL scheme to justify its local need.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Corin Williams	Greystar Euro	682	Developer

Affordable Workspace (Policy E3) Greystar note that Policy E3 remains unchanged from the Regulation 18 version of the plan. This is disappointing given the extensive evidence provided in the last consultation which explained that the blanket approach was inappropriate given the diverse range of commercial markets throughout Ealing and the context of the majority of key strategic sites. Despite this, Greystar acknowledges the necessity of providing diverse commercial space in Ealing but raises concerns regarding the proposed affordable workspace quotas in draft Policy E3. Key concerns include: 1. A uniform approach to discounted rents across Ealing could hinder viability in less established commercial areas. 2. Lack of flexibility in assessing schemes individually could further impede viability. 3. Mixed-use developments face disproportionately high affordable workspace obligations without adequate justification, potentially discouraging such developments. In response to the above, Greystar suggests allowing for lower proportions of floorspace if needs can be met and emphasises the importance of including Research & Development space	Evidence of need is set out in the AW study. The policy has been subject to both specific and whole plan viability assessment. Development proposals that cannot meet the policy requirement can indeed submit viability evidence as mitigation.	Policy E3: Northern Ealing		Corin Williams	Greystar Euro	682	Developer

Biodiversity and Access to Nature (Policy G6) Greystar supports the aims of Policy G6 and its addition to the Regulation 19 Draft submission version of the plan. It is important that developments improve access to nature via contributions that are sustainable and don't compromise the viability of the scheme. Greystar are concerned that the requirement for "development proposals to achieve a biodiversity net gain of at least 20% or the advised national minimum amount, whichever is greater" is unsustainable for developers and would prevent many schemes from coming forward for development. A 20% uplift is double the advised national amount and will severely impact the deliverability of schemes, particularly when there is a requirement for a 50% affordable housing contribution and up to a 10% contribution towards affordable workspace. Greystar request that further evidence is provided outlining how the Council arrived at this figure.	Noted. It is acknowledged that the National Planning Practice Guidance on BNG seeks to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission. Defra's own Impact Assessment indicated that the majority of costs associated with biodiversity net gain are incurred to reach a no net less position. The costs associated with moving from 10 to 20% is therefore considered to be marginal. However, the NPPG was published after considerable delays and only on February 14th 2024 (with updates on May 1st 2024) . This was after the Regulation 19 Local Plan and associated evidence base had been finalised ahead of the Full Council meeting held on February 21st 2024 and the beginning of the consultation period that ran from February 28th 2024. The council now acknowledges that additional time and further evidence is needed to prepare evidence to justify a rationale for pursuing a higher BNG percentage target. Therefore, the policy has been modified accordingly and a revised policy potentially containing a higher target will be considered as part of the next Local Plan review.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation			Corin Williams	Greystar Euro	683	Developer

Absence of a Build to Rent (BTR) Policy Greystar would like to reiterate the importance of incorporating a specific Build to Rent (BTR) policy into the Local Plan which addresses the housing needs of employees and other residents within the Borough. There is a history of limited affordable accommodation within the Borough and the Build to Rent model would offer a vital housing option for employees who would not be able to access traditional affordable housing and would otherwise be priced out of the local housing market by the high levels of market rent. There are other additional benefits to offering a more open approach to delivery of Build to Rent accommodation too. Such residential accommodation is usually of good quality and delivered by institutional landlords who provide better health and safety, holistic care and better commercial practices in tenant care. Build To Rent also provides amenity space within the existing sites, taking pressure off some local services. Furthermore, it is usually of a secure tenure, enshrined within the associated Section 106 Legal Agreements. The other key benefit of Build To Rent is that it would free up homes within the Private Rented Sector (PRS), with the secondary family housing stock found within this sector being particularly ill-suited to the needs of individual renters, who nevertheless occupy this stock, depleting the supply for families in need of such housing.	It is unclear what the content of the proposed policy would be and how the current plan fails to cover this.	General		Corin Williams	Greystar Euro	683	Developer

The policy refers to the proposed use of the site being “Commercial-led mixed-use scheme with some residential and cultural/leisure facilities.” We believe that this policy is somewhat more narrow and restrictive than is necessary, given that there is already a separate policy setting out appropriate uses within Ealing Town Centre. Policy E.2: Ealing Metropolitan Town Centre, refers to acceptable uses within the town centre as being “Development will focus on delivering strategic office, commercial, retail, and residential growth, while improving key health determinants including accessibility to and provision of healthcare facilities, deficiency in green open space provision, and improving air quality within the town centre. This will enhance Ealing Metropolitan Town Centre’s role as a destination, with a diverse retail, leisure, and cultural offer and a stronger night-time economy”. We believe that residential uses may be critical to the viability and deliverability of any development. However, the policy appears to ensure that this is not the primary use, thereby taking a different approach to the town centre policy. We note that other developments along Ealing Road have been permitted to include a large element of residential development. An example of this is the Council’s proposals for	The commercial function is the key requirement on this site given its role in the town centre. That does not mean that it is not suitable for more general town centre uses, but primary allocated use remains commercial with other uses to be accommodated around the needs of this use.	06EA 49–69 Uxbridge Road		Vincent Gabbe	Metropolitan	684	Statutory Body

Permeability Through the Site The draft policy states that “Development should improve permeability through the site to connect Uxbridge Road to The Questor’s Theatre / Mattock Lane”. It is not clear whether this is a reference to MPS’s land. This proposal may be compatible with some uses, but not others. We therefore believe that this policy should be expressed as an aspiration and not a requirement. Proposed modification:  Any proposals to create a new link through the site should be expressed as “~~Development should improve~~ <u>Any opportunities to improve</u> permeability through the site to connect Uxbridge Road to The Questor’s Theatre / Mattock Lane <u>will be encouraged, where they are compatible with the proposed uses</u>”.	Noted. Measures to improve permeability through the site are a key requirement for the site.	06EA 49–69 Uxbridge Road		Vincent Gabbe	Metropolitan	684	Statutory Body
Phasing of the Development The draft allocation covers a number of different ownerships. The timeframe for delivery section refers to “25% within 5 years”, which appears to confirm that the allocation can be broad forward in a number of separate developments. However, we believe that this should be made clearer in the text. Proposed modification: “Within years 6-15 (2028/29 – 2037/38, noting the potential need for a phased, development given fragmented ownership.”	Noted. The indicative timeframe for delivery is 6-15 years. Whilst phased development is not ruled out the opportunity to optimise development on this site will be considerably enhanced if landowners work together.	06EA 49–69 Uxbridge Road		Vincent Gabbe	Metropolitan	684	Statutory Body

We believe that the proposed allocation is not justified or effective. The reasons for this were set out within representations to the Regulation 18 draft Local Plan and are as follows. The Perivale Car Pound is located on Walmgate Road, Perivale, Greenford UB6 7LR. On 21st May 2020, LSH wrote to LB Ealing on behalf of MPS, requesting a policy protecting the car pound use at the site. MPS wrote to request the policy because it was particularly concerned that they might lose the Perivale Car Pound site. MPS believe that there is nowhere suitable to re-provide it in London, despite having searched extensively. Loss of the site would lead to a ‘service failure’ for MPS, meaning that they cannot deliver a key service, which they are legally required to deliver. MPS have since secured an extended lease for the site, following a CPO inquiry. However, it is still felt that a policy retaining the existing use is necessary and beneficial. The MPS secured a similar policy with the Royal Borough of Greenwich in relation to the only other car pound in London (Angerstein Triangle, 8 Bramshot Avenue, SE7 7HY) as part of their Site Proposals Schedules, reproduced as an addendum to the adopted Core Strategy. This allocation has also been	Noted. There is no specific site allocation that covers this parcel of land. It is part of wider parcel of Strategic Industrial Land (SIL). Policy E5 in the London Plan and Policy SP4.2 B specifically protects SIL for conforming uses.	Policy P5: Perivale Industrial Estate			Vincent Gabbe	Metropolitan	684	Statutory Body

The draft Local Plan refers to the intention to meeting and where appropriate exceeding the 21,570 unit 10-year housing supply target identified in the London Plan for the period 2019-22 to 2028-29. There would also be significant growth in jobs and tourism activities. The growth in homes, offices and other uses will significantly increase the need for policing and the cost of associated infrastructure. This therefore represents a legitimate infrastructure requirement that should be accounted for. Policy Recognition Sought MPS is seeking recognition within the proposed Local Plan that new dwellings and other development increases the need for policing, leading to a legitimate infrastructure requirement that should be accounted for through section 106 contributions. We believe that it is appropriate that this should be set out clearly within the Local Plan, as opposed to any other documents. This is because this document establishes the need for and strategy to deliver new dwellings and other growth that gives rise to the requirement. Previous representations were submitted in this regard, but the changes have yet to be incorporated into the draft plan and associated Infrastructure Delivery Plan.	Noted. The planning system can be rightly called upon to fund physical infrastructure (i.e. buildings, roads, railways etc) the need for which is because of new development, but it is not there to deal with demand for services, which is the role of rates and taxes to fund. A lack of doctor appointments or school places as objections are rarely an infrastructure issue, but a result of the way operational activity is funded. Housing development does not produce people. The people who move into a development already exist; many will be in the local area; others will move into it. Those that move into an area may increase demand in that area, but it follows that demand in the area that they move from will reduce. It is for those sectors (health, education, police etc) to manage that.	SP4.1 Good Growth			Vincent Gabbe	Metropolitan	684	Statutory Body

We are instructed by our client, Aberdeen City Council (acting as the administering authority for Aberdeen City Council Pension Fund) c/o abrdn, to formally submit representations to London Borough of Ealing Council ('the Council') draft Local Plan (Regulation 19), which is subject to consultation until 10 April 2024. We specifically write in respect of Phoenix Trading Estate, Bilton Road, Perivale, UB6 7DZ ('the site'). This letter seeks to provide representations on the draft Local Plan, as well as the latest evidence base. The draft Local Plan (Regulation 18) consultation ran from 30 November 2022 to 8 February 2023. During this period, the site was formally identified in a representation letter (dated 6 February 2023) submitted by Savills as suitable, deliverable and available for residential or mixed-use development and therefore should be allocated as such. Appendix E of the Site Selection Report for Regulation 19 Local Plan (January 2024) responded to this request for allocation as follows: "This site scores variably to below average across the deliverability criteria. This site has not been taken forward to Reg 19 due to it being a non designated industrial/employment site and due to viability considerations. Any proposals for this site would need to satisfy policy E4 and policy E5." ~~This representation seeks to respond to the Council's~~	Noted	Policy P1: Perivale Spatial Strategy		Ben Tattersall	Aberdeen Cit	685	Developer

[NPPF references regarding local plan preparation - para 16, and land availability for housing - para 69] As noted in our original representations letter dated 6 February 2023, the site represents an opportunity to achieve sustainable development and deliver much-needed homes. The site is suitable, deliverable and has capacity for a significant amount of residential homes (over 150 new homes given the site area and scale of adjacent residential consents). London Plan 2021 Policy H1 sets out the ten-year target for net housing completions in Ealing at 21,570. The site has the potential to meet this need. In response to the original representation letter, Appendix E of the Site Selection Report for the Regulation 19 Local Plan (January 2024) confirmed that the Site will not be progressed to allocation for the reason of it scoring “variably to below average” across the suitability and deliverability criteria, with viability concerns cited as the key reason for exclusion. [Details from Site Selection Report] Whilst viability and the Site’s ongoing employment use were given as the key reasons for it being excluded, we consider that many of the other criterion against which the Site scored low are similarly unreasonable given there are other examples	Allocation of existing industrial sites has generally been avoided except where design guidance is considered necessary. This is because industrial needs generally require the retention of existing stock in industrial use. In the event of redundancy this site would be managed against the criteria set out in Policy E4 and its surrounding built context will be sufficient to manage design and layout according to design policies.	Policy P1: Perivale Spatial Strategy		Ben Tattersall	Aberdeen City	685	Developer

Employment and Existing Use The Site scores “red” in both these aspects given it is in ongoing industrial use. This is one of the key reasons given for its exclusion from progression to allocation. However, upon reviewing other sites which have been progressed for allocation, there appears to be an inconsistent approach applied. Appendix 1 to this letter contains a table summarising the 21 site allocations contained in the Regulation 19 Local Plan which are characterised by existing employment uses and subsequently allocated for residential / mixed-use development. These emerging allocations demonstrate that the Council assesses redevelopment of existing non-designated employment sites in favour of mixed use / residential as a viable type of development. It is therefore unclear why the Council consider Phoenix Trading Estate as unviable for redevelopment when other sites with similar operational uses have been considered viable. Furthermore, Appendix 2 contains a table summarising recent planning consents in the Borough which relate to the redevelopment of existing employment sites for residential / mixed-use developments. This list demonstrates a significant pipeline of viable developments coming forward in the borough on existing employment sites for residential / mixed-use developments. As an example, a local council consent to	Allocation of existing industrial sites has generally been avoided except where design guidance is considered necessary. This is because industrial needs generally require the retention of existing stock in industrial use. In the event of redundancy this site would be managed against the criteria set out in Policy E4 and its surrounding built context will be sufficient to manage design and layout according to design policies.	Policy P1: Perivale Spatial Strategy		Ben Tattersall	Aberdeen City	685	Developer
Viability The specific reasons why the Site Selection Report (January 2024) assigns the Site as having significant viability constraints is unclear. The information above and contained within Appendices 1 and 2 demonstrates that similar sites across the borough have both come forward in the past; or else have otherwise progressed through to allocation in the Regulation 19 Local Plan. We therefore query the Council’s consideration of viability and request this aspect in particular (given this was key to the Site being excluded from further consideration) be reviewed and the Site as a whole reconsidered for allocation.	Viability is referenced but no details are offered.	Policy P1: Perivale Spatial Strategy		Ben Tattersall	Aberdeen City	685	Developer

Conclusion It is considered that many of the criteria which have scored “orange” and “red” in the Site Selection Report (January 2024) are insufficiently justified. Specifically, the queries on viability and the exclusion of the Site on this basis are unfounded and queried in strongest possible terms given there are numerous examples across the borough of in-use employment premises being redeveloped for residential / mixed use schemes. Given the Site’s location and clear potential for sustainable development, particularly its potential to contribute towards the delivery of housing within the Borough, we consider there is clear and compelling justification for the site to be allocated in the draft Local Plan. The site is well-located to amenities, green space, services and public transport in line with the 20-minute neighbourhood model promoted within the draft Local Plan. This aligns with the NPPF in ensuring plan-making includes allocating sufficient sites to meet priorities of the area and promotes sustainable development including promoting the effective use of land in urban areas, such as our client’s site. In our view therefore, the Site is suitable, deliverable and available within the plan period and should be reconsidered for allocation for residential or mixed-use development within the emerging Local Plan.	Allocation of existing industrial sites has generally been avoided except where design guidance is considered necessary. This is because industrial needs generally require the retention of existing stock in industrial use. In the event of redundancy this site would be managed against the criteria set out in Policy E4 and its surrounding built context will be sufficient to manage design and layout according to design policies.	Policy P1: Perivale Spatial Strategy		Ben Tattersall	Aberdeen City	685	Developer

These representations, prepared by Quod, respond to London Borough of Ealing’s (‘LBE’) Draft Local Plan Regulation 19 Consultation Document and are submitted on behalf of Valor Real Estate Partners LLP (‘Valor’) in relation to the Booker Wholesaler commercial unit in Acton, London, W3 7YA (‘the Site’). [Background - site description including photograph showing site location] The Booker building is at the end of its commercial life and in need of comprehensive redevelopment, with a significant opportunity to deliver an increase in jobs, meet housing need through optimising the use of a currently underutilised sustainably located site. Quod has instructed LBE searches however no relevant planning history is available for the Site. It is understood the unit (operating as a cash and carry commercial retail unit) is in either A1/E(a) or Sui Generis Use Class.	Noted.	Policy A1: Acton Spatial Strategy		Hannah Hiscock	Valor Real Es	686	Developer

Policy A1 – Acton Spatial Strategy Quod welcomes the proposed approach of intensifying The Vale LSIS, as set out in Policy A1 (Acton Spatial Strategy). Supporting Paragraph 4.1.30 states: “The spatial strategy seeks to ensure that Acton capitalises on its strategic location and that key Locally Significant Industrial Sites at The Vale and South Acton are protected to provide economic growth and local jobs in the future; <u>they will also be intensified to enable opportunities for more housing in the area</u>. This will be achieved through a master planning approach in these areas to guide <u>proportionate co-location of light industrial uses with residential uses</u>.” (emphasis added) The reference within the sub text in relation to co-locating industrial uses with residential uses at The Vale LSIS is also welcomed and supported, however it is strongly recommended that this support for co-location of residential in the Vale LSIS is clearly set out within the main policy text, as per the below (proposed text in green). “Development and intensification of industrial and commercial uses at Local Significant Industrial Sites (LSIS) at The Vale and South Acton on the basis of an agreed masterplan with Ealing Council, <u>including a proportionate level of co-location of housing on Locally Significant Industrial Sites provided there is no net loss of industrial footprint</u>”	Not accepted. The development needs of the plan are not predicated on residential development within LSIS. LSIS development must be industrial-led and housing delivery is dependent on satisfying identified industrial needs. There is no presumption in favour of mixed intensification and not all industrial uses will be able to be accommodated as part of mixed development.	Policy A1: Acton Spatial Strategy		Hannah Hiscock	Valor Real Es	686	Developer

Policy E7 of the London Plan requires boroughs to be proactive in encouraging intensification to facilitate the consolidation of LSIS and supports optimising the potential of industrial sites for housing on selected parts of LSIS where existing capacity can be consolidated or appropriately substituted. The ‘Industrious Ealing Workspace Audit (July 2022)’, which forms part of the new Local Plan evidence base, sets out typologies for industrial sites within LBE. It notes that The Vale LSIS scored well in the “intensify” typology and “create” typology. The latter states that the “create” areas tend to have a notable presence of creative industries and are situated within geographies of high economic need and there could be opportunities for Council owned assets to be transformed to deliver individual flagship projects to provide developer and landowners with reassurance that new ideas can work. The “intensify” typology notes that: “This may include but is not limited to identifying opportunities for the integration of more dense sectors, finding opportunities to deliver stacked employment space or <u>(in LSIS and non-designated land) to co-locate housing with industrial uses.</u>” (emphasis added) It is therefore appropriate for the main text of Policy A1 to ~~also state that the Vale LSIS should be intensified to deliver~~	Not accepted. The development needs of the plan are not predicated on residential development within LSIS. LSIS development must be industrial-led and housing delivery is dependent on satisfying identified industrial needs. There is no presumption in favour of mixed intensification and not all industrial uses will be able to be accommodated as part of mixed development.	Policy A1: Acton Spatial Strategy		Hannah Hiscock	Valor Real Es	686	Developer

As noted above, the Site is currently occupied by Booker Wholesaler and car park and therefore is in commercial use, rather than meeting local industrial needs as intended by the LSIS designation. Policy A1 must recognise that not all sites within the LSIS are currently in industrial use, with additional policy text proposed below (proposed removal in red [strikethrough], proposed text in green [underlined]). “Acton’s strong industrial base will be supported and enhanced through: (i) Development and intensification of industrial, ~~and~~ commercial <u>and other employment</u> uses at Local Significant Industrial Sites (LSIS) at The Vale and South Acton, <u>to optimise employment floorspace within existing LSIS sites</u> on the basis of an agreed masterplan with Ealing Council <u>(where available).</u>”	All land within designated industrial sites forms part of the Borough's industrial supply.	Policy A1: Acton Spatial Strategy		Hannah Hiscock	Valor Real Es	686	Developer

Furthermore, the supporting text to Policy A1 must acknowledge the below (proposed text in green). <u>“Any redevelopment proposal at the Booker Wholesaler to deliver a mixed use industrial and residential development will intensify the industrial use of the Site given the Site is not in industrial use at present.”</u> It is important that the supporting text to Policy A1 and the LBE new Local Plan makes it clear that when referring to the intensification of an LSIS, this could result in a reduction in footprint at specific sites in order to accommodate appropriate layouts, yards, parking and access points that meet the needs and requirements of the industrial market in accordance with London Plan Policy E7 (proposed text in green). <u>“Redevelopment of some LSIS sites may result in a reduction in ground floor footprint in order to achieve optimum modern layouts for local industrial units and to accommodate associated yard, parking and access points for multiple units. The importance of yard space is reflected in London Plan Policy E7 which states whilst higher plot ratios make more efficient use of the land, developments must have ‘regard to operational yard space requirements (including servicing) and mitigating impacts on the transport network where</u>	Not accepted, local policies are not places to set out general thematic approaches, and these aspects of intensification are already quite sufficiently covered in Local and London Plan policies E4-E6.	Policy A1: Acton Spatial Strategy		Hannah Hiscock	Valor Real Es	686	Developer

Policy D9 – Tall Buildings Draft Policy D9 sets out the definition of a tall building by area and states that tall buildings above the thresholds should be located within allocated development sites. The thresholds are set out in Table DMP1 and the areas are defined within Figure DMP1. The Site falls within Area A3 where a tall building is proposed to be defined as 24.5m or 7 storeys. Part G of Policy D9 states that: “Tall buildings on designated industrial sites will be subject to agreed masterplans and based upon local impacts and sensitivity.” The subtext of Policy D9 states: “Where the acceptability of tall buildings is not established by the plan, as on industrial sites, applications which include tall buildings will be subject to comprehensive masterplanning in co- operation with the Council.” The main text of Policy D9 needs to be reworded to make it explicitly clear that the definition and thresholds set out in Table DMP1 do not apply to designated industrial sites as per the below (proposed text in green). ~~“Tall buildings on designated industrial sites will be subject to~~	Designated industrial sites remain subject to existing height thresholds until the adoption of a masterplan that varies from these.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Hannah Hiscock	Valor Real Es	686	Developer

Policy E6 – Locally Significant Industrial Sites (LSIS) Policy E6 states that mixed intensification may be suitable on LSIS in cases where a masterplan is agreed with Ealing. As set out in our response above to draft Policy A1, the acknowledgement that mixed intensification could be suitable on LSIS is welcomed and supported. However, Part (i) of Draft Policy E6 that would require a masterplan to cover the full boundary of the Vale LSIS is unnecessarily onerous, would stifle delivery and should be removed (proposed removal in red, proposed text in green). “Mixed intensification may be suitable on LSIS in cases where a masterplan is agreed with Ealing according to the following principles: (i) ~~it extends to the full boundary of~~ <u>must not prejudice existing or future industrial uses in the LSIS.</u> (ii) ~~it~~ meets objectively assessed industrial needs. (iii) ~~it~~ achieves a high quality of built environment and delivers any necessary supporting infrastructure, affordable housing, and affordable workspace contributions.”	Not accepted, development within the LSIS other than conforming uses needs to be assessed for its impact on the LSIS as a whole.	Policy E6: Locally Significant Industrial Sites (LSIS) – London Plan – Ealing LPA – local variation		Hannah Hiscock	Valor Real Es	686	Developer

A more flexible approach regarding the extent of the masterplan is needed. The amendments proposed would enable LBE to start delivering on its ambitions set out in draft Policy A1 of capitalising and intensifying on The Vale LSIS far quicker than under a scenario where there would be a requirement for multiple landowners, while still retaining control over delivery. Key gateway sites of the LSIS could be redeveloped and intensified act as a catalyst for the intensification of the remaining part of an LSIS. As shown in Figure 2, the Vale LSIS spans a large area across multiple ownerships. There are approximately 88 freehold titles and 248 leasehold titles within the Vale LSIS, and the preparation and agreement of a LSIS wide masterplan is not realistic and would stifle development. [Map showing The Vale LSIS and site] The Site occupies the northeast corner of the LSIS. The Site is distinctively separate from the remaining part of the Vale LSIS as it is a corner site bounded by residential properties to the east, Allied Way to the south, and Park Mews and residential properties to the north. Immediately to the east is 3 and 5 Warple Way, both of which were subject to Prior Approval applications that were granted for the change of use to residential (refs: 183369PAOR and 180946PAOR respectively).	Not accepted, development within the LSIS other than conforming uses needs to be assessed for its impact on the LSIS as a whole.	Policy E6: Locally Significant Industrial Sites (LSIS) – London Plan – Ealing LPA – local variation		Hannah Hiscock	Valor Real Es	686	Developer
Greenford Industrial Estate – Representations to Ealing’s Draft Local Plan (Regulation 19) Consultation These representations, prepared by Quod, respond to London Borough of Ealing’s (‘LBE’) Draft Local Plan Regulation 19 Consultation Document and are submitted on behalf of Valor Real Estate Partners LLP (‘Valor’) in relation to 4no. units at Greenford Industrial Estate, Auriol Drive, London, UB6 0TP (‘the Site’). [Site background - description including photo showing site location]	Noted.	Policy G1: Greenford Spatial Strategy		Hannah Hiscock	Valor Real Es	686	Developer

Policy G1 – Greenford Spatial Strategy It is noted that supporting Paragraph 4.3.14 acknowledges that Greenford has experienced a significant loss of employment in higher value industrial sectors, with Greenford’s industrial land suffering from low employment densities. Quod welcomes the proposed approach to create a prosperous economy with a good range of employment opportunities. Part I of Policy G1 states that this will be achieved by: “Safeguarding and intensifying employment sites, improving their connectivity and supporting functions” and by “Ensuring the supply of employment land and premises meets the needs of a wide range of businesses.” In order to fully support appropriate and necessary upgrades to existing sites, it is suggested that this part of the policy be altered to the following (removed text in red, proposed text in green): “Safeguarding, <u>enhancing</u> and ~~intensifying~~ <u>optimising</u> employment sites, improving their connectivity and supporting functions.”	Employment land in Greenford forms part of the Borough's overall industrial supply and need to contribute to intensification in order to meet assessed needs.	Policy G1: Greenford Spatial Strategy		Hannah Hiscock	Valor Real Es	686	Developer

Supporting Paragraph 4.3.26 also states that “Greenford’s Strategic Industrial Locations (SIL) provide opportunities for the intensification of employment and workspace to support new and growing businesses”. This clear support for the protection and intensification of Greenford employment sites to respond to the current low employment densities and meet changing operational requirements is welcomed. In order to support this further, it is recommended that this paragraph be altered to the following (removed text in red, proposed text in green): “Greenford’s Strategic Industrial Locations (SIL) provide opportunities for the ~~intensification~~ <u>optimisation</u> of employment and workspace to support new and growing businesses”.	Employment land in Greenford forms part of the Borough's overall industrial supply and need to contribute to intensification in order to meet assessed needs.	Policy G1: Greenford Spatial Strategy		Hannah Hiscock	Valor Real Es	686	Developer
Policy G6 – Greenford Industrial Estate Quod welcomes the specific support for growth within the Greenford Industrial Estate. Part (i) of Policy G6 seeks to ensure this via “industrial Intensification to unlock significant new industrial floorspace, creating new jobs focused in the green, circular and creative sectors.” Part (ii) also highlights the importance of retaining the existing industrial supply in the Greenford Industrial Estate by supporting “retrofit and property upgrades to enhance existing industrial stock.”	Noted. Support welcomed.	Policy G6: Greenford Industrial Estate		Hannah Hiscock	Valor Real Es	686	Developer

Policy E4 – Land for Industry Logistic and Services to Support London’s Economic Function Policy E4 sets out the strategy for delivering and maintaining a sufficient supply of land for industry, logistics and economic services, setting out the hierarchy of designations under which industrial sites will be managed. Part H(i) of this policy states that “industrial intensification and reuse will be the primary consideration on industrial land and on the site of any existing employment use in Ealing.” In order to fully support appropriate and necessary upgrades to existing sites, it is suggested that this part of the policy be altered to the following (removed text in red, proposed text in green): “Industrial ~~intensification~~ <u>optimisation, enhancements</u> and reuse will be the primary considerations on industrial land and on the site of any existing employment use in Ealing.” Part H (ii) states that industrial sites will be managed in line with the hierarchy of designations, with the following at the top: “Strategic Industrial Location (SIL) – will only accommodate conforming uses.”	Employment land in Greenford forms part of the Borough's overall industrial supply and need to contribute to intensification in order to meet assessed needs.	Policy E4: Land for Industry, Logistics and Services to Support London’s Economic Function – London Plan – Ealing LPA – local variation		Hannah Hiscock	Valor Real Es	686	Developer

I represent the freehold Owners of 31-43 South Road and Part 15-17 Oxford Walk: Southall Properties Limited and Southall Investments Limited. These properties form part of the draft Site Allocation SO06 [05SO] The Owners acknowledge the draft allocation of the site for mixed use development, including residential units above retail units on the ground floor, and support the principle of the proposed use. In terms of the allocation, it is understood that the site is within a good location for public transport, has an established commercial and residential mixed use and several other positive designations, as assessed through the Suitability, Availability and Achievability Matrix. As such the Owners are not opposed to the site being allocated, however having reviewed the above site allocation, they share concerns around the indicative timeframe for delivery of the proposed use. The Owners’ further comments are set out below.	Comments noted and support welcomed.	05SO 31 – 45 South Road & Telephone Exchange Quality Foods & Iceland		Anthony Rose	Southall Inve	687	Developer

Whilst I represent two of the freehold owners of the wider site, there are further individuals and companies who make up the ownership for the adjacent sites including 45 South Road, the Telephone Exchange, Quality Foods and Iceland (including the associated car park). There are also residential units on ASTs and leaseholds above 45 South Road. This letter of representation reflects the above Owners concerns only; wider consultation has not taken place at this stage. Key in terms of the timing for any future development is the current use of the site. The occupancy level across the site is high; the commercial units at both ground and upper floors are fully let. Several leases on the commercial properties have more than 10 years left to run. These leases represent a diverse range of uses adding to the vitality and viability of this part of Southall Town Centre. The shops and offices provide essential services for local residents, as well as a range of employment opportunities. Due to the variation across the terms of the existing leases, to commence a redevelopment scheme would serve undermine confidence in the site and would disrupt currently viable businesses. Given such complex site assembly requires time, certainty and negotiation, any allocation should look towards the longer term as a reasonable timeframe for delivery. <i>A 5 year timeframe as noted in the draft allocation is</i>	Noted. The indicative timeframe for delivery is 6-15 years.	05SO 31 – 45 South Road & Telephone Exchange Quality Foods & Iceland		Anthony Rose	Southall Inve	687	Developer
Site Constraints In addition to the key matter of timings resulting from the complex lease situation, there are a number of locational constraints to the site. According to the allocation, the site is within Flood Zone 3a for surface water. Given the importance of such a constraint, a wider drainage strategy would need to be carefully addressed during redevelopment of the site to ensure occupiers are not risk, and that drainage issues are not exacerbated in other parts of the Town Centre. It would therefore make sense that the site is considered as part of a wider strategy to address surface water flooding risk holistically.	Noted. The site is in Flood Risk zone 3a (surface water) and was assessed but does meet the thresholds to have regard to the recommendations detailed in the SFRA Level 2.	05SO 31 – 45 South Road & Telephone Exchange Quality Foods & Iceland		Anthony Rose	Southall Inve	687	Developer

Site Constraints Policy D9 of the emerging Local Plan provides guidance for tall buildings in particular areas within the Borough. The site is within Area S9 which normally allows the maximum amount of six storeys. Whilst this increase is encouraged and indeed it is envisaged taller heights could be achieved, it points to the need for a wider strategy to be developed. The Owners acknowledge this follows the direction of travel for national planning policy in terms of taller buildings. Clearly any redevelopment would need to be carefully considered in terms of its impact on primarily the residential units to the east, but also the remainder of the Town Centre. Matters of overlooking, overshadowing, and daylight and sunlight impact are most effectively addressed when considered on a wider scale.	Noted. It should be noted that the tall buildings threshold height is simply that and not a presumption that any height up to this is automatically acceptable.	05SO 31 – 45 South Road & Telephone Exchange Quality Foods & Iceland	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation	Anthony Rose	Southall Inve	687	Developer

Housing Need The Ealing Housing Needs Assessment Update from November 2022 provides an update to the evidence base in Ealing in relation to housing needs. [Figure 4 housing needs assessment table] The above table demonstrates that the largest demand at 54% is three- and four-bedroom units; those usually designed for families with two or more children. Clearly the site is in a highly sustainable location; ideally located to provide high-density residential accommodation, in particular 1- and 2-bedroom units. Although the site can accommodate three- and four-bedroom units, given the site’s location in the Town Centre, it would be unable to provide an adequate amount of amenity space in the form of traditional domestic gardens. Policy D6 Housing Quality and Standards of the London Plan states that where there are no higher local standards in the borough Development Plan documents, for this case no minimum requirements are provided in the Ealing Local Plan, a minimum of 5 sq m of private outdoor space for 1-2 person dwellings and an extra 1 sq m should be provided for each additional occupant, and it must achieve a minimum depth width of 1.5m. ~~Of course, flats can be designed sensitively and are available~~	Noted. It is unclear what modifications to the site allocation are proposed.	05SO 31 – 45 South Road & Telephone Exchange Quality Foods & Iceland		Anthony Rose	Southall Inve	687	Developer

Masterplan and Suitability of Other Allocated Sites Draft Site Allocations SO01 to SO08 are predominantly based on residential and commercial development, but also educational purposes and retention of community facilities. It is understood that the ownerships, whilst varied with a mixture of Council, Private and Transport of London properties and land, are likely to be more straightforward to assemble. In that regard, these alternative draft allocations are considered more appropriate, and can likely be delivered more promptly. For example, the buildings covered by draft site allocation SO04 ‘Former Sorting Office and Kings Hall Methodist Church’ are vacant, therefore the redevelopment could be delivered more quickly and without disruption to local businesses. This would be beneficial to the wider Town Centre, contributing to housing delivery, an enhancement to the street scene, and a safer community brought about by encouraging activity in the area. Furthermore, as there are numerous draft site allocations in close proximity to Allocated Site SO06, it would be beneficial if the Council devised a Masterplan for the wider Southall Town Centre. This would enable a comprehensive redevelopment within which each site is considered alongside adjacent sites rather than in isolation. This would also enable a more	Noted. Policy WLC requires applicants to undertake an optioneering exercise as part of the Whole Life Cycle Carbon Assessment, which seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option. The findings of this optioneering exercise should be considered alongside other planning considerations to determine the most appropriate option, including consideration of a retrofit first approach. The ‘options’ considered should include reuse/refurbish options, alongside any new build options if pursued. All options evaluated should be capable of comparison reflecting the same best practice standards.	05SO 31 – 45 South Road & Telephone Exchange Quality Foods & Iceland		Anthony Rose	Southall Inve	687	Developer

Conclusions As stated, the Owners are long-standing investors in Southall Town Centre. They currently support many businesses through their retail and commercial operations, contributing to the vitality and viability of the Town Centre. The Owners have concerns in respect of the timing of the draft site allocation and would encourage the Council to consider this in the context of the deliverability assessment (Appendix C and D). Accordingly, it is requested that the timing for the draft allocation is amended to reflect a more realistic 5-15 year period. This would allow time for each of the factors outlined above to be considered in consultation with the Council and local stakeholders. It may be that the site cannot be considered as deliverable within the plan period, however the Owners would welcome involvement in a wider site Masterplan in the coming years, and are keen to work with the Council to deliver the facilities that the Council needs within an appropriate timeframe.	Noted. The indicative timeframe for delivery is 6-15 years.	05SO 31 – 45 South Road & Telephone Exchange Quality Foods & Iceland		Anthony Rose	Southall Inve	687	Developer

As owner / proprietor of businesses at Unit 10 Cowley Rd and Unit 11b Swainson Rd I accept renewal and redevelopment to improve housing and services for the local community in by luring experience sting businesses. However, the proposed 6 storeys type mirror of eastern side of Cowley Rd and southern side Swainson would be unacceptable to residents and business alike as: 1. Parking pre-scaffolding was inadequate with existing 200 plus apartments but with further 300 ? apartments is certainly not sustainable. 2. Covid illustrated how Tesco supermarket is vital to community and top Cowley Rd entrance and bottom exit simply unable to facilitate entrance and exit of their articulated delivery trucks without stacking and truck driver delays and other traffic delays through nuisance parking. 3. Drainage in Cowley Rd is existingly inadequate with drains at Unit 1 and Unit 10 both sides of road unable to handle flash flooding before further pressure on drainage from new residents. 4. Business are not interested in vertical studio units like existing East side Cowley Rd and South side Swainson Rd, but want units with horizontal depth. 5. All the existing residents on the 3 surrounding sides of the site are adversely impacted by this plan not least by light, view and privacy. 6. Existing essential amenities are inadequate to serve existing residents and businesses.	The design guidance for the site is contextual and the bulk of these issues relate to the detailed design rather than the principles of allocating the site.	06AC Acton Vale Industrial Park & Westgate House		Paul Hinkly		688	Developer
We write on behalf of our client, Liberty Springdale Ltd. Liberty Springdale Ltd is the owner of the Springdale site on Uxbridge Road, Southall. This is at the eastern end of Southall, just north west of the Iron Bridge. [Map showing Springdale Site] The site historically comprised a large dwelling called Springdale, a bungalow, a clubhouse and tennis courts (as can be seen on Figure 1). However, there was a substantial fire on the site which rendered the buildings unusable. [Drawings of dwelling]	Noted.	Policy S1: Southall Spatial Strategy		Neil Rowley	Liberty Spring	690	Developer

[Copy of NPPF para 35 on soundness of local plans] Liberty Springdale objects to the emerging Ealing Local Plan as it designates the Springdale site as Metropolitan Open Land (MOL). The Local Plan undertook a Green Belt and Metropolitan Open Land Review (henceforth “MOL Review”) which should have taken the decision to remove the Springdale site from the MOL designation. Accordingly, the emerging Local Plan is not considered to be sound because it is not Justified or Consistent with National Policy. [Copy of London Plan Policy G3 Metropolitan Open Land], London Plan para 8.3.1 and 8.3.2]	The new Local Plan does not newly designate this site as MOL. It has been designated as MOL for several decades. The GB/MOL Review did not identify any special circumstances for removing MOL designation from this site.	Policy S1: Southall Spatial Strategy			Neil Rowley	Liberty Spring	690	Developer

LB Ealing Green Belt and Metropolitan Open Land Review (henceforth “MOL Review”) [key aim of MOL Stage 1 review para 1.1.8] Springdale was considered as part of site MOL6 (Dormers Wells). MOL6 overall was considered as follows against the London Plan Policy GB3B criteria: [table from MOL review] The above assessment only considers parcel MOL6 in its entirety. Parcel MO6 is a much larger parcel of land than simply Springdale and also includes West Middlesex Golf Course and Dormers Wells Infant and Junior Schools. As part of the MOL Review, the Uxbridge Road petrol station is proposed to be removed from MOL. In addition, part of adjacent parcel MOL10 (‘developed land with commercial uses and a restaurant’) is also proposed to be removed from MOL. This leaves Springdale as surrounded on three sides by built up development: [Map showing proposed MOL deletions in relation to Springdale]	We are only proposing to remove MOL designation from sites or parts of sites that clearly do not meet MOL criteria and where there are exceptional circumstances that justify these changes. We do not consider that there is a justification for removing the MOL designation from the part of MOL6 that this representation refers to.	Policy S1: Southall Spatial Strategy		Neil Rowley	Liberty Springs	690	Developer

Assessment of Soundness Springdale is Previously Developed Land. It meets the criteria set out in the Glossary of the NPPF because it is “land which is or was occupied by a permanent structure.” It has been occupied by development since at least the 1940s. The Ealing Council officer report on application 178074FUL states that the proposal relates to a new access road ‘to a vacant property’. It is understood that a MOL review for an entire Borough will necessarily take a broad brush approach. However, the combination of Springdale in Parcel MOL6 with a much wider area in community and recreation use (including a school and golf course) has unduly influenced the assessment of this parcel. Springdale is of a vastly different character than the remainder of Parcel MOL6, being Previously Developed Land closely associated with an urban environment. Springdale is part of the urban environment of the Uxbridge Road, at the west end of Southall. There is a busy dual carriageway road which serves as a primary route from London to the west. The site is dominated by the road and transport infrastructure, including the Iron Bridge at the east end of the site. [Photo looking east along Uxbridge Road]	We are only proposing to remove MOL designation from sites or parts of sites that clearly do not meet MOL criteria and where there are exceptional circumstances that justify these changes. We do not consider that there is a justification for removing the MOL designation from the part of MOL6 that this representation refers to.	Policy S1: Southall Spatial Strategy			Neil Rowley	Liberty Spring	690	Developer

London Plan Policy GB3B sets out the purposes of including land within MOL. Our assessment of Springdale against this criteria is as follows: [see table in representation] London Plan paragraph 8.3.1 states that MOL protects and enhances the open environment and improves Londoners' quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity. Springdale offers none of these uses. It is not publicly accessible and does not encourage any form of physical activity. In our view, Springdale meets none of the purposes for including land within MOL set out in London Plan Policy GB3. Accordingly, we do not consider that the emerging Local Plan is compliant with the London Plan. Moreover, we consider that the fact that Springdale • ~~is~~ Previously Developed Land • ~~does~~ performs none of the purposes of including land within MOL set out in London Plan Policy GB3 • ~~is~~ more closely associated with the built development and activity of the Uxbridge Road ~~is surrounded on three sides by built development that is not~~	We are only proposing to remove MOL designation from sites or parts of sites that clearly do not meet MOL criteria and where there are exceptional circumstances that justify these changes. We do not consider that there is a justification for removing the MOL designation from the part of MOL6 that this representation refers to.	Policy S1: Southall Spatial Strategy		Neil Rowley	Liberty Spring	690	Developer
Conclusions - Assessment of Soundness b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; The continued designation of Springdale as MOL is not justified. The decision to continue to designate Springdale as MOL in the MOL Review was overly influenced by other land uses in Parcel MOL6. It did not take into account the fact that Springdale is Previously Developed Land and closely associated with an urban environment. A more reasonable alternative would be to not designate Springdale as MOL.	We are only proposing to remove MOL designation from sites or parts of sites that clearly do not meet MOL criteria and where there are exceptional circumstances that justify these changes. We do not consider that there is a justification for removing the MOL designation from the part of MOL6 that this representation refers to.	Policy S1: Southall Spatial Strategy		Neil Rowley	Liberty Spring	690	Developer

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant. It is fundamental to the plan led system that non strategic policies should follow strategic policies. NPPF paragraph 21 states that strategic policies should provide a clear starting point for any non strategic policies that are needed. Therefore national policy requires that policies in the local plans of London Boroughs follow the strategic policies in the London Plan. We set out above how the designation of Springdale as MOL does not comply with London Plan Policy GB3. Therefore the emerging Local Plan does not comply with the London Plan and hence is not consistent with national policy. For these reasons the emerging Local Plan is not considered to be ‘sound’. Requested amendments to the emerging Local Plan to make it ‘sound’ For the above reasons we request that the area known as Springdale (as shown by the red line on Figure 1) is removed from MOL	We are only proposing to remove MOL designation from sites or parts of sites that clearly do not meet MOL criteria and where there are exceptional circumstances that justify these changes. We do not consider that there is a justification for removing the MOL designation from the part of MOL6 that this representation refers to.	Policy S1: Southall Spatial Strategy		Neil Rowley	Liberty Springs	690	Developer

We write on behalf of our client, Montreaux Developments Limited (hereafter: “Montreaux”, or “the client”), with respect to the Public Consultation on the emerging London Borough of Ealing (“LB Ealing”; “the borough”) Draft Local Plan (Regulation 19, February 2024) [hereafter: “Draft Local Plan”] and specifically regarding Draft Site Allocation Policy 08SO Middlesex Business Centre. Background to Middlesex Business Centre It is considered that it would be helpful to remind the Council that our client has a substantial land holding within the borough, relating to Middlesex Business Centre (“the site”), located off the north-eastern end of Merrick Road (approximately 300m east of Southall station), north of Bridge Road (and the Bridge Road Estate), south of the overground railway line and west of the former Honey Monster factory and Charles House. Formerly designated as a Strategic Industrial Location (“SIL”), until it was de-designated under the Development Sites DPD (2013), the site now holds the status of a Non-Designated Industrial Site. [Detail of outline planning permission 183673OUT and reserved matters 224785REM; details of Deed of Variation to S106 Agreement ref 224177NMA] [Map of Montreaux Developments Ltd holding] Accordingly, the Draft Local Plan is of significant importance to our client who has a strong interest in ensuring that it creates a strong	Noted	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

[Details of Montreaux Developments Ltd landholding - majority landowner of 0860 Middlesex Business Centre] Formerly designated as a Strategic Industrial Location (“SIL”), the site now holds the status of a Non-Designated Industrial Site. Our client has a strong interest in ensuring that the emerging Local Plan is sound, ambitious and deliverable. [Map showing Montreaux Developments Ltd landholding] It is important to note that between Regulation 18 and Regulation 19 stage, the Council increased the site boundary of the Draft Site Allocation to include the land/building east/south of our client’s landholding, north of Bridge Road and west of Charles House, known as Unit K, as set out in Figure 2 below. It is unclear why this land has been included in the Draft Site Allocation. It sits outside our client’s land ownership which makes a comprehensive delivery of the Draft Site Allocation more complicated. For the avoidance of doubt, it also sits outside the extant Outline Planning Permission for the site referred to below. To ensure a comprehensive delivery of the Draft Site Allocation, it is strongly recommended that its boundary is updated to reflect our client’s land ownership only (see Section 6 below). [Map showing revised boundary for Reg 19]	The change in the boundary between Reg 18 and Reg 19 reflects proposed changes to broader placemaking objectives, as well as proposed changes to LSIS. Use implications are not related to use ownership and development sites are not allocated on the basis of land ownership boundaries.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

[Background - description of planning permissions, see above] Site Allocation Policy 08 (Middlesex Business Centre) As noted above, our client is the majority landowner of Draft Site Allocation Policy 08SO (Middlesex Business Centre) [hereafter: “the Draft Site Allocation”] and therefore has a strong interest that it is ambitious, deliverable and fully justified to enable the long-awaited regeneration of this part of Southall. Whilst the principle of maintaining a site allocation for the site is supported, the following paragraphs set out our client’s comments on the Draft Site Allocation and, where necessary, why it is deemed unsound in light of Paragraphs 16b) and 35 of the National Planning Policy Framework (“NPPF”, 2023). Failure to reflect the extant Permission As noted above, (the majority of) the Draft Site Allocation is subject to the extant Permission which established key development maximum parameters including the quantum of development, plot layout, network of routes and open spaces, the delivery of new transport infrastructure (i.e. Healum Avenue), as well as maximum building heights. As recent as November 2023, reserved matters (i.e. the detailed design) were approved for the first development phase (Plots A & B). In February 2024, our client further entered into a new/ revised Section 106 Agreement to enable	Policies in the plan represent updated and consistent evidence and should not necessarily be expected to align with historic planning permissions. Viability is referenced but no details are offered.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

Development Viability and its implications on delivery Whilst our client’s main priority is to bring forward the extant Permission, including the recently approved reserved matters scheme for the first development phase, it is important to note that development viability is currently a key constraint to delivery. In its latest published Five Year Housing Land Supply (Housing Trajectory, 2023) and the Government’s 2022 Housing Delivery Test, the Council’s failure to meet its objectively assessed housing need and targets has become evident. In the London Plan Review – Report of Expert Advisers (January 2024) commissioned by the Secretary of State for Levelling Up, Housing and Communities, a significant undersupply of new housing completions (>5,000) in comparison to its London Plan (2021) housing targets has similarly been identified for LB Ealing (see Figure 2.2 of the Report which is based on information contained in the Greater London Authorities [“GLAs”] Planning London Datahub), constituting the third highest of all London boroughs. One of various reasons for the stagnating delivery of new homes identified in the Report is development viability. Paragraph 3.36, for instance, notes that “the challenge of resources and levels of investment to bring forward	Policies in the plan represent updated and consistent evidence and should not necessarily be expected to align with historic planning permissions. Viability is referenced but no details are offered.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

1. Residential-led mixed use development under the max. parameters established by the extant Permission It is essential that the Draft Site Allocation and its Proposed Uses, Max. Building Heights and Design Principles reflect the maximum development parameters established by the extant Permission. As noted above, development viability is already challenging the delivery of the extant Permission (and undoubtedly many other residential-led developments across the Borough). The Draft Site Allocation (and its underlying Tall Buildings Strategy, 2023) set out maximum heights of 16 storeys for the site along its northern boundary, reducing to 1-10 storeys in its central and southern parts (including Unit K). Whilst it is unclear which of the proposed Blocks in Appendix Part 2 of the Tall Building Strategy relate to the Draft Site Allocation itself, it is envisaged that even when assuming a ‘best case’ scenario comprising Blocks A, B and C (which— it is our understanding – relate to the Draft Site Allocation; with Block D relating to the Former Honey Monster Factory), the Council’s evidence base only envisages the delivery of 994 residential units across the site, and therefore 1,089 residential units less than the quantum approved under the extant Permission (2,083 new homes)². 2. Which is also listed as capacity assumption in the Housing Trajectory (2023)	Policies in the plan represent updated and consistent evidence and should not necessarily be expected to align with historic planning permissions. Viability is referenced but no details are offered.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer
The Report to LB Ealing’s Planning Committee accompanying the extant Permission concluded (p.53), for instance, that: [Copy from report] <u>"Given the above considerations the density proposed is acceptable and responds to the aspirations promoted by the Southall Opportunity Area designation and the emerging urban context. The proposed intensification on this important strategic site is considered acceptable and consistent with the aims to regenerate the wider area."</u> (our emphasis)	Policies in the plan represent updated and consistent evidence and should not necessarily be expected to align with historic planning permissions. Viability is referenced but no details are offered.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

With regard to maximum building heights and massing, the Council’s assessment confirmed that (p.60): “The proposed heights ensure the most efficient use of the site is made and advantage is taken of the relatively unconstrained northern part of the site. <u>The proposed heights of the buildings have been demonstrated to have no adverse impact associated with overshadowing or issues associated with privacy or outlook. The heights have also been assessed in terms of their visual impact and whilst it is accepted that significant change will occur as part of the development of this and neighbouring sites it is considered that a suitable balance has been achieved between protecting the setting of existing heritage assets on the site, the amenity of existing and future residents and the making of place.</u> The existing site has a very low townscape value and the proposals will include high quality architecture that will significantly enhance the public realm and the townscape qualities of the site and will result in an overall positive impact on the area. [Continuation of report] <u>It is considered therefore that the overall bulk and massing of this outline scheme in terms of townscape and urban design (sense of place, density, new public realm, landscaped areas and active frontages) would accord with the objectives of sections 12 of the National Planning Policy Framework.</u>	Policies in the plan represent updated and consistent evidence and should not necessarily be expected to align with historic planning permissions. Viability is referenced but no details are offered.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

Notwithstanding the Council’s undersupply of new homes in recent years and pressure to deliver new developments/site allocations at appropriate densities, it is considered that given the maximum development parameters, density and quantum have been fully tested and deemed acceptable, and are subject to an extant planning permission, the Draft Site Allocation (and its requirement to be in accordance with the Tall Buildings Strategy) fails to: •Make most effective use of well-connected brownfield land to meet evidenced need (NPPF Para. 123 and 124d; London Plan Policy GG2); •Build at appropriate densities (NPPF Para. 128 and London Plan Policy GG2); and •Achieve optimum site capacities (through testing design options) (London Plan Policy D3). The maximum building heights and linked requirement to develop the Draft Site Allocation in accordance with the Tall Buildings Strategy will therefore result in a sub-optimal form of development which stands in contrast with the NPPF’s (and London Plan’s) objectives to make most effective use of brownfield land (to maximise public / planning benefits) and fails to consider reasonable alternatives (i.e. the extant Permission and its public / planning benefits or an alternative development scenario as described below) in order to meet identified needs.	Policies in the plan represent updated and consistent evidence and should not necessarily be expected to align with historic planning permissions. Viability is referenced but no details are offered.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

2. Alternative Development Scenario Should the extant Permission be undeliverable on viability grounds, it is not considered that an alternative form of development for the land uses currently proposed by the Draft Site Allocation alongside a significantly reduced scale and density will be deliverable. As a reasonable fall-back option, it is strongly recommended for the Draft Site Allocation to consider the delivery of an industrial and storage-led redevelopment (including the potential for a data centre) as an alternative development scenario. This is not only considered to be compatible with the site’s current use and status as Non-Designated Industrial Site (as confirmed by the extant Permission’s assessment of the LPA and GLA; see GLA ref. GLA/3449a/01), but also its former designation as Strategic Industrial Location (“SIL”), before it was de-designated as part of the Council’s Development Sites DPD (2013). The site is further adjacent to Bridge Road Industrial Estate (Locally Significant Industrial Site; “LSIS”) including Charles House to the immediate east of the site. With the Council resolving to grant hybrid planning permission for the industrial and logistics-led redevelopment of the	Industrial reuse of this site in close proximity to Southall Station does not accord with any plans for Southall and would seem to conflict with the points raised above about housing delivery.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

In fact, this alternative development scenario would comply with the Council’s latest evidence on employment need. The West London Employment Land Review (August 2022) highlights that LB Ealing should “continue to seek opportunities to provide additional space for both light industrial (Class E (g)(iii)) and general industrial / distribution (B2/B8) as well as upgrade older existing stock” (p.50). The need for additional industrial and storage space is considered to have grown since the latest Employment Land Review was undertaken. Recent years have generally been marked by rapid growth in the industrial and storage/distribution sector locally, regionally, and nationally, where this dynamic industry has been innovating and evolving to align with changing consumer expectations. It has been required to respond, for instance, to a long-term shift towards online shopping which rapidly accelerated during the COVID-19 Pandemic, not only altering how and – crucially – where we work, but through changing consumer behaviours also adding continuous further growth towards the demand for industrial, warehousing (including data) and logistics space. This is far from the only driver of growth in the industrial and storage/distribution sector with a growing emphasis also on creating and protecting business space for efficient supply chains.	Industrial reuse of this site in close proximity to Southall Station does not accord with any plans for Southall and would seem to conflict with the points raised above about housing delivery.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

The site, in its current state, is further deemed to meet the criteria for the provision of additional industrial capacity as set out in London Plan Policy E4(D), particularly with regard to its: 1)Accessibility to the strategic road network; 2)Ability to provide of capacity for logistics, emerging industrial sectors (including data centres), and essential industrial-related services that support London’s economy and population; 3)Ability to provide capacity for a range of enterprise-sizes; 4)Suitability for last mile distribution (or alternative industrial/storage functions); and 5)Ability to support supply chains and/or local employment in industrial and related activities. The proposed alternative development scenario is further deemed to meet the objectives of the Southall Employment Audit (2022) which reflects the Southall RESET Action Plan (2022) placing industrial land, activities and jobs at its heart . Similarly, the site is considered to be well-placed to deliver the objectives of NPPF Chapter 6 and provide space for networks of knowledge and data-driven, creative or high technology industries (such as data centres) or storage and distribution operations at a variety of scales and in suitably accessible locations (see NPPF Para. 87). Providing a flexible Local Plan accounting for alternative	Industrial reuse of this site in close proximity to Southall Station does not accord with any plans for Southall and would seem to conflict with the points raised above about housing delivery.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

Conclusion To ensure that the Local Plan is sound and provides a supportive, viable and deliverable framework for the regeneration of Middlesex Business Centre it is suggested that Draft Site Allocation Policy 08SO is amended to ensure it is either delivered: 1. In accordance with the maximum development parameters established by the extant Permission, thereby ensuring the site truly makes most effective use of brownfield land and maintains an appropriate site capacity; or – where development viability prevents a residential-led regeneration of the site – 2. In an alternative development scenario comprising an industrial and storage-led redevelopment (including the potential for data centres), thereby meeting an alternative objectively assessed need	Industrial reuse of this site in close proximity to Southall Station does not accord with any plans for Southall and would seem to conflict with the points raised above about housing delivery.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

Proposed Modifications to Draft Site Allocation 08SO To enable the comprehensive redevelopment of the Draft Site Allocation, it is strongly recommended to reinstate the site boundaries used at Regulation 18 stage. Our client has no control over the additional land inserted into the Draft Site Allocation which complicates its delivery. The additional land sits outside the extant Permission and therefore needs to be subject to a separate development proposal. It is unclear to our client whether it is indeed available for development within the Plan period. [Maps showing Reg 19 site boundary and Reg 18 site boundary] Proposed Uses For the reasons set out in Section 5, the Proposed (Land) Uses should be amended as follows: ‘Mixed-use scheme with residential, health facility, community use and a portion of commercial/retail hotel, flexible commercial, retail, and community/social infrastructure uses or, alternatively, industrial and storage-led redevelopment (including, potentially, a data centre or other emerging industrial sectors).’	Development sites are not allocated on the basis of land ownership boundaries. We will accept the following amendment to the proposed uses: ~~Mixed-use scheme with residential, health facility, community use and a portion of commercial/retail~~ <u>, flexible commercial, small-scale retail, and community/social infrastructure uses</u>	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer
Proposed Modifications to Draft Site Allocation 08SO Tall Buildings For the reasons set out in Section 5, the Tall Buildings threshold should be amended as follows: •~~The site is in principle suitable for a tall buildings. Design analysis indicates a maximum height of 16 storeys (56 metres).~~ <u>Maximum heights of c.27 storeys or up to 124.125 metres are deemed acceptable (see Design Principles).</u>	Policies in the plan represent updated and consistent evidence and should not necessarily be expected to align with historic planning permissions. Viability is referenced but no details are offered.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

Proposed Modifications to Draft Site Allocation 08SO Key Infrastructure Requirements For the reasons set out in Section 5, the Key Infrastructure Requirements should be amended as follows: • ~~Social infrastructure~~ <u>(subject to identified needs applicable at the time of delivery and depending on development option), including healthcare.</u> New road and highways improvements. Public realm, landscaping and greening improvements. Measures to improve permeability and active travel.'	Noted.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer
Proposed Modifications to Draft Site Allocation 08SO Contextual Considerations For the reasons set out in Section 5, the Contextual Considerations should be amended as follows: • ~~2nd bullet point: 'In line with the development parameters tested and established through the extant planning permission, n~~ New buildings should respond sensitively to the context of tall buildings and strategic industrial land.'	Policies in the plan represent updated and consistent evidence and should not necessarily be expected to align with historic planning permissions. Viability is referenced but no details are offered.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer
Design Principles For the reasons set out in Section 5, the Design Principles should be amended as follows: • ~~New commercial, retail and community uses on the ground floor should be considered in the form of mixed-use development, with a focus on active frontages~~ <u>being maximised</u> along all street edges Reason: With servicing/back-of-house requirements, it will be impossible to deliver active frontages along all street edges. However, as set out in the Design Code accompanying the extant Permission, active frontages should be maximised.	Accepted	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

Design Principles For the reasons set out in Section 5, the Design Principles should be amended as follows: • Consideration should be given to the provision of employment non-residential floorspace across the site in the most appropriate places, particularly at the east part of the site as an appropriate transition between adjacent Locally Significant Industrial Site (LSIS) Reason: Any non-residential and/or employment floorspace should be in strategic and most appropriate places. As demonstrated by the extant Permission, the provision of hotel or office floorspace closer to Southall station, along key routes and open spaces is deemed to be beneficial to make sure this is attractive to future occupiers whilst resulting in a truly mixed use and activated form of development.	This clause is designed specifically to address uses that reflect the adjacent LSIS, not just any non-residential use.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer
Design Principles For the reasons set out in Section 5, the Design Principles should be amended as follows: • A new health facility and community centre should be considered. Any new social infrastructure/community uses facilities must be compatible with other public uses emerging in Southall and should address an evidenced need. Reason: The provision of social infrastructure and community uses should be linked to a clear and evidenced need for such facilities in this location. It is not considered that the Council’s evidence base (i.e. Infrastructure Delivery Plan, etc.) is specific and robust enough to support the Design Principle as drafted.	The clause requires consideration in light of the evidence available at the point of application	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

Design Principles For the reasons set out in Section 5, the Design Principles should be amended as follows: •New homes should be situated away from LSIS and interspersed between commercial and community uses. Reason: Too prescriptive. Subject to suitable mitigation the location of new homes adjacent to LSIS or other non-residential uses should be acceptable as has been established by the Permission. There are various successful examples of residential next to non-residential/industrial uses including various Co-Location schemes across the capital . As set out in the first bullet point, in a mixed use development scenario it is already assumed that residential and non-residential uses are interspersed.	LSIS like SIL enjoys protection from constraining uses as as a matter of London Plan policy and the allocation reflects this. Alternative mitigation measures will be assessed on a case by case basis.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer
Design Principles For the reasons set out in Section 5, the Design Principles should be amended as follows: •~~Ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy.~~ Heights are to range between 1 and a maximum of <u>16 c.27 storeys (56.124.125m)</u> across the site, with the tallest elements situated along the railway in response to the site’s context of tall buildings. Reason: As set out in Section 5, the approach of the Tall Buildings Strategy is not considered to accord with the objectives of national policy (and the London Plan, 2021)	Policies in the plan represent updated and consistent evidence and should not necessarily be expected to align with historic planning permissions. Viability is referenced but no details are offered.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer
Design Principles For the reasons set out in Section 5, the Design Principles should be amended as follows: •Create a new east-west linear park that links Merrick Road and Glade Lane Park. Reason: Not in accordance with extant Permission. This concept has not been tested and may not deliver the best form of open space. There are strong reasons for a north-south-oriented open space as approved under the extant Permission (Maypole Park), i.e. in terms of usability and minimising overshadowing.	The validity of the allocation is not determined by its conformity with the existing permission.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

Design Principles For the reasons set out in Section 5, the Design Principles should be amended as follows - add: • <u>Alternative Development Scenario: Should it be demonstrated that the extant Permission or alternative residential-led mixed use development achieving the same/similar development quantum is unviable, an alternative development scenario delivering modern, flexible industrial and storage or other emerging industrial sector uses (including, for instance, data centres) should be pursued which provides linkages and connections to adjacent industrial designations. Given the site's location, a high quality approach towards design and landscaping will need to be demonstrated. A suitable transition/buffer zone to nearby residential uses within or adjacent to the site allocation should be incorporated.</u> Reason: To enable an alternative development scenario to come forward for the reasons set out in Section 5 which complements surrounding designated industrial areas and achieves a suitable transition towards the residential uses to the west.	Industrial reuse of this site in close proximity to Southall Station does not accord with any plans for Southall and would seem to conflict with the points raised above about housing delivery.	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer
Our client wishes to reserve the right to participate in upcoming hearing sessions to answer questions from/provide clarifications to the Inspector and/or to provide in-depth response to any (technical) matters/issues identified in relation to these written representations.	Noted	08SO Middlesex Business Centre		Christopher Schiele	Montreaux Developme nts Limited	691	Developer

Introduction We write on behalf of our client, Marks & Spencer PLC, to set out formal representations to the London Borough of Ealing’s (‘LBEs’) New Local Plan (Regulation 19) consultation which was published for consultation in February 2024. This submission builds on representations made in February 2023, in respect of LBE’s Regulation 18 Local Plan. These previous representations are contained within Appendix 1 of this submission. {Appendices attached as follows: • Appendix 1 – Representations made in response to LBE’s Regulation 18 Local Plan • Appendix 2 – Supplementary report prepared by Montague Evans LLP in response to LBE’s Regulation 18 Local Plan} }	Noted	02EA Ealing Broadway Shopping Centre & Crystal House		Ollie Cooper	Marks & Spe	692	Developer

Proposed Land Use As outlined further within Appendix 1, our client welcomes the inclusion of the site as part of wider draft allocation 02EA, including for mixed-use development – in supporting growth and the ongoing vitality of Ealing Metropolitan Centre into the future. This approach ultimately supports the National Planning Policy Framework (NPPF) Paragraph 90, which states that ‘planning policies should support the role that the town centre plays at the heart of local communities, by taking a positive approach to their growth, management, and adaptation.’ Part F goes on to state that this should include residential development, in recognising the important role this plays in ensuring the ongoing viability of town centres. Following the conclusion of the Regulation 18 Consultation, the allocation’s ‘Proposed Use’ has been amended from ‘residential led, mixed-use scheme...’ to a ‘retail led, mixed-use scheme’ within the Regulation 19 Consultation document. Whilst our client is fully supportive of the importance of retail within town centres, they consider that a mixed- use proposal containing a significant proportion of residential would strengthen the role of the town centre as a main focus for Londoners’ sense of place and local identity in the capital, as recognised within London Plan Policy SD6. As set out within Paragraph 90, Part F of the NPPF, residential development is	Given its important location within the town centre it is important that development on this site proceeds from the point of making retail provision first with other suitable town centre uses as a complement to that.	02EA Ealing Broadway Shopping Centre & Crystal House		Ollie Cooper	Marks & Spencer	692	Developer

Design Principles Our client welcomes draft allocation 02EA’s assessment that the site is in principle suitable for a tall building. The supporting Tall Buildings Strategy (as prepared by Allies and Morrison; dated December 2023) again (as it did within its November 2022 version to support the Regulation 18 Consultation) defines this area as ‘Ealing Town Centre Zone D’ with ‘guidance for prospective tall buildings’ set at 9-21 storeys (31.5-73.5 metres). Our client wholly welcomes the site being designated as suitable for tall buildings – acknowledging the site’s highly accessible location within Ealing Metropolitan Town Centre which also benefits from a prominent frontage onto The Broadway. However, conversely to the guidance set out for Zone D, the draft allocation 02EA sets a ‘maximum’ height of 12 storeys (42 metres) for the site – noting that proposals should be developed in accordance with the ‘Tall Buildings Strategy’. As set out previously within our Appendix 1 representations, a cap at 12 storeys appears to be at odds with the guidance from the Tall Buildings Strategy, which is said to underpin the height principles of the draft allocation. Whilst our client welcomes the commissioning of the Tall Buildings Strategy and the building heights and types plan ~~being indicative only with any future proposals for tall~~	Tall buildings evidence is consistent and evidence based. However, changes to ensure conformity with the London Plan now mean an approach of 'recommended' rather than maximum heights and this should provide any reasonable flexibility necessary to realise development on sites.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Ollie Cooper	Marks & Spe	692	Developer
Chapter 3 – Spatial Strategy Further to representations made within Appendix 1, our client fully supports the vision that is set out within Draft Local Plan Policy SP1, which refers to Ealing becoming the ‘engine of West London’s new economy’.	Noted.Support welcomed.	Policy SP1: A Vision for Ealing		Ollie Cooper	Marks & Spe	692	Developer

Chapter 3 – Spatial Strategy Our client also supports policy SP.4 (Creating good jobs and growth), in that it fundamentally aligns with the aims and aspirations of Policy GG2 of the London Plan and ultimately the fundamental principle of the NPPF Paragraph 8 in terms of achieving sustainable development. This approach is therefore considered sound in line with Paragraph 35 of the NPPF.	Noted.Support welcomed.	Policy SP4: Creating good jobs and growth		Ollie Cooper	Marks & Spe	692	Developer
Chapter 4 – Town Plans Our client strongly agrees with LBE’s proposals to enhance Ealing Metropolitan Town Centre within Policy E2, through the delivery of significant high density residential and employment growth. As outlined within Appendix 1, our client requests that the role of tall buildings in helping to achieve higher densities should be outlined within the policy text of E2. This will ensure that the Local Plan is ‘positively prepared’ to meet the Borough’s objectively assessed needs, in line with criteria a) of paragraph 35 of the NPPF.	Noted. The need to optimise development is already acknowledged in policy terms and each site allocation provides guidance on recommended heights.	Policy E2: Ealing Metropolitan Town Centre		Ollie Cooper	Marks & Spe	692	Developer
Changes sought Draft Policy E2: Ealing Metropolitan Town Centre Our client would suggest that the draft policy wording is amended as follows: [C] ‘(iii) Optimising growth around Ealing Broadway and West Ealing stations to maximise their opportunities to bring people into the borough and reflect the ~~critical mass necessary~~ density required for their role within London’s office, business, and cultural hierarchy. <u>Greater density can be achieved through the construction of tall buildings around key nodes in sustainable locations.</u>’	Noted. Critical masss in this context does not mean scale, height or massing. The need to optimise development is already acknowledged in policy terms and each site allocation provides guidance on recommended heights.	Policy E2: Ealing Metropolitan Town Centre		Ollie Cooper	Marks & Spe	692	Developer

Changes sought Draft site allocation - Ealing-02EA – Ealing Broadway Shopping Centre & Crystal House Our client proposes the following amendments to the wording of the draft site allocation reference 02EA: Proposed use ‘Retail Residential led, mixed-use scheme with significant retail, employment, residential and community space provision.’ Tall Buildings ‘Design analysis indicates a maximum recommended height of 12 storeys (42 metres), albeit appropriate heights will be subject to an individual assessment at planning application stage’.	Given its important location within the town centre it is important that development on this site proceeds from the point of making retail provision first with other suitable town centre uses as a complement to that. Tall buildings evidence is consistent and evidence based. However, changes to ensure conformity with the London Plan now mean an approach of 'recommended' rather than maximum heights and this should provide any reasonable flexibility necessary to realise development on sites.	02EA Ealing Broadway Shopping Centre & Crystal House		Ollie Cooper	Marks & Spencer	692	Developer

Summary On behalf of Marks and Spencer PLC, thank you for providing the opportunity to comment on the draft Ealing Local Plan Regulation 19 consultation document. As noted above, Marks and Spencer PLC are broadly supportive of the draft allocation proposed for wider site allocation '02EA– Broadway Shopping Centre and Crystal House', subject to a further review of the prescriptive building heights currently set for the site, which our client believes should allow greater flexibility whilst also being based on an individual assessment for the site at planning application stage. Our client wants to exercise their right to appear and be heard at a hearing session, as they have made a representation seeking changes to the plan.	Noted.	02EA Ealing Broadway Shopping Centre & Crystal House		Ollie Cooper	Marks & Spencer	692	Developer
Additional site allocation for gypsy and traveller pitch position at Down Barn Farm UB5 6RB We would like to inform you that our company has been operating at this location since 1996 where we have developed a truck service and parking lot for our trucks. At this moment we have an investment of over 3 million pounds in our workshop in brake rollers, tools, repair parts, and trucks as well. We have over 30 employees who depend on our services. If you really think it is necessary to allocate this space to the gypsy and traveller, we expect a remuneration of 5 million pounds. I hope you will consider the losses we will incur if you agree to allocate this site to gypsy and traveller.	Noted. Whilst the objection to allocate six pitches is strongly opposed by the landowner, the council would welcome further discussion with the landowner and/or their agents to enable the council to seek to acquire an interest in the land. The notion that such development is not appropriate is somewhat contradicted by the alternative vision presented by the landowner that would seek to deliver 600-800 homes and other uses as well as the apparent displacement of the farm and other commercial activities on the site.	09NO Kingdom Workshop, Sharvel Road		John Kennedy	Kingdom Workshop	693	Individual

We are instructed by our client, Ginni PVT Ltd , to formally submit representations to London Borough of Ealing Council (‘the Council’) draft Local Plan (Regulation 19), which is subject to consultation until 10 April 2024. We specifically write in respect of 4 Gladstone Road, Southall, Ealing, UB2 5BB (‘the site’). This letter seeks to provide representations on the draft Local Plan, as well as the latest evidence base. In addition to this letter, please find attached an OS Site Plan which identifies the site boundary and area. [Site plan appended] [Pre app dated 2022 - 12 - 07 appended]	Noted	10SO The Green		Nicola Forster	Ginni PVT Ltd	694	Developer

Site Description and Context The Site is situated in the London Borough of Ealing on the eastern side of Gladstone Road and adjoins the corner junction with Queens Road. The existing Site measures 0.34 hectares and comprises 3,579m2 of light industrial buildings with ancillary office space and a covered loading bay. [Aerial view showing site] The main building is located along Gladstone Road which comprises the nuts and confectionary production facility and ancillary offices. The smaller warehouse building is located to the north of the site, which is used for storage. Informal on-site parking is provided along Gladstone Road and the service yard is to the north of the Site for delivery vehicles. The Site is adjacent to the main line railway and embankment to the north, which is a designated Green Corridor. To the west of the Site the area is characterised by 19th Century terraced housing. To the east are industrial buildings accessed from Southbridge Way. To the south is the Featherstone Industrial Estate which is accessed from Featherstone Terrace. Parts of the adjoining industrial estate form part of ‘The Green Masterplan’ area which has been granted planning permission for significant regeneration, comprising residential led mixed-use development. An extract of the Location Plan is shown at Figure 2 with photographs in Figure 3 below.	Noted	10SO The Green		Nicola Forster	Ginni PVT Ltd	694	Developer

Planning Designations Within the adopted Local Plan, the Site forms part of a wider site designation in the Development Sites DPD known as “SOU8 – The Green”, refer to Figure 4 below. Site Allocation SOU8 supports the following: “Mixed use development appropriate to the town centre, with continued protection of existing industrial uses on Featherstone, Dominion and Suterwalla estates as a Locally Significant Industrial Site (LSIS) and retention of the Dominion Arts Centre”. [Figure 4 Extract from SOU8 - Ealing Development Sites DPD 2013] Additionally, on the basis of the adopted Policies Map, the Site is located within the following planning designations: • Locally Significant Industrial Site (Southbridge Way); • Southall Opportunity Area; • Park Deficiency (Local and District) The Site is not located within a Conservation Area, however there are a number of Locally Listed Assets and Statutory Listed Buildings. Southall War Memorial First World War memorial and The Green Manor House are Grade II listed and sit approximately 200m south-east from the Site. The Straight Water Tower is Grade II listed and is 220m north-east. The	Noted	10SO The Green		Nicola Forster	Ginni PVT Ltd	694	Developer

Representations The London Borough of Ealing has begun the process of preparing a new Local Plan, which plans and allocates sites for development over the next 15-years. In order to assist with the development of the Local Plan, the Council is keen to ensure that when new development takes place, it is sustainable and makes the best use of available land. On this basis, the Council are aiming to identify any potentially suitable sites for all types of housing and commercial development on brownfield land within the London Borough of Ealing.	Noted	10SO The Green		Nicola Forster	Ginni PVT Ltd	694	Developer
Changes sought Draft site allocation - Ealing-02EA – Ealing Broadway Shopping Centre & Crystal House Our client proposes the following amendments to the wording of the draft site allocation reference 02EA: Proposed use ~~‘Retail~~ <u>Residential</u> led, mixed-use scheme with significant retail, employment, residential and community space provision.’ Tall Buildings ‘Design analysis indicates a ~~maximum~~ recommended height of 12 storeys (42 metres), <u>albeit appropriate heights will be subject to an individual assessment at planning application stage</u>’.	Management of LSIS sites is set out in Policy E6, this permits mixed development in the event of a comprehensive masterplan. Development is otherwise limited to conforming uses.	10SO The Green		Nicola Forster	Ginni PVT Ltd	694	Developer

Changes sought Draft site allocation - Ealing-02EA – Ealing Broadway Shopping Centre & Crystal House Our client proposes the following amendments to the wording of the draft site allocation reference 02EA: Proposed use ‘~~Retail~~ <u>Residential</u> led, mixed-use scheme with significant retail, employment, residential and community space provision.’ Tall Buildings ‘Design analysis indicates a ~~maximum~~ recommended height of 12 storeys (42 metres), <u>albeit appropriate heights will be subject to an individual assessment at planning application stage</u>’.	Not accepted, development within the LSIS other than conforming uses needs to be assessed for its impact on the LSIS as a whole.	Policy E6: Locally Significant Industrial Sites (LSIS) – London Plan – Ealing LPA – local variation			Nicola Forster	Ginni PVT Ltd	694	Developer

Changes sought Draft site allocation - Ealing-02EA – Ealing Broadway Shopping Centre & Crystal House Our client proposes the following amendments to the wording of the draft site allocation reference 02EA: Proposed use ~~‘Retail~~ <u>Residential</u> led, mixed-use scheme with significant retail, employment, residential and community space provision.’ Tall Buildings ‘Design analysis indicates a ~~maximum~~ recommended height of 12 storeys (42 metres), <u>albeit appropriate heights will be subject to an individual assessment at planning application stage</u>’.	Designated industrial sites remain subject to height thresholds until the adoption of a masterplan that varies from these.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation			Nicola Forster	Ginni PVT Ltd	694	Developer

Changes sought Draft site allocation - Ealing-02EA – Ealing Broadway Shopping Centre & Crystal House Our client proposes the following amendments to the wording of the draft site allocation reference 02EA: Proposed use ‘~~Retail~~ <u>Residential</u> led, mixed-use scheme with significant retail, employment, residential and community space provision.’ Tall Buildings ‘Design analysis indicates a ~~maximum~~ recommended height of 12 storeys (42 metres), <u>albeit appropriate heights will be subject to an individual assessment at planning application stage</u>’.	Given its important location within the town centre it is important that development on this site proceeds from the point of making retail provision first with other suitable town centre uses as a complement to that. Tall buildings evidence is consistent and evidence based. However, changes to ensure conformity with the London Plan now mean an approach of 'recommended' rather than maximum heights and this should provide any reasonable flexibility necessary to realise development on sites.	10SO The Green		Nicola Forster	Ginni PVT Ltd	694	Developer

We previously submitted representations in relation to the Regulation 18 consultation on behalf of our client Merlin Entertainments Group (Merlin). A copy of our letter of representation (dated 7 February 2023) is provided in Annex 1 to this letter. We have reviewed the Regulation 19 Draft Local Plan and note that the previous comments have not been addressed, nor have they been referenced in the Council’s response document to the Regulation 18 representations. On behalf of Merlin we wish to maintain our previous representations and resubmit them for this Regulation 19 consultation, as they continue to be relevant to the current consultation. In particular we note the following: • Westgate House and Acton Vale Industrial Park are in separate ownership and they are functionally separate and have different characteristics (Westgate House being an office and not of industrial character). Therefore, we request that the sites have separate allocations in the new local plan. Westgate House is in office use. The appropriate uses for a refurbished and extended Westgate House should be a mix of uses focusing on employment (office) and residential. The building is not considered to be suitable for industrial uses.	Site allocations are not based upon land ownership boundaries, there is nothing to stop a scheme coming forward on part of the site where it is able to meet the overall objectives of the allocation.	06AC Acton Vale Industrial Park & Westgate House		Alice Green	Merlin Enter	696	Developer
[Annex Regulation 18 letter] We set out below representations on behalf of our client Merlin Entertainments Group in relation to the above consultation which the local plan team has advised has been extended to 8 February 2023. We have provided a representations on: 1 Chapter 4, Town Plans – site AC09 “Acton Vale Industrial Park 118 & Westgate House” 2 Figure A2 “Acton Spatial Strategy” 3 Policy E3: “Affordable Workspace London Plan – Ealing LPA – local variation”. 4 Policy E4: “Land for Industry, Logistics and Services to Support London’s Economic Function – London Plan Ealing LPA – local variation” [Background and site location description of Westgate House part of proposed site allocation 06AC (previously AC09) Acton Vale & Westgate House] [Site location map]	Noted.	06AC Acton Vale Industrial Park & Westgate House		Alice Green	Merlin Enter	696	Developer

Reg 18 rep: Chapter 4 “Town Plans and Development Sites” of the draft new Local Plan (Regulation 18) consultation document identifies Westgate House alongside Acton Vale Industrial Park as a potential suitable development site for Mixed-use intensification as “site AC09”. This draft allocation positively recognises the development potential of Westgate House, which is supported by Merlin. Merlin confirms that given the underutilisation of the site it can be available for reuse/redevelopment within the next 5 years. However, it is considered that given the different ownerships between Westgate House and the Acton Vale Industrial Park the sites should be given separate allocations. Both sites are functionally separate from each other and the nature of the building/access arrangements mean that Westgate House is quite different to the other industrial units and unsuited to modern industrial activity.	Sites are not allocated on the basis of land ownership boundaries and change of use on this site needs to be understood in the context of the whole allocation. If Westgate House does come forward then it will be determined against the provisions of policy E4 whether or not it is part of a broader allocation or allocated at all.	06AC Acton Vale Industrial Park & Westgate House		Alice Green	Merlin Enter	696	Developer
Reg 18 rep: The Local Plan refers to the type of employment floorspace to be retained in the Acton area referring to the important defined industrial estates and the strong industrial base for a variety of uses, see Policy A.1part H(i). Westgate House does not have the characteristics to meet the typical requirements of industrial uses referred to in part H(i). Westgate House has floorspace spread across several levels and access/outside servicing area is unsatisfactory. The property is located in predominantly residential area and residential amenity will be a consideration for any development proposals.	If Westgate House does come forward then it will be determined against the provisions of policy E4 whether or not it is part of a broader allocation or allocated at all.	06AC Acton Vale Industrial Park & Westgate House		Alice Green	Merlin Enter	696	Developer
Reg 18 rep: Given the character and use of Westgate House we request that separate allocations are identified for the two sites to avoid restricting or delaying development. AC09 assumes that development is “beyond 5 years”. This is not the case for Westgate House and it could be developed sooner enabling better use to be made of this property/site. Separate allocations would of course still allow for a combined/comprehensive scheme if all parties agreed in the future.	Timelines in site allocations are not restrictive of of development	06AC Acton Vale Industrial Park & Westgate House		Alice Green	Merlin Enter	696	Developer

Reg 18 Rep: The draft allocation refers to “lower intensity development” (Figure A2). We suggest that the scale of any development should not be pre-determined at this stage but should be confirmed at a later stage informed by a thorough review of the site, its context and the existing building to ensure that the development of this brownfield site is optimised-as required by national policy- and of particular importance in urban areas where development land is in short supply. A detailed analysis of the site will ensure it is developed in a sustainable way, that is acceptable in relation to surrounding amenity. The exact nature of development for the Westgate House site could be for reuse and extension or redevelopment and with respect to uses we consider that the future use should be broader and rather than “mixed use intensification”, should be identified as being suitable for residential and/or employment or a mix. This would assist the Council in meting its objectives and allow a more comprehensive review of the site and its suitability to be undertaken. An unduly limited range of uses may result in delaying the reuse/redevelopment of the site if it excludes viable options. The approach we set out means that the site is acknowledged as suitable for development and that given the location is potentially suitable for a variety of uses but the appropriate use (or perhaps mix) can be determined when more analysis is undertaken. We suggest that Westgate House is either given its own AC reference or is referred to as AC09A and the properties to the south as AC09B.	Height guidance is given in line with the tall buildings policy and evidence.	06AC Acton Vale Industrial Park & Westgate House		Alice Green	Merlin Enter	696	Developer
Reg 18 Rep: Policy E3: “Affordable Workspace London Plan – Ealing LPA – local variation”. There may be incidences where a scheme is simply not viable to meet the affordable workspace policy requirements. To ensure development is not stifled viability should be considered and the policy should be amended to reference the need to consider a sites suitability and viability.	Suitability and viability are different considerations, an unsuitable site will result in offsite contribution. The policy has been found viable by the whole plan viability assessment so no general caveat is appropriate. Site specific assessments are welcome where there are exceptional viability constraints.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation	06AC Acton Vale Industrial Park & Westgate House	Alice Green	Merlin Enter	696	Developer

Reg 18 Rep: Policy E4: “Land for Industry, Logistics and Services to Support London’s Economic Function – London Plan Ealing LPA – local variation” part H ii) c) should refer to non designated sites in industrial use and not non designated sites generally.	Part 2 clearly states that this forms part of a hierarchy of industrial sites.	Policy E4: Land for Industry, Logistics and Services to Support London’s Economic Function – London Plan – Ealing LPA – local variation	06AC Acton Vale Industrial Park & Westgate House	Alice Green	Merlin Enter	696	Developer
Savills is instructed by All Souls College and the West London Shooting School (hereafter our “Clients”) to submit a representation in relation to the above consultation. This follows on from previous submissions promoting this site to the 2023 Call For Sites, the 2023 Local Plan Review and the 2023 Additional site allocations for gypsy & traveller pitch provision consultation. This response is accompanied by an updated Vision Document. The Vision Document confirms that this site could provide around 600 new homes in a highly sustainable location. The development will provide high quality public spaces for all to enjoy and will incorporate Yeading Meadows and the brook to the west. The Yeading brook and the footpaths within Michael Frost Park will be connected with pedestrian and cycling routes through the site that can be used by new and existing residents and will unlock the open space for biodiversity enhancement and natural park land use. Pedestrian links will be provided to the south that will connect the new community with existing neighbourhoods and to the existing primary school and community centre. A number of local shopping areas are nearby, The Northolt parade at Yeading Lane (including Co-op supermarket) is within a 5-minute cycle ride or 15 minute walk and a further parade at	Noted. The scope and quantum of the proposed development would clearly fail to meet the requirements of London Plan Policy G2 which says that the green belt should be protected from inappropriate developmen particularly where it would casue harm to the green belt and where there is a failure to demonstrate very special circumstances exist.	09NO Kingdom Workshop, Sharvel Road		Roger Smith	All Souls Coll	697	Developer

The Draft Local Plan We have reviewed the Local Plan with a particular focus on the Spatial Strategy given our Clients land interest in the Borough. On balance, Our Clients object to the draft Local Plan as it is not considered to provide an effective strategy for meeting the housing needs of the population. In this regard the Plan is not sound.	Noted.	Policy SP1: A Vision for Ealing		Roger Smith	All Souls Coll	697	Developer
Our Clients support the aim of Policy SP4.3, which is to meet the 21,570 unit 10-year housing supply target identified in the London Plan for the period 2019-20 to 2028-29. The proposal to roll forward the 2,157 annual target for the final five years of the Plan period is also supported.	Noted. Support welcomed	Policy SP4: Creating good jobs and growth		Roger Smith	All Souls Coll	697	Developer
However, Our Client is disappointed that the Council’s preferred spatial strategy is one of restraint given the substantial evidence that exists of chronic under-delivery in the Borough. The NPPF is clear that housing targets should be treated as a minimum, not a ceiling. This, in part, makes allowances for any under-delivery of housing which is a problem affecting Ealing, as shown in the November 2023 update to Five Year Housing Land Supply Position Statement & Housing Trajectory. One of the issues undermining this Plan is that, by the time it is adopted in 2025, the London Plan will be four years old. Therefore, it is not clear what the base date for calculating housing need is, so it is difficult to judge if simply adopting the London Plan target will now adequately meet the needs of the Borough. The Local Plan should be much clearer on the intended housing delivery trajectory. Regardless, Ealing is already falling behind in its commitment to meet the London Plan target. In November the under delivery of new homes across the first four years of the London Plan was 2,2262 homes. Ealing already needs to apply a 20% buffer to its housing need due to persistent under-delivery of housing against existing targets. As this Plan is still in preparation, the current figures should be used, which show a 2.7 year supply. This equates to	The emerging Local Plan derives its housing requirement from the 2021 London Plan. London Plan policy H1 establishes a delivery target of 21,570 net additional units for Ealing LPA over the 10 year period 2019/20 to 2028/29. Any shortfall or surplus accumulated prior to this date (31st March 2019) is assumed to have been accounted in determining target and isn’t rolled forward. Any deficit or surplus in delivery against the target arising since the 1st April 2019 is however calculated and is added to the outstanding requirement. The latest iteration (due to be published early 2025) of the trajectory and 5 YHLS position statement both use the 1st April 2024 as the point of break between future and past activity, with anything expected to occur from the 1st April 2024 onwards being treated as occurring in the future, and anything occurring between 1st April 2019 and 31st March 2024 currently being treated as past activity. This current 'split' reflects the latest available information on housing completions which have been verified up to the 31st March 2024. Unlike the plan itself however the Trajectory and 5YHLS position statement operate as live documents, and will be updated in the future to account for future completion returns and the window of time covered will be rolled forward. It should be noted that the ‘break date’ is not fixed and will roll forward over the life of the plan. Whilst the shortage of deliverable supply over the next five years is acknowledged, it should be borne in mind that the Council has adopted a fairly precautionary approach when determining which large sites qualify as ‘deliverable’, i.e. those whose capacity is	SP4.3 Genuinely affordable homes		Roger Smith	All Souls Coll	697	Developer

The Proposed Sharvel Lane Allocation – Policy 09NO Our Clients strongly object this allocation. Nothing has changed in this regard since our August 2023 representation to the Additional site allocations for gypsy & traveller pitch provision consultation. As before, our Clients accept the need for the Borough to allocate at least 6 more pitches. But, as stated, this site is not Available, Suitable or Achievable. In this respect, the draft Local Plan cannot be considered to be sound as it is not positively prepared, justified or effective.	Noted. The acknowledgement that there is a need to meet the needs of the gypsy and traveller community is welcomed. Whilst the objection to allocate six pitches is strongly opposed by the landowner, the council would welcome further discussion with the landowner and/or their agents to enable the council to seek to acquire an interest in the land. The notion that such development is not appropriate is somewhat contradicted by the alternative vision presented by the landowner that would seek to deliver 600-800 homes and other uses as well as the apparent displacement of the farm and other commercial activities on the site.	09NO Kingdom Workshop, Sharvel Road		Roger Smith	All Souls Coll	697	Developer
Availability The National planning policy for traveller sites is contained within 'Planning policy for traveller sites', which was updated in 2015 (PPTS). The PPTS states that planning authorities should, in producing their Local Plan - a) identify a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets; b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15. It goes on define 'deliverable' as, "To be considered deliverable, sites should be available now, offer a suitable location for development, and be achievable with a realistic prospect that development will be delivered on the site within five years." [emphasis added] Our Clients would confirm their firm position that this site is not available for allocation. The site remains in active commercial use for a wide range of activities related to the long-standing commercial and equestrian use of the land. This site is used to grow haylage to serve the needs of the tenants who use the land for exercising the horses stabled at Down Barn Farm. This is an established commercial enterprise that currently makes use of this site and plans to continue doing so for the foreseeable future.	Noted. Whilst the objection to allocate six pitches is strongly opposed by the landowner, the council would welcome further discussion with the landowner and/or their agents to enable the council to seek to acquire an interest in the land. The notion that such development is not appropriate is somewhat contradicted by the alternative vision presented by the landowner that would seek to deliver 600-800 homes and other uses as well as the apparent displacement of the farm and other commercial activities on the site.	09NO Kingdom Workshop, Sharvel Road		Roger Smith	All Souls Coll	697	Developer

Suitability & Achievability The site is part of the Green Belt. The PPTS is clear at Para 16 that, “Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. Subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.” Sustainability Paragraph 13 of the PPTS reads, “Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally.” and goes on to list eight criteria that Local Planning Policies should meet. A)Promote peaceful and integrated co-existence between the site and the local community This site would not be integrated with the local community, being separated from it by a busy A-road and the large-scale American Golf Driving Range facility. Even if this site were to be built out in full, it would still be clearly isolated from the community, without any supporting infrastructure. B)Promote, in collaboration with commissioners of health services, access to appropriate health services The nearest GP Surgery is 800 metres away	Noted. Whilst the objection to allocate six pitches is strongly opposed by the landowner, the council would welcome further discussion with the landowner and/or their agents to enable the council to seek to acquire an interest in the land. The notion that such development is not appropriate is somewhat contradicted by the alternative vision presented by the landowner that would seek to deliver 600-800 homes and other uses as well as the apparent displacement of the farm and other commercial activities on the site.	09NO Kingdom Workshop, Sharvel Road		Roger Smith	All Souls Coll	697	Developer

Alternative Sites In the previous gypsy & traveller pitch provision consultation, the Council identified two other sites, Marnhams Field and Northolt Driving Range) that would provide ample pitches to meet the identified need on less constrained land. Marnhams Field is Council owned land so is immediately available, unlike our Clients site. It is designated MOL, rather than Green Belt, and relative to our Clients site it is much better located for integrating the new residents into the community with similar access to key facilities. Northolt Driving Range is another Council owned site that is immediately available as the driving range operation has ceased and our Clients note the steps that have already been taken by the Council to remove the Green Belt land use designation from this site. The distance to local facilities is again similar to our Clients land, with a Special Needs School immediately adjacent to the site. The Local Plan Review previously proposed a mixed-use allocation for this site so it entirely feasible that some gypsy and traveller pitches could be provided as part of this.	Noted. Whilst Marnhams Field in Greenford is in council ownership this is deemed to be highly performing MOL and was not considered suitable for release unlike Kingdom Workshop. Northolt Driving Range is also in council ownership it is not immediately available. It is on a long lease to a third party and is not expected to become available until towards the end of the plan period.	09NO Kingdom Workshop, Sharvel Road		Roger Smith	All Souls Coll	697	Developer

Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation Our Clients do not consider there is sufficient justification for the proposed requirement of 20% Net Gain, double the newly introduced national requirement. We consider Ealing would need to be able to demonstrate either exceptional value habitats or an exceptional biodiversity habitat deficit to be able to justify this approach. Our Clients do not see that either of those scenarios exist and so National Policy should remain the vehicle by which net gain is delivered. With regards to the Sharvel Lane site, our Clients propose a “fabric first” approach, using landscaping design, habitat creation and ongoing stewardship to deliver a carbon net zero development that also deliver a policy compliant net gain. For these reasons, our Clients object to this policy as not justified or properly evidenced.	Noted. It is acknowledged that the National Planning Practice Guidance on BNG seeks to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission. Defra’s own Impact Assessment indicated that the majority of costs associated with biodiversity net gain are incurred to reach a no net less position. The costs associated with moving from 10 to 20% is therefore considered to be marginal. However, the NPPG was published after considerable delays and only on February 14th 2024 (with updates on May 1st 2024) . This was after the Regulation 19 Local Plan and associated evidence base had been finalised ahead of the Full Council meeting held on February 21st 2024 and the beginning of the consultation period that ran from February 28th 2024. The council now acknowledges that additional time and further evidence is needed to prepare evidence to justify a rationale for pursuing a higher BNG percentage target. Therefore, the policy has been modified accordingly and a revised policy potentially containing a higher target will be considered as part of the next Local Plan review.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation			Roger Smith	All Souls Coll	697	Developer

Summary Regrettably, our Clients consider that the draft Local Plan cannot be considered sound in respect of the spatial strategy not being suitably Effective as it does not adequately make provision for the chronic and continuing under delivery of housing in the Borough. The Council needs to revise the Spatial Strategy to be more ambitious and allocate further sites to seek to provide for more housing than the London Plan target to allow for some new allocations not delivering as planned and exacerbating the existing supply problem. Our Clients also strongly object to Site 09NO which seeks to allocate the Sharvel Lane site as a Gypsy and Traveller Site. Our Clients own this site as part of the wider landholding being promoted to this Local Plan and have no interest in allowing the land to be developed in this way as it is not a suitable or compatible use given the existing uses on the site, which include Sharvel Haulage. The Sharvel Lane site is not available, suitable or deliverable and the proposed allocation cannot be considered sound. {Appendix: Northolt Vision Document}	Noted. Whilst the objection to allocate six pitches is strongly opposed by the landowner, the council would welcome further discussion with the landowner and/or their agents to enable the council to seek to acquire an interest in the land. The notion that such development is not appropriate is somewhat contradicted by the alternative vision presented by the landowner that would seek to deliver 600-800 homes and other uses as well as the apparent displacement of the farm and other commercial activities on the site.	09NO Kingdom Workshop, Sharvel Road		Roger Smith	All Souls Coll	697	Developer

Iceni Projects Ltd (“Iceni”) has been instructed by the London Diocesan Fund (“LDF”) to prepare representations to the Local Plan Review – Regulation 19 Consultation on the Single Local Plan. These representations are with regards to Rectory Fields, Osterley Lane, Southall, which straddles the Borough boundaries of both Hounslow and Ealing (hereafter referred to as “the Site”), which is within the LDF’s ownership. A site location plan outlining the landholding and Borough boundaries is contained at Appendix A1. To note, the north western part of the Site, located adjacent to St Mary’s Church of England Primary School is located in Ealing and the southern part of the site within Hounslow. These representations focus on how the element of the site within Ealing could be redeveloped for a variety of uses, but we would welcome cross-boundary discussions with all parties should this be necessary. Notwithstanding this, we consider that the Ealing element of the site could be successfully developed. [Description of Diocese of London and their wish to promote and optimise their landholdings to fund their wider ecclesiastical community activities.]	Noted	Policy S1: Southall Spatial Strategy		Lydia Frimley	London Diocese	700	Developer

The site is sustainably located close to a range of services and public transport and thus would be an ideal candidate to accommodate a residential development. Alternatively, it could deliver a new school or extension to an existing school to support housing growth – the site adjoins the successful St Mary’s Church of England Primary School. There is the potential to provide SEND provision spaces on the Site which could be related to the adjoining school or in a freestanding facility. Another potential option would be to deliver a solar farm on the Site – delivering renewable energy to respond to the climate change emergency declared by the Council. We are supportive of the principle within the Local Plan of releasing Green Belt and MOL for different forms of development in the emerging Local Plan; however, we consider that the Council needs to go further to ensure that it needs the full range of development needs over the plan period and the only way to do this is to release further Green Belt and MOL.	Noted.	Policy S1: Southall Spatial Strategy		Lydia Frimley	London Dioc	700	Developer

The Local Plan as currently drafted is not sound as it does not fully meet the needs for housing (providing insufficient family houses, affordable and community-led housing), does not make full provision for education needs and lacks a path to achieving its sustainability aims through the creation of renewable energy. The Local Plan therefore fails the tests of soundness in regard to being positively prepared, justified, effective and consistent with national policy. As we shall highlight within this document, the Site can be designed to overcome the limited constraints and deliver a sensitive development that meets the needs of the local community and provides significant public benefits. This would form part of a strategy within a revised version of the Local Plan to remedy the failure against the tests of soundness identified above. As such, we consider there is a robust case for the allocation of the site in later versions of the Local Plan. [Description of site and surroundings which is located within both LB Ealing and Hounslow. Site plan attached as Appendix] [Reasons given for site's sustainable location including access to Southall Station, M4 motorway and proximity of Heathrow Airport. Schools, shops, park, pub, GP all within 10 minutes walk] To summarise, the Site is well served by the range of public	Noted.	Policy S1: Southall Spatial Strategy		Lydia Frimley	London Dioc	700	Developer

Metropolitan Open Land (MOL) Policy G3 of the London Plan (2021) outlines that the protection should be given to London’s MOL from planning applications for inappropriate development, except in very special circumstances, giving the same level of protection as in the Green Belt. The London Plan also outlines that policy guidance outlined within the National Planning Policy Framework (NPPF) regarding Green Belt equally applies to MOL. This does not mean that Metropolitan Open Land should not be developed and Ealing is one of several London Boroughs which is seeking to redesignate the poorest quality areas of Green Belt and MOL for different forms of development. In this instance, Exceptional Circumstances should be demonstrated to justify the release of these sites as part of the Local Plan process. Any release of Green Belt or MOL needs to be assessed in the context of its quality and clearly the highest quality Green Belt and MOL should be retained and development focused on the poorer quality elements. On this basis, our analysis in Table 1 has shown that when assessed, the site does not contribute towards the five aims of the Green Belt or in this case the MOL (as outlined in	The site straddles the border with Hounslow. While the part of the site that lies within Ealing's boundary is relatively small, it is part of a much largen green chain in Hounslow, which is designated MOL. Therefore, the status of the site needs to be considered in this context. This justifies the council's decision to designate the site as MOL to protect it from inappropriate development. Assessing MOL sites against Green Belt objectives is not a sound approach.	General		Lydia Frimley	London Dioc	700	Developer

{Overview of the Norwood Green Conservation Area} {Setting} {Contribution of Site to Special Interest} Developability of the Site in heritage terms The above summary of the significance of the Conservation Area, the setting of the CA as well as the contribution of the Site to the special interest of the CA has informed our recommendations below. As discussed above, the Site is a leftover plot within the CA, once associated with a now long demolished Parsonage and now located within a ribbon of established development along the southern side of Tentelow Lane. Therefore, in its current form, it has a very limited contribution to the special interest of the CA. It is considered that there is scope to develop part of the Site without detracting from the special interest of the CA. The northwestern part of the Site is considered developable, and would be understood as a contextual modern development within an established area of built form. This would retain the more open southern part of the Site. Development on northern part of the Site could retain the contribution of the Site to the significance of the CA through the retention of the mature green boundaries. Views in and out of the Site from the Green and to the south would need to be considered as part of any forthcoming development. There is scope for the retention of the existing hedgerows surrounding the Site which would minimise much of the visibility for any forthcoming development on the Site	The site straddles the border with Hounslow. While the part of the site that lies within Ealing's boundary is relatively small, it is part of a much largen green chain in Hounslow, which is designated MOL. Therefore, the status of the site needs to be considered in this context. This justifies the council's decision to designate the site as MOL to protect it from inappropriate development.	Policy S1: Southall Spatial Strategy		Lydia Frimley	London Dioc	700	Developer

Section Conclusion Following the analysis of the site’s MOL and heritage constraints it is clear that: •The site does not perform well against the characteristics of Green Belt land within the NPPF. •It can be released from MOL and redeveloped without significant harm to the objectives set out within the NPPF. •The site has some limited heritage contribution to the character of the Conservation Area. •The site can be developed without harm to the character of Conservation Area through the locating development closest to the school and with the use of appropriate and sensitive landscaping.	The site straddles the border with Hounslow. While the part of the site that lies within Ealing's boundary is relatively small, it is part of a much larger green chain in Hounslow, which is designated MOL. Therefore, the status of the site needs to be considered in this context. This justifies the council's decision to designate the site as MOL to protect it from inappropriate development.	Policy S1: Southall Spatial Strategy		Lydia Frimley	London Diocese	700	Developer

This section outlines the site’s suitability for development and provides commentary on the soundness on the content of the Local Plan Review. Ealing’s Development Strategy General market housing Ealing is in significant need of new housing. The London Plan sets a target of 2,157 dwellings per annum (dpa). The delivery against this target has been low in the past few years, which is evidenced by the 5 YHL Position Statement November 2023 with a figure of 3.5 years. The Housing Delivery Test was published in 2023 and gives them a percentage of 86% and an Action Plan is required. According to the London Datastore, the gap between need and delivery is expected to widen in future years. Affordable housing The adoption of an ambitious Local Plan is required to boost delivery to the necessary levels. The Local Housing Needs Assessment states that in 2021 there was an overall affordable housing need of 15,406 and an estimated need in 2021-41 of 17,234 (which this Local Pan as drafted will not meet). Community-led housing The latest NPPF changes also require local authorities to identify sites for small and medium sized developments, including for community-led housing (paragraph 70). The	Where the council proposes to allow some development on Greeb Belt or MOL sites, this is primarily to enable improvements to GB/MOL that would otherwise not be possible. Any development on such sites should be in accordance with the new Local Plan's enabling development policy which states that any enabling development should be proportionate to the improvements being enabled.	Policy S1: Southall Spatial Strategy		Lydia Frimley	London Dioc	700	Developer
Suitability of Site for Housing As highlighted earlier in these representations, the site is in close proximity to public services, facilities and transport options that mean it is ideally located for residential development of all types. As examined above the constraints in terms of MOL and heritage can be overcome with a suitable design and landscaping.	Where the council proposes to allow some development on Greeb Belt or MOL sites, this is primarily to enable improvements to GB/MOL that would otherwise not be possible. Any development on such sites should be in accordance with the new Local Plan's enabling development policy which states that any enabling development should be proportionate to the improvements being enabled.	Policy S1: Southall Spatial Strategy		Lydia Frimley	London Dioc	700	Developer

Suitability of Site for School The Infrastructure Delivery Plan published in February 2024 states that there has been an overall decrease in demand for primary school places across the borough. However, 10 new forms of entry are needed in Southall to support the level of anticipated growth of the plan period. There are two planned primary school projects over the plan period, which is the proposed redevelopment of Stanhope Primary School to provide improved facilities and the provision of two FE class schools at Southall Waterside and Middlesex Business Centre developments has been secured through relevant S106 Agreements. This is unlikely to meet the full need for 10 FE of primary school provision over the Local Plan and more places will need to be identified. This report also states the need for SEND Provision, with 131 spaces projected for Southall. The Department for Education (Securing Developer Contributions for Education) and DLUCH (revisions to Planning Practice Guidance) have published guidance on collecting developer contributions to fund new school places. This is part of a significant shift of emphasis away from Central Government funding the bulk of new school places towards a situation whereby developers will be expected to deliver ~~them where it is directly arising from new housing growth~~	A school development would be inappropriate development as it would be harmful to MOL and would reduce the openness of the site. Very special circumstances would need to be established and demonstrated.	Policy S1: Southall Spatial Strategy		Lydia Frimley	London Diocese	700	Developer

Solar Farm The Local Plan Review does not identify any sites for solar farms. In order to deliver on the Council’s objectives on climate change it is considered that the Council needs to identify sources of renewable energy, this includes allocating suitable sites for solar farms. The Osterley Lane site can be utilised as a solar farm, by virtue of its broadly south facing nature and existing access, as an alternative to education or housing development. The solar panels can be well screened within the site and will not be overly visible from public viewpoints. The temporary nature of solar panels also means that they can be utilised in a way that avoids any significant biodiversity impact. The renewable energy created from the solar farm has the potential to improve the sustainability of the borough and to facilitate the provision of housing delivery. The solar farm could be delivered quickly to help meet the immediate needs of the borough. We consider that an allocation of the site and its removal from the Green Belt is necessary to encourage investment in the sector and allow the Council to make a more meaningful contribution to reducing its own carbon emissions.	A solar farm would be inappropriate development as it would be harmful to MOL and would reduce the openness of the site. Very special circumstances would need to be established and demonstrated.	Policy S1: Southall Spatial Strategy			Lydia Frimley	London Diocese	700	Developer

Conclusion These representations are produced on behalf of London Diocesan Fund, relating to Rectory Fields, Osterley Lane, Southall which is located within the LB of Ealing and within the LB of Hounslow. They seek to demonstrate that the site is suitable for development due to its sustainable location and its limited impact on the openness of the Green Belt. Based on the level of growth required, Green Belt boundaries are likely to be needed to be altered Borough wide to be able to meet need effectively, therefore it makes little sense to only review a smaller area within the Borough as per the now withdrawn Local Plan Review. As demonstrated in these representations, the existing approach of previously developed land focussed delivery is leading to a significant under delivery of affordable housing and a huge mismatch in delivering the three bedroom houses that there is an overwhelming need for. More significant Green Belt release will improve the viability of schemes and allow them to deliver more affordable homes and larger family houses that are required within the Borough. We consider the site is a sustainable option for the delivery of either housing or educational facilities and therefore the Council should consider its release from the Green Belt ~~through the Local Plan. This site is deliverable in the short~~	Inappropriate development (including residential / educational) would be harmful to MOL and would reduce the openness of the site. Very special circumstances would need to be established and demonstrated.	Policy S1: Southall Spatial Strategy		Lydia Frimley	London Dioc	700	Developer

Brydell acknowledge that the draft plan will shape and guide future development in the area over the next 15 years from 2024 – 2039 and includes a strategic vision, spatial strategy and collection of seven Town Plans which provides place-based strategies to accompany development management policies which apply to the entire district. Brydell are supportive and appreciative of this engagement on the draft plan having initially responded to the Regulation 18 consultation last year in February 2023. This consultation remains of great interest to Brydell given their landholdings at the Former Greenwich School of Management (Site Allocation 05GR) which is proposed for a “High density employment-led mixed-use scheme with education, community, and residential elements” by the draft plan. In summary, Brydell supports many of the principles and aims outlined in the draft plan, particularly the intention to “encourage the delivery of significant levels of development in proximity to planned and proposed public transport infrastructure” (Figure SS1) and ambition for Ealing to become “the engine of West London’s new economy” (Policy SP1). Comments focus on: the Greenford Spatial Strategy (Policy A1), Development Management Policies relating to Tall Buildings (Policy D9), Affordable Housing (Policy HOU), Large Scale Purpose Built Shared Living (Policy H16), Affordable Workspaces (Policy F3) and Biodiversity (Policy G6).	Noted.	05GR Former Greenwich School of Managemen t		Corin Williams	Brydell Partn	701	Developer

Greenford Spatial Strategy (Policy G1) Brydell supports the broad aims of Policy G1 and its emphasis on growing and intensifying development in its town centres, industrial areas and green spaces. In particular, Brydell support the addition of Point B to the policy which aims to reinvigorate Greenford District Centre as the “primary hub of the area” via a “masterplan led, mixed use redevelopment of the town centre with a more diversified retail offer with a wide range of community, cultural and civic assets”. Greenford Station is located approximately 900m to the south of the site, whilst Sudbury Hill Underground Station is around 750m north of the site. Additionally, new bus stops are being provided on Berkeley Avenue as part of the adjoining Greystar development meaning that the site represents a sustainable location for development despite its relatively low PTAL score. Given the proximity of Site allocation 05GR to Greenford Railway Station, the aim to improve connectivity to the rest of the borough via the provision of a more frequent and attractive rail service between Greenford and West Ealing is also supported.	Noted. Support welcomed.	Policy G1: Greenford Spatial Strategy		Corin Williams	Brydell Partn	701	Developer
Brydell note the addition of Point I which relates to the creation of jobs. Whilst this inclusion is broadly supported, Brydell recommend that Point I(ii) which seeks to “explore opportunities to provide additional employment land, particularly adjacent to well established industrial clusters” should also consider sites that are easily assessable and benefit from local transport links. Point I(iii) could also be expanded to ensure that the supply of employment land provides a “wide range of unit sizes” which will allow the “wide range of businesses” desired by the policy to inhabit the space.	Noted. Support welcomed. A modifcation to Policy G1 is proposed.	Policy G1: Greenford Spatial Strategy		Corin Williams	Brydell Partn	701	Developer

Whilst supportive of the overall aims of the policy, Brydell would also like to highlight an inconsistency between the Greenford Spatial Strategy and Figure SS1 which supports the Borough’s overall Spatial Strategy on page 65 of the draft plan. Figure SS1 lists the level of development intervention expected by the council at each of the “town locations” in Ealing. Number (iv) states that Ealing Council will expect “delivery of significant levels of development in Greenford and Northolt town centres”. Section A of Policy G1 however states that “Moderate levels of mixed-use development will be directed to the areas of best connectivity”. In the interests for consistency, Brydell ask that Policy G1 is amended to express a requirement for “significant” levels of development in the areas of best connectivity so that it aligns with the Spatial Strategy for Ealing.	Noted. Support welcomed. This is a transcription error and a modiifcation to Policy G1 is proposed.	Policy G1: Greenford Spatial Strategy		Corin Williams	Brydell Partn	701	Developer

Greenford Development Sites It is noted that Ealing have brought forward 5 of the previous 10 draft allocations from the Regulation 18 Plan. These are agreed to be the most promising development opportunities in the area and together will ensure that Greenford continues to grow and develop over the plan period. Brydell Partner’s land interest at the Former Greenwich School of Management forms part of a draft site allocation under this policy (Site Allocation 05GR). The draft plan outlines that the site’s proposed use is for a “High density employment-led mixed-use scheme with education, community and residential elements”. Brydell note that the description of the proposed use has changed from a “non-residential-led mixed use” to a “high density employment-led mixed use” scheme and agree that the site represents an excellent opportunity for commercial development due to its proximity to the Greenford Strategic Industrial Land designation and major industrial / logistics uses nearby such as the Tesco and Sainsbury’s distribution centres. Due to its direct connection to Greenford Road, any strategic industrial / logistics uses (B2, B8) at the site would benefit from equally efficient access to the A40 and the additional connections to the strategic road network (the M25 and M40) that this provides. This site is also of an appropriate	Noted. Support welcomed.	05GR Former Greenwich School of Managemen t		Corin Williams	Brydell Partn	701	Developer

Brydell would also like to discuss the site’s suitability for residential development given its proximity to major residential developments in the local area. The site is located opposite the new Greenford Quay residential development, the size of which has a significant impact on the local context. As per the implemented planning permission at the Greenford Quay site, it is clear that the area surrounding the site now has a distinct residential character. In light of this, both a high-density residential scheme and a commercially / employment led scheme would be equally suited to the local area. To this effect, Brydell would suggest that, given the surrounding context, a residential-led mixed use scheme should not be discounted at this early stage. The site is in a highly sustainable location between two tube stations and therefore has the ability to support a range of residential and commercial uses comprising, but not limited to, development within use classes C1 (hotels), C3 (dwellinghouses) as well as flexible commercial/community/town centre uses (Class B/E/F/ Suis Generis).They also note that a broader mixed-use allocation, with the potential for a range or combination of uses would be more suitable. This would provide greater flexibility to allow emerging schemes to more appropriately respond to the rapidly changing character in the immediate vicinity of the site, and across Greenford more broadly.	Noted. The possibility of including residential elements as part of a mixed use is not precluded by the site allocation although any developpment proposals should be employment led.	05GR Former Greenwich School of Managemen t		Corin Williams	Brydell Partn	701	Developer

Brydell would also like to query the decision to change the design principles of the site from having an “indicative heights range between 6 – 18 storeys (21 – 63 metres)” in the Regulation 18 plan to having an indicative “maximum height of 12 storeys (42 metres)” in the draft Regulation 19 plan. As stated above, the council is proposing that “high density” development takes place at this location and agrees that it is one of the top 5 locations for development in Greenford. The intention to reduce the maximum height of buildings at this location therefore is unexpected, especially as Block 7 and Block 8 of the Greenford Quays scheme comprise 14 storey towers, and Brydell would like to request further evidence as to how this decision has been reached. It is understood that the council seeks to introduce a new Tall Building policy and a response to this is provided in Section C.	Tall buildings evidence was reviewed for consistency and height allocations have been updated. Note that due to broader changes these are now recommended rather than maximum heights.	05GR Former Greenwich School of Management		Corin Williams	Brydell Partners	701	Developer
Brydell Partners also highlight that this site allocation encompasses land beyond the Greenwich School of Management, extending into the Fererro headquarters site to the south and southwest. Due to the split ownership of the site, Brydell Partners would also like to confirm that it is their assertion that the two separate land parcels do not need to rely on one another to come forward concurrently; rather, two asynchronous applications which are mindful and respectful of one another and the end uses proposed could also be acceptable and provide a high quality redevelopment of this site. Furthermore, Brydell note, and appreciate the changes to the description of the site’s current use as requested in our response to the Regulation 18 consultation.	Noted. The allocation suggests that an employment led masterplan is produced that would ultimately seek to optimise any proposed development for all of the land owning interests. The timing and phasing of development does not preclude piecemeal development provided it is part of an agreed masterplan.	05GR Former Greenwich School of Management		Corin Williams	Brydell Partners	701	Developer

Brydell expresses disappointment with the lack of changes made to Policy D9 and the Tall Building Evidence Base. Whilst a positive approach to growth in the borough is appreciated, it is considered that concerns regarding tall buildings and site allocations have not been adequately addressed. Brydell support the character-led development approach in line with London Plan policies but consider that the current approach to height and density in the Draft Development Sites is problematic as it may hinder future development potential in the area due to its inability to respond to changing housing demands. Brydell is concerned by the inconsistency in defining tall buildings across different areas of the borough and suggests revisiting the Tall Building Study Appendices and Policy D9 for consistency. We also propose a more flexible approach to tall buildings, allowing for development outside allocated sites if they meet a certain criteria. Additionally, Brydell questions the use of "maximum" heights and "indicative ranges" for site allocations and suggest that these restrictions are not sufficiently evidenced / justified by detailed assessments. In summary, Brydell are of the view that each site should be considered on its own merits with regard to whether a tall	Tall buildings evidence was reviewed for consistency and height allocations have been updated. Note that due to broader changes these are now recommended rather than maximum heights.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Corin Williams	Brydell Partn	701	Developer

Brydell supports LB Ealing's overall targets for affordable housing delivery and the aim to deliver good quality homes at affordable rents to enable local workers and students to live in the borough. However, Brydell has concerns with the requirement for 40% affordable housing provision to be eligible for the Fast Track route as such a large contribution is likely to create practical challenges and viability issues for developers. We understand this view is also shared with the Home Builders Federation (HBF) which is expected to state that “it is unjustified to increase the burden on housing development when the Council should be exploring ways to incentivise it further”. Furthermore, the draft HBF response considers that raising the Fastrack affordable housing requirement from 35% to 40% is likely to “erode any benefit” and “potentially increase the number of schemes that will have to be tested for viability”. It also considers that “the new conditions relating to early, mid and late stage reviews means that the Council’s policy will be more of a hindrance than a help” and that “subjecting housing schemes to a requirement for 40% affordable housing is not conducive to improving supply”. As a result, Brydell would also like to request further justification and viability evidence from the council as to how such a figure was agreed upon, especially as the figure is	There are no identified needs in Ealing for PBSL and so PBSL contributions do not perform against affordable housing targets. The 40% threshold is a necessary step towards meeting these needs.	Policy HOU: Affordable Housing – Ealing LPA – local policy			Corin Williams	Brydell Partn	701	Developer

Large Scale Purpose Built Shared Living (Policy H16) Brydell maintain their support for large-scale purpose built shared living accommodation and the necessity for developments of this use to be located in areas that are well connected to public transport, local amenities and employment opportunities. It is disappointing to see that the restriction that limits all developments of this type to Ealing Metropolitan Town Centre still remains as Brydell consider that each site should be judged on its individual merits and that limiting the spread of developments which are proven to assist students / young single professionals is likely to have a detrimental impact on their numbers within the District. Brydell maintain that co-living will continue to play a key role in addressing future housing need as it acts as a platform that offers new graduates and young professionals seeking accommodation locally or home ownership an alternative between student accommodation and paying full market rent.	There are no identified needs in Ealing for PBSL, and these schemes must demonstrate their need as part of the application process.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Corin Williams	Brydell Partn	701	Developer

Brydell note that Policy E3 remains unchanged from the Regulation 18 version of the plan. This is disappointing given the extensive evidence provided in the last consultation which explained that the blanket approach was inappropriate given the diverse range of commercial markets throughout Ealing and the context of the majority of key strategic sites. Despite this, Brydell acknowledges the necessity of providing diverse commercial space in Ealing but raises concerns regarding the proposed affordable workspace quotas in draft Policy E3. Key concerns include: 1. A uniform approach to discounted rents across Ealing could hinder viability in less established commercial areas. 2. Lack of flexibility in assessing schemes individually could further impede viability. 3. Mixed-use developments face disproportionately high affordable workspace obligations without adequate justification, potentially discouraging such developments. In response to the above, Brydell suggests allowing for lower proportions of floorspace if needs can be met and emphasises the importance of including Research & Development space for STEMM businesses in the policy. Additionally, the proposed policy mandates an 80% discount to market rents across Ealing, which Brydell argues is	Needs, discount rates and viability are demonstrated in the AW study. Where there are site specific viability concerns then these are for the applicant to raise. Provision is very much opposite to a one size fits all approach; offsite constitutions will be spent according to an AW strategy based upon local needs, and provision exists in the policy for onsite provision to meet any demonstrable and legitimate local AW needs.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		Corin Williams	Brydell Partn	701	Developer

Biodiversity and Access to Nature (Policy G6) Brydell supports the aims of Policy G6 and its addition to the Regulation 19 Draft submission version of the plan. It is important that developments improve access to nature via contributions that are sustainable and don't compromise the viability of the scheme. Brydell are concerned that the requirement for "development proposals to achieve a biodiversity net gain of a least 20% or the advised national minimum amount, whichever is greater" is unsustainable for developers and would prevent many schemes from coming forward for development. A 20% uplift is double the advised national amount and will severely impact the deliverability of schemes, particularly when there is a requirement for a 50% affordable housing contribution and up to a 10% contribution towards affordable workspace. Brydell request that further evidence is provided outlining how the Council arrived at this figure.	Noted. It is acknowledged that the National Planning Practice Guidance on BNG seeks to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission. Defra's own Impact Assessment indicated that the majority of costs associated with biodiversity net gain are incurred to reach a no net less position. The costs associated with moving from 10 to 20% is therefore considered to be marginal. However, the NPPG was published after considerable delays and only on February 14th 2024 (with updates on May 1st 2024) . This was after the Regulation 19 Local Plan and associated evidence base had been finalised ahead of the Full Council meeting held on February 21st 2024 and the beginning of the consultation period that ran from February 28th 2024. The council now acknowledges that additional time and further evidence is needed to prepare evidence to justify a rationale for pursuing a higher BNG percentage target. Therefore, the policy has been modified accordingly and a revised policy potentially containing a higher target will be considered as part of the next Local Plan review.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation			Corin Williams	Brydell Partn	701	Developer

We write on behalf of our client, Christian Vision, with respect to the Public Consultation on the emerging London Borough of Ealing (“LB Ealing”; “the Borough”) Draft Local Plan (Regulation 19, February 2024) [hereafter: “Draft Local Plan”] and specifically regarding the Ealing Town Plan and Draft Site Allocation Policy 11EA Sainsbury’s & Library, West Ealing. Christian Vision, has a significant land holding within Draft Site Allocation 11EA. This includes the existing Sainsbury’s supermarket and associated multi-storey car park to the west of Melbourne Avenue, to the south of Canberra Road, to the east of St James’ Avenue, and to the north of Leeland Terrace, West Ealing, W13 9BZ (“the site”), illustrated in Figure 1 below. Our client therefore has a strong interest in ensuring that the emerging Local Plan is sound, ambitious and deliverable. Christian Vision forms part of the wider IM Group, and is a global charitable Christian organisation founded in 1988 by Lord Edmiston. [Details of Christian Vision, the IM company and their holdings in LBE] [Figure showing draft site allocation 11EA and Christian Vision's land holding]	Noted.	11EA Sainsbury’s & Library, West Ealing		Christopher Schiele	Christian Vision	702	Developer

It is important to note that the site is neither located within a Conservation Area nor are there any Statutory Listed Buildings or Local Heritage Assets identified through in the current Local Heritage List located within close proximity / neighbouring. The surrounding area is also not of notable scenic (townscape) quality. In addition, the local context is evolving with a number of consented or under construction schemes to the north of the site. This will introduce a series of tall buildings positioned both along and setback from the Broadway and to the north of Singapore Road. As noted at Regulation 18 stage, Christian Vision supports – in principle – the Borough’s objectives of tackling the climate crisis, fighting inequality and creating good jobs and growth as well as its ambition to create a 20-minute neighbourhood in Ealing Town, as set out in Chapter 4 of the Draft Local Plan (which covers the Council’s ambition and spatial approach for Ealing in general and parts of West Ealing, including Draft Site Allocation 11EA, in particular). This position remains unchanged. Our client is a key landowner within Draft Site Allocation Policy 11EA (Sainsbury’s & Library, West Ealing) [hereafter: “the Draft Site Allocation”] and therefore has a strong interest that it is ambitious, deliverable and fully justified to enable the long-awaited regeneration of this part of West Ealing.	Comments noted and support welcomed.	11EA Sainsbury’s & Library, West Ealing		Christopher Schiele	Christian Vision	702	Developer

Proposed Use We positively note the revisions made to the Proposed Uses following our written representations at Regulation 18 stage and that the provision of a replacement supermarket has been recognised in the updated Draft Site Allocation, thereby acknowledging existing lease and occupier requirements which are key constraints to delivery. Nevertheless, it is still considered that the Draft Site Allocation should refer to the reprovision of a supermarket '<u>and/or other compatible town centre uses</u>', thereby: 1) Fully reflecting the site's location within a designated town centre (and linked in-principle acceptability of town centre uses within this designation, in accordance with Chapter 7 of the NPPF); 2) Ensuring that the Draft Site Allocation is flexible enough to respond to changing economic circumstances (see Para. 86d)) of the NPPF); and 3) Safeguarding a future redevelopment of the Draft Site Allocation against market need and demand at the time (rather than limiting or prescribing any future town centre uses in this location to a supermarket only). This would also align the Proposed Uses section of the Draft Site Allocation with corresponding Design Principles bullet	Accepted. Suggest Proposed Use is amended to include "<u>together with any other town centre uses</u>"	11EA Sainsbury's & Library, West Ealing		Christopher Schiele	Christian Vision	703	Developer
Indicative Timeframe for Delivery As highlighted at Regulation 18 stage, the indicative timeframe for delivery ('Within 6-15 years') seems realistic, although a start on site may be accelerated through a collaborative masterplanning approach between key landowners (including the Council) and existing occupiers, and is dependent on agreeing an adequate phasing strategy.	Accepted. We can suggest modification to Indicative Timeframe for Delivery to reflect this.	11EA Sainsbury's & Library, West Ealing		Christopher Schiele	Christian Vision	704	Developer

Design Principles, Tall Buildings & Phasing Christian Vision strongly considers that the Council’s envisaged approach to Design Principles and, in particular, building heights, as well as the specific requirement for any future redevelopment of the site to “[e]nsure building height, massing and street layout proposals are developed in accordance with the Tall Buildings Strategy ” (our emphasis) to be unsound. It is our client’s opinion that those elements fail to be: a)Positively prepared; b)Justified; and c)Consistent with national policy. Relevant Development Plan & Policy Framework [Reproduction of Chapter 11 NPPF: para 123, 124d, 128; Referencing London Plan: Policy GG2 Making the best use of land, Policy D3 Optimising site capacity through the design led-approach] As set out in Footnote 1 above, the Tall Buildings Strategy does not form part of the Development Plan or carries significant weight in decision-making. It has not been subject to independent examination.	Addressed above	11EA Sainsbury’s & Library, West Ealing		Christopher Schiele	Christian Vision	705	Developer

Evidenced Housing Need The Council sets out an annual housing target of 2,157 new homes (Draft Policy SP4.3) which reflects the requirements of Table 4.1 of the London Plan (2021). However, in recent years, the Council consistently failed to meet its objectively assessed housing need. The Government’s 2022 Housing Delivery Test identified that LB Ealing only delivered 86 per cent of its need, meaning that the Borough already requires an Action Plan to set out how it intends to boost housing delivery. In the London Plan Review – Report of Expert Advisers (January 2024) commissioned by the Secretary of State for Levelling Up, Housing and Communities, a significant undersupply of new housing completions (>5,000) in comparison to its London Plan (2021) housing targets has similarly been identified for LB Ealing (see Figure 2.2 of the Report which is based on information contained in the Greater London Authorities [“GLAs”] Planning London Datahub), constituting the third highest of all London boroughs. The Council itself reported a 5 Year Housing Land Supply of 3.7 years in November 2023 (LB Ealing, Position Statement and Housing Trajectory, November 2023). Whilst the Council seeks to target the minimum annual housing target set out for the Borough in the London Plan (2021), it is unclear from the draft site allocations in combination with the published version of its Housing	Whilst the shortage of deliverable supply over the next five years is acknowledged, it should be borne in mind that the Council has adopted a fairly precautionary approach when determining which large sites qualify as ‘deliverable’, i.e. those whose capacity is assigned to the 'next five years'. Only capacity from sites benefitting from full permission have been included, when in reality some capacity might be delivered during that period from sites which are currently less advanced in the planning cycle. It is possible then that the identified deliverable capacity might underestimate what supply could potentially be delivered within that window of time. As detailed in the report itself, the position when examined over a longer timeframe, is more positive. Over the full 19 year trajectory period delivery/supply is expected meet the cumulative requirement with a modest contingency. Whilst it is helpful to examine the position over a longer timeframe to even out the inevitable fluctuations that can occur from year to year, the use of a longer timeframe also poses challenges. This is particularly evident for the latter part of the trajectory period where it is difficult to comprehensively identify which sites might be available and suitable that far into the future. As a consequence it is probable that the trajectory undercounts what capacity might be delivered over the life of the plan. As well as taking a restrained approach to phasing, in establishing capacity estimates for individual sites to feed into the trajectory, and specifically for those sites which don’t currently benefit from an extant permission, officers have similarly sought to adopt a	SP4.3 Genuinely affordable homes		Christopher Schiele	Christian Vision	706	Developer

Implications for the Draft Site Allocation’s approach to Building Heights/Density Neither the requirements of national and regional policies, nor the evidenced housing need seem to be reflected in the Draft Site Allocation which does – in our view – not result in the most effective use of brownfield land. The strict requirement to ensure that a future redevelopment is in accordance with the Council’s Tall Buildings Strategy – therefore ignoring to take into account reasonable alternatives – contradicts wider national (and regional) policy requirements to: • Make most effective use of well-connected brownfield land to meet evidenced need (NPPF Para. 123 and 124d; London Plan Policy GG2); • Build at appropriate densities (NPPF Para. 128 and London Plan Policy GG2); and • Achieve optimum site capacities (through testing design options) (London Plan Policy D3). It is further important to note that the approach set out in the Tall Buildings Strategy is inconsistent with the Draft Site Allocation itself which states that the site is “in principle suitable for a tall building. Design analysis indicates a maximum height of 16 storeys (56 metres)”. Our client fully agrees with the site being identified within an area suitable for tall(er) buildings of up to 16 storeys, as discussed in more detail in Paragraph 59 of the Built Heritage and Townscape Technical Note (“HTVIA”) Technical Note prepared by Turley provided in support of these written representations (see Annex 1).	Heights set through site allocations replace general guidance on heights in policy D9.	11EA Sainsbury’s & Library, West Ealing		Christopher Schiele	Christian Vision	707	Developer

For the avoidance of doubt, the Tall Buildings Strategy further deviates from adopted site allocation EAL16 (59-116 Broadway and New Ealing House) of the Development Sites Development Plan Document (“DPD”; 2013) which currently allocates the site and wider area for mixed use development and notes in relation to height that: “There is an opportunity for taller elements to locate within the centre of the site subject to development safeguarding acceptable levels of privacy for users of adjacent residential developments and to development not being overbearing in relation to views from The Broadway. Buildings fronting St James’s Avenue should be of a height adequate to the setting of St James’s Church and should reflect the character of this locally significant heritage asset.” Locating taller elements within the centre of the site (allocation) has therefore been previously deemed acceptable (in-principle) by the Council as a sound approach towards the redevelopment of this part of West Ealing. Not only contradicting the DPD and the maximum building heights set out in the Draft Site Allocation, it is considered that the requirement to develop the site allocation ‘in accordance with the Tall Buildings Strategy’ will further result in a sub-optimal form of development which stands in contrast with the NPPF’s (and London Plan’s) objectives to make most effective use of brownfield land (to maximise public / planning benefits) and fails to consider reasonable alternatives in order to meet identified needs as noted above.	The new plan is not bound by previous permissions or site allocations. The tall buildings evidence base forms a consistent set of recommendations based upon a comprehensive character and context assessment of the borough.	11EA Sainsbury’s & Library, West Ealing		Christopher Schiele	Christian Vision	708	Developer

Whilst other environmental effects will need to be considered at pre-application/planning application stage, no heritage and/or townscape reasons limiting a future redevelopment of the Draft Site Allocation to strictly follow the prescriptive approach to (layout and) building heights set out in the Tall Buildings Strategy have been identified. Therefore, any reference in the Design Principles of the Draft Site Allocation to develop proposals in accordance with the Tall Buildings Strategy should be removed to ensure the Draft Site Allocation (and therefore Draft Local Plan) is sound and deliverable (see suggested modifications in Section 6 below). This will result in making best use of one of the Borough's most highly sustainable and accessible brownfield sites, as required under the NPPF and London Plan, in an area which can accommodate additional height/massing (as demonstrated above), and therefore maximise the public / planning benefits that this site and the wider Draft Site Allocation can deliver (i.e. including a higher number of [affordable] homes alongside other community or employment-generating town centre uses and significant improvements to the local public realm). It also assists in ensuring that the Draft Site Allocation – which is supported in principle – is aspirational, yet deliverable, in accordance with Para. 16b) of the NPPF. It will also ensure that the detailed consideration of development options, environmental impacts and (urban) design criteria at pre-application/application stage identifies the optimum form, height and density of development, as envisaged by London Plan Policy D3 and Para.	Accepted. Amend wording to note layout as guidance as to the recommended location of heights.	11EA Sainsbury's & Library, West Ealing		Christopher Schiele	Christian Vision	709	Developer

Land Use, Layout and Phasing (as set out in the Tall Buildings Strategy) With regards to the distribution of land uses, layout and therefore linked phasing of the Draft Site Allocation, it is further noted that those aspects are similarly covered in the Tall Buildings Strategy. Given that the primary purpose of the document should be to provide a robust evidence base for the Draft Local Plan in terms of identifying suitable tall building zones, it is further seen that any compliance with the Tall Buildings Strategy in terms of layout and the location of land uses is unjustified. The Tall Buildings Strategy does not form part of the Development Plan or carry any statutory weight in decision-making, i.e. is it not an Area Action Plan, Supplementary Planning Document, or other form of adopted Masterplan/Guidance. In fact, the suggested allocation of land uses is not considered to respond to land ownership constraints or phasing requirements. It assumes all retail floorspace along the Broadway and all community uses within our client's site, thereby releasing the wider land parcels for residential only. In line with the NPPF (i.e. Para. 86d) and Chapter 7) there needs to be increased flexibility for the provision of town centre uses and their location within the designated town centre. The redevelopment of the Draft Site Allocation requires a robust phasing and delivery strategy. Landowners either need to work together to develop a comprehensive redevelopment strategy/masterplan or sites come forward individually at different times within the Plan period (i.e. ~~subject to design guidance ensuring a holistic approach to~~	The strategy informs the allocation which does have statutory weight as a local plan policy.	11EA Sainsbury's & Library, West Ealing		Christopher Schiele	Christian Vision	710	Developer
Proposed modification to 11EA For the reasons set out in Section 5, the Tall Buildings threshold should be amended as follows: 'The site is in principle suitable for a tall buildings [...]'	Addressed above	11EA Sainsbury's & Library, West Ealing		Christopher Schiele	Christian Vision	711	Developer

Proposed modification to 11EA Design Principle • Ensure building height, massing and street layout proposals are developed in accordance with the Tall Buildings Strategy. Heights should range between 3.6m and a maximum of 16 storeys (28m-56m) across the site allocation, informed by a detailed consideration of the surrounding context, development options, and environmental, townscape and heritage assessments at planning application stage. Any tall buildings should be assessed against London Plan Policy D9(C). Reason: As set out in Section 5, the approach of the Tall Buildings Strategy is not considered to accord with the objectives of national policy (and the London Plan, 2021). Appropriate building heights for different parts of the Draft Site Allocation should be developed through the consideration of detailed development options and masterplanning alongside townscape, heritage and environmental testing at pre-application and planning application stage and be in accordance with an overarching development framework established by the Draft Site Allocation and Development Plan (rather than an overly prescriptive Tall Buildings Strategy which carries no statutory weight in decision-making).	Amend wording to note layout as guidance as to the recommended location of heights.	11EA Sainsbury's & Library, West Ealing		Christopher Schiele	Christian Vision	712	Developer
Proposed modification to 11EA Design Principle • Arrange building typologies according to perimeter blocks, potentially comprising taller elements linked by lower-rise blocks and terraces particularly on east-west streets. Ensure heights step down towards Leeland Terrace to the south. Reason: As above. The Design Principle is too prescriptive. Building typologies should be developed following detailed consideration at masterplan/planning application stage. The remaining text can be incorporated in a single Design Principle relating to building heights (i.e. as set out above).	These principles are important to the justification of taller elements on this site and are not considered overly prescriptive. The spatial framework and development principles reflect a townscape and character-led approach to optimising the capacity of sites that have not been subject to full design or viability testing. It is for development proposals to demonstrate where the planning balance should favour a different approach.	11EA Sainsbury's & Library, West Ealing		Christopher Schiele	Christian Vision	713	Developer

Proposed modification to 11EA Design Principle ~~• Incorporate no/low levels of car parking for any residential development given the town centre location.~~ Reason: Remove. Repetition of wider policies contained in the Development Plan. A car-free/car light approach to vehicle parking is already a requirement of the Development Plan for this location.	Transport for London (TfL) have requested the Design Principle be amended to read "Residential and retail uses should be car free given the town centre location"	11EA Sainsbury's & Library, West Ealing		Christopher Schiele	Christian Vision	714	Developer
Proposed modification to 11EA Design Principle ~~• Deliver significant and co-ordinated improvements to the public realm.~~ Reason: 'Significant' is not defined and adds uncertainty. Compliance cannot be measured and is open to misinterpretation.	Meaning more than token.	11EA Sainsbury's & Library, West Ealing		Christopher Schiele	Christian Vision	715	Developer
Our client wishes to reserve the right to participate in upcoming hearing sessions relating to Chapter 4 Ealing Town Plan and Draft Site Allocation EA11 (as well as, if required, Draft Policy D9 Tall Buildings London Plan – Ealing LPA – local variation) to answer questions from/provide clarifications to the Inspector and/or to provide responses to any (technical) matters/issues identified in relation to these written representations to ensure that the Draft Site Allocation is deliverable.	Noted	11EA Sainsbury's & Library, West Ealing		Christopher Schiele	Christian Vision	716	Developer

GTR have a confidential interest in a LSIS site in the borough, which is progressing to completion in the short term. GTR therefore have significant investment and hold a vested interest in the evolution of the policy framework affecting the Borough. The planning representations relate to the following draft policies which are included as documents appended to this letter as follows: ☐Policy SP1 – A Vision for Ealing; ☐Policy SP2 – Tackling the climate crisis; ☐Policy SP4 – Creating good jobs and growth; ☐Policy S1 – Southall Spatial Strategy; ☐Policy E3 – Affordable Workspace London Plan – Ealing LPA – Local Variation; ☐Policy E6 – Locally Significant Industrial Sites (LSIS) – London Plan – Ealing LPA - Local Variation; ☐Policy G6 – Biodiversity and Access to Nature London Plan – Ealing LPA – Local Variation; and ☐Policy OEP – Operational Energy Performance – Ealing LPA – Local Policy.	Noted.	General		Tom Vernon	Global Techn	703	Developer
1.1GTR is supportive of LBE’s recognition that Ealing will become the engine of West London’s new economy with an intention to grow and diversify business space and further strengthen the role of industrial areas. 1.2Ealing is strategically located to foster growth in a diversified and forward thinking industry and employment sector. GTR supports the core vision objectives which are central to creating a solid basis for the vision and spatial strategy for Ealing.	Noted. Support welcomed.	Policy SP1: A Vision for Ealing		Tom Vernon	Global Techn	703	Developer

2.1~~6~~TR is supportive of the LBE’s overarching approach to tackling climate change and specifically policy wording set out in SP2.2 B (iv) which supports and encourages appropriate meanwhile uses in multi-phased schemes, particularly for employment uses on vacant industrial land and premises. 2.2~~6~~TR is supportive of LBE’s commitment to support the delivery of Net Zero Carbon buildings where technically feasible. In this context policy wording needs to be updated to remain flexible with proposed development reviewed on a site-by-site basis and reflective of use to not preclude development coming forward. Providing on-site renewable energy generation to match remaining/residual energy needs of the site may not be possible owing to site specific circumstances and this wording should therefore be removed. 2.3~~6~~In addition to the above policy wording needs to be updated to allow for viability consideration as per Section 11 of the NPPF (Making effective use of land). Paragraph 128 recognises (amongst other criteria) planning policies and decisions should support development that makes efficient use of land, taking into account local market conditions and viability.	Noted. Support welcomed. Regards delivery of net zero, there is an extensive policy suite in Chapter 5. In particular, Policy WLC requires applicants to undertake an optioneering exercise as part of the Whole Life Cycle Carbon Assessment, which seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option. The findings of this optioneering exercise should be considered alongside other planning considerations to determine the most appropriate option, including consideration of a retrofit first approach. The ‘options’ considered should include reuse/refurbish options, alongside any new build options if pursued. All options evaluated should be capable of comparison reflecting the same best practice standards. Regards NPPF Para 128 this is understood and it should be borne in mind that all policies in the draft Local Plan have been subject to an independent viability assessment.	SP2.2 Climate action		Tom Vernon	Global Techn	703	Developer

2.4² Suggested revised wording relevant to criteria D is provided below: D. Supporting the delivery of Net Zero Carbon buildings <u>(where technically feasible and subject to viability)</u>, which are designed and built to: (i)~~Minimise~~ their heat demand and energy usage. (ii)~~Avoid~~ the use of fossil fuels, with heat provided through low carbon sources instead. (iii)~~Maximise on-site renewable energy generation - to match the remaining/residual energy needs of the site, and to minimise pressure on the electricity network.~~ (iv)~~Connect~~ to low or zero carbon district heating networks <u>where technically feasible</u>. (v)~~Minimise~~ embodied carbon. (vi)~~Facilitate the re-use of existing buildings~~ <u>where this aligns with proposed development requirements</u> and represents the optimum outcome. E. Ensuring that planned growth is managed in line with ~~energy network upgrades and reinforcement~~	Regards delivery of net zero, this policy sets out the overall objectives of policy and there is an extensive policy suite in Chapter 5 which deals with the specifics of development management. In particular, Policy WLC requires applicants to undertake an optioneering exercise as part of the Whole Life Cycle Carbon Assessment, which seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option. The findings of this optioneering exercise should be considered alongside other planning considerations to determine the most appropriate option, including consideration of a retrofit first approach. The ‘options’ considered should include reuse/refurbish options, alongside any new build options if pursued. All options evaluated should be capable of comparison reflecting the same best practice standards. The assessment of technical feasibility and ability to meet any new development requirements, for example, can all be considered as part of this process.	SP2.2 Climate action		Tom Vernon	Global Techn	703	Developer

3.1 GTR is supportive of emerging policy aspirations for creating good jobs and growth. Specifically GTR is supportive of wording set out in SP4.1 C which seeks to ensure that the most efficient use of land is undertaken to optimise development on sites, leading to more sustainable patterns of development and land use. 3.2 GTR is supportive of establishing a strategy for LSIS designations, as outlined in SP4.2 C. However any specific strategy/plan-led masterplan should be progressed in coordination with land owners and not preclude development coming forward in advance of adoption of such documents. Such a requirement would have significant potential to preclude development within LBE. Suggested revised wording for Criteria C is provided below: C. Setting out a specific strategy for Locally Significant Industrial Sites (LSIS) in line with the London Plan ~~and actively~~ by means of plan-led comprehensive masterplans undertaking mixed intensification <u>progressed in combination with</u> landowners. Development will not be precluded in advance of <u>such strategies/masterplans where it is in accordance with the wider development plan.</u>	Noted. Support welcomed. This policy sets out the overall objectives of policy and should be read in conjunction with Policy E6 in the London Plan and the local variation in Chapter 5 which says that mixed intensification may be suitable on LSIS in cases where a masterplan is agreed with Ealing according to the following principles: (i) It extends to the full boundary of the LSIS. (ii) It meets objectively assessed industrial needs. (iii) It achieves a high quality of built environment and delivers any necessary supporting infrastructure, affordable housing, and affordable workspace contributions. As has already been done in South Acton and is currently being done in Acton Vale, the council will always seek to work with willing landowners to develop masterplans for these areas.	Policy SP4: Creating good jobs and growth		Tom Vernon	Global Techn	703	Developer
3.3 GTR is strongly supportive of wording at Criteria E which seeks to grow the size and range of the employment offer in Ealing.	Noted. Support welcomed	Policy SP4: Creating good jobs and growth		Tom Vernon	Global Techn	703	Developer
3.4 In addition to the above any requirement for the provision of affordable workspace (Policy SP4.2, Criteria G) should remain consistent with the London Plan (Policy E3) and be reflective of proposed use and viability. Further comments on affordable workspace are made later in these representations in relation to draft LBE policy E3.	Noted. This policy sets out the overall objectives of policy and should be read in conjunction with Policy E3 in the London Plan and the local variation in Chapter 5 which addresses viability issues at G.	Policy SP4: Creating good jobs and growth		Tom Vernon	Global Techn	703	Developer

4.1 GTR is supportive of LBE’s recognition of Southall’s strong industrial base. However, to remain forward thinking and foster innovation in this sector, additional policy wording should be provided to include reference to the ‘emerging industrial-related activities/sectors’ referenced in London Plan Policy E4 (Land for industry, logistics and services to support London’s economic function) and the supporting policy justification in paragraph 6.4.1. Additional wording to be added to Policy S1 I is suggested as follows: <u>(ii) Alongside traditional industrial, logistics uses, encouraging the provision of emerging industrial-related sectors in accordance with the London Plan.</u>	Noted. The London Plan is an integral part of Ealing's local developenmt plan so there is no need to repeat or duplicate polcies or text in the London Plan.	Policy S1: Southall Spatial Strategy		Tom Vernon	Global Techn	703	Developer
4.2 As identified in relation to emerging policy SP4, any specific strategy/plan-led masterplan for LSIS designations (Criteria IV) should be progressed in coordination with land owners and not preclude development coming forward in advance of adoption of such documents where it is consistent with the wider development plan.	Noted. This policy sets out the overall objectives of policy and should be read in conjunction with Policy E3 in the London Plan and the local variation in Chapter 5 which addresses viability issues at G.	Policy S1: Southall Spatial Strategy		Tom Vernon	Global Techn	703	Developer
4.3 As identified in relation to emerging policy SP4 any requirement for the provision of affordable and managed workspace in Southall needs to be reviewed on a site by site basis and remain reflective of viability/wider development plan aspirations to not over burden future development.	Noted. This should be read in conjunction with Policy E3 in the London Plan and the local variation in Chapter 5 which addresses viability issues at G.	Policy S1: Southall Spatial Strategy		Tom Vernon	Global Techn	703	Developer

5.1 GTR are supportive of the provision of affordable workspace where appropriate. However Policy E3 needs to re-inforce that the provision of affordable workspace will remain reflective of viability in accordance with Paragraph 128 of the NPPF. 5.2 In addition draft policy wording does not include enough flexibility with regards to on-site/off site provision. There are industrial uses (particularly those in emerging industrial related sectors such as data centres) where the requirement for affordable workspace could be relevant but on site provision would not be appropriate. Suggested revised policy wording is provided below: F. <u>Subject to viability</u> affordable workspace in Ealing will be provided on the basis of a levy on development of 10% of gross floor area in mixed use schemes, and 5% of net floorspace in office and industrial schemes. ~~Where that levy would result in affordable provision~~ <u>Provision should be on site for proposals delivering</u> of at least 1000sqm of mixed-use space, 2000sqm of office space, or 3000sqm of industrial space <u>but will be reviewed on a site by site basis reflective of proposed use and site specific circumstances</u> ~~then provision should be onsite~~. Where the total space provided by development is less than these thresholds then provision ~~should be by means of offsite contributions~~	This is incorrect. Provision is very much opposite to a one size fits all approach; offsite contributions will be spent according to an AW strategy based upon local needs, and provision exists in the policy for onsite provision to meet any demonstrable and legitimate local AW needs.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		Tom Vernon	Global Techn	703	Developer

5.3 At present supporting justification text in paragraph 5.3.1 is not aligned with London Plan policy E4 (Land for industry, logistics and services to support London’s economic function) on the basis it does not reflect the wide range of industrial, logistics and related uses identified by policy. Specifically emerging industrial related sectors such as data centres are not recognised. Amended wording is suggested to simplify confirming use narrative as follows: Conforming uses are defined in London Plan Policy E4 and supporting justification. ~~And include mainly pure industrial and logistics uses, and some sui generis uses primarily related to vehicle maintenance.~~ Conforming uses do not include trade counters or any other retail or leisure-driven use. Designated sites are managed specifically to the exclusion of non-conforming uses and permissions for new uses within Class E will specify which industrial sub-uses will be permitted. The terms ‘industrial uses’ and ‘employment uses’ are generally used interchangeably, however, for the purposes of this policy both mean defined conforming uses.	Not accepted, the current wording is a statment of fact.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		Tom Vernon	Global Techn	703	Developer
6.1 Policy E6 C needs to be varied to ensure it remains consistent with appropriate uses set out in the London Plan (Policy E4) and reflects the role of ‘emerging industrial-related sectors’ in such locations. Such uses do not necessarily generate high employment density but have significant economic value for the borough and London as a whole. Revised wording for Policy E6 C is suggested as follows: Conforming uses with high employment density and or economic value will be prioritised on LSIS.	GLA has raised no general conformity objection on policy E6	Policy E6: Locally Significant Industrial Sites (LSIS) – London Plan – Ealing LPA – local variation		Tom Vernon	Global Techn	703	Developer

7.1~~6~~TR are supportive of the mandatory biodiversity net gain requirements (10%) established by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). 7.2~~1~~The identified local requirement for 20% biodiversity net gain (BNG) as set out in Policy G6 F is not aligned with NPPG on the basis that no evidence has been provided to substantiate a substantially increased net gain requirement. 7.3~~1~~The NPPG (Paragraph: 006 Reference ID: 74-006-20240214) identifies: Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. <u>To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development.</u> Consideration will also need to be given to how the policy will be implemented. 7.4~~1~~It is noted that LBE do not appear to have any evidence base that supports the proposed 20% threshold. As such, the policy wording should be amended to remove the 20% requirement and exclusively reference the mandatory 10% requirement.	Noted. It is acknowledged that the National Planning Practice Guidance on BNG seeks to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission. Defra’s own Impact Assessment indicated that the majority of costs associated with biodiversity net gain are incurred to reach a no net less position. The costs associated with moving from 10 to 20% is therefore considered to be marginal. However, the NPPG was published after considerable delays and only on February 14th 2024 (with updates on May 1st 2024) . This was after the Regulation 19 Local Plan and associated evidence base had been finalised ahead of the Full Council meeting held on February 21st 2024 and the beginning of the consultation period that ran from February 28th 2024. The council now acknowledges that additional time and further evidence is needed to prepare evidence to justify a rationale for pursuing a higher BNG percentage target. Therefore, the policy has been modified accordingly and a revised policy potentially containing a higher target will be considered as part of the next Local Plan review.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation			Tom Vernon	Global Techn	703	Developer

Policy OEP wording and the associated Tables DMP2 and DMP3 need to be revised. At present the draft policy has significant viability implications and is likely to result in commercial development (except for hotels which have a much higher Energy Use Intensity target) being unviable. It is not clear what underpins the targets included in Table DMP3 (EUI targets), or why warehouses and light industrial units have the same target as C3 uses. At present EUI targets are based in very limited evidence and such a requirement is unlikely to be achievable for development in the short term. Failure to meet such targets and achieve an energy balance via on-site renewable energy provision (which may not be appropriate owing to individual site circumstances) would result in significant offsetting via payment in lieu. 8.3The viability impacts of such targets are identified in LBE’s Local Plan Viability Assessment (dated December 2023). This relates not only to operational requirements (which are still substantial indicating that the reduction in residual land values is typically circa 6% to 25%) but very significant where the operational and embodied carbon scenario is concerned with the document identifying: The impact of this scenario on the residual land values is higher, with a typical reduction of between circa 13% and 40% from the baseline residual to some cases the percentage	The proposed policies as revised have been underpinned by evidence - namely the 'Delivering Net Zero' study. This has tested the proposed policies in terms of technical feasibility and viability. Chapter 9 of the DNZ study provides detailed cost modelling for the various archetypes and scenarios. This demonstrated that policy option 2 (as progressed via Ealing’s Local Plan) would result in modest uplift in construction costs of around 1% to 4% relative to a Part L baseline. Viability has also been tested in the round alongside the full suite of local plan policies as part of a whole plan viability assessment. The revised policy approach is considered to be justified, effective and consistent with national policy objectives.	Policy OEP: Operational Energy Performance –Ealing LPA –local policy			Tom Vernon	Global Techn	703	Developer

1.1.15 Stantec is instructed by SEGRO plc ('SEGRO' hereafter) to prepare a representation to the Ealing Local Plan Regulation 19 Consultation ('the Local Plan'), including relevant documents within the evidence base. 1.1.57 The major estates that SEGRO has assets in that are covered by the Ealing Local Plan are: -SEGRO Park Perivale -SEGRO Park Greenford Central -SEGRO Park Greenford -SEGRO Centre Greenford North -SEGRO Park Fairway Drive (Greenford) -SEGRO Park Acton 1.1.62 All of SEGRO's sites are identified within the adopted Development Plan as Strategic Industrial Locations ('SILs'), with the exception of Acton Park (The Vale), which is instead designated as a Locally Significant Industrial Site ('LSIS'). These designations highlight the importance of these sites in meeting employment needs within Ealing. SEGRO supports the continued recognition of these designations through the new Local Plan. [Details of SEGRO and its properties] 1.1.90 Within Ealing, SEGRO estates accommodates approximately 200 different businesses across 20 sectors	Noted.	General		Alex Lloyd	SEGRO	704	Developer

3.2.1SEGRO supports the Council’s vision for Ealing which, amongst other things, seeks to support growth to create jobs for all. In particular, SEGRO supports Policy SP1 which states ‘Ealing will grow and diversify its business space, and further strengthen the role of its industrial areas.’ 3.2.2Investing in modern, operationally flexible, high-capacity facilities provides a strong foundation for business to improve efficiency and productivity on the same amount of land. Investing in infrastructure like fibre, power and transport also drives investment in buildings and productivity. 3.2.3The starting point for Local Plan making should therefore be to encourage investment in industrial buildings and infrastructure, to grow and diversify the Borough’s business space. Without the focus on need for investment within Draft Policy SP1, we consider this policy contrary to NPPF paragraphs 86(c) and 35(d). We therefore propose that Draft Policy SP1 is amended to include this additional sentence: ‘SP1(b): Ealing will become the engine of West London’s new economy managed to provide equitable access to jobs that provide decent living incomes that can support genuinely affordable homes for all. We want growth in Ealing to be inclusive so that people can both contribute to and benefit from growth. Ealing will grow and diversify its business space, and further strengthen the role of its industrial areas. Such growth will be supported by further investment within	It is very difficult to see what the proposed sentence will add to the policy.	Policy SP1: A Vision for Ealing		Alex Lloyd	SEGRO	704	Developer

3.3.1SEGRO support points A-E of Sub-Policy SP 2.2 ('Climate Action'), which presents five priorities in tackling climate change, including Point B which supports 'making the best use of land'. 3.3.2Redeveloping existing employment sites would serve to support other aspects of draft Policy SP2.2, such as Point (d) 'supporting the delivery of Net Zero Carbon buildings' and Point (f) 'building resilience and adapting to a changing environments', through the provision of modernised developments which are more energy efficient. 3.3.3However, clarification is required on what 'making the best use of land' means in practice. In relation to industrial provision, 'making the best use of land' generally translates to 'intensification'. However, the current definition of industrial intensification is too narrow. It is leading to a misunderstanding of the drivers of productivity which fails to make more effective use of industrial land. From a commercial industrial perspective, making the most efficient use of land involves modernising, investing, creating resilience, sustainability and improving quality. When referencing 'making the best use of land' the Local Plan should not solely rely on quantum of floorspace or development footprint. Reference needs to be made to modernised floorspace, increased building heights, infrastructure investment, resilience, sustainability, quality and operational flexibility (24/7 use). All of these serve to maximise productivity of Industrial land, which in turn creates jobs and attracts investment. 3.3.4Recognition also needs to be given to the importance of car	Industrial intensification is too detailed a concept to be explored well in a strategic policy. Much of this is well covered in London Plan Policy E7 but understandings of industrial intensification will continue to evolve in future plans and guidance. The proposed addition would confuse the application of this policy to non-industrial land.	SP2.2 Climate action		Alex Lloyd	SEGRO	704	Developer

3.3.6 In relation to SP2.2(g)(iii), whilst supportive of urban greening, SEGRO requests that the policy is developed in accordance with London Plan standards (London Plan Policy G5), which recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses). The London Plan is an integral part of the statutory development plan for the borough of Ealing. The Local Plan must be in general conformity, any basis for departure from this would be contrary to the NPPF, unless it is very clearly justified and demonstrated to be viable. 3.3.7 Part (g)(iii) also makes reference to maximising opportunities for a net gain biodiversity. Recent changes to the Planning Practice Guidance (PPG) emphasise that Local Plans should not stipulate BNG levels exceed the minimum 10% unless adequately justified. 3.3.8 Accordingly, to ensure compliance with NPPF paragraph 35(d), Part (g) (iii) should be updated to state: <u>‘Maximising opportunities for urban greening, in accordance with the London Plan targets and a net gain in biodiversity, in accordance with national requirements.’</u> (contd below)	Noted. As proposed to be revised in the Reg. 19 plan local policy G5 seeks to adopt the same target levels as already established in the London Plan. These targets were previously tested in respect of viability under the London Plan.	Policy G5: Urban Greening – London Plan – Ealing LPA – local variation		Alex Lloyd	SEGRO	704	Developer

3.3.9 In relation to Part (h), we request that the draft Air Quality policy wording is drafted in full accordance with London Plan Policy SI 1 ‘Improving Air Quality’, which requires the following: “Part 2 a. Proposals must be at least Air Quality Neutral b. Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures c. Major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1 d. Development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure....” 3.3.10 To ensure compliance with NPPF paragraph 35(d) ‘consistent with national policy’, Part (h) should be updated to	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on sustainable infrastructure including Policy SI 1 on improving air quality. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. The Mayor of London has not raised objections to this approach.	SP2.2 Climate action		Alex Lloyd	SEGRO	704	Developer

3.4.1 SEGRO supports Part (c) of Policy SP 4.1 which refers to making ‘the most efficient use of land on development sites ... which will contribute to more sustainable patterns of development and land uses’. 3.4.2 Part (g) (iii) of SP 4.1 refers to ‘Creating a clear framework for future negotiations on planning obligations, including developer contributions that will include a new Community Infrastructure Levy (CIL)’. While SEGRO supports the provision of clarity in respect of developer contributions, the Council must ensure its priorities and vision for the Borough are deliverable. While the Local Plan relies on the re-development and intensification of existing industrial floorspace, the Viability Study demonstrates that industrial and warehouse uses cannot afford to pay the proposed CIL rate when reasonable assumptions are made about existing use value. Additional policy obligations proposed in the Draft Local Plan worsen this position. The proposed rate is also significantly above rates set by neighbouring authorities. Please find set out below examples of other authority charge rates for industrial uses: a. Old Oak and Park Royal Development Corporation - £35 per sqm b. London Borough of Brent - £0 per sqm c. London Borough of Hounslow - £20 per sqm d. London Borough of Hammersmith and Fulham - £0 per sqm e. London Borough of Harrow - £0 per sqm 3.4.3 This sets Ealing’s Industrial locations at a competitive disadvantage, that would directly contradict other policies that seek investment and intensification. It is therefore not appropriate to	Noted, CIL rates are subject to separate examination, but have been factored into the whole plan assesement of viability alongside plan policies.	SP4.1 Good Growth		Alex Lloyd	SEGRO	704	Developer

3.4.5 Policy SP4.2 Parts (b) seeks to manage SILs exclusively for ‘conforming uses’. SEGRO agrees with this approach. 3.4.6 Policy SP4.2 Part (b) also makes reference to necessary consolidation of SIL sites through the plan making process only. London Plan Policy E5 ‘Strategic Industrial Locations’ states that SILS should be managed proactively through a plan led process to sustain them as London’s largest concentration of industrial, logistics and related capacity for uses that support the functioning of London’s economy. The ‘West London Employment Land Review’ (2022), states that the industrial market in Ealing is undersupplied due to both strong demand and declining levels of supply. The resulting planning policy response to improve the market performance should be to seek to prevent future losses of stock and/or increase supply (para 4.26). SEGRO objects to the principle of consolidating SILS, particularly given the evidence demonstrates the Borough cannot afford to lose any further industrial space. Currently, this draft policy is unjustified and contrary to the Local Plan evidence base. Reference to consolidation should be deleted from Policy SP4.2(b), to ensure a ‘justified’ policy in compliance with NPPF paragraph 35(b). 3.4.7 Part (c) of SP4.2 states LSIS sites will be brought forward through plan-led comprehensive masterplans (mixed intensification), in accordance with the London Plan. Whilst SEGRO has no objection to the ‘mixed use’ reference in principle, this cannot be to the detriment of industrial uses and businesses within the LSIS itself or on surrounding sites. As set out in part (d) of London Plan Policy E7 ‘Industrial intensification, co-location and	SP 4.2 B simply acknowledges the existing London Plan position in relation to SIL. The plan brings forward limited and specific proposals for SIL consolidation at Hanger Lane Gyratory and Alperton Lane that are clearly justified in relation to their current use and surroundings. The approach to plan-led mixed use intensification is set out in Policy E6 and the strategic policy is not the place to alter or define this.	SP4.2 Decent living incomes			Alex Lloyd	SEGRO	704	Developer

3.4.8 Policy SP4.2 Part (g) refers to the need for ‘affordable workspace’. Draft Policy E3 expands on this and is commented on later in these representations. However, in summary, SEGRO has raised a number of concerns relating to the lack of justification for the unprecedented discount rate and duration (80% over 15 years), the unsuitability of industrial sites to provide affordable workspace due to their scale and internal configuration, viability and other economic benefits industrial and logistic sites can deliver. We ask that policy excludes industrial (E (g)(ii), E(g)(iii), B2 and B8) from the affordable workspace obligation, to ensure compliance with NPPF 35(b). This should be reflected throughout the draft Local Plan. Please refer to our comments on draft Policy E3 for further justification. 3.4.9 SP4.2 Part(g) also refers to the need to enable more small and medium sized businesses to start up. Business requirements can only be market driven and based on need. With industrial space at such a premium in Ealing (as referenced by the West London Employment Land Review) it is essential that land is able to deliver for expanding and larger businesses. If not, they will re-locate outside of London having the opposite effect on goals to enhance sustainability and create/support jobs. specific requirement for small/ medium sized units should not be stipulated in local policy. Individual smaller sites will be appropriate for smaller and medium sized businesses, and each site should be assessed on its own merits and consideration given to modern business needs, given that only a small number of sites within London can actually meet the requirements of growing and larger employers. To ensure an ‘effective’ policy as per NPPF 35(c). SP4.2(g) should be amended as	This level of detail is better explored in the DM policy than at this strategic level.	SP4.2 Decent living incomes			Alex Lloyd	SEGRO	704	Developer

3.4.10 SEGRO continues to support the identification of Northolt, Greenford and Perivale as areas for growth in the size and range of employment typologies, as set out in SP4.2 Part (e). 3.4.11 Whilst Part 8 of ‘Strategic Place Interventions’ (page 90) supports maintaining and intensifying SILs and LSIS, this principle should be enshrined in policy, as per our comments on SP4.1 Whilst supportive of ‘maintaining and intensification, again we must express the need to apply this principle pragmatically, where applicants can demonstrate efficiencies within planning applications that are both quantitative and qualitative, on a site by site basis. The emphasis should not purely be on intensification. Redevelopment should focus on modernised floorspace, operational efficiency of the entire sites (including service yards); building height, infrastructure investment, resilience, sustainability, quality and operational flexibility (24/7 use). This should be appropriately reflected in Part (c) of Policy SP 4.1. To ensure ‘effectiveness’, paragraph 3.69 should be updated as per comments below to ensure compliance with NPPF paragraph 35(c): ‘The spatial strategy will reinforce and intensify, where feasible, existing Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) within the borough and explore options to improve industrial land and intensify employment, where appropriate.’	As before, that strategic principle behind intensification is central to the London and Ealing Plans, the detail of what and how to intensify is best explored in the DM policy.	SP4.2 Decent living incomes		Alex Lloyd	SEGRO	704	Developer

4.2.1☐SEGRO supports the proposed spatial strategy for Acton set out within Policy A.1. including the recognition that ‘growth will be concentrated around existing transport interchanges’, including Acton Central (A1.(c)). 4.2.1☐SEGRO supports the proposed spatial strategy for Acton set out within Policy A.1. including the recognition that ‘growth will be concentrated around existing transport interchanges’, including Acton Central (A1.(c)). 4.2.2☐SEGRO welcomes Policy A.1 (m)(i), which supports development and intensification of industrial and commercial uses at Local Significant Industrial Sites (LSIS) at The Vale and South Acton on the basis of an agreed masterplan with Ealing Council. However, the term ‘intensification’ should be clearly defined as explained in our response to strategic policies in Chapter 2. It must allow planning applications to be determined positively where they can demonstrate qualitative improvements to an estate’s efficiency, sustainability and adaptability, rather than a blunt focus on achieving a net increase in floorspace which may not result in usable/ attractive space for modern business. As previously set out, policy should reference modernised floorspace, enhanced state efficiency, increased building heights, infrastructure investment, enhancing resilience, improving sustainability, quality and operational flexibility (on a 24/7 basis) as important factors in ‘intensification’. 4.2.3☐ Recognising the importance of yards as a core ingredient of efficient industrial design is also essential (in accordance with	Intensification is not limited to greater site coverage or increased floor area. These points should be addressed in relation to the process of intensification itself rather than by caveating strategic policy.	Policy A1: Acton Spatial Strategy		Alex Lloyd	SEGRO	704	Developer

4.3.1 Whilst SEGRO supports the principles set out in Policy G1(d), including references to ‘intensification, enhancement and improvement’, the Local Plan should review its narrative in respect of industrial sites. Policy should focus on modernisation, estate efficiency, investment, building resilience, and enhancing sustainability and quality, rather than purely ‘intensification’. Intensification from a floorspace perspective should only take place on sites where it is feasible and appropriate to do so. 4.3.2 Whilst SILs are referred to in supporting paragraphs to draft Policy G.1 (para 4.3.50), SEGRO requests that SILs are referenced directly within G.1, to ensure they are enshrined in policy. To ensure an ‘effective’ policy in accordance with NPPF paragraph 35(c), we therefore propose the following amendments to G1(d): ‘Greenford’s industrial estates (including SILS) will be intensified (where feasible), enhanced and improved (see Policy G6)’ 4.3.3 In relation to Policy G1 (I), draft policy refers to a prosperous economy through the provision of affordable space and infrastructure, including safeguarding and intensifying employment sites [I(i)] and ensuring employment land and premises meets the needs of a wide range of businesses from small start-ups looking for affordable premises, to large well established businesses [I(iii)]. To ensure a ‘justified’ policy as per NPPF 35(b), Policy G1(I) should be amended as follows: ‘Greenford will be a prosperous economy with a good range of employment opportunities. This will be achieved by providing	The approach to intensification is set out in and is integral to the London Plan, the proposed caveat does not add any value to the policy.	Policy G1: Greenford Spatial Strategy		Alex Lloyd	SEGRO	704	Developer

4.3.4 As per our comments on draft Policy SP4.2 Part G, we ask that the Local Plan excludes industrial and relevant parts of E Class (E(g)(ii), E(g)(iii), B2 and B8) from the affordable workspace obligation, given the proposed unprecedented discount rate and duration (80% over 15 years), the unsuitability of industrial sites to provide affordable workspace due their scale and internal configuration, viability and other economic benefits industrial and logistic sites can deliver. 4.3.5 The Council should set no specific requirement for small/ medium sized units in local policy. There is a clear shortage of industrial space in West London, and only a limited number of sites can support the needs of growing businesses looking to upscale or accommodate within larger units. To impact on planning for these larger units would undermine the London economy. Instead, each site should be assessed on its own merits and consideration given to planning applications that respond directly to addressing/planning for modern business needs. This approach is ‘justified’ by the ‘West London Employment Land Review’ (2022) and is therefore in accordance with NPPF paragraph 35(b). 4.3.6 Finally, SEGRO welcomes the inclusion of the Greenford Flood Alleviation Scheme and proposed active travel improvements as set out in draft Schedule G1.	The policy has been found viable through the whole plan viability assessment, but any site specific viability constraints can be addressed by the submission of viability evidence as for any other policy.	Policy G1: Greenford Spatial Strategy		Alex Lloyd	SEGRO	704	Developer
4.3.7 SEGRO welcomes the inclusion of draft policy G6 ‘Greenford Industrial Estate’. As per comments on G.1, to ensure an ‘effective’ policy as per NPPF paragraph 35 (c), SEGRO requests that SILs are explicitly referenced within draft Policy G6. Our proposed amendments are: ‘To protect and grow the important industrial cluster, including SILs, at Greenford reflecting its important role in the A40 and West London logistics cluster by:…’	Suggest "...which is focused upon the designated SIL..."	Policy G6: Greenford Industrial Estate		Alex Lloyd	SEGRO	704	Developer

4.3.8 In respect of intensification in point (i), SEGRO again requests that additional text is included within the policy stating, ‘where feasible’. The definition of ‘industrial intensification’ should be updated to include floorspace, estate efficiency, building height, infrastructure investment, operational flexibility (24/7 use). Further, in the interests of securing a resilient and successful local economy, policy should not prescribe specific target industries. Over the plan period, the economy is likely to evolve and change. To be ‘effective’, policy needs to respond accordingly. This should be directly reflected within this Plan, and more critically decision taking. To ensure an ‘effective’ policy as per paragraph 35(c) of the NPPF, we propose the following amendments: ‘(i) Industrial intensification, where feasible, new floorspace, improved estate efficiency, increased building height volume, infrastructure investment, and operational flexibility (24/7 use), to unlock significant new industrial floorspace fit for modern businesses, creating new jobs focused in the modern growth sectors, which may include green and creative industries. green, circular and creative sectors.’	The approach to intensification is set out in and is integral to the London Plan, the proposed caveat does not add any value to the policy.	Policy G6: Greenford Industrial Estate		Alex Lloyd	SEGRO	704	Developer

4.3.9 SEGRO welcomes point (ii), which references retrofit and upgrades. Investment of industrial sites will often involve improvements to existing units, modifying to meet the needs of the existing business market and enhancing sustainability. 4.3.10 Point (iv) seeks to explore opportunities for active frontage to industrial units, particularly where these can showcase existing industrial uses and contribute to facilities for local people and workers. Whilst SEGRO supports the positioning of offices and entrances, to positively contribute to streetscapes and provide activation, it must be led by operational efficiency, so as to ensure Ealing’s estates remain competitive at attracting businesses and investment. Point (iv) drafting is too onerous and should be deleted. First and foremost, design, particularly within SIL/LSIS, must take into consideration the efficient function of industrial units (as per London Plan Policy E5 ‘Strategic Industrial Locations’ (d)), reflecting the primary function of these estates to provide the right conditions for industrial operators to function and grow. 4.3.11 On some sites, development of multi-storey industrial units may be viable/feasible over the plan period. To accommodate this, draft Policy G6 should include a further section stating: ‘On designated SILs there is an opportunity for tall buildings, subject to agreed masterplans and based upon local impacts and sensitivities’. 4.3.12 This would be in accordance with London Plan Policy E7 ‘Industrial intensification, co-location and substitution’ Part A, which	This point is already addressed in Policy D9 Detail on active travel will be set out in the LIP and borough transport strategies.	Policy G6: Greenford Industrial Estate		Alex Lloyd	SEGRO	704	Developer

4.4.1 Policy P1(g)(i) refers to the safeguarding, intensifying, diversifying and enhancing of Perivale’s industrial core. Firstly, SEGRO requests that reference is made to SILs within the policy itself, as the ‘industrial core’ is not a defined term or area and is therefore unclear as to what area the policy is applicable to. This amendment is accordingly required for the policy to be ‘effective’, as per NPPF paragraph 35(c). 4.4.2 Secondly, as is the case for Acton and Greenford, in respect of intensification, the policy should include the phrase ‘where feasible’. Appropriate redevelopment of industrial sites comes in various forms, including intensification, improved floorspace, increased building height, infrastructure investment and operational flexibility. This should be reflected in policy drafting and decision making. Policy P1(g)(i) also makes reference to affordable workspace for small businesses and new startups. As per our comments on draft Policy SP4.2 Part (g), we ask that the Local Plan excludes industrial and relevant parts of E Class (E(g)(ii), E(g)(iii), B2 and B8) from the affordable workspace obligation. This is necessary due to the unsuitability of industrial sites to provide affordable workspace due their scale and internal configuration, viability and other economic benefits industrial and logistic sites can otherwise deliver. It is considered that the provision of affordable workspace within these Use Classes has not been ‘justified’, based upon proportionate evidence, and is therefore contrary to NPPF paragraph 35(b).	The approach to intensification is set out in and is integral to the London Plan, the proposed caveat does not add any value to the policy.	Policy P1: Perivale Spatial Strategy		Alex Lloyd	SEGRO	704	Developer
4.4.3 In respect of Policy P4, SEGRO is supportive of the aspiration to provide a Neighbourhood Centre in the vicinity of the Station. However, whilst SEGRO recognises the benefits of such a facility, clarity is required in both in terms of the extent of the retail offer to be provided and the land which might be required to deliver such development. This will enable the policy to be ‘effective’ and deliverable, in accordance with NPPF paragraph 35(c). 4.4.4 As part of SEGRO’s vision for the Perivale Estate, small scale retail and amenity uses (such as a café) may be introduced. These amenities would likely be temporary to begin with, to establish the level and nature of demand, before more permanent facilities are introduced if the concept is successful.	The objectives for the centre do not override existing industrial designations or the policies set out in the local and London Plans for their protection.	Policy P4: Perivale Station and Environs		Alex Lloyd	SEGRO	704	Developer

4.4.5 SEGRO welcomes Policy E5 {this should have read P5} 'Perivale Industrial Estate' which seeks to protect and enhance the broader Perivale industrial estate. We would, however, ask that the Council clarifies what 'embrace the existing clusters of employment' means on Perivale Industrial Estate in practice (as referenced in Part (a)(i)). Again, this clarity is required in order to ensure the policy is 'effective', in accordance with NPPF paragraph 35(c). 4.4.6 We note Policy E5 Part (b) makes reference to active frontage, particularly around Aintree Road, where these can showcase existing industrial uses and contribute to facilities for local people and workers. Whilst SEGRO supports the positioning of offices and entrances, to positively contribute to streetscapes and provide activation, it must be led by operational efficiency. Part B drafting is too onerous and should be deleted.	Embrace' will be clarified. The requirement to 'explore opportunities for active frontage' can hardly be said to be onerous.	Policy P5: Perivale Industrial Estate		Alex Lloyd	SEGRO	704	Developer
5.1 General Comments on the Development Management Policies 5.1.1 As per the Regulation 18 consultation, this section of the plan sets out the development management policies to provide the standards and guidelines for planning applications will need to comply with. These are organised by policy topic areas that respond specifically to Chapters 3 to 10 of the London Plan (2021). The policies are set out in 2 forms: Local variations to the London Plan (2021), which append new text to those London Plan policies and should be read alongside them – policy name includes both letters and numbers; and New policies which can be read independently but which also sit within Ealing's broader development plan which includes the London Plan (2021). – policy name includes letters alone.	Noted. The London Plan is an integral part of Ealing's local development plan. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. The Mayor of London has not raised any objections to this approach. However, once adopted the council plan to provide an on line digital version of the plan that will seek to incorporate London Plan and Ealing LPA policies to make the policy framework more accessible.	General		Alex Lloyd	SEGRO	704	Developer

5.2.1 SEGRO generally agrees with the principles outlined in Policy DAA concerning adverse impacts. However, it contends that new developments should only be held responsible for mitigating adverse effects deemed 'unacceptable,' as stipulated in Paragraph 180 e) of the NPPF, rather than shouldering the burden for 'any' adverse effects on neighbours and surroundings. To ensure an 'effective' and 'justified' policy in accordance with NPPF paragraph 35(b) and (c), we therefore propose the policy wording is amended to state "unacceptable harm" instead of "any adverse impact". 5.2.2 In Parts (iii – v), the policy emphasises the importance of ensuring adequate levels of daylight and sunlight, privacy, and a visually appealing environment. Nonetheless, the vagueness of terms like 'good' and 'positive' fails to provide clear benchmarks for assessment. While supporting Paragraphs 5.7 – 5.12 aim to clarify these standards, it is essential to adhere to Paragraph 16 of the NPPF, which mandates policies to be explicit and unambiguous. Despite the supplementary text, Policy DAA lacks clarity on defining 'good' levels of daylight and sunlight, privacy, and positive visual impact, thus hindering the ability to ensure policy compliance. 5.2.3 Moreover, it is crucial to recognise that some sites, where appropriate, may undergo redevelopment or intensification whilst retaining their established principal use within specific area and contextual surroundings. Therefore, the Council should evaluate each site individually, considering its existing use and structures concerning the proposed development, in adherence to this Policy. 5.2.4 Consequently, further refinement of Policy DAA is necessary	This goes to the planning balance and will be assessed by the decision-maker. It is for them to determine if any impact is unacceptable.	Policy DAA: Design and Amenity – Ealing LPA – local policy		Alex Lloyd	SEGRO	704	Developer

5.3.1 Policy D9 aims to establish a definition for 'Tall Buildings', recognising that this definition may vary depending on the geographical location within the Borough. However, Point (h) specifies that 'Tall buildings on designated industrial sites will be subject to agreed masterplans and based upon local impacts and sensitivity.' 5.3.2 SEGRO acknowledges and supports Policy D9, particularly the flexibility it provides for designated industrial sites. 5.3.3 From the Policy it is understood that a tall building in Greenford is over 21m, in Perivale its 21m, and in Action Park its 24.5m. We understand that whilst tall building would be over 31.5m in North Acton/Park Royal; and 21m at Westway Industrial Estate, where sites fall within the OPDC, we understand that Policy D9 would not apply. Where buildings exceed the defined threshold (set out in DMP1) these may be considered acceptable but would be subject to a master planning process. 5.3.4 A point of clarification required relates to Figure DMP1. Some areas in Greenford, such as the east boundary of G3, and west/north boundary of P1 in Perivale are shown as blank. It is unclear why this is the case. The figure should be reviewed accordingly.	Thresholds will be set out on the interactive policies map.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Alex Lloyd	SEGRO	704	Developer

5.3.5 We understand that Policy D9(f) does not pertain to designated industrial estates; rather, in these cases, Policy D9(h) will be applicable. We would recommend that recognition is given in the supporting text to multi-storey industrial developments under construction in London that are 35-40-meter tall, in line with the purpose of DP(h) to facilitate the construction of high- capacity, modern industrial buildings, including multi-storey warehouses where commercially feasible. 5.3.6 The Policy acknowledges the economic viability of such developments in densely populated urban areas like London, aiming to optimise land utilisation and enhance industrial infrastructure efficiency. By aligning with current trends and addressing the evolving needs of industrial operations, policy will support sustainable urban development and foster economic growth in London's industrial sector. 5.3.7 It should be also recognised that tall industrial buildings are likely to have large footprints to accommodate vehicular ramps and/or goods lifts. 5.3.8 Whilst this approach is ‘justified’ by the ‘Tall buildings strategy’ (2023), we would recommend that the tall building threshold for industrial estates gives recognitions to requirements of multi- storey buildings.	Noted, this is precisely the reason for the approach set out in H). Masterplans will still need to address the sensitivity of surrounding areas to height, notwithstanding the desirability of intensification that is set out in the plan.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation			Alex Lloyd	SEGRO	704	Developer

5.4.1 Policy E3 mandates the provision of affordable workspace at an 80% discount for a duration of 15 years, with specific requirements for different types of developments: - Mixed-use schemes: 10% of gross floor area - Office and industrial schemes: 5% of net floor area 5.4.2 Policy E3 requires that when the provision of affordable workspace reaches certain thresholds (1,000 sqm for mixed-use, 2,000 sqm for office, or 3,000 sqm for industrial), it should be provided onsite. Otherwise, offsite contributions are acceptable. 5.4.3 SEGRO raises a number of concerns regarding Policy E3 in its current form: a. Lack of justification for the discount rate and duration: The Affordable Workspace Study identifies rising commercial property rents but fails to explain why an 80% discount over 15 years is warranted. It is considered that this is not in itself justification for an affordable workspace policy. Furthermore, the study does not specify which businesses will benefit from subsidised space, their space requirements, or the optimal locations for accommodating them. b. Unrealistic discount rate: An 80% discount would be unprecedented and financially	The discount rate is addressed in evidence as necessary to provide space that meets affordable needs, and has been subject to whole plan viability assessment.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		Alex Lloyd	SEGRO	704	Developer

c. Unsuitability for industrial development: Industrial sites present challenges for providing affordable workspace due to difficulties in subdividing large warehouse and external spaces. Flexible office and shared workspaces are better suited for this purpose, which operate on a smaller scale and are either easily sub-divided or are able to operate as ‘shared spaces’. Such spaces are also more attractive to occupiers, as they are typically located in a location and environment that is more conducive to micro-businesses. d. Viability concerns: The Local Plan viability study demonstrates that at realistic existing use values, this policy requirement is unviable. Please refer to SEGRO’s response to the Draft CIL Charging Schedule at Appendix 1. e. Economic benefits of industrial/logistics development: Industrial/logistics schemes on brownfield sites contribute significantly to job creation, training opportunities, and economic growth, outweighing the feasibility of providing affordable workspace. 5.4.4 Based on the above, the policy is not considered to be 'effective' or 'justified' in accordance with NPPF paragraph 35(b) and (c). Therefore, we propose the policy is revised in a way that excludes industrial and relevant parts of E Class E(g)(ii), E(g)(iii), B2 and B8 from the affordable workspace obligation.	There is identified need for affordable industrial space, which is why the benchmark for industrial uses is set in the policy. Where there are site specific viability or suitability considerations these should be considered on their merits through the development management process.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		Alex Lloyd	SEGRO	704	Developer
5.5.1 SEGRO fully supports the imperative to safeguard and uphold an ample supply of land designated for industrial, logistics, and economic services. Additionally, we endorse the fundamental principle of intensifying (where feasible) and repurposing existing employment land, including Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs), to optimise land use efficiency.	Support welcomed	Policy E4: Land for Industry, Logistics and Services to Support London’s Economic Function – London Plan – Ealing LPA – local variation		Alex Lloyd	SEGRO	704	Developer

5.6.1 We acknowledge and endorse the overarching concept of prioritising industrial requirements as the primary consideration on designated Locally Significant Industrial Sites (LSISs). However, we advocate clarification and necessary adjustments to Point C regarding the definition of 'high employment density and economic value.' 5.6.2 It is imperative that the language used in the policy provides clear parameters for what constitutes 'high employment density and economic value' uses. Without precise definitions, there is ambiguity regarding which types of activities qualify under this designation. Clarity in this regard is essential to ensure effective implementation and alignment with broader economic development objectives, and to ensure development meets the identified need for industrial and logistics space (as opposed to other forms of employment space such as office). 5.6.3 Furthermore, while supporting paragraph 5.32 attempts to elaborate on the term 'substantial contribution,' it falls short of providing adequate clarification. The phrase "substantial contribution" remains open to interpretation, leaving room for uncertainty regarding the specific criteria and benchmarks used to determine what qualifies as such a contribution. 5.6.4 In summary, while we support the fundamental premise of prioritising industrial needs on LSISs, we urge for specific revisions to (c) to define 'high employment density and economic value' uses more clearly. Additionally, further clarification is needed regarding the notion of a 'substantial contribution' as outlined in supporting	This wording is recommended for change as part of the SoCG with GLA. The paragraph now sets out in more technical detail the approach to LSIS masterplanning.	Policy E6: Locally Significant Industrial Sites (LSIS) – London Plan – Ealing LPA – local variation		Alex Lloyd	SEGRO	704	Developer

5.6.5 In relation to Part (d) (iii), it is crucial to highlight that the provision of affordable workspace must be contingent upon viability. This aspect should be explicitly addressed in the drafting of planning policies. Both the National Planning Policy Framework (NPPF) Paragraph 58 and the National Planning Practice Guidance (NPPG) (ref ID: 10-002-20190509 and 10-005-20180724) emphasise the importance of viability assessment at the plan stage. SEGRO has raised a number of concerns relating to the lack of justification for the unprecedented discount rate and duration (80% over 15 years), the unsuitability of industrial sites to provide affordable workspace due their scale and internal configuration, viability and other economic benefits industrial and logistic sites can deliver. We therefore ask that policy excludes industrial and relevant parts of E Class (E(g)(ii), E(g)(iii), B2 and B8) and logistics development from the affordable workspace obligation. 5.6.6 By adopting this approach, the planning process can strike a balance between promoting affordability and ensuring the financial viability of developments. It is imperative that the planning policies reflect this nuanced perspective to facilitate sustainable and feasible development within the borough. 5.6.7 In summary whilst we acknowledge and endorse the overarching concept of prioritising industrial requirements as the primary consideration on designated LSISs, to ensure an ‘effective’ policy in accordance with NPPF paragraph 35(b), further clarification is required regarding the definition of 'high employment density and economic value.'	The whole plan viability assessment has determined this policy to be viable, it is for individual applications to demonstrate where this is not the case, rather than the policy to encumber itself in caveats.	Policy E6: Locally Significant Industrial Sites (LSIS) – London Plan – Ealing LPA – local variation		Alex Lloyd	SEGRO	704	Developer

5.7.1 Part (b) of Policy G5 in the London Plan explicitly stipulates a target score of 0.3 for predominantly commercial development, with exceptions for B2 and B8 uses. However, Ealing's approach appears to deviate and it unclear the rationale for doing so without clear justification. 5.7.2 Regarding warehousing uses (which would include Class B2 and B8), we advocate for maintaining the exclusion as per the Inspector's report on the examination of the London Plan. Paragraph 451 of the report highlights the inherent challenges in achieving most Urban Greening Factors for industrial and warehouse developments, citing limitations and practical difficulties. Specifically, the report notes that while green roofs may be feasible, they come with additional construction costs, loading concerns, and maintenance issues. The viability evidence presented is deemed inconclusive. Until further evidence elucidates the practical implications for such developments, it is recommended to exclude them from the policy, as endorsed in recommendations PR39 and PR40 of the Inspector's report. 5.7.3 To ensure a 'justified' policy as per NPPF 35(b), it should be amended as follows: 'Ealing will apply the Urban Greening Factor as set out in the London Plan with a target of 0.4 for residential development and 0.3 for commercial development (excluding Class B2 and	Noted and agreed. It was the intention to implement the London Plan policy including the exceptions for B2 and B8. It is acknowledged that the policy could have been better worded and the suggested modificatioi is intended to provide better clarity.	Policy G5: Urban Greening – London Plan – Ealing LPA – local variation		Alex Lloyd	SEGRO	704	Developer

5.8.1 The 20% requirement for Biodiversity Net Gain (BNG) above the national minimum is not supported. No clear guidance has been provided to justify why such a high BNG requirement is prescribed within Ealing, either across various types of development or in general. Additionally, we find no justification for surpassing the 10% BNG set by future national requirements under the Environment Act, effective as of February 12, 2024. 5.8.2 Moreover, the recent changes to the Planning Practice Guidance (PPG) emphasise that Local Plans should not stipulate BNG levels exceeding the minimum 10% unless adequately justified. "Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented." 5.8.3 While developers can be encouraged to exceed the 10% threshold voluntarily, local plan policies should not mandate BNG levels beyond national standards. Imposing	Noted. It is acknowledged that the National Planning Practice Guidance on BNG seeks to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission. Defra’s own Impact Assessment indicated that the majority of costs associated with biodiversity net gain are incurred to reach a no net less position. The costs associated with moving from 10 to 20% is therefore considered to be marginal. However, the NPPG was published after considerable delays and only on February 14th 2024 (with updates on May 1st 2024) . This was after the Regulation 19 Local Plan and associated evidence base had been finalised ahead of the Full Council meeting held on February 21st 2024 and the beginning of the consultation period that ran from February 28th 2024. The council now acknowledges that additional time and further evidence is needed to prepare evidence to justify a rationale for pursuing a higher BNG percentage target. Therefore, the policy has been modified accordingly and a revised policy potentially containing a higher target will be considered as part of the next Local Plan review.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation		Alex Lloyd	SEGRO	704	Developer

5.9.1 It is recommended that the policy language be clarified and specified to explicitly state that 'Residential developments' and/or 'Residential-led mixed-use developments' are the specific types of developments obligated to provide adequate sports provision. This clarification is essential to prevent ambiguity and ensure that developers clearly understand their obligations regarding sports facilities within residential projects. By delineating the types of developments subject to this requirement, the policy can effectively guide planning decisions and promote the integration of sports facilities into residential developments where appropriate. 5.9.2 To ensure an 'effective' policy in accordance with NPPF paragraph 35(b), we therefore propose the policy wording as follows: <u>'Residential developments and/or residential-led mixed-use developments'</u> Development should ensure sufficient quality of sports provision in line with Ealing's Sports Facilities Strategy. Loss of existing sports facilities will not be supported, unless it forms part of the strategy to improve the quality or range of overall provision'.	Noted and understood. This policy requires applicants to adhere to the provision requirements detailed in Ealing's Sports Facilities Strategy. The Facilities Strategy specifies which development types / threshold trigger specific provision requirements (both on-site and off-site). This is also clarified at paragraph 5.46 of the supporting text, which references a threshold of 300 residential units for on-site provision. Whilst the standards here principally relate to residential led developments, the requirements specified are not solely limited to residential developments. For example the standards here also relate to the protection and enhancement of existing provision which may be independent of any proposed residential development. Amongst other things the standards here also seek to secure community access to proposed provision including that provided by education providers. Given that the scope of the requirements are not solely limited to schemes encompassing a residential component, and this is sufficiently clear in the Facilities Strategy itself, the Council are not minded to amend the text at clause E of local policy S5.	Policy S5: Sports and Recreation Facilities – London Plan – Ealing LPA – local variation			Alex Lloyd	SEGRO	704	Developer

5.10.1 SEGRO notes the target of 15kWh/m2 for heating set out in draft Policy OEP. Whilst this target will be easily achieved in larger industrial units, this will prove more challenging in smaller units. Larger estate regeneration will often include various sized units. For larger projects, SEGRO urges the Council to adopt an estate wide approach whereby developers can undertake calculations for a whole development and then calculate the heating energy demand accordingly. 5.10.2 The same principle applies for the EUI target of 35kWh/m2 for warehousing and light industrial units. Based on our previous projects, the average EUI is 40kWh/m2 - 50kWh/m2 for the warehouse and light industrial units considering all the small equipment and small powers. This limit is 55kWh/m2 (Commercial) for NZC buildings in the LETI guidance for this category. Thus, the proposed targets in Ealing Local Plan are lower than the average practise and NZC targets. Many developments will struggle to achieve such targets and may lead to projects becoming undeliverable. Further targets to be listed for unheated or heated warehouse units etc. SEGRO welcomes further engagement with the Council on this point. Furthermore, monitoring and submitting the total energy use and renewable energy generation for 1-2 years are sufficient to identify the performance gap if there any. Therefore, 5 years monitoring targets can also be reduced to 1-2 years.	The proposed policies as revised have been underpinned by evidence - namely the 'Delivering Net Zero' study. This has tested the proposed policies in terms of technical feasibility and viability. Chapter 9 of the DNZ study provides detailed cost modelling for the various archetypes and scenarios. This demonstrated that policy option 2 (as progressed via Ealing's Local Plan) would result in modest uplift in construction costs of around 1% to 4% relative to a Part L baseline. Viability has also been tested in the round alongside the full suite of local plan policies as part of a whole plan viability assessment. The revised policy approach is considered to be justified, effective and consistent with national policy objectives. In developing the study (DNZ) a range of archetypes were explored. It was recognised that there is an almost infinite variety of building types represented in London. This included consideration of a multi storey industrial typology as well as single storey industrial archetypes. The participating boroughs in the study decided collectively to test a 2 storey industrial building, as it was felt that this provided the most representative example (see page 53 of the study for further detail). It is worth noting that each archetype was also modelled against a range of different specifications for fabric and ventilation and so we believe that we have struck the right balance. It is also recognised that decision makers will be able to use discretion when applying the EUI archetype targets, particularly where a proposed building doe not exactly fit the target groups. Further guidance on the implementation of this policy will be provided. The approach will be to use the nearest building type	Policy OEP: Operational Energy Performance –Ealing LPA –local policy		Alex Lloyd	SEGRO	704	Developer

5.11.1 There are two different targets set out in Table DM4 contained within draft Policy ECP, however, it is unclear how these differentiate from one another. 5.11.2 We are assuming that the yellow table is the embodied carbon limits until 2030 and green tables are the limits after 2030. Furthermore, the RICS modules have not been mentioned in the targets, whether they are for the whole life cycle (Modules A-C) or for only the construction stage (Module A1-5). There are differences of embodied carbon emissions in between the small scale and large scale, multi-storied, residential/ non-residential buildings which was not considered in the carbon limits. 5.11.3 Whilst we acknowledge the design requirements to achieve pre-2030 (yellow) targets, we are raising concerns regarding the higher (green) targets. Whether these targets are achievable in relation to viability and functionality is largely untested. The lack of evidence base is reflected in the local plan viability assessment, where the feasibility of attaining these higher targets remains untested. Therefore, the policy is considered unjustified, and contrary to NPPF paragraph 35(b). 5.11.4 In addition to the above, it is imperative to recognise the unique nature of multi-storey industrial buildings	Noted. The proposed embodied carbon policy introduces stepped embodied carbon limits for different building types/use. The first section of table DMP4 in yellow specifies those carbon limits deemed acceptable up to 2030. The second part of the table in green specifies those limits specified from 2030. It is noted that there is a typo in the heading of the second part of the table which needs to be corrected to read as ‘from 2030’. These are based on LETI best practice design based targets, and based on the building life cycle stages A1 to A5. It is recognised decision makers will be able to use discretion when applying the embodied carbon limits, particularly where a proposed building / use doesn’t exactly fit the target groups. Further guidance will be published to support the implementation of this policy, and this will address matters of flexibility etc.	Policy ECP: Embodied Carbon – Ealing LPA – local policy			Alex Lloyd	SEGRO	704	Developer

5.12.1 It is not agreed that major developments requiring demolition should be mandated to undertake carbon optioneering to assess the optimal approach to building form and reuse. There are no further instructions for the reporting format, methodology, number of required options and how this information need to be included in the whole life cycle carbon assessment. The council should also provide further explanation of best practice standards as the options need to be capable of comparison reflecting this best practice standard. 5.12.2 Such a requirement could significantly impact the viability of projects. Imposing additional requirements without careful consideration of their practical implications may lead to projects becoming undeliverable. Therefore, it is essential to balance environmental considerations with the practical realities of development to ensure that policies support sustainable outcomes without unduly burdening stakeholders. 5.12.3 The policy is not considered to be 'effective' or 'justified' in accordance with NPPF paragraph 35(b) and (c). Accordingly, this policy should introduce the following drafting: ‘Major developments should undertake a Whole Life Carbon assessment, <u>or similar assessment as agreed with the Council,</u>	Policy WLC 'Whole Life Cycle Carbon Approach' introduces locally the requirement for applicants to undertake an optioneering exercise as part of the Whole Life Cycle Carbon Assessment. The requirement to prepare Whole Life Cycle Assessment for referable applications is currently a feature of London Plan policy SI 2. Local Policy WLC extends this requirement to all major developments. The optioneering exercise seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option. The findings of this optioneering exercise should be considered alongside other planning considerations to determine the most appropriate option, including consideration of a retrofit first approach, and different building forms (heights). The ‘options’ considered should include reuse/refurb options, alongside any new build options if pursued. All options evaluated should be capable of comparison reflecting the same best practice standards. The intention is to prepare additional guidance to support the implementation of carbon optioneering. Viability has also been tested in the round alongside the full suite of local plan policies as part of a whole plan viability assessment. The revised policy approach is considered to be justified, effective and consistent with national policy objectives.	Policy WLC: Whole Life Cycle Carbon Approach – Ealing LPA – local policy		Alex Lloyd	SEGRO	704	Developer

5.13.1² SEGRO does not support the assertion made in Policy FLP that additional detail will be furnished in a separate Supplementary Planning Document (SPD) concerning Planning Obligations and Legal Agreements. While supplementary guidance can be beneficial if it elaborates on existing policies, it should refrain from introducing new policies or detailing aspects that have not undergone adequate testing or consideration within the viability assessment of the Local Plan. Any supplementary documents must align closely with established policies and ensure consistency in implementation. 5.13.2² Regarding the Community Infrastructure Levy (CIL) consultation, a separate response will be provided. However, in summary the response concludes that industrial, workshop and warehouse uses, including re-investment, re-development and intensification are critical to achieving the Local Plan outcomes and are central to the future of the area. Ealing Council’s own evidence suggests that such development does not achieve EUV benchmarks and it is therefore inappropriate to set a CIL rate for these uses (E(g)(ii), E(g)(iii), B2 and B8). 5.13.3² For Data Centres the Viability Study does not provide sufficient evidence to understand how the proposed rate was arrived at therefore doesn’t provide ‘appropriate available evidence’ to justify the proposed rates. 5.13.4² The full response included in Appendix 1 and offer insights into SEGRO’s position and perspectives on the CIL consultation and should be considered along this representation, ensuring transparency and clarity in our engagement with the consultation	Noted	Policy FLP: Funding – The Local Plan – Ealing LPA – local policy		Alex Lloyd	SEGRO	704	Developer

Summary 6.1.1This comprehensive document, prepared by Stantec on behalf of SEGRO, offers a detailed response to the Ealing Local Plan Regulation 19 Consultation, specifically focusing on policies relevant to SEGRO's extensive industrial estates in the area. 6.1.2As a major UK Real Estate Investment Trust, SEGRO manages a diverse portfolio of industrial estates across Ealing, playing a crucial role in supporting businesses across 30 sectors, thus contributing significantly to job creation and economic growth. 6.1.3The representation aims to align SEGRO's interests with the overarching vision outlined by the Council for Ealing's growth and development. It underscores the vital role of industrial areas in fostering economic development and job creation, while also emphasising the importance of policies that facilitate modernization, efficiency, and sustainability within these industrial spaces. 6.1.4While expressing overall support for the Council's vision, SEGRO highlights the need for clarity and refinement in certain policy areas, particularly concerning land use, intensification, and modernization of industrial spaces. Additionally, SEGRO raises concerns regarding proposed	Noted.	General		Alex Lloyd	SEGRO	704	Developer

Our client is 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, now referred to as 06EA, and this is supported by FCT. The retained site allocation was previously referred to as EA11 under the Regulation 18 Draft Local Plan. FCT owns and control 49-51 Uxbridge Road. Initial pre-application discussions took place with Ealing Council officers regarding the potential redevelopment of the site to provide a nine storey office-led scheme, in March 2022. Overall, the principle of an office development with an increase of floorspace was acceptable and the proposal was supported, subject to minor comments. Pre-application discussions with the GLA took place in September 2023, for a larger scheme, ranging in height from nine to twelve storeys. The GLA generally supported the principle of the proposed development. The GLA confirmed that this building height could be supported on the site, subject to greater analysis of what could be achieved on the remainder of the allocation. The principle of development is also supported by the draft Allocation 06EA in the emerging Local Plan.	Noted.	06EA 49–69 Uxbridge Road		Anna Rigelsford	Four Countie	705	Developer

FCT supports draft Policy SP4.1 which seeks to direct development to sustainable locations that are well connected to sustainable transport modes or within close proximity to town centres, and thus deliver patterns of land use that reduce the reliance on the car. 49-51 Uxbridge Road is in Ealing Town Centre, within walking distance of the main shopping areas and the London underground and national rail stations at Ealing Broadway, including Crossrail/the Elizabeth Line. Draft Policy SP4.1 also confirms that the Council are seeking to ensure that most efficient use of land is made so that development on sites is optimised, which will contribute to more sustainable patterns of development and land uses. This is supported by FCT in the context of the proposed scheme at 49-51 Uxbridge Road which would allow the site to be optimised and ensure that the land is used efficiently in this sustainable location.	Noted. Support welcomed.	SP4.1 Good Growth		Anna Rigelsford	Four Countie	705	Developer
The emerging Local Plan contains a set of Town Plans for each area in the Borough. The Ealing Town Plan notes the importance of the Uxbridge Road corridor in accommodating the Borough’s higher quality office stock. Recent high-density, mixed-use development in the town centre at Dickens Yard, Filmworks, and the planned redevelopment of Ealing Council’s offices at Perceval House reflect the increased connectivity and appeal that the Elizabeth line brings to the Ealing Town Centre. This is reflected in the Ealing Spatial Strategy shown on Table E2 with multiple locations identified for significant development intensity, including the identifying allocation 06EA as a development site. FCT supports the Ealing Spatial Strategy and can confirm that the 49-51 Uxbridge Road could add to the high-quality office stock in this area.	Noted. Support welcomed.	06EA 49–69 Uxbridge Road		Anna Rigelsford	Four Countie	705	Developer

FCT supports proposed allocation 06EA, which includes the site at 49-51 Uxbridge Road. The proposed use is commercial-led mixed-use scheme with some residential and cultural/leisure facilities. Our client’s proposal for an office development at 49-51 Uxbridge Road sits comfortably within the wider allocation. However, there has been a significant reduction in indicative building heights at site allocation 06EA since the draft Regulation 18 site allocation (EA11). The draft allocation previously confirmed that the site falls within an area potentially appropriate for tall buildings ranging from 9-21 storeys. Draft allocation 06EA now limits heights to a maximum of 8 storeys. Within the supporting text, the Draft Local Plan states that building height, massing and street layout proposals should be “developed in accordance with the Tall Buildings Strategy. Heights are to range between 3 and a maximum of 8 storeys (28m) across the site.” The Tall Buildings Strategy (TBS) (December 2023) 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 06EA 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, <u>the TBS reviews the appropriate locations for tall buildings in</u>	The site falls within Tall Building Zone D where the guidance for prospective tall building heights is 9 - 21 storeys. However, this does not mean that all prospective buildings within this zone may reach the upper limit of this range. The proposed building heights shown on p.139 of the Ealing Tall Buildings Site Guidance Appendix Part 2 are indicative and reflect a townscape and character-led approach to optimising the capacity of sites that have not been subject to full design or viability testing. It is for development proposals to demonstrate where the planning balance should favour a different approach.	06EA 49–69 Uxbridge Road		Anna Rigelsford	Four Countie	705	Developer
In addition, it should be noted that site allocation 06EA is not owned by a single developer. FCT requests that the allocation references that proposals for redevelopment on this site may come forward as individual buildings and on a phased basis in the future.	Noted. A masterplan approach between the various land owners has the potential to optimse any future development proposals for the site. However, it is accepted that piecemeal development is acceptable in this instance.	06EA 49–69 Uxbridge Road		Anna Rigelsford	Four Countie	705	Developer

The definition of a tall building in Ealing differs across the Borough. A tall building within area E14 in Ealing Town Centre is defined as 21 storeys (73.5m). This policy and approach are supported by FCT. Site allocation 06EA acknowledges that it is appropriate for a tall building to be accommodated on site, however, limits this to 8 storeys, which is contradictory to draft policy D9. Therefore, the indicative height range at allocation 06EA should be reverted to 9-21 storeys, as noted above, to align with wider planning policy in the Draft Local Plan and make optimal use of the site.	Heights set through site allocations replace general guidance on heights in policy D9.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Anna Rigelsford	Four Countie	705	Developer
Ealing Council have updated the wording of draft Policy G5 so that it is in line with the requirements of the London Plan. FCT supports this approach. Viability also plays a key role in delivering urban green tools and this should be taken into consideration. Accordingly, FCT would encourage the Council to pursue this policy in line with the London Plan and the wording of the policy be updated to note that developments should seek to exceed this <u>‘where possible.’</u>	Noted. As proposed to be revised in the Reg. 19 plan local policy G5 seeks to adopt the same target levels as already established in the London Plan. These targets were previously tested in respect of viability under the London Plan.	Policy G5: Urban Greening – London Plan – Ealing LPA – local variation		Anna Rigelsford	Four Countie	705	Developer
Draft Policy G6 has been added to the Regulation 19 Local Plan since the previous Regulation 18 version. Ealing Council are requesting development proposals to ‘achieve a biodiversity net gain of at least 20% or the advised national minimum amount, whichever is greater’. The mandatory national minimum requirement is set at achieving a 10% BNG on major development projects. Viability is a key issue in delivering BNG and achieving a 20% BNG will be challenging, particularly on town centre development sites. As such, FCT would encourage the Council to re-word this policy so that it accords with national legislation requirements.	Noted. It is acknowledged that the National Planning Practice Guidance on BNG seeks to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission. Defra’s own Impact Assessment indicated that the majority of costs associated with biodiversity net gain are incurred to reach a no net less position. The costs associated with moving from 10 to 20% is therefore considered to be marginal. However, the NPPG was published after considerable delays and only on February 14th 2024 (with updates on May 1st 2024) . This was after the Regulation 19 Local Plan and associated evidence base had been finalised ahead of the Full Council meeting held on February 21st 2024 and the beginning of the consultation period that ran from February 28th 2024. The council now acknowledges that additional time and further evidence is needed to prepare evidence to justify a rationale for pursuing a higher BNG percentage target. Therefore, the policy has been modified accordingly and a revised policy potentially containing a higher target will be considered as part of the next Local Plan review.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation		Anna Rigelsford	Four Countie	705	Developer

FCT welcomes the opportunity to comment on the emerging Ealing Local Plan and are keen to continue to engage especially in relation to 49-51 Uxbridge Road site. FCT is supportive of Ealing’s aspirations in the Local Plan, including the enhancement of the Uxbridge Road corridor to accommodate the Borough’s higher quality office stock. The allocation of 06EA 49 - 69 Uxbridge Road for commercial-led mixed-use development is supported. The site is in a highly sustainable area, supported by excellent transport links. Commercial development in this location represents an excellent opportunity to deliver employment floorspace. As noted above, the height restriction of 8 storeys within the proposed allocation should be amended to refer to 9-21 storeys in accordance with the evidence base.	Noted. Support welcomed.	06EA 49–69 Uxbridge Road		Anna Rigelsford	Four Countie	705	Developer

These Representations are written on behalf of our client, T R Suterwalla & Sons Ltd (TRS), in response to the London Borough of Ealing (LB Ealing) Draft Local Plan Public Consultation (Regulation 19) from the 28th of February 2024 until 6pm on the 10th of April 2024. These Representations are written specific to TRS’s land holding at Southbridge Way, Southall, UB2 4AX and UB2 4BY (‘the Site’). [Aerial view of TRS's site] However, these representations outline the areas where the Draft Local Plan is unsound in its basis, and the amendments that are proposed in order to resolve these issues, namely: 1. Re-establishing the allocation for the Site, as part of The Green policy 10SO, in order to maximise brownfield land for a comprehensive redevelopment of the town centre. 2. In line with the above, reinstating the Site as part of the Tall Buildings Strategy. 3. Allowing for co-living within Southall, as a major town centre and area with high growth potential appropriate for co-living, in line with the LSPBSL LPG (2024). 4. Reducing the requirement for 40% affordable housing (with 70% social housing) to qualify for the Fast Track Route down to 35%, in line with the London Plan. It is important for the Council to work collaboratively to	Noted.	10SO The Green		Kate Macmillan	TR Suterwalla	706	Developer

The Site covers 3.2 hectares (7.9 acres), including five warehouse units (12,843sqm / 138,244sqft GIA), office space (2,609sqm / 28,085sqft GIA), and 18 residential units in Martins Court (with a c.13-year remaining lease). Southall is identified in the London Plan as an Opportunity Area (OA) with potential for 9,000 new homes and 3,000 new jobs by 2041. The OA was designated 2011 and is part of the Heathrow/Elizabeth Line West Growth Corridor. The planning documents relevant to the Site are: •EBC Core Strategy (Policies 2.1, 2.8, 2.9 and 4.4. Map:16) (2012) •Development Sites DPD (2013) - (Policy SOU8) •Southall Gateway SPD (2015) •The Green SPD (2017) •Draft Local Plan (Regulation 19 draft 2024) These representations are in response to a review of the soundness of the Draft Local Plan. It is noted that in line with Paragraph 35 of the National Planning Policy Framework (2023) {quotes Para 35}.	Noted.	10SO The Green		Kate Macmillan	TR Suterwalla	706	Developer

The Site is currently allocated for development under policy SOU8 ‘The Green’, covering multiple land holdings of both publicly and privately owned areas, over 8.3 hectares in total. The policy is aligned with Development Strategy Policies 1.2(b) and 2.8, particularly 2.8(b) and 2.8(c). The allocation is for mixed use development appropriate to the town centre, with continued protection of existing industrial uses on the Featherstone, Dominion and Suterwalla estates as a Locally Significant Industrial Site (LSIS) and retention of the Dominion Arts Centre. [Map of adopted site SOU8 showing representor's site] The adopted The Green SPD (2017) states that the site is suitable for mixed use development appropriate to the town centre, with continued protection of existing industrial. It justifies this by saying that consolidation and intensification of the site will allow retention of the locally important industrial uses and allow the introduction of new uses to support the vitality and viability of the neighbourhood centre. The site is therefore suitable, in current policy terms, for a mixed use development to include industrial, commercial and residential uses that successfully blend the town centre to the employment areas. The Draft Local Plan maintains the site as Locally Significant Industrial Land. However, the proposed updated ‘The Green’ allocation (10SO) is reduced to the extent of the Peabody planning permission, covering the southern component of the original allocation area. The Draft Local Plan is therefore proposing to remove the allocation for mixed-use redevelopment of the Site	There is no evidential basis for the release of any designated industrial sites over the plan period. Development on LSIS sites is subject to Policy E6.	10SO The Green		Kate Macmillan	TR Suterwalla	706	Developer

The existing buildings are coming to the end of their life and, with the short leases in place, there will be an opportunity to redevelop the site for a more comprehensive and better use of the land. Brownfield land should be optimised where possible, and the site has the opportunity to provide more jobs and homes than the current premises provide. Employment in Southall and the borough of Ealing is changing; the redevelopment of the site will enable the new uses and tenants to best serve the economy of Ealing. The Site provides an excellent opportunity for optimisation of the area through efficient and considered redevelopment, contributing to much needed new housing and sitting centrally as part of the new and enhanced town centre. The Site is centrally located within the Southall Opportunity Area. Incorporating the Site within the allocation will enable comprehensive development and will bring forward the opportunity to create permeability to this part of Southall, benefiting residents and businesses to the west of the site by creating greater comprehensive connectivity. Whereas under its current use, the Site is underused and closed off with no public access.	There is no evidential basis for the release of any designated industrial sites over the plan period. Development on LSIS sites is subject to Policy E6.	10SO The Green		Kate Macmillan	TR Suterwalla	706	Developer

The NPPF (2023) states that strategic housing plans should prioritise brownfield and other under-utilised urban sites, to utilise existing infrastructure, and to allow people to live near the services they rely on, making travel patterns more sustainable (Chapter 11). The document gives substantial weight to the benefit of using suitable brownfield sites to provide housing, and states that strategic policies should make as much use as possible out of previously developed land. The Site is an excellent example of this, a well situated but currently underutilised developed land, which benefits from significant infrastructure already in place to accommodate new development. The NPPF states that the use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist (paragraph 89). From this policy perspective, the Site should be prioritised as a sustainable option for redevelopment for both housing and improved industrial uses. The Government’s Industrial Strategy (2017) outlines a vision to drive productivity improvements across the UK and sets out a delivery programme to make the UK a leader in artificial intelligence and big data, clean growth, future mobility, and catering for an ageing society. Allocating the Site for mixed-use redevelopment will support the reprovision of new and improved industrial and commercial uses and contribute to job creation and an overall high quality offering to attract new businesses to the area. The above points are further emphasised in Michael Gove MP’s letter to the Mayor of London, of the 12th February 2024. The letter sets out the changes the Government is consulting on making in	There is no evidential basis for the release of any designated industrial sites over the plan period. Development on LSIS sites is subject to Policy E6.	10SO The Green		Kate Macmillan	TR Suterwalla	706	Developer

The Five Year Housing Land Supply (Housing Trajectory, 2023) and the Government’s 2022 Housing Delivery Test show the Council’s failure to meet the objectively assessed housing need. The London Plan Review – Report of Expert Advisers (January 2024) also illustrates a significant shortage in housing delivery (under 5,000) in comparison to the London Plan (2021) housing targets. As LB Ealing currently only have a 3.7 year housing supply, with a shortfall of 3,935 units, the addition of this large Site would maximise the opportunity to achieve the housing need in the area.	Noted. The Council does recognise the challenge. The targets represent a significant step change from those established previously and the influence of any new policy interventions will take time to impact on rates of delivery. Whilst the shortage of deliverable supply over the next five years is acknowledged, it should be borne in mind that the Council has adopted a fairly precautionary approach when determining which large sites qualify as ‘deliverable’, i.e. those whose capacity is assigned to the 'next five years'. Only capacity from sites benefitting from full permission have been included, when in reality some capacity might be delivered during that period from sites which are currently less advanced in the planning cycle. It is possible then that the identified deliverable capacity might underestimate what supply could potentially be delivered within that window of time. As detailed in the report itself, the position when examined over a longer timeframe, is more positive. Over the full 19 year trajectory period delivery/supply is expected meet the cumulative requirement with a modest contingency. Whilst it is helpful to examine the position over a longer timeframe to even out the inevitable fluctuations that can occur from year to year, the use of a longer timeframe also poses challenges. This is particularly evident for the latter part of the trajectory period where it is difficult to comprehensively identify which sites might be available and suitable that far into the future. As a consequence it is probable that the trajectory undercounts what capacity might be delivered over the life of the plan.	SP4.3 Genuinely affordable homes		Kate Macmillan	TR Suterwalla	706	Developer

For full comprehensive redevelopment of central Southall, the Site is a key component in connecting the Peabody development to the town centre, and the Havelock Estate as an extension to that interconnectivity. The massing illustration from the Tall Buildings Strategy (2023) illustrates the significance of the Site (redline) within the wider masterplan context. [Illustration of proposed massing of The Green from Tall Buildings Strategy showing representor's site] In consideration of the above, it is requested that the red line of the previous site allocation be re-instated to include the Site, which will bring forward the opportunity for a comprehensive redevelopment of the town centre. Our client, TRS, is therefore submitting representations to support the principle of mixed use redevelopment of the Site as it presents an excellent opportunity to enhance a central Southall area. The surrounding developments, particularly Peabody’s development of the Green, will be improved by the connection provided by this Site. It is recommended that the Site maintains its existing allocation, as part of the existing The Green policy SOU8 (proposed policy 10SO) and The Green SPD. Continuing the allocation for mixed-use redevelopment of the Site would make the Draft Local Plan sound in supporting the comprehensive redevelopment of Southall and to contribute to the borough’s five year housing land supply targets by way of maximising the use of brownfield land. The proposed changes to 10SO as follows:	There is no evidential basis for the release of any designated industrial sites over the plan period. Development on LSIS sites is subject to Policy E6.	10SO The Green		Kate Macmillan	TR Suterwalla	706	Developer

Building heights on the Site have not been assessed in LB Ealing’s Tall Buildings Strategy (2023). Clarity on LB Ealing’s aspirations for building heights at the Site would be welcomed, in order to optimise and make the best use of this underutilised land. In the absence of a draft policy on this, given that the reduced allocation at The Green (referenced as Southall 013 in the Tall Buildings Strategy) assesses that heights up to 18 storeys (neighbouring the Site) are suitable, it is considered that heights for a residential-led mixed use scheme on the Site would therefore also be suitable at 18 storeys adjacent to the Peabody scheme. The positioning of the site adjacent to the railway lines, away from heritage assets and considering the emerging townscape context of the area also supports tall buildings in this location. Moreover, the existing policy wording (SOU8) supports an increase of heights up to the railway line. The reinstatement of this within policy documents would be welcomed, in order to guide a design-led approach to the Site in line with Gove’s letter to the Mayor (2024) to maximise the scale of ambition within OAs to accelerate housing delivery. The letter states that Policy SD1 has not been successfully unlocking development within OAs, which are underdelivering across London. The review of the policy looks to maximise the scale and ambition of development, particularly in well-connected areas that can accommodate large scale housing delivery, such as the Site.	The London and Local Plans require a plan-led approach to tall buildings. Policy D9 has now been modified to set recommended heights.	10SO The Green		Kate Macmillan	TR Suterwalla	706	Developer
It is recommended that, in extending the current allocation to the Draft Local Plan, the position on building heights is represented in line with the existing allocation and the work done to the updated Tall Buildings Strategy for the Green, as it shares the same context. The Site should therefore remain a designated tall building area, with opportunities to maximise developable area whilst taking into consideration the relevant technical and townscape factors. The proposed changes to the Tall Buildings Strategy & Policy 10SO as follows: [Aerial view of 10SO/SO10 The Green from Tall Buildings Strategy and map showing recommended amendment to site boundary]	The London and Local Plans require a plan-led approach to tall buildings. Policy D9 has now been modified to set recommended heights.	10SO The Green		Kate Macmillan	TR Suterwalla	706	Developer

The Draft Local Plan restricts co-living developments to Ealing town centre only, due to the lack of assessment for market demand in other parts of the borough. Co-living (or LSPBSL) provides a strong opportunity to meet housing demand, and support scheme viabilities in providing the affordable housing requirement. The LSPBSL LPG (2024) provides guidance in plan-making for allocations, or any broad locations or policies in development plan documents that relate to co-living. Chapter 2 of the document outlines the requirements of co-living in meeting the requirements of London Plan Policy H16 part A3, noting major town centres and area with high growth potential appropriate locations for co-living. In line with this LPG, Southall would be an appropriate location for co-living. Policy support for such a use in this well-connected location, benefitting from the Elizabeth Line transport links, would provide a potential solution to unlock many upcoming schemes. The Draft Local Plan is unsound in not complying with wider national and Greater London policies. It is recommended that the Draft Local Plan allows for co-living in Southall, to maximise housing delivery appropriate to the housing need, in line with the London Plan's LSPBSL LPG (2024).	To be clear; there is no demonstrated need for LSPBSL anywhere in the borough and this type of development does not therefore meet identified housing needs. LSPBSL is restricted to EMTC because of the negative effects of these types of development in areas with limited facilities.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Kate Macmillan	TR Suterwalla	706	Developer
The updated requirement for 40% affordable housing, with 70% low cost and 30% intermediate split, to qualify for the Fast Track Route (non-viability tested) is in excess of the London Plan Policy H5, which seeks 35% affordable housing for Fast Track (where there is no net loss of industrial). This conflicting affordable housing policy lacks clarity, and makes the route to development more challenging for a potential residential-led scheme to successfully support the reprovision of improved industrial uses on this LSIS. The Draft Local Plan is unsound in not complying with wider national and Greater London policies. It is recommended that the proposed affordable housing policy for Fast Track planning applications is clarified to confirm that the Fast Track requirement remains at 35% (where there is no net loss of industrial on an LSIS), in line with the London Plan Policy H5. This will allow for existing brownfield land to be successfully redeveloped to provide more space efficient industrial and commercial area, whilst also positively contributing to housing supply.	London Plan policy is owed general not absolute conformity. The policy is tested as viable by the whole plan viability assessment and is a valuable albeit only partial measure to meet overwhelming affordable needs identified in the LHNA.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Kate Macmillan	TR Suterwalla	706	Developer

Principle of BTR Contrary to national and London Plan guidance there is very little recognition of the importance of this form of housing as part of housing supply within the draft Local Plan. Policy SP4.3 is not positively prepared and does not reflect London Plan’s paragraph 4.11.1. Policy SP4.3 should be strengthened to clearly support BTR planning applications on this basis, rather than noting that affordable rented properties as part of BTR schemes will be supported by the Council. Affordable Housing The only direct reference to BTR is to affordable housing expectation at Policy HOU. Part C requires at least 40% affordable housing without an evidence basis – including the LHNA. It goes on to expect a tenure split which is contrary to national and London Plan Policy H11. The draft Policy will not be effective as BTR schemes will not be viable nor deliverable. This alternative affordable housing has not been explored in any evidence base. ~~Policy HOU should therefore reflect the approach taken by the~~	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on housing including Policy H11 which deals with build to rent. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. The Mayor of London has not raised objections to this approach. A Local Plan Viability Assessment forms part of the evidence base and it tests the ability of developments in the London Borough of Ealing to accommodate emerging policies in the draft Local Plan alongside a range of potential Community Infrastructure Levy (‘CIL’) rates.	SP4.3 Genuinely affordable homes	Policy HOU: Affordable Housing – Ealing LPA – local policy	Ben Wrighton	Watkins Jones	707	Developer

Need for PBSL Firstly the draft Local Plan is not positively prepared in respect of co-living / PBSL. This is evidenced by draft Paragraph 5.18 states: “This [Ealing’s Local Planning Policy Guidance] also provides guidance on specialist forms of housing such as co-living and houses of multiple occupation (HMOs) that may make a valuable contribution to housing supply in particular circumstances but will not be generally acceptable across the Borough.” A crucial role of the Local Plan is to maintain the supply of new housing in order to meet the housing requirement with sufficient flexibility to take account of changing circumstances. A plan-led solution to supply will help to meets the needs of groups with specific housing requirements, as set out in the NPPF at Section 5. Therefore, there is an overriding principle to facilitate the supply of housing targeted at single households, including co-living. We believe that co-living has an important role to play in diversifying the choice of accommodation in the Borough. It can also assist in realising strategic objectives around the attraction and retention of talent, providing that such accommodation is provided to a high quality, with appropriate room sizes, in appropriate locations and is delivered by experienced operators. This is reflected in the Council’s LHNA at Paragraph 35.	None of Ealing's identified housing needs are for LSPBSL and is provision will not meet any of these. Individual schemes will need to be demonstrated on a case by case basis.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Ben Wrighton	Watkins Jones	707	Developer

Draft Paragraph 5.20 of the Local Plan goes on to state: “Ealing’s Local Housing Needs Assessment (LHNA) found that need for PBSL and PBSA could not be demonstrated at a strategic level and so any schemes must be justified on a case by case basis with reference to specific local needs and the impact upon the broader housing market of any proposed provision. Similarly, these constitute discrete housing products not part of conventional housing supply.” In respect of the need for co-living, the LHNA states at paragraph 5.20-22: “Given that Ealing is projected to see a decline in single young person households, then the household projections would envisage little role for this type of dwelling, and this is reflected in our modelled size and tenure mix. However, as a policy led response to the increasing lack of housing for younger people in the area the schemes could have a role in short term housing for groups such as recent graduates looking to establish themselves in Ealing as an alternative to living in HMOs. “In conclusion, it is difficult to project a need for studio apartments or co- housing schemes because it may be that many young people prefer to share and save for their own property rather than have their own more expensive separate unit. The scale of the student numbers in Ealing would suggest that there may be a market for post-student self-contained units which could run in to hundreds of units and that this is likely in turn to reduce the need for larger	None of Ealing's identified housing needs are for LSPBSL and is provision will not meet any of these. Individual schemes will need to be demonstrated on a case by case basis.	Policy HOU: Affordable Housing – Ealing LPA – local policy			Ben Wrighton	Watkins Jones	707	Developer

Policy HOU: Affordable Housing states: E. Affordable housing contributions from large scale purpose built shared living (PBSL) should be in the form of conventional housing units on site and should meet a minimum 40% contribution. Paragraph 5.21 goes on to set out: While the London Plan supports a cash in lieu contribution for PBSL, more recent guidance has acknowledged that onsite affordable housing can be supported, particularly given the London Plan’s strong preference for onsite affordable provision and the proliferation of PBSL schemes. Onsite conventional affordable housing is favoured above a cash in lieu contribution given the acute need for affordable homes in the borough and the need for each site to contribute to meeting that need and this should be equivalent to at least 40% (or 50% where that threshold applies). There is no evidence base to support the policy expectation of 40%, and therefore the Policy should reflect the London Plan’s Policy E7 of 35% or 50% depending upon site context. The LPG regarding co-living allows for on-site affordable housing “on larger sites” (paragraph 2.2.7 of the LPG, February 2024) as not all schemes can support more than one tenure in respect of design and viability limitations – both of which should be acknowledged in Policy H16 and Paragraph 5.24. The Council has demonstrated no evidence of the proliferation of co-living schemes within the Borough, nor of co- living schemes delivering conventional	Identified affordable housing needs exceed the 35% threshold and the policy has been tested as viable.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Ben Wrighton	Watkins Jones	707	Developer

Appropriate Locations Policy H16: Large Scale Purpose Built Shared Living states: Development of large-scale shared living will only be permitted within Ealing Metropolitan Town Centre and will only be supported where it can be demonstrated that the scheme would: (i) ~~Not~~ compromise the supply of class C3 self-contained homes; (ii) ~~Not~~ result in an overconcentration of similar uses; and (iii) ~~Not~~ be detrimental to local amenity and the mix and cohesiveness of community uses in the area. Firstly, this Policy does not address all of the matters covered in the GLA’s LPG Section 2 which would help to ensure that the Policy is positively prepared. The GLA’s LPG (Section 2.1) provides much greater flexibility on locations that would support co-living. The restriction to the Ealing Centre only, refers at Paragraph 5.23 to: “large scale shared living depends for the amenity of its residents upon access to excellent public transport connections and a wide range of local amenities”. It is not reasonable to suggest that co-living is reliant or depends upon the amenities of a local area. The housing product is self sufficient in respect of day to day needs of residents. It is equally supportable to promote co-living in the other town centres of the	There is no demonstrated need for LSPBSL anywhere in the borough and this type of development does not therefore meet identified housing needs. LSPBSL is restricted to EMTC because of the negative effects of these types of development in areas with limited facilities.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Ben Wrighton	Watkins Jones	707	Developer

Purpose Built Student Accommodation We consider that the draft Local Plan is not prepared in a positive, justified or effective manner in respect of purpose built student accommodation (PBSA). The draft local Plan is also not consistent with National or London Plan Policy. By way of introduction, draft Policy SP4’s supporting Paragraph 3.58 states: “Access to housing represents a significant economic constraint and source of inequality in the borough which appears to be constraining population growth and causing outmigration of the crucial working age population. In particular, the council will pursue unit-by-unit delivery of identified affordable housing needs and will also set out a strategy for the delivery of specialist housing types. Mixed and balanced communities are also important for access to housing, improving inequality, and reducing social isolation. The Local Plan provides a flexible policy framework to manage housing provision based upon demonstrated needs and according to local character and amenity.” Based upon the following we consider that the strategy for PBSA is not clearly set out, but certainly appears to be unsupportive in principle. It also does not provide any kind of flexibility in understanding how this specialist form of housing interacts with the wider housing market. The strategy does not benefit from any support within the Council’s evidence base such as the LHNA.	Addressed above	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Ben Wrighton	Watkins Jones	707	Developer

PBSA Need The London Plan is very clear on the pan-London strategic need for PBSA and the inappropriateness of considering at a Borough level. This is recognised by the LHNA at Paragraph 5.25. However, Paragraph 5.20 of the draft Local Plan states: “Ealing’s Local Housing Needs Assessment (LHNA) found that need for PBSL and PBSA could not be demonstrated at a strategic level and so any schemes must be justified on a case by case basis with reference to specific local needs and the impact upon the broader housing market of any proposed provision. Similarly, these constitute discrete housing products not part of conventional housing supply.” Firstly, we cannot find that conclusion within the LHNA in respect of PBSA. The above approach is contrary to national planning guidance which is clear that PBSA and contribute towards housing targets. Further, that PBSA benefits from reducing pressure on conventional forms of housing stock from student occupation. The Local Plan should clearly also reflect this in a positive manner. Paragraph 5.18 of the draft Local Plan may be trying to grapple with concept but it is not clear. Further the LHNA recognises at Paragraph 30: “The overall need for housing also requires to be set in the context of other policy objectives. For example there is the need to meet the needs of older persons, those seeking shared accommodation.	The LHNA follows the conclusions of the London Plan that strategic borough targets for PBSA should not be set.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation			Ben Wrighton	Watkins Jones	707	Developer

Draft Policy SP3.3 Healthy Lives suggests that the Council will support: (K) “Meeting needs for specialist housing where this can complement conventional supply”. Draft Paragraph 3.43 of the Local Plan goes on to qualify that: “Housing is a key determinant of health and well-being, and specialist housing will likely play a larger role over the plan period. This will be supported where it meets identified needs, supports social welfare, and increases overall housing supply within the borough”. To that end the Local Plan should be clear in the Housing Section that there is a strategic need for PBSA across London including the Borough of Ealing, and that PBSA will contribute towards the supply of housing at a ratio of 2.5 as set out in the Government’s planning guidance, and as reported to the Council at Paragraph 5.26 of the LHNA. There should be no requirement for applicants to demonstrate need for PBSA on a project by project basis and Paragraph 5.20 should be amended / deleted. (contd below)	PBSA does not meet Ealing’s identified housing needs and should continue to be assessed on a case-by-case basis	SP3.3 Healthy lives		Ben Wrighton	Watkins Jones	707	Developer

Draft Policy HOU refers to affordable housing for PBSA. Paragraph 5.22 states: “To be consistent with the other thresholds in this plan and recognising that cost of accommodation can often be a barrier for those from lower income families from accessing further education in London, 40% of the rooms should be affordable”. The draft Policy requires more than 35% (40%) than the London Plan policy with no justification. This simple statement above is insufficient to justify the differing affordable housing approach. The Policy should simply comply with the London Plan policy for affordable student accommodation unless evidence justifies otherwise. In respect of assessing affordable housing needs in the Borough, the LHNA states (Paragraph 4.13): “Student households are also excluded, given that their needs are assumed to be transient and do not count towards the need for affordable housing in Ealing.” There is therefore no evidence to support an alternative approach to the London Plan. The Local Plan should simply follow London Plan policy regarding affordable PBSA.	Identified affordable housing needs exceed the 35% threshold and the policy has been tested as viable.	Policy HOU: Affordable Housing – Ealing LPA – local policy			Ben Wrighton	Watkins Jones	707	Developer

Engagement with Higher Education Institutions Draft Paragraph 5.22 of the draft Local Plan addresses HEI support and nomination agreements. Firstly, this does not accord with the London Plan. Secondly, such position should be set out in policy and not justification text. There is no evidence to justify the need to move away from London Plan policy, nor to require support from locally-based institutions. If this draft paragraph is promoting sustainable travel, then the overly simple approach is poorly evidenced and would not meet such aims given the high accessibility of parts of the Borough to other areas of London that are not adjacent Boroughs. Otherwise there is no justification of such a restrictive approach in planning terms and no evidence of engagement with HEIs on the matter. Paragraph 5.24 of the LHNA states “However, in London it is common for students to attend a university in one Borough while residing in a different one.” It offers no basis for such a negatively prepared and restrictive policy. Paragraph 5.22 should therefore be removed. We are an experienced developer and operator of residential for rent housing. The policy as drafted is someway off what would be expected for a local planning authority at Regulation 19, and therefore it would be appropriate to engage in further drafting through the examination process.	Noted	Policy HOU: Affordable Housing – Ealing LPA – local policy		Ben Wrighton	Watkins Jones	707	Developer

These representations are submitted on behalf of our client, Tesco Stores Limited, with regards to their Site – Tesco, 229 Greenford Road, Greenford, UB6 8QY (hereafter ‘the Site’) - to the London Borough of Ealing in relation to their consultation on Ealing’s Draft Local Plan (Regulation 19 Consultation Documents), which is currently taking place. Having reviewed the emerging Local Plan documents, we can see a real desire to make significant change across the Borough. We fully support these aspirations and welcome the opportunity to be involved in making meaningful change within the area. In order to assist the Council in meeting their aspirations, in particular, the annual delivery of 2,157 new homes, there is an opportunity to allocate the Site as an additional Greenford Development Site that would lie adjacent to the Greenford Broadway Car Park allocation (02GR).	Noted and support welcomed. However, we suggest the proposed site be added to the existing 02GR Broadway Car Park proposed allocation. We would like to see a comprehensive scheme come forward for the extended site, and at this stage, we are not able to add new site allocations.	02GR Greenford Broadway Car Park		Rachel Lea	Tesco Stores	708	Developer
The Site currently comprises a Tesco Express store located within the locally listed former Grenada cinema building, fronting onto Greenford Road and associated surface level car park. The Site is located within Greenford District Centre. [Map showing Tesco Express store]	Noted	02GR Greenford Broadway Car Park		Rachel Lea	Tesco Stores	708	Developer

Greenford Broadway Car Park is an existing Council owned surface level car park located to the rear of the Tesco Express. The Site also incorporates 3no. existing commercial buildings. [Map showing 02GR Greenford Broadway Car Park draft site allocation] The proposed use is for residential, retail and community uses and the site is identified as suitable for a tall building (maximum height of 6 storeys). The relevant contextual considerations of this allocation are: • Location within Greenford District Centre • Proximity to Greenford Hall, Greenford Library and Ravenor Park • Surrounding locally listed buildings (including the Site) • Located 1.5km from Greenford Underground Station with good bus links • Neighbouring allocation (01GR) The relevant design principles are: • Seeking to capitalise on the site’s proximity to the town centre and Ravenor Park by introducing mixed-use development that provides new homes alongside retail, commercial or co-working space • Heights to be in accordance with Tall Building Strategy (range up to a maximum of 6 storeys within a medium to high	Noted	02GR Greenford Broadway Car Park		Rachel Lea	Tesco Stores	708	Developer

Introduction These representations are submitted on behalf of our client, Tesco Stores Limited, with regards to their Site – Tesco, 229 Greenford Road, Greenford, UB6 8QY (hereafter ‘the Site’) - to the London Borough of Ealing in relation to their consultation on Ealing’s Draft Local Plan (Regulation 19 Consultation Documents), which is currently taking place. Having reviewed the emerging Local Plan documents, we can see a real desire to make significant change across the Borough. We fully support these aspirations and welcome the opportunity to be involved in making meaningful change within the area. In order to assist the Council in meeting their aspirations, in particular, the annual delivery of 2,157 new homes, there is an opportunity to allocate the Site as an additional Greenford Development Site that would lie adjacent to the Greenford Broadway Car Park allocation (02GR). The Site currently comprises a Tesco Express store located within the locally listed former Grenada cinema building, fronting onto Greenford Road and associated surface level car park. The Site is located within Greenford District Centre. Greenford Broadway Car Park Allocation (02GR) <i>Greenford Broadway Car Park is an existing Council owned</i>	The council's position is outlined in the Statement of Common Ground document prepared in September 2024.	02GR Greenford Broadway Car Park		Paul Manning	Tesco Stores	708	Developer

Proposed Site Allocation The NPPF establishes the Government’s objective of significantly boosting the supply of homes and recognises that it is important that suitable amounts and variety of land can come forward where it is needed. The NPPF also states that LPAs should promote the effective use of land in meeting the needs for homes by making the best use of previously developed or ‘brownfield’ land. This is echoed within the London Plan that requires developments to make the best use of land through enabling development of brownfield, town centre sites that are well-connected by public transport. In this regard, it is contended that the Site carries the hallmarks that are conducive to redevelopment. Furthermore, this is a key town centre Site that benefits from falling within one ownership – crucially, it is an available and deliverable Site. Drawing on the relevant contextual considerations and design principles of the adjacent site allocation, it is strongly contended that the Site lends itself to a mixed-use development that provides new homes (including co-living, PBSA, build-to-rent, market, affordable, later living) alongside retail, commercial or co-working space.	The council's position is outlined in the Statement of Common Ground document prepared in September 2024.	02GR Greenford Broadway Car Park		Paul Manning	Tesco Stores	708	Developer

Whilst it is our view that the Site should come forward as an allocation in its own right, it is recognised that it would be important to engage with the adjacent landowner (i.e. the Council) in designing a comprehensive masterplan across the wider site to ensure that the most effective use of land is realised and that neither development precludes development on the adjoining site. It will be important to ensure that the sites could be delivered both independently and in conjunction with each other. There may also be an option to separate out the Tesco car park from the Tesco store to be an allocation itself. The Site, in our view, can play a key part in realising the Council’s aspirations of capitalising on the adjacent allocation’s proximity to the town centre given the Site’s prominent corner position on Greenford Road. Furthermore, in combination with the neighbouring allocation, there is a real opportunity to improve the permeability across the sites, creating key linkages between Greenford Road, The Broadway and Oldfield Lane South. Should the Site come forwards as an allocation, we support the Council’s general approach to allocations in so far as they are not overly prescriptive in terms of use and quantum, but instead provide an indication of possible proposed uses along with some contextual considerations and design principles that need to be considered.	The council's position is outlined in the Statement of Common Ground document prepared in September 2024.	02GR Greenford Broadway Car Park		Paul Manning	Tesco Stores	708	Developer

Union4 is instructed by TT Group to prepare and submit representations to Ealing Borough Council’s (“the Council”) Regulation 19 Consultation (‘publication version’) of the Draft Local Plan to 2039. The representations predominantly focus on the site at Castle House, 119-127 Gordon Road, West Ealing, identified in the Draft Local Plan as Allocation 17EA. TT Group are the site owner and in recent years have developed out the land to the rear as a fully residential scheme, pursuant to planning consent P/2015/4089. Whilst these representations focus on the specific site allocation, they additionally consider other relevant policies within the Local Plan relating to housing delivery including density and building heights. TT Group are generally supportive of the Draft Local Plan, particularly given that the allocation of the site represents the opportunity to put this underutilised land back into beneficial use. However, the specifics of the proposed site allocation are questioned in part and the following representations set out where policies are considered unsound. They then go on to set out constructive suggestions on how policy wording may be amended to ensure the tests of soundness are met. The conclusion summarises the suggested amendments to policy and sets out the proposed amendments to allocation 17EA.	Noted. Support welcomed.	17EA Castle House		Vivienne Goddard	TT Group	709	Developer

Site Description The site at Castle House, 119-127 Gordon Road comprises 1 hectare of previously developed land, located on the southern side of Gordon Road in West Ealing. The site location is as shown at Figure 1 below. The site is currently occupied by the predominantly vacant Castle House which functions as a BT Switching Centre and Telephone Exchange, including ancillary office accommodation at the Gordon Road frontage. Utilisation of the building is extremely minimal, generally amounting to a handful of operatives visiting the site on a sporadic basis. The frontage office element amounts to the equivalent of approximately 4 residential storeys and comprises horizontal glazing and a pebble dashed panel banding finish. [Map showing site location] The rear element of Castle House forms a large, bulky structure, constructed in dark brick, rising to the equivalent height of approximately 8 residential storeys, and between 9-10 storeys including the lift cores. The site forms part of allocated site EAL13 in the Ealing Development Sites Development Plan Document (2013), where it is allocated for residential use. The designation	Noted.	17EA Castle House		Vivienne Goddard	TT Group	709	Developer

The site is now allocated within the Reg 19 Draft Local Plan (17EA) with a proposed use identified as “residential led with some provision of affordable workspace”. With regard to tall buildings, it is stated that “the site is not in principle suitable for a tall building. The threshold height for a tall building is 7 storeys (24.5 metres)”. The allocation also seeks infrastructure requirements and sets out “public realm improvements, landscaping and greening and measures to permeability and improve active travel. Flood risk mitigation (surface water)”. The timeframe for delivery is stated as within years 6–10 (2028/29 – 2032/33).	Noted.	17EA Castle House		Vivienne Goddard	TT Group	709	Developer

Prior to this consultation the site was put forward under the March 2022 Call for Sites as an allocation for residential use and redevelopment. TT Group fully supports the renewed strategic thrust of policy in the emerging new Local Plan, to direct development onto brownfield sites, but it is intended that this site will be brought forward as a fully residential scheme, given the site context and history. As such, TT Group object to the inclusion within the allocation for the delivery of affordable workspace, which would be out of character with the wider area and would seriously jeopardise the delivery of a meaningful quantum of homes at the site. Emerging Policy E3 (London Plan Variation) seeks a quantum of affordable workspace as part of mixed use or commercial development schemes. The inclusion of the provision of affordable workspace or a contribution in lieu of on-site provision is not appropriate nor is it sought by policy E3 as part of residential schemes. This policy, requiring the provision of affordable workspace (in the region of 10%) as part of commercial and mixed use schemes, does not appear to align with allocation 17EA which seeks a residential scheme (not a mixed use scheme), but with a degree of affordable workspace. This is not a commercial location and is outside a designated town centre where employment uses are encouraged. There has been a long-standing acceptance of the principle of the residential development of the site and notwithstanding the above policy conflict, no evidence to demonstrate why this site would be appropriate to deliver a commercial component has been provided. We would additionally question the principle that the site is not suitable for buildings over 6 storeys. Whilst it is recognised that the two storey scale along Gordon Road needs to be protected the replacement of the existing bulky building which equates to over 8 storeys plus the relationship with the tall building to the rear allow for taller buildings set into the site, particularly towards the centre and rear of the site, particularly given the 13 storey scale of built development to the rear. It has been demonstrated through the previous 2017 consent that a building at the frontage, respectful of the scale of Gordon Road, can be achieved, allowing for greater flexibility in form and massing to the rear, which will not be readily visible from Gordon Road.	The AW requirement will be deleted.	17EA Castle House	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation	Vivienne Goddard	TT Group	709	Developer
	Policy D9 has now been revised to give recommended heights, however departure from it will need to be justified in design terms.	17EA Castle House		Vivienne Goddard	TT Group	709	Developer

In terms of the public realm requirements these are fully supported, and high quality hard and soft landscaping would constitute a key feature of any redevelopment scheme coming forward at the site.	Noted. Support welcomed.	17EA Castle House		Vivienne Goddard	TT Group	709	Developer
With regard to the timeframe for the delivery of new homes at the site, this is achievable, and it would be hoped to be towards the earlier part of this 6-10 year range. Timescales would however be dependent on the full decommissioning of the existing building.	Noted. Support welcomed.	17EA Castle House		Vivienne Goddard	TT Group	709	Developer
Meeting Housing Need and Site Capacity The sites continued allocation in the emerging local plan for residential development is fully supported. The site has been predominantly vacant for many years and its delivery provides the opportunity to bring a previously developed site back into beneficial use, providing a substantive contribution to housing delivery in the borough and improvements to the physical appearance and vitality of the surrounding street scene. As part of the original application, as approved in 2017, the scheme proposed a development over two phases with a varied mix of 1 bed, 2 bed and 3/4 bed family units. Phase I (now built out) was submitted as a detailed application with the following phase II submitted as an outline application. Phase II proposed 172 units consisting of 3 x 6-storey buildings with connecting blocks and a terrace of 18 Town Houses. The London Plan sets a 10-year housing target for net housing completions (2019/20 -2028/29). In the case of Ealing, this is 21,570 dwellings, or 2,157 dwellings per annum for the planning area outside of OPDC, (with a further capacity target of 6,120 or 612 per annum in the area covered by OPDC in Ealing). These are of course not insignificant targets, and the site has the capacity to deliver a significant number of new homes and	Noted. Support welcomed.	17EA Castle House		Vivienne Goddard	TT Group	709	Developer

Density and Building Heights London Plan Policy GG2 requires developments to making the best use of land. Criteria C specifically requires that those involved in planning and development must: “Proactively explore 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” (Criterion C) Within the emerging Local Plan, each draft site allocation sets out whether the site is considered appropriate for tall buildings. Allocation 17EA is identified as being in principle not suitable for a tall building. The definition of a tall building in different parts of the borough is set out in Table DMP1 in Emerging Policy D9 Tall Buildings London Plan – Ealing LPA – local variation. The site is in an area with a threshold height for a tall building is 7 storeys (24.5 metres). Whilst Gorden Road is low rise in nature the site to the rear rises to 13 No. storeys. The current building is itself in excess of 8 residential storeys (equivalent). In this regard it is considered that the site does have capacity for a taller element, particularly towards the centre of the site, and it would be overly restrictive to restrict development to 6 storeys. We consider that only identifying a number of sites where tall buildings are appropriate does not accord with Policy GG2 of the London Plan which seeks to make the best use of land particularly	Policy D9 has now been revised to give recommended heights, however departure from it will need to be justified in design terms.	17EA Castle House	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation	Vivienne Goddard	TT Group	709	Developer

Employment Provision and Affordable Workspace London Plan Policy E3 relates specifically to Affordable workspace. The London Plan 2021 introduced a new strategic policy (E3) seeking the provision of affordable workspace from commercial development in areas where a local authority has identified a need and considering the overall viability of development. London Plan Policy E3 sets out specific circumstance where planning obligations may be used to secure affordable workspace (in the B Use Class) at rents maintained below the market rate for that space for a specific social, cultural, or economic development. Criterion B states that consideration should be given to the need for affordable workspace where: [repetition of London Plan Policy E3, Criterion B] Emerging Local Plan Policy E3 Affordable Workspace London Plan – Ealing LPA – local variation requires that: “F. Affordable workspace in Ealing will be provided on the basis of a levy on development of 10% of gross floor area in mixed use schemes, and 5% of net floorspace in office and industrial schemes”. Emerging Policy E2 ‘Ealing Metropolitan Town Centre’ supports the delivery of affordable workspace in the town centre. Criterion C states that Ealing Metropolitan Town Centre will be maintained and enhanced by: “Provision of affordable workspace, including potential local office hub facilities which will serve residents and strengthen key local	The AW requirement will be deleted.	17EA Castle House	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation	Vivienne Goddard	TT Group	709	Developer

Emerging Policy E3 and the need for the delivery of affordable workspace is brought forward based on the findings of the Draft OPDC and LB Ealing Affordable Workspace Study. This report aims to address three key challenges for the delivery of Affordable Workspace: design and evidence, affordability, and the curation opportunity. It brings together the evidence, recommendations and tools required to inform planning policy, guidance, and section 106 (s106) negotiations. This document is clear that affordable workspace is only provided in conjunction with a mixed use commercial scheme. From the analysis of new build schemes providing affordable workspace, the report recognises that a common outcome is that Affordable Workspace is shoehorned into an unsuitable part of the development. It is therefore imperative that for the success of such workspace a scheme delivers the appropriate operational requirements. Such provision will not always be viable, and the blanket requirement will lead to the continued provision of not only inappropriate affordable space but a compromised development scheme as a whole. The London Plan seeks to secure such workspace in specific identified locations. However, Emerging Policy E3 of the Local Plan seeks the blanket application of affordable workspace policy across all commercial sites. We consider this is not the correct approach for the delivery of affordable workspace and greater flexibility, taking account of affordability, should be agreed on a case by case basis and in line with London Plan policy.	The AW requirement will be deleted.	17EA Castle House	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation	Vivienne Goddard	TT Group	709	Developer

Conclusion These representations have been produced by Union4 on behalf of TT Group in response to Ealing Borough Council's consultation on the Draft Local Plan 2020 -2040. TT Group is the site owner and developer of the recent scheme at Phase I to the rear of Castle House. Castle House is identified as allocation 17EA within the Draft Local Plan. We consider that the Draft Local Plan can be made sound through amendments as set out within these representations and we trust that the Council will consider such amendments in the period following this Regulation 19 consultation and subsequent Examination of the Local Plan. We wish to be kept informed on all matters relating to the Local Plan and would equally wish to attend the Examination in Public in due course.	Noted.	17EA Castle House		Vivienne Goddard	TT Group	709	Developer
As you are aware from previous consultation engagement, Spaceworks Properties Ltd own 97-107 Uxbridge Road, known as 'CP House' which secured planning permission for an office redevelopment (Ref: 210030FUL) on 11th March 2022. These representations therefore focus on Ealing and the Ealing Metropolitan Town Centre, in which the site is located within, the Site's Draft Allocation 07EA and other relevant development management policies. Summary We trust our comments will be taken on board in progressing the Local Plan and we look forward to engaging further with you in the future. Should you require any further information, please contact Nona Jones or Tom Horne of this office.	Noted.	07EA CP House		Nona Jones	Spaceworks P	710	Developer

Policy SP3: Fighting Inequality Part K of SP3.3 supports “meeting the needs for specialist housing where this can complement conventional supply”. The Glossary of Terms at page 511 of the plan defines ‘Specialist Housing’ as “Housing that is intended for a targeted group for example students, older, vulnerable and disabled people. This includes supported housing and also designated housing where access to support is provided where needed”. As well as “inc. Co-Living, older person” in the terminology section. This definition should be clearer in what accommodation types it refers to and align with the terminology used elsewhere in the plan for clarity i.e Large-Scale Purpose Built Shared Living at Policy 16 which captures ‘co-living’. Furthermore, the policy should recognise that these ‘specialist’ products play more than just a complementary role in meeting housing needs and targets.	Demonstrated needs set out in the LHNA do not include specialist housing and so the current reference to the supporting role of these types of housing is correct.	SP3.3 Healthy lives		Nona Jones	Spaceworks P	710	Developer
Policy SP4: Creating good jobs and growth SP4.2 Decent living income Part J of SP4.2 relates to measures in order to sustain the vitality and viability of our town centres. This includes criteria (i) “Maintaining and enhancing the role of Ealing Metropolitan Town Centre as a commercial and employment hub for West London”. While this objective is supported, mixed-use schemes including non-commercial should also be considered in light of the increasing challenges facing our high streets and the benefits of introducing a mix of uses complementary to retail in town centres, in addition to the introduction of residential accommodation and ‘Specialist Housing’ on upper floors in recognition of the Council’s aspirations for a 20-minute neighbourhood.	The current wording does not conflict with the development of non-commercial development as long as this development does not conflict with the commercial role of EMTC.	Policy SP4: Creating good jobs and growth		Nona Jones	Spaceworks P	710	Developer

Policy E2: Ealing Metropolitan Centre We welcome the spatial strategy for Ealing Metropolitan Centre as set out in Part A, directing significant high-density residential and employment growth and supporting the broadest range of offer in this location. This approach is in accordance with both strategic and national planning policies which look to make the best and most effective use of land, prioritising well-connected, mixed-use and brownfield sites. Policy E2 makes a number of references to the “office corridor” (at parts C(iv), D and F) and supporting text 3.55 as the “Uxbridge Road office corridor”. While it is appreciated that this is also referred to in the currently adopted Local Plan policies, the new plan must acknowledge the new mixed-use character of this part of Uxbridge Road – which now has a number of hotels, residential developments and other commercial uses along it and not solely office. This is acknowledged in the supporting evidence base including the Tall Buildings Strategy Document by Allies and Morrison, which refer to Uxbridge Road as a “Mixed Use” and “Commercial” area. Part F specifically requires the “office corridor” to be maintained (emphasis added) and strengthened as a key employment location while improving active frontage and the pedestrian environment. It is therefore recommended that reference to office corridor is updated to reflect its new context.	The office/employment role of EMTC is central to the Local Plan for Ealing which is why it is referenced in this way.	Policy E2: Ealing Metropolitan Town Centre		Nona Jones	Spaceworks	710	Developer

Ealing Development Sites – Site Allocation - CP House - 07EA First and foremost, we strongly support and welcome the allocation of CP House for future development in this highly sustainable location. Current Use – We can confirm the site is still in use as office. Notwithstanding circa 40% of CP House is currently vacant and the majority of the remaining tenant leases expire in 2024, currently with a reduced rent. There is no interest from large companies for long term lease due to the number of vacant offices primarily in central London and there is no interest in pre-let. Proposed use – Whilst the site clearly has capacity for a large uplift of floorspace, a more diverse range of uses would make the site more deliverable in the current market, where there are a number of unimplemented office consents along Uxbridge Road. We consider that residential, co—living, student accommodation and/or senior living accommodation i.e identified ‘Specialist Housing’ products would be well suited to be delivered alongside an uplift in employment uses as part of a mixed-use development on site. Complementing the already established residential uses (and hotel developments) along the Uxbridge Road corridor. We therefore encourage a mixed-use site allocation in this sustainable town centre location where a broad range of uses is being directed in accordance with Policy E2.	Specialist living developments should demonstrate need on a case by case basis so they should not form the basis of a site allocation.	07EA CP House		Nona Jones	Spaceworks P	710	Developer
Tall Buildings – the allocation identifies that the site is suitable in principle for a tall building and design analysis indicates a maximum height of 10 storeys or 35m. We note that this sentence is not complete i.e missing a closed bracket and full stop, and assume this is all of the contents proposed for this subsection. This should be amended to “at least 13 storeys” given the extant scheme on site has demonstrated a high- quality scheme of this scale can be achieved. We comment further on this below in relation to Tall Building Policy D9 and accompanying evidence base.	The recommended height derives from a site-specific assessment.	07EA CP House		Nona Jones	Spaceworks P	710	Developer

Contextual Considerations – the third bullet requires new development to contribute to “improvements in active frontage, traffic mitigation measures and improved public realm” in response to this stretch of Ealing Broadway being dominated by car traffic. We question what is meant by “transport mitigation measures”. It is assumed that the purpose of this criteria is to encourage sustainable modes of transportation and active travel to reduce vehicular movements – and suggest this is expanded upon for clarification.	The reference is to traffic mitigation measures.	07EA CP House		Nona Jones	Spaceworks P	710	Developer
Design Principles – the second bullet point states that the allocation should “Realise the potential for significant additional A-grade office floorspace within office corridor...” (emphasis added). As noted above, there are a number of unimplemented office consents along Uxbridge Road and no market demand evidence to suggest such a “significant additional” quantum of floorspace is needed in the future within this locality. For example, Exchange Plaza 54-58 Uxbridge Road directly opposite CP House secured planning permission for circa 25,000 sqm of office in 2017 but has failed to secure a pre-let to date. We also understand the recent refurbishment of Aurora 71-75 Uxbridge Road comprising circa 54,000 sqft of Grade A floorspace has been sold for a significantly reduced rate on the basis of a lack of interest in office tenancies. Planning policy should therefore not expect any more than re-provision of the existing quantum of office floorspace on site and realise that current market conditions require a mix of uses to come forward to enable higher-quality development and a vibrant area. We comment further on the principle of the Tall Building Strategy further below.	Noted	07EA CP House		Nona Jones	Spaceworks P	710	Developer

Policy D9 - Tall Buildings It is assumed that a typographical error has been made in relation to this policy, where the four part criteria starts at Part E and not in alphabetical order. Part E defines tall buildings by height and number of storeys in different parts of Ealing as set out in Table DMP1. As noted in our previous representations, it remains unclear what applies for locations which lie between two area boundaries i.e the darker coloured highlight. Clearer boundaries should be defined or explanatory text to what approach should be taken for such locations. For example, it is not clear whether CP House is located within area E10 which defines a tall building as 7-storeys in Table DMP1 or E14 which defines a tall building as 21-storeys. To add to this confusion, the ‘Tall Buildings Strategy’ evidence base document by Allies and Morrison dated December 2023 identifies the Site within both ‘West Ealing / Zone C’ with a guidance for prospective tall buildings between 24.5-45.5m or 7-13 storeys; as well as ‘Ealing Town/ Zone D’ for 31.5 – 73.5m or 9-21 storeys. Extracts of the maps identifying each Zone are included for clarity below – showing CP House outlined in red and the extent of the map which overlaps both zones in orange. [Maps from Tall Building Strategy] The report does note for both Zone C and D that they are “contiguous” with one another, but does not explain any such areas of overlap and how the relevant height guidance should therefore	Heights guidance is set out in policy D9 and in individual site allocations based upon the evidence set out in the Tall Buildings Strategy. There were some transcription errors in the published study which did not reflect in the heights table the correct heights determined by the character analysis. This has been corrected in the submission version and is reflected in site allocations.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Nona Jones	Spaceworks P	710	Developer

It is noted that Part G of Policy D9 currently states “The tall buildings threshold height is simply that and not a presumption that any height up to this is automatically acceptable”. This should be revised to state “The acceptability of tall building proposals will be assessed against both Local Plan Policy D9 and London Plan Policy D9 on tall buildings and other relevant development plan policies” in acknowledgement that it may be appropriate to exceed the relevant thresholds in some exceptional circumstances. We also assume referenced to Mattock Road is actually in relation to Mattock Lane. It is also unclear what is meant by the ‘lighter purple area’ in this instance as no such area is highlighted on the map (as extracted above). The key for the relevant map suggests this would indicate an ‘appropriate location with character to changing potential’. It is also noted that the evidence base document list online dates the Tall Building Strategy as February 2024. Whereas the documents listed only comprise the Tall Buildings Strategy December 2023 and November 2022 iterations. This date should be updated or the latest February 2023 Strategy uploaded with further opportunity to review and consult. The Local Plan does not make any reference to a specific version in which findings it relates to (page 19 and throughout).	Noted	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Nona Jones	Spaceworks P	710	Developer
Policy HOU – Affordable Housing Part C and F relates to the relevant thresholds for qualifying for London Plan Fast Track in respect of affordable housing provision. As previously highlighted, this should therefore align with the London Plan Policy H5 approach, which is set at a minimum of 35% as opposed to the proposed 40% (subject to having a compliant tenure split and mix). Policy HOU remains unclear how a development qualifies for affordable housing provision i.e how many units or more (gross) trigger the need for affordable housing. The NPPF is clear at paragraph 65 that affordable housing is expected only from major developments other than in designated rural areas which is not applicable here. Policy HOU as currently drafted is therefore not consistent with national policy requirements.	The higher threshold will go some way toward meeting identified affordable housing needs and has been assessed as viable in the whole plan viability assessment.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Nona Jones	Spaceworks P	710	Developer

Policy H16 – Large Scale Purpose Built Shared Living (LSPBSL) It is assumed that a typographical error has been made in relation to this policy, where the policy starts at Part B and not in alphabetical order. We strongly support the provision of large-scale shared living development in the Ealing Metropolitan Town Centre. However, as set out previously, further evidence should be provided as to why other town centres are excluded from providing this housing typology given its importance as a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs. The London Plan acknowledges at paragraph 4.1.9 that such housing contributes to meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home. Part ii requires LSPBSL proposals to “not result in overconcentration of similar uses”. To ensure that it is effective, this policy should include a definition of what constitutes an overconcentration require evidence to be submitted by the applicant and agreed with the Council as to the extent of area where impacts are likely to arise from proposed schemes.	There is no demonstrated need for LSPBSL anywhere in the borough and this type of development does not therefore meet identified housing needs. LSPBSL is restricted to EMTC because of the negative effects of these types of development in areas with limited facilities.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Nona Jones	Spaceworks P	710	Developer

Policy E3 – Affordable Workspace It is assumed that a typographical error has been made in relation to this policy, where the policy starts at Part F and not in alphabetical order. Policy E3 Part A requires 10% of gross floor area in mixed use schemes (and 5% for industrial schemes) to provide affordable workspace. Where that levy would result in affordable provision of at least 1000sqm of mixed-use space, 2000sqm of office space, or 3000sqm of industrial space, then provision should be onsite. Firstly, as reiterated previously, it is important that this is calculated on net uplift. This position was tested and agreed at the Islington Local Plan Examination after extensive consultation and examination and based on GIA as the NIA could change over the lifetime of the development. Secondly, we request that “mixed-use” schemes are clearly defined in this policy i.e we would not expect an affordable workspace provision to be required for a scheme providing residential and retail. The London Plan is clear at Policy E3 that it should only be secured for B Use Class (now Class E) developments. The policy also currently states at Part H that “Affordable workspace will be provided at 80% discount for a period of 15 years”. It is unclear what discount is meant by this i.e rents at an 80% or 20% discount of the market rate. ~~Further guidance or supplementary text should be produced to~~	The policy is based upon net uplift, this will be clarified.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		Nona Jones	Spaceworks P	710	Developer
Policy G6 – Biodiversity Net Gain It is assumed that a typographical error has been made in relation to this policy, where the policy starts at Part F and not in alphabetical order. Furthermore, we suggest that this policy is re-named as there is another Policy G6 in the Local Plan relating to Greenford Industrial Estate, to avoid confusion. Policy G6 should also acknowledge the certain exemptions to BNG for full clarity.	Noted. The numbering reflects that this clause is a local variation to the parent policy in the London Plan. The point on numbering policies in Chapter 4 and 5 is acknowledged and this will be revised.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation		Nona Jones	Spaceworks P	710	Developer

Policy ECP - Embodied Carbon Policy ECP looks to introduce new embodied carbon targets for major developments. This should be in accordance with the latest relevant GLA Guidance (i.e Whole Life-Cycle Carbon LPG) for consistency with the strategic development plan and consistency across London.	Noted and agreed.	Policy ECP: Embodied Carbon – Ealing LPA – local policy		Nona Jones	Spaceworks P	710	Developer
Our client, TT Group (“TTG”), has a majority land holding within Draft Site Allocation 22EA. This includes the core of the site with vehicular access from Queens Drive and (potential) pedestrian access to Hanger Lane (with freehold edged in green below in Figure 1) (“the site”). In the context of wider ownership within Allocation 22EA, Ealing House (33 Hanger Lane) which appears to be in an existing office use (edged in red), sits outside of our client’s demise. TTG’s site is currently leased to and occupied by BT but they have recently served the requisite notice to confirm that they will be vacating the site shortly in June 2024. At this point the site will be handed back to TTG with vacant possession. Initial feasibility testing has indicated that the Site could provide in excess of 200+ homes (subject to detailed design) if a residential-led scheme is pursued, subject to detailed testing and technical analysis. However, if a viable residential-led scheme cannot be secured, TTG may need to consider an industrial-led redevelopment of the site as a fallback. With this underutilised site shortly to be vacated, our client therefore supports the principle of a residential-led allocation for the site. However, and with a soon to be vacated site, this is on the basis that the draft allocation within the emerging Local Plan is sound, ambitious and importantly <u>deliverable</u> to allow for this land to come forward for an optimum use/development in the short-term. As set out below, the site	Noted.	22EA 96 Queens Drive & Telephone Service Centre		Alex Christopher	TT Group	711	Developer

Proposed Use – the draft allocation confirms “residential-led mixed use”. The principle of a ‘residential-led’ allocation is fully supported. It is considered that the principle of a residential-led scheme as part of the Allocation is wholly consistent with London Plan Policy GG2 (Making the Best Use of Land) with Part (b) setting out to “prioritise sites which are well-connected by existing or planned public transport”. The site is located directly opposite (c. 20 metres) from the entrance to North Ealing Underground station as well as backing onto residential properties and therefore represents a highly sustainable location for new development. It is however considered that the balance, form and quantum of supporting wider land uses as part of a ‘mixed-use’ scheme will need to be carefully assessed given the existing constraints of the site (limited access, surrounding residential properties) which is expanded below. It is noted that under the supporting text within ‘Design Principles’ in respect of the site’s existing ‘undesigned employment’ land use the requirement for any scheme to “satisfy the requirements of London Plan Policy E4 and Ealing Local Variation Policy E4 H-I for industrial retention and any co-location of residential uses should achieve industrial uplift”. This is a clear conflict with the corresponding sub-policy for land use and a “residential-led” development. Draft Policy E4 (i) of the Local Plan allows for a sequential approach	Noted	22EA 96 Queens Drive & Telephone Service Centre	Policy E4: Land for Industry, Logistics and Services to Support London’s Economic Function – London Plan – Ealing LPA – local variation	Alex Christopher	TT Group	711	Developer

There is therefore a clear policy conflict between a “residential-led” scheme (“Proposed Use”) and an “Employment-led” approach (Satisfying Ealing draft Policy E4). With this, Allocation 22EA is not sound when considered against Part 16 (b) of the NPPF and “be prepared positively, in a way that is aspirational but deliverable”. It is considered there are a number of factors that would prohibit this site coming forward as per the currently allocation in a mixed-use format (as opposed to residential led), namely: •Given the quantum/form of the existing employment floorspace on site it would not be feasible to reprovide this existing floorspace (with no net loss/increase) and deliver residential accommodation as the predominant “led” land use; •The site is not suitable and/or realistic for co-locating employment and residential uses on the basis of: oVertical stacking of uses would not be realistic with capped maximum heights of 21m rendering this unviable/unrealistic as well as likely conflict with wider fire and M&E strategies. oThe site only benefits from a single and restricted point of vehicular access from Queens Drive with this being a single lane/opposite a proposed new pedestrian crossing. In respect of both highway safety and placemaking objectives, it would not be feasible to have any meaningful servicing/operational traffic for employment floorspace entering into the core of the site (and/or servicing yards) alongside residential use. It is assumed that any	Noted	22EA 96 Queens Drive & Telephone Service Centre	Policy E4: Land for Industry, Logistics and Services to Support London’s Economic Function – London Plan – Ealing LPA – local variation	Alex Christopher	TT Group	711	Developer

Specialist industrial agency advice has been secured (appended to these representations) which provides commentary on demand and requirements from potential industrial occupiers, namely: “From our leasing experience in this geography , we continue to see good levels of applicant enquiry from a range of occupiers , primarily in the warehouse and distribution sector , looking to deliver to nearby residential areas or to business customers in Central London , and their building needs are around 24/7 use, allocated yards, access / loading for HGV and van loading & unloading at peak and non-peak hours, amenity space for staff and with clear span warehouse space for marshalling and storage” “Therefore, it should be straightforward to understand how this varied mix of key operational requirements would provide day to day challenges when operating in the same building which has a residential use”. With this advice in mind and the investable conflicts with the above requirements if a true mixed-use scheme is pursued, we would contend that the site needs to be either promoted as a residential (led) scheme or alternatively an intensified employment (only) scheme as mixed-use would be challenging to deliver based on market demand from operators/developers. The existing constraints of the site are not deemed to render it as being viable for securing a true mix of residential and employment uses. [Appendix attached - market-facing advice on co-location of industrial and residential elements by Gerald Eve] (contd below)	Noted	22EA 96 Queens Drive & Telephone Service Centre	Policy E4: Land for Industry, Logistics and Services to Support London’s Economic Function – London Plan – Ealing LPA – local variation	Alex Christopher	TT Group	711	Developer

The site is currently underutilised and as noted above is located in a highly sustainable location opposite an underground station which gives clear backing to the basis of a residential-led scheme. In assessing the most appropriate (and predominant) land use we would identify Policy D3 (Optimising site capacity through the design-led approach) of the London Plan which recognises that “all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations”, and “higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2”. It is therefore concluded and respectfully requested that clarification(s) should be made within the updated site allocation prior to submission. This is on the basis that the site is defined under land use as appropriate for a residential-led mixed-use scheme, and that with this, there is a logical expectation that there will be a net loss of existing industrial capacity as part of a residential-led scheme. Whilst some modest re-provision of employment floorspace may be feasible in limited areas of the site (which would need to be tested), it is considered that as worded the allocation creates too much uncertainty and with it, cannot be considered to be ‘sound’ on the basis it is not positively prepared and/or justified (Para.35 of the NPPF).	Noted	22EA 96 Queens Drive & Telephone Service Centre	Policy E4: Land for Industry, Logistics and Services to Support London’s Economic Function – London Plan – Ealing LPA – local variation	Alex Christopher	TT Group	711	Developer

Indicative Timeframe for Delivery – the site is currently designated for delivery between years 6–15 (2028/29 – 2037/38) of the Plan period. However, and as set out above the site is shortly to be vacated and TTG are intending to bring the site forward for a residential development in the short term if a viable and deliverable scheme could be secured (the fallback being that if not, a solely industrial scheme would be pursued). The draft allocation should therefore be updated for delivery in Years 1-5 of the Plan Period (i.e. 2023/24 - 2027/28). This change to be designated as Years 1-5 of the Plan period is considered to be a very material update in the context of the above commentary on proposed land use(s) and how as currently worded, the allocation could see delays to the site coming forward and with it restricting housing delivery. To frame this importance, and the role the site could play for housing delivery, it is important to clarify current evidenced housing need and delivery in the borough. The Council sets out an annual housing target of 2,157 new homes (Draft Policy SP4.3) which reflects the requirements of Table 4.1 of the London Plan (2021). However, in recent years, the Council consistently failed to meet its objectively assessed housing need. The Government’s 2022 Housing Delivery Test identified that LB Ealing only delivered 86 per cent of its need, meaning that the Borough needs to improve its delivery.	Noted. A suggested modification is proposed.	22EA 96 Queens Drive & Telephone Service Centre		Alex Christopher	TT Group	711	Developer

It is suggested that the following text should be deleted under ‘Design Principles’ Satisfy the requirements of London Plan Policy E4 and Ealing Local Variation Policy E4 H–I for industrial retention and any co-location of residential uses should achieve industrial uplift. And/or additional supporting text should be added to the allocation to clarify the balance of land uses and the allocation being that of residential led, i.e. an acceptance of the allocation supporting a net loss of industrial capacity with a sequential assessment (under E4(i)) being undertaken to confirm levels of reprovion and use (but not an uplift). This will be key to ensure that any emerging residential-led schemes will be deliverable and viable. If this is not agreeable and to ensure that the site allocation has enough flexibility to secure a future (viable) land use, then the proposed land use should be changed to “residential-led mixed use and/or retained/intensified employment use” These revisions would ensure that the plan is ‘sound’ in the context of Part 16 (b) of the NPPF and being “prepared positively, in a way that is aspirational but deliverable (our emphasis)”.	Amend as suggested	22EA 96 Queens Drive & Telephone Service Centre	Policy E4: Land for Industry, Logistics and Services to Support London’s Economic Function – London Plan – Ealing LPA – local variation	Alex Christopher	TT Group	711	Developer
We would at this stage reserve the right to attend the hearing session(s) if appropriate changes are not made to the Allocation and further explanation on the implications of this to the Inspector are required.	Noted	22EA 96 Queens Drive & Telephone Service Centre		Alex Christopher	TT Group	711	Developer
Conclusion: it should be straightforward to understand how this varied mix of key operational requirements would provide day to day challenges when operating in the same building which has a residential use. In our view, this sector would struggle to prove to be a good fit within a mixed use design in this location.	Noted	22EA 96 Queens Drive & Telephone Service Centre		Alex Christopher	TT Group	711	Developer

We understand that TTG are making representations at the above site in advance of a new local plan. As part of the submission, TTG has asked for Gerald Eve’s market-facing advice on the co-location of industrial and residential elements, respectively. GE Involvement By way of background, Gerald Eve’s Industrial team have represented occupiers, developers and investors in the W London Market over the past 30 years. In a personal capacity, I have been active within this market since 2006 having joined Jansons and Partners, and subsequently throughout my career at Colliers, Deloitte Real Estate and laterally as Head of Industrial and Logistics SE for Gerald Eve. Clients represented include SEGRO, ABRDN, Ocado, Maroush, Kennedy Wilson and JLR. Market Overview Since the explosion of demand in March 2021, we have now seen a number of industrial/ storage multi- storey buildings either constructed or under construction on a speculative basis in the London area; the rationale here is that these buildings are designed and built for industrial /warehouse use, primarily for the following reasons. - as a more efficient, intensive use of land by being multi storey - to provide space for local businesses and help accelerate small business growth - and/or to fulfil the planning obligation of “no net loss” as part of a wider mixed-use planning application. The following are good	Noted	22EA 96 Queens Drive & Telephone Service Centre		Alex Christopher	TT Group	711	Developer

Imperial acknowledge that the draft plan will shape and guide future development in the area over the next 15 years from 2024 – 2039 and includes a strategic vision, spatial strategy and collection of seven Town Plans which provides place-based strategies to accompany development management policies which apply to the entire district. Imperial are supportive and appreciative of this engagement on the draft plan having initially responded to the Regulation 18 consultation last year in February 2023. This consultation remains of great interest to Imperial given their landholdings in North Acton comprising 140 Wales Farm Road, Woodward Halls and 1 Portal Way which are located close to the northern boundary of the District. For context, 1 Portal Way received full planning permission for their major hybrid application for residential, student accommodation and associated employment development (21/0181/OUTOPDC) in April 2024 and will act as a major catalyst for regeneration in the wider area.	Support noted and welcomed. It should be noted that 140 Wales Farm Road, previously known as the Perfume Factory, Woodward Halls and 1 Portal Way are located within the OPDC local planning authority (LPA) area. We are not able to comment on or make policy for sites that are located within another LPA's area.	Policy A6: North Acton and Park Royal		Corin Williams	Imperial Coll	712	Developer

In summary, Imperial supports many of the principles and aims outlined in the draft plan, particularly the intention to “encourage the delivery of significant levels of development in proximity to planned and proposed public transport infrastructure” (Figure SS1) and the ambition for Ealing to become “the engine of West London’s new economy” (Policy SP1). Comments focus on: •The Acton Spatial Strategy (Policy A1), •North Acton and Park Royal (Policy A6) •Land Development Management Policies relating to: - oTall Buildings (Policy D9), - oAffordable Housing (Policy HOU), - oLarge Scale Purpose Built Shared Living (Policy H16), - oAffordable Workspace (Policy E3) - oLand Biodiversity (Policy G6). Details of Iceni services} Further details pertaining to Imperial’s views on the Draft Plan and information on where we are seeking amendments to, or further clarification on the guidance documents, is noted in Section B below. Imperial College London [Details of Imperial College's status as a top ten university and its role as a long term and significant stakeholder in West London, Ealing and QPDC, Imperial WestTech Corridor, list	Noted.	Policy SP1: A Vision for Ealing		Corin Williams	Imperial Coll	712	Developer

Acton Spatial Strategy (Policy A1) Imperial supports the broad aims of Policy A1 and the emphasis on the creation of employment opportunities, affordable housing, workspaces, and a better-quality environment with healthier lifestyles. In particular, Imperial support the intention to “focu[s] on education, employment, and skills opportunities that support residents in the most deprived communities” as these aims align with Imperial's objectives for its landholdings in Acton and West London, particularly 1 Portal Way. Whilst supportive of the overall aims of the policy, Imperial have a number of concerns relating to the location and amount of development being proposed. Point B of Policy A1 states that “Growth will capitalise on Acton’s strategic location, the Elizabeth line connection to central London and Heathrow at Acton Main Line Station – and its proximity to the future High Speed 2 (HS2) station at Old Oak Common to maximise economic opportunities for the area”. Point C also states that “Growth will be concentrated close to transport interchanges including Acton Mainline, Acton Town, South Acton, and Acton Central which benefit from existing and proposed connections (West London Orbital and HS2)”. From these two policies it is clear that the excellent transport connections available in Acton offer a unique opportunity for development and that due to this concentration of rail and	Noted. Support welcomed. It should be noted that 140 Wales Farm Road, previously known as the Perfume Factory, Woodward Halls and 1 Portal Way are located within the OPDC local planning authority (LPA) area. We are not able to comment on or make policy for sites that are located within another LPA's area. Therefore the references to moderate levels of growth are related solely to Ealing LPA and stem from strategic place interventions derived from a Spatial Options Report that forms part of the local Plan evidence base.	Policy A1: Acton Spatial Strategy		Corin Williams	Imperial Coll	712	Developer

Additionally, there are references to numerous stations within Policy A1 but no recognition of North Acton Station and the surrounding area which lies within the OPDC development boundary. As highlighted in our response to the Regulation 18 consultation, Imperial maintains that given the scale of emerging development in North Acton, such as the proposals at 1 Portal Way and other approved schemes at 2, 4 and 6 Portal Way, it appears pertinent that the OPDC area of Ealing be considered in Policy A1. Ultimately, development coming forward from Imperial and other key developers in North Acton is already contributing to the objectives in the Spatial Strategy and that omitting this area would be detrimental to achieving the aims of the policy and undermine the intention for the plan to “reinforce the positive relationships and connections between Ealing’s seven towns” (paragraph 4.1). Overall, Imperial view North Acton as a key focus area for future investment and growth of the University within the borough, and therefore would strongly support the inclusion of the OPDC areas of Acton within the overarching Spatial Strategy, in acknowledgement of the key role the University will play in future development, investment and placemaking.	Noted. The scope of the local plan is unfortunately limited to the LPA area and the council cannot make policy for the area beyond this boundary. Indeed, OPDC have made representations suggesting that we have already exceeded our authority and proposed remaning Policy A6 as a consequence. Notwithstanding this bot Ealing Council and OPDC recognise the importance of working together collaboratively to optimise development opportunities in the area.	Policy A1: Acton Spatial Strategy		Corin Williams	Imperial Coll	712	Developer

North Acton and Park Royal (Policy A6) Imperial support the Council’s intention to work collaboratively with the Old Oak and Park Royal Development Corporation (OPDC), neighbouring boroughs and other key stakeholders yet consider that the policy fails to acknowledge the key stakeholders (such as Imperial) that have been crucial to North Acton’s redevelopment. Imperial have been a key player in North Acton and Ealing for a number of years and have contributed to the borough’s emerging status as a cultural, educational and employment centre of West London. Over the next five years Imperial seek to build upon their research-led, entrepreneurial environment and focus on the ways the college can help make society become more sustainable, healthy, smart and resilient. As part of this, the college wants to build upon the emerging West London technology and innovation arc and the significant amount of railway infrastructure proposed in the area. Attracting and retaining a talented community of staff and students within the Ealing area will be central to this mission including provision of quality accommodation, town centre facilities and high-quality places on the doorstep to Imperial’s main campuses. Given the above, Imperial would consent to being used as an example within the policy for future developments to follow. This	Noted. Support welcomed.	Policy A6: North Acton and Park Royal		Corin Williams	Imperial Coll	712	Developer

Acton Development Sites As stated in our response to the Regulation 18 Consultation in February 2023, Imperial College London has concerns regarding the omission of certain sites within the Old Oak and Park Royal Development Corporation (OPDC) area, particularly those in North Acton which feature in development plans. Imperial request that one specific site, 1 Portal Way, be included in the plans and call for a process to consider additional sites in North Acton. Imperial College has a need for approximately up to 5,000 student beds over the next decade. This will be addressed through provision of Purpose-Built Student Accommodation (PBSA) schemes that cater to their specific requirements, including accommodation for wardens, cluster flats, amenities, and Imperial-run management. It is important that such developments are university-led to ensure the delivery of high-quality, affordable, and welfare-centric accommodation. Imperial aims to expand its student accommodation provision in the existing North Acton student village, which currently houses around 1,200 undergraduate students in two halls.	Noted. It should be noted that 140 Wales Farm Road, previously known as the Perfume Factory, Woodward Halls and 1 Portal Way are located within the OPDC local planning authority (LPA) area. We are not able to comment on or make policy for sites that are located within another LPA's area.	Policy A6: North Acton and Park Royal		Corin Williams	Imperial Coll	712	Developer
Imperial also have interests at Warren Farm (Site Allocation 16SO) and would like to highlight its commitment to providing high quality accessible open space and recreational facilities in the Borough working directly with the London Borough of Ealing.	Noted. Warren Farm is part of site allocation 16SO and the site boundary has been extended since Reg 18 to include the Imperial College land holding.	Policy A6: North Acton and Park Royal		Corin Williams	Imperial Coll	712	Developer

Tall Buildings (Policy D9) Imperial would like to note that they are disappointed with the lack of amendments to the Regulation 19 Local Plan and the Tall Building Evidence Base following representations made on the Regulation 18 Plan, particularly as a number of concerns were raised with the approach to tall buildings and site allocations which have not been addressed. Imperial continue to welcome the generally positive approach to growth within the borough achieved by the Regulation 19 Plan, in line with London Plan’s approach to ‘good growth’. We are also supportive of the character-led approach to development which follows London Plan Policies D3 and D4. This is reflected in the spatial dimensions underpinning Ealing’s Spatial Strategy set out paragraph 3.6: ‘(i) Focus growth in opportunity areas and growth corridors; (ii) Focus growth within town centres first; and (iii) Prioritise strategic and local regeneration areas’. As such, we welcome the approach to managing growth set out in Draft Policy SP4.1. However, Imperial do not believe that these fundamental principles are reflected in the approach to height and density set out in the Draft Development Sites. We are concerned that the issues that we have identified with the Draft Development Sites indicate that, as a whole, the Borough is at risk of unnecessarily stymying its future development potential. While clearly, the Plan is based on detailed analysis of the Borough’s ability to deliver new homes on the basis of current housing targets, these numbers could change: we are	Maximum heights will now be changed to recommended heights in line with GLA advice on the application of London Plan policy.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Corin Williams	Imperial Coll	712	Developer

More specifically, we would note the following: Firstly, Draft Policy D9 ‘Tall Buildings London Plan - Ealing LPA – local variation’ provides a definition of tall buildings per individual area of the borough, apparently following ‘rigorous assessment’ (para 5.12). A definition of a tall building is helpful and adds colour to the existing loose definition (Development Management Policy 7.7, part H). However, the application of varied definitions seems inconsistent and does not match the definitions in the Evidence Base (i.e. area E14 is 21 storeys in Table DMP1, but 9 storeys in the Tall Building Strategy Main Report). Furthermore, there are Draft Development Sites identified as “suitable for a tall buildings”, but indicated for a ‘maximum height’ which would be below the tall building thresholds identified in Table DMP1 (i.e. 6 storeys in an area identified for 7 storeys). We would encourage the Council to revisit the Tall Building Study Appendices and Policy D9, in order to ensure that it is consistent in its approach and does not create unintended outcomes which stymy development. Secondly, Draft Policy D9 also states that ‘F. Tall buildings above defined thresholds are exceptional and should be located upon specified Development Sites defined in the Development Plan.’ While we recognise that London Plan Policy D9 advocates a plan-led approach, restricting tall buildings to allocated sites does not recognise the judgement of Master Brewer Case [R (London Borough of Hillingdon) v Mayor of London, 15 December 2021] that while boroughs need to identify suitable locations for tall buildings under Parts A and B, tall buildings can come forward outside of allocated sites providing they meet the impact requirements of Part C. We	Maximum heights will now be changed to appropriate heights in line with GLA advice on the application of London Plan policy.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Corin Williams	Imperial Coll	712	Developer

Affordable Housing (Policy HOU) Imperial supports LB Ealing's overall targets for affordable housing delivery and the aim to deliver good quality homes at affordable rents to enable local workers and students to live in the borough. However, Imperial has concerns with the requirement for 40% affordable housing provision to be eligible for the Fast Track route as such a large contribution is likely to create practical challenges and viability issues for developers. Imperial would also like to request further justification and viability evidence from the council as to how such as figure was agreed upon, especially as the figure is beyond the threshold outlined in the London Plan. Imperial note the changes to Policy HOU and the addition of Point E which relates to affordable housing contributions for Large Scale Purpose Built Shared Living (PBSL) accommodation and Point F which relates to a Fast Track Route for student accommodation schemes which provide at least 40% of the accommodation as affordable. Imperial object to the inclusion of Point E in this policy. Whilst there is an understandable need for affordable housing in the borough, a blanket requirement for all PBSL accommodation to provide its affordable housing contribution in the form of conventional housing (C3) will not be workable in practice owing to the differing designs and layouts of the respective types of accommodation. Whilst this strategy may work on larger, multiple building sites where the residential contribution can be located in a single building, it will be extremely difficult from a practical perspective to provide both PBSL	None of Ealing's identified housing needs are for LSPBSL or Student Housing and its provision will not meet any of these. Need for individual schemes will need to be demonstrated on a case by case basis.	Policy HOU: Affordable Housing – Ealing LPA – local policy			Corin Williams	Imperial Coll	712	Developer

Large Scale Purpose Built Shared Living (Policy H16) Imperial maintain their support for large-scale purpose built shared living accommodation and the necessity for developments of this use to be located in areas that are well connected to public transport, local amenities and employment opportunities. It is disappointing to see that the restriction that limits all developments of this type to Ealing Metropolitan Town Centre still remains, as Imperial consider that each site should be judged on its individual merits and that limiting the spread of developments which are proven to assist young single people is likely to have a detrimental impact on their numbers within the district. As part of our response to Policy H16 in the Regulation 18 consultation, Imperial provided a table showing a number of co-living schemes that had been approved outside the Ealing Metropolitan Town Centre. This highlighted that the restriction imposed by Policy H16 was contrary to many of the forthcoming co-living schemes in the borough (This table is featured below). Further analysis has found 4 additional applications for co-living since our response to the Regulation 18 consultation showing that areas outside the town centre remain viable and sustainable locations for co-living use. Site#LPA Ref.#No of Units The Castle Hotel Victoria Road# 214465OPDFUL# 462 208 Western Avenue# 193574EUI# 264	The policy is based upon experience of exactly these sorts of schemes, and their effect both upon occupants and the surrounding area.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Corin Williams	Imperial Coll	712	Developer

Affordable Workspace (Policy E3) Imperial note that Policy E3 remains unchanged from the Regulation 18 version of the plan. This is disappointing given the extensive evidence provided in our last response which explained that the blanket approach was inappropriate given the diverse range of commercial markets throughout Ealing and the context of the majority of key strategic sites e.g. 1 Portal Way is located outside an established office location and within an early regeneration area with known viability issues for commercial development. Despite this, Imperial acknowledges the necessity of providing diverse commercial space in Ealing but raises concerns regarding the proposed affordable workspace quotas in draft Policy E3. Key concerns include: 1. A uniform approach to discounted rents across Ealing could hinder viability in less established commercial areas. 2. Lack of flexibility in assessing schemes individually could further impede viability. 3. Mixed-use developments face disproportionately high affordable workspace obligations without adequate justification, potentially discouraging such developments. In response to the above, Imperial suggests allowing for lower proportions of floorspace if needs can be met and emphasises the importance of including Research & Development space for STEMB businesses in the policy.	The representation fails to engage with the AW evidence base. In practice the policy is flexible because, 1) the discount is indexed to the actual rents being charged, and 2) contribution is financial except upon sites where on-site provision is viable.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		Corin Williams	Imperial Coll	712	Developer

Biodiversity and Access to Nature (Policy G6) Imperial supports the aims of Policy G6 and its addition to the Regulation 19 Draft submission version of the plan. It is important that developments improve access to nature via contributions that are sustainable and don't compromise the viability of the scheme. Imperial are concerned that the requirement for "development proposals to achieve a biodiversity net gain of at least 20% or the advised national minimum amount, whichever is greater" is unsustainable for developers and would prevent many schemes from coming forward for development. A 20% uplift is double the advised national amount and will severely impact the deliverability of schemes, particularly when there is a requirement for a 50% affordable housing contribution and up to a 10% contribution towards affordable workspace. Imperial request that further evidence is provided outlining how the Council arrived at this figure.	Noted. It is acknowledged that the National Planning Practice Guidance on BNG seeks to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission. Defra's own Impact Assessment indicated that the majority of costs associated with biodiversity net gain are incurred to reach a no net less position. The costs associated with moving from 10 to 20% is therefore considered to be marginal. However, the NPPG was published after considerable delays and only on February 14th 2024 (with updates on May 1st 2024) . This was after the Regulation 19 Local Plan and associated evidence base had been finalised ahead of the Full Council meeting held on February 21st 2024 and the beginning of the consultation period that ran from February 28th 2024. The council now acknowledges that additional time and further evidence is needed to prepare evidence to justify a rationale for pursuing a higher BNG percentage target. Therefore, the policy has been modified accordingly and a revised policy potentially containing a higher target will be considered as part of the next Local Plan review.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation			Corin Williams	Imperial Coll	712	Developer

Absence of a Purpose-Built Student Accommodation (PBSA) Policy Imperial notes that there is still no policy which relates specifically to the provision of Purpose Built Student Accommodation. As a Higher Education Institution, this remains a key priority for Imperial who have a history of providing affordable, modern high-quality rooms at a large scale to ensure students receive an exemplar experience during their studies, welfare needs can be met, and that Imperial can recruit students from diverse socio-economic backgrounds. The design of all Imperial accommodation has been community-led with halls designed to support socialisation and community building and to protect student welfare. It is also important to note here there is continued growing demand for PBSA rooms. Whilst PBSA is traditionally seen as the accommodation of choice for first year undergraduates and one-year masters students, Imperial are now starting to see a marked increase in the number of ‘returning’ students requesting to live in PBSA. In the last three academic years, Imperial have been significantly oversubscribed for PBSA and expect increased demand as the supply demand issues worsen in London. Imperial believe that this is a result of the lack of supply of	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on housing including Policy H15 which deals with purpose built student accommodation. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. The Mayor of London has raised no objections to this approach.	SP3.3 Healthy lives		Corin Williams	Imperial Coll	712	Developer

Absence of a Build to Rent (BTR) Policy Imperial would like to reiterate the importance of incorporating a specific Build to Rent (BTR) policy into the Local Plan which addresses the housing needs of employees and other residents within the Borough. Imperial’s staff have long experienced a shortage in affordable accommodation within the Borough and the Build to Rent model would offer a vital housing option for employees who would not be able to access traditional affordable housing and would otherwise be priced out of the local housing market by the high levels of market rent. BTR will also play a critical role in supporting the delivery and success of the Innovation WestTech Corridor (IWTC). Imperials vision for the IWTC (outlined above) will see significant development in the borough generating thousands of new jobs and millions of pounds of investment into Ealing. As such there must be strong support for ensuring the housing infrastructure is capable of supporting such levels of growth and BTR will be a key cog in ensuring this is achieved. There are other additional benefits to offering a more open approach to delivery of Build to Rent accommodation too. Such residential accommodation is usually of good quality and delivered by institutional landlords who provide better health	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on housing including Policy H11 which deals with build to rent. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. The Mayor of London has raised no objections to this approach.	SP3.3 Healthy lives		Corin Williams	Imperial Coll	712	Developer

Local Infrastructure Priorities Imperial would like to note the importance of upgrading strategic infrastructure in North Acton, such as expanding North Acton Station's capacity and enhancing connectivity to Acton Mainline station as a Crossrail station. These enhancements are crucial for fostering economic development and regeneration in the area. Additionally, Imperial acknowledges the need for improvement in North Acton's public realm, high levels of congestion and insufficient pedestrian and cycle networks. Imperial consider that a strong engagement with OPDC and LB Ealing, will be needed for significant improvements to the area's road layout and overall user experience to create a safe and welcoming environment for everyone. Despite ongoing redevelopment, there's a limited number of forthcoming projects to finance large- scale infrastructure improvements beyond Imperial's own projects. Whilst it is acknowledged that one development alone cannot finance the required improvements, the success of North Acton as a neighbourhood town centre is reliant on a safe and user-friendly environment. On this basis, wider gyratory and vehicular improvements should be incorporated within the Local Plan. This could include traffic and speed calming measures which would improve connectivity and safety for	Noted. The OPDC is the planning authority for North Acton and is responsible for infrastructure planning across the OPDC area. Ealing Council will continue to work closely with OPDC and key stakeholders to support the economic development and regeneration of the area.	Policy A6: North Acton and Park Royal			Corin Williams	Imperial Coll	712	Developer

Science Innovation and Education Imperial notes Ealing’s approach to Strategic Industrial Land (SIL) supporting its inclusion within the draft Local Plan. It is seen as vital by the University to its future growth. Imperial particularly wishes to highlight how SIL can and should be a priority to provide much needed commercial and manufacturing spaces for Science Innovation and Education (SIE) occupation. The University is keen to promote SIE spaces in the borough and feel Ealing’s SIL policy will be supportive of this aim. At present the SIE space provision is extremely limited with the Universities own White City SIE spaces at near 100% occupancy at present, with no new space likely available within a 5-year horizon. Couple this with the wider London picture of limited available incubator space and no substantial SIE manufacturing spaces in Greater London: apart from small pilot spaces. The need for such spaces is vital as without suitable spaces, SIE firms will relocate out of the city. Therefore, the inclusion of specific SIL policy is welcome.	Noted. Support welcomed.	Policy A6: North Acton and Park Royal		Corin Williams	Imperial Coll	712	Developer

Please find attached our representations, on behalf of our client, Interland Group, to the Publication Stage Consultation (Reg. 19) on the emerging Local Plan: Final Proposals, and specifically with regard to the redevelopment of their site at Park View Place, located at Greenford Road, Greenford, UB6 0JA ('the site'). The full representations are contained within the submitted letter, which relate to a proposed site specific site allocation, as well as comments on Policy D9: Tall Building London Plan Ealing LPA – Local Variation. The comments on Policy D9 have also been duplicated within the Publication Stage Representation Form, which has been submitted to specifically set out why this policy is not considered sound. For the avoidance of doubt, these should both be read in conjunction of each other. Our client is the landowner of the Park View Place site, which as set out below, constitutes brownfield land in a sustainable development location, is under single ownership and is available for residential-led redevelopment over the Draft Local Plan period. The site lies adjacent to the north of, and surrounds, the former Kellogg Tower office complex in Greenford, which used to comprise the headquarters of the engineering firm Kellogg. ~~The application site comprises approximately~~	Noted.	Policy G1: Greenford Spatial Strategy		Luke Sumnall	Interland Gro	713	Developer

As set out in draft Policy SP4.3 of the emerging Local Plan the Council is seeking to meet the 21,570 unit 10-year housing supply target identified in the London Plan for the period 2019-20 to 2028-29. This also forms an annual target of 2,157 units for the rest of the Local Plan period. As a site already benefitting from planning permission / resolution to grant planning permission for 558 homes, of which 204 are affordable housing, the site already has the potential to contribute a strategic number of homes towards the delivery of this housing target. In its latest published Five Year Housing Land Supply (Housing Trajectory, 2023) and the Government’s 2022 Housing Delivery Test, the Council’s failure to meet its objectively assessed housing need and targets has become evident. In the London Plan Review – Report of Expert Advisers (January 2024) commissioned by the Secretary of State for Levelling Up, Housing and Communities, a significant undersupply of new housing completions (>5,000) in comparison to its London Plan (2021) housing targets has similarly been identified for LB Ealing (see Figure 2.2 of that Report which is based on information contained in the Greater London Authorities [“GLAs”] Planning London Datahub), constituting the third highest of all London boroughs.	Noted.	Policy G1: Greenford Spatial Strategy		Luke Sumnall	Interland Gro	713	Developer

Draft Policy D9: Tall Building London Plan Ealing LPA – Local Variation The current drafting of Policy D9: Tall Building London Plan Ealing LPA – Local Variation part F states that ‘tall buildings above defined thresholds are exceptional and should be located upon specified Development Sites defined in the Development Plan.’ The Tall Building Study evidence base underpinning the policy is based on a macro assessment of the Borough. It is purposefully broad and not site specific. Significantly greater analysis is needed to understand acceptability of specific building heights on a site-by-site basis. London Plan (2021) Policy D9 accommodates this by the performance-based criteria in limb (D). Adopting this approach instead of the word 'exceptional' would be Effective and would ensure that the Plan is positively prepared in this regard and consistent with the NPPF principles noted above. Equally, the test of "exceptional" places an arbitrary threshold to deliver tall buildings. As demonstrated in the Master Brewer1 decision, a proposal shall be consistent with the development plan if it meets the criteria testing of D9(C) and equivalent local plan design policies. ~~This approach was recently tested by the Planning~~	Noted.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Luke Sumnall	Interland Gro	713	Developer

Similarly, the main modifications to the emerging tall building policy for the London Borough of Barnet removed the “exceptional circumstances” test for “very tall buildings”. The Inspector provided two reasons for this removal, stating that “there is no substantive evidence as to where very tall buildings may be appropriate” and “the criteria for determining whether to permit proposals for very tall buildings was not clear.” We consider that the approach in both the examination of the Brent Local Plan and the Barnet Local Plan is sound and can be adopted by the LBE. Accordingly, the insertion of the word ‘exceptional’ is not consistent with D9, read as a whole. It is not justified. Our suggested amendment is as below (our amendments are marked in bold [underline] and strikethrough): AE. The definition of a tall building in different parts of Ealing is set out in Table DMP1. BF. Tall buildings above defined thresholds are exceptional and should be located upon specified Development Sites defined in the Development Plan and comply with Part C of London Plan Policy D9. G. The tall buildings threshold height is simply that and not a presumption that any height up to this is automatically acceptable. DH. Tall buildings on designated industrial sites will be subject to ~~agreed masterplans and based upon local impacts and sensitivity~~	GLA has raised no general conformity objection to this aspect of the policy.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Luke Sumnall	Interland Gro	713	Developer

Evidence Base for Appropriate Locations of Tall Buildings Draft Policy D9 (Tall Buildings London Plan - Ealing LPA - local variation) of the Emerging Local Plan defines a tall building in Greenford (Areas G1 to G6) as being at least 21 metres or 6 storeys. We believe the evidence base set out in The Tall Building Strategy underpinning the height threshold is flawed for two reasons. First, the area G5 within which the Park View Place site is located already comprises an existing tall building and has consent for other tall buildings up to 11 storeys. Second, the area was discounted as being appropriate for a tall building on the basis that it is currently designated Metropolitan Open Land. On review of the Evidence Base for the Emerging Local Plan, and specifically the Tall Buildings Strategy December 23, prepared by Allies & Morrison, it is understood that the site was discounted for assessment for Tall Buildings on the basis of having two sensitive attributes in the degree of sensitivity assessment. Upon review it would appear that these are ‘Open space and areas deficient in access to Public Open Space’ (given the site’s current MOL designation) and adjacent to an ‘Area of a consistently low building scale’. [Figure showing extract of Degree of Sensitivity Assessment from Tall Buildings Strategy 2023] (contd below)	The evidence base provides a snapshot in time. Existing/planned tall buildings were identified in the Ealing Tall Building Strategy for this location. However, proximity to adjacent tall buildings does not, in isolation, make a strong case for additional tall buildings to be developed nearby. Particularly if building heights for an area are considered to have been maximised already from a townscape perspective. If the evidence base underpinning the TB strategy changes (e.g. de-designation of MOL) then the recommendations emerging from the strategy would be reviewed. However, the designation of tall building zones typically results from accumulation of the positive planning criteria (e.g. suitabilities such as high PTAL and town centre locations) rather than the absence of negative criteria (e.g. sensitivities such as the removal of areas deficient in open space).	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Luke Sumnall	Interland Gro	713	Developer

It is material to the formulation of the evidence base that the site is proposed to be de-designated as MOL within the emerging Local Plan. If de-designated this would remove one of the two ‘negative attributes’ restricting tall building development, namely being an ‘Open space and areas deficient in access to Public Open Space’ Of the remaining negative attribute, an ‘Area of a consistently low building scale’, the site is located adjacent to an existing tall building (Atrium Point – 10 storeys), as identified within the Tall Buildings Assessment Criteria of Suitability, therefore it is not considered this criteria alone makes the site sensitive to tall buildings, using the Council’s only methodology. The site is also subject to an extant consent for tall buildings up to 11 storeys in height (application refs. 182843FUL & 213378FUL), which is a material consideration of weight that does not seem to have been considered as part of the evidence base. Furthermore, when assessing against the site against the Criteria of Suitability for tall buildings within the Tall Buildings Assessment the site scores highly against these criteria, with a score of 5. As shown in the maps adjacent to each criteria within the Tall Building’s Assessment, the site meets the following criteria: •Area of Intensification •Adjacent to an existing tall building •Adjacent to town centres •Sustainable neighbourhood •Area with good access to open space Consequently, using the methodology within the Council’s own Tall	The evidence base provides a snapshot in time. Existing/planned tall buildings were identified in the Ealing Tall Building Strategy for this location. However, proximity to adjacent tall buildings does not, in isolation, make a strong case for additional tall buildings to be developed nearby. Particularly if building heights for an area are considered to have been maximised already from a townscape perspective. If the evidence base underpinning the TB strategy changes (e.g. de-designation of MOL) then the recommendations emerging from the strategy would be reviewed. However, the designation of tall building zones typically results from accumulation of the positive planning criteria (e.g. suitabilities such as high PTAL and town centre locations) rather than the absence of negative criteria (e.g. sensitivities such as the removal of areas deficient in open space).	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Luke Sumnall	Interland Gro	713	Developer

Identification of Height Threshold If the site were to be positively identified as suitable for a tall building, the policy drafting may be inclined to identify a threshold of 11 storeys, based on the maximum height of consented development under application refs. 182843FUL & 213378FUL. The officer report submitted to the Planning Committee for this application stated the tall buildings: • would be located beside the existing 10 storey Atrium Point and the approved buildings of up to 9 storeys immediately to the north; they would reinforce an established group of higher buildings and their role as a local landmark beside the station and Grove Farm Park; • the architectural quality of the buildings is considered to be of a high standard and they would make a positive contribution to the local townscape; • the tops of the buildings are well designed and it is not considered that they would adversely affect local or strategic views; • the base of some of the buildings, with various commercial and community uses accessible to the public, would have a direct relationship with the street; • the proposed taller building would not harm the setting of the listed Sudbury Hill station building, which is over 300m away and is already viewed against a background containing the 10 storey Atrium Point and which will contain the approved 5-9 storeys buildings on the former Kellogg site; • there is no indication that the buildings would cause reflected glare, light pollution or other adverse environmental effects. The principle of tall buildings on site is already deemed to have been	TB zones are broad, strategic growth designations around areas that are well connected to public transport (PTAI) and, typically, close to existing town or local centres. While there are instances and sites across the Borough where individual tall buildings have been built or have received permission, it does not follow that new tall building zones must be created around these locations.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Luke Sumnall	Interland Gro	713	Developer

A detailed overview of the site’s suitability for future residential-led redevelopment allocation under the Draft Local Plan is set out in Table 1 below. However, for the avoidance of doubt, it is understood that the site has been deemed suitable for redevelopment given its linked planning history set out above. Site suitability assessment [or see Table 1 in representation letter page 5] Item#Commentary / Response Site Details Park View Place, Greenford Road, Greenford, UB6 0JA Site Ownership Interland Group (100%) Existing Use Vacant Previously Developed Land Site size 2.4 ha Relevant Planning History: The site has been subject to previous applications for its redevelopment for residential led proposals, with the northern half receiving planning permission in 2020 for a mixed-use development of 5 blocks with 346 residential units (Ref: 182843FUL). The southern half subsequently received resolution to grant planning permission in February 2022 (Ref. 213378FUL) for 288 residential units, 426sqm of commercial floorspace and 166sqm of community space within five buildings of between 6 and 11 storeys. Proposed Site Use: Residential (C3), Later Living Accommodation (C3), Purpose-Built Shared Living (PPSL) / Cui	Noted. The principle of development has already been clearly established, and as mentioned in the representation, the site currently benefits from two extant planning permissions. As part of the Local Plan process, we conducted both an Early Call for Sites and a Call for Sites alongside the Reg 18 consultation. We are not able to propose new site allocations at this stage of the draft Local Plan.	Policy G1: Greenford Spatial Strategy		Luke Sumnall	Interland Gro	713	Developer

Proposed Uses Residential Use (C3) Increasing the current housing stock is an important strategic objective for the London Borough of Ealing. Policy H1 of The London Plan (2021) aims to optimise the potential for housing delivery on all suitable and available brownfield sites especially in areas with PTAL levels of between 3-6 or within 800m of a station. This is supported by London Plan policy D3 which aims to make the best use of land by following a design led approach that optimises the capacity of sites. Section 11 of the National Planning Policy Framework (‘Making Effective Use of Land’) encourages as much use as possible of previously developed land and vacant buildings as well as optimising the use of land to meet as much of the identified need for housing as possible. Consequently, planning policy fully supports the provision of residential uses at the site, however in any case the principle of residential development at this site has already been accepted under application refs. 182843FUL & 213378FUL.	Noted. The principle of development has already been clearly established, and as mentioned in the representation, the site currently benefits from two extant planning permissions. We understand that works for 182843FUL have commenced and that subsequent application 213378FUL is currently awaiting Legal Agreement. As part of the Local Plan process, we conducted both an Early Call for Sites and a Call for Sites alongside the Reg 18 consultation. We are not able to propose new site allocations at this stage of the draft Local Plan.	Policy G1: Greenford Spatial Strategy			Luke Sumnall	Interland Gro	713	Developer

Later Living Accommodation (C2) NPPF paragraph 60 refers to the importance of providing for ‘the needs of groups with specific housing requirements’ and paragraph 62 refers specifically to housing for older people, noting that ‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to [inter alia]... older people...[and] people with disabilities’. The national Planning Practice Guidance (PPG) contains the following key provisions which clearly set out that the varied housing needs of older people must be met and that it is not sufficient to rely upon only one form of accommodation (such as, for example, care at home): • 63-001-20190626 – The need to provide housing for older people is critical... Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. • 63-002-20190626 - The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives. Unsuitable or un- adapted housing can have a negative impact on disabled people. Assessing	Noted.	Policy G1: Greenford Spatial Strategy		Luke Sumnall	Interland Gro	713	Developer

Furthermore, London Plan Policy H13 supports the provision of specialist older persons housing (under both Use Classes C3 and C2) in well-connected sites which can contribute to an inclusive neighbourhood, having access to relevant facilities, social infrastructure and health care, and being well served by public transport. The site is located in a sustainable location directly adjacent to the Sudbury Hill Neighbourhood centre, and consequently in close proximity to a number of local facilities and services. As a mix of uses within a wider residential development, the proposals would also ensure a mixed and inclusive neighbourhood. Furthermore, the site has a PTAL of Part-3 and Part-4, meaning it has high public transport accessibility. Consequently, it is considered the site is wholly suitable for the provision of Later living Accommodation. The later living will also be occupied by a bespoke provider and the use does not compete (in terms of market absorption / sales etc) with conventional C3 residential use, meaning the inclusion of the use at the site de-risks the development as a whole and includes multiple development ‘exit routes’ with the development. This also means it can be built and delivered alongside other residential uses and negates the need for a phased redevelopment of the site. It’s inclusion therefore	Noted. We are not able to propose new site allocations at this stage of the draft Local Plan.	Policy G1: Greenford Spatial Strategy		Luke Sumnall	Interland Gro	713	Developer

Purpose Built Shared Living (PBSL) (Sui Generis) London Plan Policy H16 states that PBSL is acceptable in locations it is well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency. Furthermore, the policy stipulates PBSL must contribute towards mixed and inclusive neighbourhoods. The site is located in an area of PTAL 3/4, meaning it has high public transport accessibility and is located adjacent directly adjacent to the Sudbury Hill Neighbourhood centre, and consequently in close proximity to a number of local facilities and services. In addition, as part of a mix of uses alongside C3 self-contained units (including affordable housing), and potentially later living accommodation (C2), the inclusion of PBSL in the site would ensure a truly mixed and inclusive neighbourhoods with a range of housing typologies and tenures providing the local community a range of housing choice. Furthermore, it provides the opportunity for PBSL residents to stay within the local area, and indeed specifically the site, should they decide to progress to a larger home. Whilst it is noted that the emerging Local Plan’s local variation of Policy H16 states that PBSL must not compromise the	A PTAL rating of 3/4 is not considered as highly accessible for public transport. Other comments noted. We are not able to propose new site allocations at this stage of the draft Local Plan.	Policy G1: Greenford Spatial Strategy		Luke Sumnall	Interland Gro	713	Developer

Hotel Use (C1) London Plan Policy E10 stipulates that strategically important strategically-important serviced accommodation should be located within the CAZ and Opportunity Areas, but that in Outer London smaller scale serviced accommodation is suitable in town centre locations and are well-connected by public transport, particularly to central London. As set out previously, the site is located in an edge-of-centre location with good levels of public transport accessibility. Consequently, it is considered that as a mix of residential uses the site is suitable for small scale hotel provision. Once again, as the hotel would be a non-competitive use (to the sale of C3 residential units) with a separate end occupier, de-risks the development as a whole and can be built and delivered alongside other residential uses, negating the need for a phased redevelopment of the site. It’s inclusion therefore ultimately speeds up and aids delivery of the C3 self-contained homes, including affordable housing, and aids the contribution to the Borough’s housing need faster, and therefore should be supported in a mix of uses as part of a site allocation.	Noted. We are not able to propose new site allocations at this stage of the draft Local Plan.	Policy G1: Greenford Spatial Strategy		Luke Sumnall	Interland Gro	713	Developer

Commercial Class E Use The principle of ancillary and complementary small-scale class E uses at the site is already established by the previous planning applications which included the following commercial uses at ground floor level of the development: • Application ref. 182843FUL - 564sqm of commercial floorspace, including an ancillary creche or office, cafe or shop or financial and professional services, restaurant or office; • Application ref. 213378FUL – 426sqm of commercial floorspace, including office space, flexible retail space, a cafe and gym. Furthermore, emerging policy G4 of the Draft Local Plan seeks to diversify the retail, commercial, and leisure offer (including low levels of potential development) to better meet the convenience needs of local residents. The supporting text to this policy also notes that providing a good range of convenience shops is particularly important, as the area is not well served by large supermarkets. It is therefore considered the inclusion of commercial Class E uses, to include those permitted previously on site and specifically including convenience food retail that serves the needs of the local area is supported and should be included within any proposed site allocation.	Noted. The principle of development has already been clearly established, and as mentioned in the representation, the site currently benefits from two extant planning permissions. We understand that works for 182843FUL have commenced and that subsequent application 213378FUL is currently awaiting Legal Agreement. As part of the Local Plan process, we conducted both an Early Call for Sites and a Call for Sites alongside the Reg 18 consultation. We are not able to propose new site allocations at this stage of the draft Local Plan.	Policy G1: Greenford Spatial Strategy		Luke Sumnall	Interland Gro	713	Developer

Public Benefits Overall, it is considered the allocation for redevelopment of the site could deliver a number of public benefits to the local area and borough as a whole: •A strategic contribution to Ealing’s housing and affordable housing needs •A truly mixed, balanced and inclusive community with a range of housing products and tenures •Redevelopment of a vacant underutilised brownfield site in a sustainable location •Improved access and connections to Metropolitan Open Land at Grove Farm Park for the local community •New and additional public realm •New commercial uses serving the direct local community, whilst also creating direct and indirect employment opportunities •Opportunity for the delivery significant ecological and biological enhancements to the site •Significant CIL and S106 contributions to support and improve local services within the area	Noted. We are not able to propose new site allocations at this stage of the draft Local Plan.	Policy G1: Greenford Spatial Strategy		Luke Sumnall	Interland Gro	713	Developer

Conclusion and recommendations Overall, and as set out above, our client considers their site, Park View Place, to be suitable, available, deliverable and economically viable to deliver new housing during the Draft Local Plan period. It is considered that the site offers an ideal opportunity to facilitate a sustainable future housing development at an appropriate, brownfield site that can deliver a strategic contribution to the Borough’s Housing Need, whilst also ensuring a range of residential uses, in a truly mixed and balanced community, which can ensure delivery of the site and its associated public benefits. The proposed mix of residential uses/tenures/products and the opportunity for tall buildings at site is considered to be acceptable to ensure the site is deliverable, suitable, available and economically viable (in line with the definition of deliverable housing sites set out in NPPF Paragraph 69 and its Glossary) and the site’s strategic contribution to housing and affordable housing need can be realised. As such, it is recommended to consider the site for inclusion in the emerging Draft Local Plan in the form of a Site Allocation for residential-led redevelopment, which specifically: • Exclude the potential for the following proposed uses:	Comments and request noted. We are not able to propose new site allocations at this stage of the draft Local Plan.	Policy G1: Greenford Spatial Strategy		Luke Sumnall	Interland Gro	713	Developer

We write further to the current Regulation 19 consultation on the London Borough of Ealing’s (‘LB Ealing’) New Local Plan. Specifically, we wish to make representations in light of draft policy H16 ‘Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation’. During 2022/23 Halcyon Development Partners (‘Halcyon’) delivered over 800 shared living units (40% of the total UK supply). Halcyon is therefore at the forefront of the shared living industry with a deep understanding of designing and delivering shared living accommodation; how it meets local housing need; and the wider benefits to the surrounding community. Over the last two years, Halcyon has been working in collaboration with the Greater London Authority to develop design and operational guidance for the shared living sector. In February 2024, the Large-scale Purpose-built Shared Living LPG (‘the LPG’) was published which promotes a best practice approach. The content of the LPG was created using data and design information from Halcyon’s current operational schemes.	Noted.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Harry Manley	Halcyon	714	Developer

LB Ealing’s Regulation 19 New Local Plan consultation includes an extension to London Plan Policy H16, specifically to add a section ‘B’ to the policy framework. The draft Regulation 19 wording states: “Development of large-scale shared living will only be permitted within Ealing Metropolitan Town Centre and will only be supported where it can be demonstrated that the scheme would: (i) Not compromise the supply of class C3 self-contained homes; (ii) Not result in an overconcentration of similar uses; and (iii) Not be detrimental to local amenity and the mix and cohesiveness of community uses in the area.” Shared living provides a purpose-built housing solution for renters who are faced with little choice in the housing market. Often, these individuals are required to compromise on quality, affordability and/or location in order to find somewhere to live in London. Shared living schemes are high quality and include intensive management and operational arrangements to look after residents’ welfare and promote a strong sense of community within the schemes. At first hand, Halcyon has seen the benefit that shared living schemes bring to local housing markets. This includes: • Opportunities for people to live in locations that are unaffordable or having limited stock for individuals/renters; • The provision of a high quality and purpose designed housing product that is institutionally regulated and operated in accordance with a formal management plan; • Reduced pressure on existing housing stock including adhoc	There is no demonstrated need for LSPBSL anywhere in the borough and this type of development does not therefore meet identified housing needs. LSPBSL is restricted to EMTC because of the negative effects of these types of development in areas with limited facilities.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Harry Manley	Halcyon	714	Developer

The London Plan Policy H16 specifies that shared living schemes should be “located in an area well-connected to local services and employment by walking, cycling and public transport”. As currently drafted, the Regulation 19 wording is inconsistent with The London Plan, which as read specifies that shared living developments should only be located in Metropolitan Town Centres. Moreover, The London Plan stipulates that the appropriateness of a location for a shared living use should depend on an assessment of accessibility to local public transport and the range of local amenity options on offer. The recent LP supports The London Plan Policy H16 position pursuant to determining appropriate locations for shared living developments. It goes further to specify that “other town centres with high or medium growth potential (see Annex 1 of the London Plan)” are appropriate locations for shared living developments. Note, that in Annex 1 the London Plan identifies other town centres within Ealing with high growth potential including Acton. The New Local Plan policy wording as drafted in the Regulation 19 consultation is therefore inconsistent with the London Plan and would inhibit the opportunity for the benefits that shared living can bring. The wording should therefore be revised accordingly as below: Development of large-scale shared living will only be permitted within Ealing Metropolitan Town Centre on sites with access to excellent public transport connections and a wide range of local amenities	The policy adds another criterion to the approach of the London Plan, it does not contradict the approach of that plan.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Harry Manley	Halcyon	714	Developer

We do not dispute the importance of the delivery of class C3 self-contained homes for the London housing market. Shared living is a complementary residential use to such homes. Halcyon is actively working on significant London masterplans whereby shared living uses will neighbour class C3 homes providing a greater variety of housing options for Londoners. As recognised by national guidance, shared living contributes meaningfully to housing numbers on a ratio of 1.8:1. It therefore provides a valuable contribution to achieving overall housing delivery numbers. Often sites in London are traded on the basis of having traditional residential planning permissions with little prospect of those homes coming forward. This could be due to a variety of reasons including viability and buildability. Such sites remain vacant and make no contribution to solving London’s housing supply crisis. It would therefore be inappropriate to prohibit such sites, which may benefit from a traditional residential planning permission which has not come forward, from being developed for another residential use such as shared living. We would therefore propose that the Regulation 19 policy wording is amended as follows: (i) enable a site to come forward for development, not compromise the supply of including sites previously permitted for class C3 self-contained homes which can no longer be delivered	None of Ealing's identified housing needs are for LSPBSL or Student Housing and its provision will not meet any of these. Need for individual schemes will need to be demonstrated on a case by case basis.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Harry Manley	Halcyon	714	Developer
All planning proposals should protect existing local amenity. The promotion of a sense of community is not just reserved for residents of a shared living development. As shown from Halcyon’s schemes there is an opportunity to embrace and celebrate the community surrounding a shared living scheme through operational initiatives including on-site events (our comedy club events in Harrow are a real success with locals) and neighbourhood liaison initiatives.	Noted	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Harry Manley	Halcyon	714	Developer

Proposed Revised Regulation 19 Policy Wording Halcyon supports the introduction of a dedicated planning policy for shared living uses in Ealing. Shared living provides a much higher quality form of accommodation for renters and can provide a valuable contribution to housing options in Ealing. We would suggest the New Local Plan Regulation 19 draft policy wording is amended as follows to support the development of shared living uses in a responsible manner: “Development of large-scale shared living will only be permitted on sites with access to excellent public transport connections and a wide range of local amenities and will only be supported where it can be demonstrated that the scheme would: (i) enable a site to come forward for development, including sites previously permitted for class C3 self-contained homes which can no longer be delivered; (ii) not result in an overconcentration of similar uses; and (iii) not be detrimental to local amenity and the mix and cohesiveness of community uses in the area.”	None of Ealing's identified housing needs are for LSPBSL or Student Housing and its provision will not meet any of these. Need for individual schemes will need to be demonstrated on a case by case basis.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Harry Manley	Halcyon	714	Developer

Introduction We write on behalf of our client, the Commercial Estates Group Limited (hereafter ‘CEG’). CEG commend the Borough progressing a new Local Plan in an effort to replace the out-of-date Core Strategy (2012), Development Management Document (2013), and Development Sites (2013) documents. Notwithstanding, CEG have a number of serious reservations around the Draft New Local Plan (DNLP) and associated evidence base and considers that, as drafted, it is not positively prepared, justified, effective, or consistent with national or regional policy. Consequently, the DNLP is not sound and CEG object to the plan in its current form. As a landowner within the Borough, CEG welcomes the opportunity to be involved in shaping the future of the London Borough of Ealing (hereafter ‘LBE’) via the Regulation 19 consultation. This representation is submitted by Savills (UK) Limited (hereafter ‘Savills’) in response to the LBE draft Regulation 19 consultation of the DNLP. CEG is a UK developer and investor who manages assets across the country. One of these assets is Exchange Plaza, 58 Uxbridge Road, W5 2ST (‘the Site’) in the London Borough of Ealing. CEG have a programme of ongoing investment in their estate across the UK and would like to take the opportunity to work with the Local Authority, partners, and other stakeholders to ensure that the potential of Exchange Plaza	Noted.	08EA Craven House		Amelia Hunt	Commercial	715	Developer

Summary of Comments & Recommendations CEG would welcome the opportunity to discuss the below representations with Officers in the coming months and further assist in the plan-making process going forward and to discuss the Site’s potential to contribute towards the Borough’s objectives by making the best use of this highly sustainable site that can contribute towards the growth of the Borough as a whole. For the avoidance of doubt, CEG will retain their right to submit hearing statements and speak at the forthcoming Examination in Public and they look forward to collaboratively engaging with LBE through the plan- making process, emphasising their commitment to partnership and open dialogue. 1. CEG are supportive of the Borough’s ambition to deliver a spatial strategy for Ealing, however, raise concerns that the strategies are not reflective of the market. As a result, the DNLP appears unbalanced and inadequately prepared with a focus on constraining development, rather than focusing on the need to positively prepare for good growth. This is in direct conflict with national and regional policy. 2. Housing delivery in Ealing has faltered and the Borough is unable to demonstrate the required five- year housing land supply for new homes. Across the capital, new home completions have dropped by 50% in 2023 and the rental market continues to face significant supply-side issues. Despite this, the DNLP takes an overly restrictive approach to residential development, limiting the definition of residential uses to only Use Class C3. CEG find this specification to be overly stringent to different types of specialist residential	Noted, these are addressed above.	08EA Craven House		Amelia Hunt	Commercial	715	Developer

[Background to Commercial Estates Group (CEG)] Since being appointed as managers, they have also taken ownership of the Site and have recently submitted an application for its redevelopment. CEG’s vision is to bring the vacant, underutilised, brownfield Site which is currently blighting the Uxbridge Road development corridor back into use, through the delivery of best-in-class office floorspace to serve the local SME market, and the introduction of a new Purpose Built Student Accommodation use, in line with evidenced demand for student accommodation at a regional and local level. The pending application proposes 504 purpose-built student accommodation bedrooms and 7,687 sqm office floorspace, including affordable workspace. The proposals would bring a long-term use back to the Site, revitalising the vacant land to deliver economic and social benefits to the community, alongside extensive public realm and landscaping improvements. For context, the Site has the following designations in the DNLP: - Site Allocation 08EA: Craven House (Previously EA13) - Ealing Metropolitan Town Centre Given the Site’s allocation, CEG has the following comments relating to the proposed policies within the LBE Regulation 19 DNLP which are discussed in detail below. Whilst the majority	Noted.	08EA Craven House		Amelia Hunt	Commercial	715	Developer

Background - London Plan Review No one disputes the fact that we have a housing crisis in London and CEG supports the Borough’s desire to address housing needs. However, in its current format, the DNLP is overly restrictive around a number of housing typologies and thus does not adequately address the pressures within the housing market as a whole. [Detailed London Plan Review: housing crisis, housing under-delivery, overcrowding, Housing Delivery Test and meeting house building targets, key findings of London Plan Review - Report of Expert Advisors] As a consequence of the undersupply, the London Plan Review Report recommends the introduction of a presumption in favour of granting planning permission for proposals which comprise or include residential development on Brownfield (previously developed) land.’ Local Authorities will qualify for the presumption where they fail to meet their target, a category into which Ealing falls. In applying the presumption, substantial weight is to be given to the benefits of delivering homes. Should it be adopted, the presumption means granting planning permission as quickly as possible unless the benefits of doing so would be significantly and demonstrably outweighed by any adverse impacts which would arise from not following policies in this Plan.	Noted.	08EA Craven House		Amelia Hunt	Commercial	715	Developer

Background – Ealing’s Housing Delivery At a local level, Ealing has a 21,570-unit 10-year housing supply target identified in the London Plan for the period 2019-20 to 2028-29. This forms an annual target of 2,157 homes for the rest of the Local Plan period. There has been a shortfall in the delivery of 2,262 homes over the past four years, compounding this target. Furthermore, because Ealing has not met its Housing Delivery Test, a 20% buffer is applied to its housing targets, increasing its annual target to 2,609 homes. According to the Ealing Housing Trajectory Evidence Base, this gives a total cumulative requirement of 15,656 homes over the next five years. Given the above, it is clear that any new Plan will need to incentivise delivery by setting targets that are realistic and deliverable, as well as recognising the role that other housing typologies can play in meeting the differing needs of residents across the Borough. In addition, the Borough will need to recognise that development will become more viable where cost burdens are reduced, and policy takes a pragmatic approach to introducing a level of flexibility within policies. The proposed DNLP does not achieve this balance. Moreover, the DNLP does not recommend any policy-driven initiative to solve this crippling housing need and deliver a balanced mix of housing typologies which is detrimental to London’s physical environmental and social well-being of residents.	Noted	08EA Craven House			Amelia Hunt	Commercial	715	Developer

Background – Value Creation In order to adequately facilitate the delivery of homes, any Development Plan needs to consider its ability to create value for the development being delivered. It is also critical to recognise that operational developments, such as Purpose-Built Student Accommodation projects, require a minimum degree of scale to be viable. Currently, the DNLP does not consider this relationship. Any development plan which artificially suppresses capacity is not only out of step with policies around optimisation, particularly those within the London Plan (Policies GG2, D3, & SD6) but also less able to facilitate delivery. It is clear from the London Plan that local authorities are expected to follow a design-led approach when determining the capacity of sites to accommodate developments. Where sites are in Town Centres, local authorities are expected to optimise residential growth potential, in line with London Plan Policy SD6, to ensure the vitality and viability of London’s Town Centres are promoted and enhanced. Specifically, locations should be identified for mixed-use or housing-led intensification that will secure a high-quality environment and complement local character and heritage assets. As part of any design-led approach, local authorities shall have regard to the character of developments in the area, and clusters of high-density development are to be identified, to consider expanding these areas. The Site constitutes vacant, previously developed land that sits at the heart of Ealing Metropolitan Town Centre. As a highly accessible brownfield site with a PTAL rating of 5, the Site features all of the	Noted	08EA Craven House		Amelia Hunt	Commercial	715	Developer

Background – Costs Given the need for sustainable development, CEG would question whether now is the right time to introduce CIL in Ealing and would expect, if introduced, the Borough to acknowledge that this is expected to have a direct impact on the scale and pace of delivery in the Borough. A series of additional costs have been added to development over the last 24 months, including, but not limited to, cost price inflation in construction and the introduction of dual staircases, which is supported. Where the additional cost needs to be absorbed by the developer, returns fall and the prospect of development commencing reduces with a direct consequential impact on delivery. Therefore, the Borough must also acknowledge that the introduction of a CIL charge must have a significant impact on the level of development able to be delivered, contrary to the aims of the DNLP. The DNLP notes in Paragraph 0.31 that LBE are preparing separately a CIL charging schedule. This is described as entirely separate from the Local Plan consultation. Clearly, both are a completely integrated process as the costs impact the viability of development, and therefore housing delivery, and should be treated as such. ~~As mentioned previously, CEG will also be submitting~~	Noted. A Local Plan Viability Assessment forms part of the evidence base and it tests the ability of developments in the London Borough of Ealing to accommodate emerging policies in the draft Local Plan alongside a range of potential Community Infrastructure Levy ('CIL') rates.	08EA Craven House			Amelia Hunt	Commercial	715	Developer

Background – Relationship with the London Plan Ealing’s DNLP is structured uniquely, as its development management policies appear to be set out in a series of policy variations concerning the current London Plan. In some instances, the DNLP proposes the same policy names within the London Plan, such as draft Policy D9 on Tall Buildings. Whilst the rationale is understood, this has the potential to be inconvenient in practice, and a change should be considered. Moreover, the London Plan is widely expected to undergo a review over the coming years, to manage London’s evolving needs and provide up-to-date policy for Boroughs to adapt accordingly. Therefore, the Plan should clarify how the status of the DNLP policies will change as the London Plan is reviewed and the policies on which the DNLP is based are altered. This is something that arose in the previous Core Strategy and Development Management documents.	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. The Mayor of London has not raised any objections to this approach.	08EA Craven House		Amelia Hunt	Commercial	715	Developer

LEGISLATIVE FRAMEWORK [Details of National Planning Policy and Local Plan 'soundness' para 35 NPPF] In London, Local Plans are also required to be in 'general conformity' with the London Plan. It is CEG's view that the DNLP has not been positively prepared as it fails to meet objectively assessed needs. It is not justified as it doesn't consider reasonable alternatives. It is not effective as it places too much of a financial burden on development. It is not consistent with national policy as it will fail to meet its objectified need for homes. {The representaton is also accompanied by an Urban Design and Townscape Analysis, prepared by Montagu Evans (Appendix A), and Viability Analysis (Appendix B) by Savills Viability}.	Noted. A statement of common ground with the Mayor of London provides evidence of general conformity. Consideration oof alternative spatial options was considered and is part of the extensive evidence base.	08EA Craven House			Amelia Hunt	Commercial	715	Developer

Spatial Strategy for Ealing CEG understand that a Borough with such a varied character, such as the LBE, should incorporate a spatial strategy with differing policy objectives tailored to the requirements of each area. CEG raises concerns that a number of Ealing’s Spatial Strategies do not appear to reflect the market. As a result, the Plan appears unbalanced and inadequately prepared for constraints on development, rather than focusing on the need to positively prepare for good growth. In addition, Paragraph 2.51 [2.31 is correct para] of the DNLP states that ‘The Local Plan seeks to develop sophisticated and ambitious employment policies.’ CEG consider that the use of ‘sophisticated and ambitious’ is overly convoluted and undermines the purpose of the planning policy framework. The DNLP should seek to develop simple and resilient policies that provide certainty.	Noted.	08EA Craven House			Amelia Hunt	Commercial	715	Developer

Draft Policy SP1 sets out the 15-year vision for Ealing, which has been aligned with the Borough’s core themes. Draft Policy SP1 (a) notes that ‘The unique characteristics and cultural identities of each of Ealing’s seven towns will be respected and enhanced, through the application of locally sensitive Good Growth principles.’ CEG understands the need to have regard to the existing character of a place and respond to the existing townscape characteristics. SP1(a) should specify the need to have regard to these matters through the application of the Design-Led approach set out in London Plan Policy D3. Further to this, CEG supports the strategy to prioritise and strengthen Ealing Metropolitan Town Centre; and agrees that it should be the focus – in spatial planning terms – for high-density residential development considering the location of several key transport nodes in the area. This is reaffirmed in Figure SS1 which outlines the place intervention to deliver major development within Ealing Metropolitan Town Centre. CEG support this intervention, which will build on the Town Centre’s excellent connectivity and enhance its role as a strategic destination.	Noted. The London Plan is an integral part of Ealing's local development plan. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so.	SP1: A Vision for Ealing		Amelia Hunt	Commercial	715	Developer

Draft Policy SP2 sets out the Borough’s approach to tackling the climate crisis, and how this would aid in delivering the overall vision of the DNLP. CEG supports the overarching principles of the draft policy to create inclusive economies, thriving communities, and take climate action. CEG recognises the strengthening of this policy compared to the Regulation 18 DNLP, including the addition of new criteria detailing how Ealing will support the delivery of New Zero Carbon buildings at SP2.2 D (i-vi)). Further additions include ensuring that planned growth is managed in line with energy network upgrades and reinforcement (SP2.2 E); promoting design measures which minimise the risk of overheating, without increasing energy usage (SP2.2 F(i)); utilising green infrastructure to minimise the effects of climate change and to provide a place of respite, and ensuring that the green network itself is resilient (SP2.2 F(iv)); and maximising opportunities for urban greening and a net gain in biodiversity (SP2.2 G(iii)). CEG also recognise and appreciates that this policy has been supplemented by more detailed Development Management policies, including the introduction of new policies, to more clearly set out how this goal will be achieved. CEG is committed to becoming a more sustainable and ethical business and identifies with all efforts to tackle the climate crisis. However, pertinent to creating this positive change, policies should be framed and adequately balanced in relation to the environment.	Noted. A Local Plan Viability Assessment forms part of the evidence base and it tests the ability of developments in the London Borough of Ealing to accommodate emerging policies in the draft Local Plan alongside a range of potential Community Infrastructure Levy (‘CIL’) rates.	Policy SP2: Tackling the climate crisis		Amelia Hunt	Commercial	715	Developer
CEG support the principles of draft Policy SP3 to create a more equal and affordable borough where the opportunities to access good quality housing are maximised. Draft Policy SP3 discusses the delivery of affordable homes. Whilst there is clearly a shortfall in the delivery of affordable homes throughout the capital, the Plan should seek to tackle the housing crisis as a whole; where the DNLP makes the delivery of market housing typologies viable, affordable delivery will follow.	Noted.	Policy SP3: Fighting inequality		Amelia Hunt	Commercial	715	Developer

Draft Policy SP4 outlines that growth should be directed to sustainable locations that are well-connected to transport modes or within close proximity to Town Centres, which is supported. Part C outlines the need to ensure that the most effective use of land is made so that development on sites is optimised. This will be important in Town Centre locations with great transport connectivity, of which the opportunity is noted within Para 2.5, which recognises that the Borough is located uniquely near 5 new Crossrail Stations, making Ealing one of London’s best-connected boroughs. Part D outlines that Ealing will promote Good Growth by ‘following a character-led and contextual approach to growth that optimises the capacity of sites while reflecting the valuable components of the built environment.’ Part D is an oversimplification of the London Plan’s Good Growth Principles. The ‘character-led’ approach should be replaced with the ‘Design-Led’ approach as currently outlined within London Plan Policy D3. Part F discusses the identification of suitable sites for tall buildings and change. It outlines that in these instances, they should add quality to and complement Ealing’s Character and place-making ambitions. CEG understand and support the principle of identifying where tall buildings may be accepted, in line with London Plan Policy D9. However, the DNLP’s application of draft Policy D9 will heavily curtail the ability of Planning Applications to contribute to the wider aims of the Strategic Policies SP1-4 by virtue of the constraints	Noted	Policy SP4: Creating good jobs and growth		Amelia Hunt	Commercial	715	Developer

Sitting below the spatial strategy is a set of strategic place interventions. The first is: ‘Delivery of significant levels of development at Ealing Metropolitan Town Centre.’ This strategic intervention is strongly supported. The DNLP identifies Ealing Metropolitan Centre as a location for significant, high-density residential and employment growth. It’s therefore paramount to the success of the Plan that the policy framework enables the delivery of high-density schemes within the Ealing Metropolitan Town Centre. Chapter 4 of the DNLP sets out the Town Plans for Ealing’s 7 towns, as well as identifying a number of development sites across the Borough. The Regulation 19 DNLP has reconfigured and strengthened each of the town spatial strategy policies to include separate headings on spatial vision and the same three strategic objectives that underpin the borough-level spatial strategy: tackling the climate crisis, fighting inequality, and creating good jobs and growth. Each town's spatial strategy also sets out any key infrastructure delivery priorities for the area and now has an amended spatial strategy diagram.	Noted.	Policy SP1: A Vision for Ealing		Amelia Hunt	Commercial	715	Developer

Ealing Town Plan The Ealing Town Plan sets out that the town is the largest in the borough and is home to over 91,000 people, equivalent to 25% of the borough’s total population. However, despite having the highest average resident income, Ealing is the second most unaffordable town in the borough. As set out in Paragraph 4.2.11, current land and house prices in the area mean new homes may not be affordable for existing and new residents. In an effort to tackle the problem, the town has seen an uptick in conversions of spacious villas into Houses of Multiple Occupation (HMOs) which had the wider impact of undermining heritage and townscape elements of the 14 Conservation Areas that cover the town. As previously mentioned, CEG supports the prioritisation of Ealing Metropolitan Town Centre to be a location for significant, high-density residential and employment growth and thus supports the principles set out in draft Policy E2. Crucial to the success of the Plan will be the delivery of key allocated sites within the Metropolitan Town Centre. Paragraph 4.2.2 outlines that ‘The character of these neighbourhoods varies, from spacious villas to mansion blocks, garden suburbs, and 1960s townhouses’. Within the Ealing Metropolitan Town Centre, there is also a range of high-density development, tall buildings and new developments.	Noted.	Policy E1: Ealing Spatial Strategy		Amelia Hunt	Commercial	715	Developer
Draft Policy E1 outlines the Spatial Strategy for Ealing. CEG maintains strong support towards the vision of Ealing and prioritisation of Ealing Metropolitan Town Centre to be a location for significant, high-density residential and employment growth. CEG especially support the addition of clause Q, which states: ‘Using growth to enhance the character of different areas and centres, reflecting mixed and aided uses below residential in and around Town Centres, key uses and facilities near to transport hubs, and enhancement of residential neighbourhoods, particularly around major regeneration projects.’	Noted.	Policy E1: Ealing Spatial Strategy		Amelia Hunt	Commercial	715	Developer

CEG broadly support draft Policy E2, which outlines how Ealing Metropolitan Town Centre would be the location for significant high-density residential and employment growth. Specifically, Part B of Policy E2 outlines that ‘Development will focus on delivering strategic [...] residential growth.’ CEG support the new long-term, 15-year, vision, and objectives for Ealing as the commercial heart of the borough, citing the importance of delivering a high-quality mix of uses. Draft Policy E2 (C) (iv) refers to ‘maintaining the role and critical mass of the office corridor’ along Uxbridge Road. CEG consider that the principle of Uxbridge Road as an ‘office corridor’ is outdated and unachievable. At present, Uxbridge Road is home to a wide mix of uses, including residential and hotel, alongside some office space. CEG accept that from an office perspective, delivery of large headquarter office buildings directly next to Crossrail is suitable, however, the central portion of Uxbridge Road is a considerable distance from both Crossrail stations, and this distance isn't palatable for large-scale office development. Draft Policy E2 (C) should remove the reference to Uxbridge Road as an ‘office corridor’ and take into account the distinction in the office market between Town Centres adjacent to Crossrail and those on Uxbridge Road, as well as the mixed-use character of Uxbridge Road.	Noted	Policy E2: Ealing Metropolita n Town Centre		Amelia Hunt	Commercial	715	Developer

In summary, the Framework places a clear impetus on the delivery of high-density housing within Town Centres. NPPF Paragraph 86 states that ‘residential development often plays an important role in ensuring the vitality of centres’. London Plan Policy SD6 sets out that the vitality and viability of Town Centres should be promoted and enhanced by ‘encouraging strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners, including main Town Centre uses, night-time economy, civic, community, social and residential uses,’ and by ‘identifying locations for mixed-use or housing-led intensification to optimise residential growth potential’, particularly the consideration and encouragement of a diverse range of housing [...] including smaller households, Build to Rent, older people’s housing and student accommodation’. As the borough’s only Metropolitan Town Centre, the Framework and associated policies should have a strong focus on securing opportunities for high-density mixed-use and residential development.	Noted.	Policy E2: Ealing Metropolita n Town Centre		Amelia Hunt	Commercial	715	Developer

The Regulation 19 DNLP includes significant changes to the proposed Development Sites when compared to the Regulation 18 Draft. The DNLP notes that ‘these changes are also based upon public and stakeholder feedback at Regulation 18 together with a further assessment of site suitability and deliverability.’ To achieve the Plan’s wider strategic objectives for Good Growth, allocated Development Sites must be delivered within the 15-year plan period, especially for sites within the Ealing Metropolitan Town Centre, where high-density growth in the Borough is directed. Paragraphs 4.2.52 and 4.2.54 respectively reference the importance of development sites to the success of the Plan: ‘Development Sites have development potential that could support the delivery of the spatial strategy whilst ensuring the borough meets its housing [...] requirements.’ and ‘Development Sites represent site- specific components of the development plan and are intended to deliver the broader thematic policies set out elsewhere in this document’. Considering that the DNLP places significant impetus on Development Sites delivering its thematic policies, CEG has significant concerns that the current drafting of the requirements for these Development Sites will inadvertently hinder their deliverability through the introduction of onerous and unjustified maximum tall building thresholds. Considering the most deliverable and appropriate 82 sites (out of a previous total of 114) were chosen to be allocated, the DNLP must ensure there is an appropriate planning framework in place to ensure the deliverability of these sites. so they are not curtailed by the planning system.	Policy D9 has now been revised to give recommended heights, however departure from it will need to be justified in design terms.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Amelia Hunt	Commercial	715	Developer

Further to this point, the evidence base for the Regulation 18 DNLP was vastly different to the Regulation 19 DNLP. The Tall Buildings Strategy (2022) to support the Regulation 18 DNLP set out a number of areas that could be appropriate for tall buildings within the Borough. Ealing Town Centre was designated Zone D (in which the Site falls) where indicative heights were identified to range between 9 – 21 storeys. This was mirrored in the Regulation 18 Draft Site Allocation for the Site, EA13 (Craven House). The Regulation 19 evidence base's messaging has drastically changed, identifying the Site as suitable for a development ranging between 3-10 storeys with no detailed analysis as to how this conclusion has been drawn, especially given the contradiction to the Regulation 18 DNLP. It is CEG's view that such a significant and radical change in approach brings into question the credibility of the evidence base. Any credibility is further diminished by the lack of clarity around the drivers of the revised approach. {The representaton is also accompanied by an Urban Design and Townscape Analysis, prepared by Montagu Evans (Appendix A), and Viability Analysis (Appendix B) by Savills Viability}.	The consultation version Tall Buildings Study was subject to some transcription errors which have now been corrected in the submission version.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Amelia Hunt	Commercial	715	Developer

CEG notes that Paragraph 4.2.56 now specifies that the Development Site Schedules should be read to understand that ‘Residential’ uses refer only to Use Class C3 housing. CEG find this specification to be highly limiting to different types of specialist residential development, especially considering Paragraphs 3.43 and 3.58 which state, respectively: - Housing is a key determinant of health and well-being, and specialist housing will likely play a larger role over the plan period. This will be supported where it meets identified needs, supports social welfare, and increases the overall housing supply within the borough. - Access to housing represents a significant economic constraint and source of inequality in the borough which appears to be constraining population growth and causing outmigration of the crucial working age population. In particular, the council will pursue unit-by-unit delivery of identified affordable housing needs and will also set out a strategy for the delivery of specialist housing types. CEG also queries Paragraph 5.18 which states that ‘specialist forms of housing such as co-living and houses of multiple occupation (HMOs) [...] may make a valuable contribution to housing supply in particular circumstances but will not be generally acceptable across the Borough’. Given the location of a number of Ealing Town’s Development Sites within the Metropolitan Town Centre, where the majority of growth within the borough is to be directed, not accounting for forms of specialist housing such as that for students, older, vulnerable, and	None of Ealing's identified housing needs are for LSPBSL or Student Housing and its provision will not meet any of these. Need for individualschemes should be demonstrated on a case by case basis.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Amelia Hunt	Commercial	715	Developer

Development Site 08EA: Craven House This section is supported by the representations prepared by Montagu Evans LLP (Appendix A), which should be read in conjunction with the text below. Montagu Evans LLP’s report critically assesses the evidence base and draft policies contained within the plan, specifically focusing on the suitability of tall buildings in Ealing and the maximum height proposed for the 52-58 Uxbridge Road site (08EA Craven House). The representation reviews various documents, including the Local Plan Regulation 19 Site Selection Report, Ealing Character Studies, Tall Buildings Strategy, and planning policy guidance on tall buildings. It provides recommendations based on the analysis of the evidence and suggests that the maximum height of 10 storeys for the site is not justified and greater heights of at least 20 storeys are considered a more appropriate response to optimise the site in both design and heritage terms. In terms of the current Site condition, Exchange Plaza remains vacant following the demolition of the building as part of planning permission (Reference Number: 164805FUL). Exchange Plaza (52-58 Uxbridge Road) remains allocated as a development site under new title, 08EA: Craven House. While the draft Development Site comprises both Exchange Plaza and Craven House, only Exchange Plaza is managed by CEG and therefore comments in this representation do not refer to Craven House. The rationale behind grouping Exchange Plaza (the CEG Site) and	The sites share the same development principles, and a significant problem with development along the office corridor is that individual sites have been developed in isolation. It is wholly appropriate for these principles to apply across land ownership boundaries.	08EA Craven House		Amelia Hunt	Commercial	715	Developer

Allocated Use The amended draft allocation maintains the proposed use as ‘Office’ for the Site, however, CEG continues to find this to be overly restrictive in nature. Whilst the extant planning permission for Revolution (as referred to above) achieved consent for a 100% office scheme, market forces, office demand, and the economic landscape has changed considerably since 2017 – as shown by the aforementioned historic marketing for the Site with no purchase or pre-let interest. While this reduction in demand has been largely exacerbated by the COVID- 19 pandemic and the resultant change in working models and patterns, as well as the arrival of Crossrail to Ealing, the full and continuous marketing of the Site from 2017 onwards demonstrates that CEG were unsuccessful in promoting the scheme before the pandemic, despite launching Revolution to the West London Property market twice within this period and responding to all live requirements. As such, CEG’s view remains that the area is no longer viewed as an office location, and to solely pursue an office allocation at Exchange Plaza would hinder the ability for a key and prominent development site to come forward. Therefore, it is once again recommended that a more flexible site allocation at Exchange Plaza be secured. Exchange Plaza is located within an area currently undergoing significant change and has seen the redevelopment and optimisation of nearby brownfield sites to create tall, high-quality, high-density mixed-use developments. In particular, the evolving skyline has been driven through the direction of growth and density along the Uxbridge Road Corridor - from Ealing Broadway down to West Ealing, with notable developments including CP House.	Amend to permit supporting town centre uses.	08EA Craven House		Amelia Hunt	Commercial	715	Developer

Tall Buildings and Height The DNLP sets a series of height caps on Site Allocations, including a 10-storey allocation on 08EA: Craven House. Development Site EAL9 was previously identified in the Regulation 18 DNLP as falling within an ‘area potentially appropriate for tall buildings’ with indicative heights ranging between 9 - 21 storeys (31.5 - 73.5 metres). This has been revised within the Regulation 19 DNLP to state ‘the Site is in principle suitable for a tall building’, however, ‘design analysis indicates a maximum height of 10 storeys (35 metres)’. This is a drastic alteration from the previous version of the DNLP and is not reflective of the pre-application discussions held to date whereby the council have maintained their support for a building of up to 21 storeys, in line with the previous allocation. Consideration of the appropriate building heights, townscape impact and architectural form at the Site have been rigorously assessed as part of the recent planning submission at the Site, as set out in the supporting representation prepared by Montagu Evans LLP. The application demonstrated that tall buildings up to 20- storeys were in principle capable of being appropriate on-site, via a thorough assessment of the Scheme against the London Plan Policy D9. The submitted Heritage and Townscape Visual Impact Assessment also supported a scheme of this height. The Borough’s own Design Review Panel has also noted that the height of the proposed buildings to be acceptable in principle given the emerging context of the area. These findings have heavily informed the design process for CEG, as they remain committed to their consideration of the community’s existing local character and needs.	Noted	08EA Craven House		Amelia Hunt	Commercial	715	Developer

Tall Buildings The current drafting of draft Policy D9 requires more clarity relating to the requirements for justifying heights above the defined thresholds. As set out in the supporting representation prepared by Montagu Evans LLP, part of their critique of the evidence base relates to lack of reasonable alternatives that have been tested as part of the evidence base, namely different height scenarios to justify the proposed maximum heights. This criticism is relevant to draft Policy D9 because, as currently drafted, part F states that “tall buildings above defined thresholds are exceptional and should be located upon specified Development Sites defined in the Development Plan”. The current drafting does therefore allow for heights that exceed the defined thresholds. However, there is a lack of clarity as to when those circumstances may be appropriate even in “exceptional” circumstances. In any event, the use of the word ‘exceptional’ in the policy wording implies a presumption, when in fact if a proposal above the threshold height has acceptable effects, it should be consented (all other considerations being equal). The word exceptional is not justified and is disproportionate. It demonstrates that the policy has not been positively prepared. To assist Montague Evans highlight the methodology that the	The wording 'exceptional' reflects that clearly established plan-led approach required by the local and London plans.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Amelia Hunt	Commercial	715	Developer

CEG note the Council’s addition of Part G since the Regulation 18 consultation, where “The tall buildings threshold height is simply that and not a presumption that any height up to this is automatically acceptable” has been inserted and moved from the reasoned justification. This is negatively worded and not consistent with the objective of London Plan D3, which requires options testing. The wording should be changed to the effect that ALL proposals for tall buildings will be assessed according to the relevant environmental criteria in the development plan. For completeness we commend the following amendments below (our amendments are marked in bold and strikethrough): AE. The definition of a tall building in different parts of Ealing is set out in Table DMP1. BF. Tall buildings above defined thresholds are exceptional and should be located upon specified Development Sites defined in the Development Plan and comply with Part C of London Plan Policy D9. G. The tall buildings threshold height is simply that and not a presumption that any height up to this is automatically acceptable. All proposals for tall buildings will be tested under the relevant design criteria. DH. Tall buildings on designated industrial sites will be subject to agreed masterplans and based upon local impacts and sensitivity ~~This suggested drafting is consistent with other London boroughs~~	These proposals confuse rather than clarify the policy.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Amelia Hunt	Commercial	715	Developer

Finally, CEG support the majority of drafting of Paragraph 5.15 of the reasoned justification. For consistency with our suggested amendments to the main policy, we comment the following addition for clarification: “All sites that may be appropriate for tall buildings are identified in Development Sites (or site allocations) appended to each of the Town Plans in Chapter 4. Heights listed in Development Sites are the product of detailed design assessment, nevertheless they remain subject to a full design assessment at the point of application against the impact policies set out in London Plan Policy D9 C. The threshold is therefore to be treated as guidance, on the understanding that detailed environmental testing is needed to acceptable site capacity.” CEG therefore advocate that the local plan is not restrictive with regard to threshold heights but should instead be supportive of working with applicants to bring forward tall buildings in sustainable locations. In this, all the facts of each case should be presented, and a decision should be made based on the merits of each scheme. For the reasons set out above, CEG consider this policy as drafted is not justified. The application of draft Policy D9 is likely to discourage development and unduly restrict LBE’s ability to deliver the wider objectives of the DNLP. The policy as drafted is also therefore not effective. CEG consider that the proposed changes set out above would fix these issues and ensure full compliance with national policy and ensure the policy is effective and sound.	Policy D9 has now been revised to give recommended heights, however departure from these will need to be justified in design terms.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Amelia Hunt	Commercial	715	Developer

Affordable Housing Draft Policy SP 4.3 has been amended to clarify housing delivery targets and the maximisation of affordable housing. CEG support the ambition to build more genuinely affordable homes by Meeting the 21,570-unit 10- year housing supply target identified in the London Plan for the period 2019-20 to 2028-29. This translates to an annual target of 21 57 units for the rest of the Local Plan period. Draft Policy HOU has an additional policy clause (F) which states that ‘For purpose-built student accommodation (PBSA) to follow the Fast Track Route set out in Policy H1 5 4) a) of the London Plan at least 40% of the accommodation must be secured as affordable student accommodation’. It is considered the proposed introduction of Clause (F) within draft Policy HOU of the Regulation 19 Plan will adversely impact the delivery of new development within the borough whilst increasing unaffordability, reducing build quality and sustainability commitments, and also suppressing economic growth. Savills Viability has undertaken a full review of the DNLP, and the Local Plan Viability Assessment (‘LPVA’) prepared by the Council’s advisors, BNP Paribas Real Estate (‘BNPP’) to support the draft affordable housing policy. They have prepared a written representation setting out their primary concerns pursuant to the methodology and/or assumptions made within the document, and consequently, why draft Policy HOU will impact the delivery of new development. Their full written representation can be found in	Noted	Policy HOU: Affordable Housing – Ealing LPA – local policy		Amelia Hunt	Commercial	715	Developer

Affordable Workspace Draft Policy E3 of the draft Local Plan sets out the requirement for affordable workspace in the borough, stating that ‘Affordable workspace in Ealing will be provided on the basis of a levy on development of 10% of gross floor area in mixed-use schemes, and 5% of net floorspace in office and industrial schemes.’ In principle, CEG support the notion of development proposals to provide affordable workspace in principle but considers the current wording of the draft policy to be unclear. The policy applies a 10% threshold to mixed- use development, on the amount of proposed net additional commercial floorspace. It is not clear from the draft policy or the supporting text what a ‘mixed-use’ development constitutes, with the current definition within the glossary not offering any additional clarification (Development for a variety of activities on single sites or across wider areas such as Town Centres). Further, Paragraph 4.2.15 notes that the wider unaffordability of Ealing Town is disproportionately affecting small businesses and proposes that Ealing Town could explore how Affordable Workspace provision can address the cost of the enterprise. However, according to its own draft policy, micro and small businesses would themselves be required to fulfil the 10% net floorspace requirement if provided as part of mixed-use development. CEG, therefore, again seek greater clarity on the types of development which would meet this criterion and suggest a more robust definition is included in the supporting text or glossary of the draft Plan. Additionally, CEG wants to clarify what commercial floorspace entails and suggests this solely applies to Use Class E(i) Offices.	The policy is a levy on development of net additional space and has been found viable by the whole plan viability assessment.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		Amelia Hunt	Commercial	715	Developer

Biodiversity Draft Policy G5 of the draft Local Plan sets out the requirements for urban greening in the Borough through the use of the Urban Greening Factor (UGF). The Urban Greening Factor is a policy tool that aims to deliver increased green infrastructure, including green roofs, street trees, and supplementary vegetation. Regional policy, set out in London Plan Policy G5 recommends a target score of 0.4 and 0.3 for predominantly residential and predominantly commercial developments respectively. CEG support the ambitions of this policy and shares the Council’s view that meeting targets for urban greening should be integral to new development and providing positive contributions to biodiversity and the wider environment, so long as they do not have an adverse impact in terms of viability and therefore affect delivery. CEG welcomes the new clarification that Ealing will apply the Urban Greening Factor as set out in the London Plan with a target of 0.4 for residential development and 0.3 for commercial development, and the addition of the new draft Policy G6 to promote local biodiversity improvement proposes that ‘development proposals should achieve a biodiversity net gain of at least 20% or the advised national minimum amount, whichever is greater’. This brings consistency to the regional tier of planning policy.	Noted. Support welcomed.	Policy G5: Urban Greening – London Plan – Ealing LPA – local variation		Amelia Hunt	Commercial	715	Developer
Design Draft Policy DDA of the DNLP sets out the Council’s approach to design and amenity, noting that development should ensure the protection of sensitive uses, be of high-quality design, ensure good levels of daylight, sunlight, and privacy, and have a positive visual impact. CEG support this policy in principle and the aspiration to create beautiful, high-quality places. High-quality design is fundamental to all of CEG’s development aspirations, making a strong contribution to their economic, social and environmental sustainability aims as a developer.	Noted. Support welcomed.	Policy DAA: Design and Amenity – Ealing LPA – local policy		Amelia Hunt	Commercial	715	Developer

Conclusion CEG find the policies within the DNLP to be overly constrained and raise concerns that the restrictive nature of the proposed policies will in turn hinder development and ultimately prevent LBE from delivering against its strategic ambitions to fight inequality and create good growth. A summary of the key comments and recommendations is as follows: 1. CEG support the Borough’s ambition to deliver a spatial strategy, however, it raises concerns that the strategies are not reflective of the market. As a result, the DNLP will constrain development, rather than deliver good growth. This is in direct conflict with national and regional policy. 2. Despite the housing crisis, the DNLP limits the definition of residential uses to only Use Class C3, which CEG consider to be overly stringent. This approach does not recognise the key role that alternate housing typologies play in meeting housing targets and creating mixed and balanced communities and is, therefore, not effective, justified, or positively prepared. To ensure soundness, the definition of residential uses should be amended to include specialist residential development typologies. 3. The DNLP places great weight on sustainably located brownfield sites and references how Site Allocations have the potential to support the delivery of the spatial strategy. Despite this, the DNLP places unjustified height caps on each Site Allocation which, if applied, would hinder the ability to deliver the DNLP’s Strategic Policies. Consequently, the DNLP is contradictory to national and	Noted, these are addressed above.	08EA Craven House		Amelia Hunt	Commercial	715	Developer

Stantec UK Limited have been instructed by Mount Anvil Limited to review and submit representations to Ealing Council (“the Council”) in respect of the Publication Draft Ealing Local Plan (“the Draft Local Plan”) dated 28th February 2024. The representations are submitted in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Mount Anvil have a long-standing interest in the borough and are currently working in partnership with registered provider, Peabody, to regenerate the Friary Park Estate in Acton. The estate regeneration is a strategically significant multi-phase estate regeneration project with planning permission in place for up to 1,228 homes and supporting non-residential facilities. The approved phasing plan for the development is shown in Figure 1 below. [Map showing site and phasing plan] Representations were previously submitted on behalf of Mount Anvil Limited in February 2023 in responses to the Regulation 18 Draft Local Plan, dated 30th November 2023. These representations are enclosed in Appendix A. The previous representations focused on supporting the Council’s vision to regenerate the area around Acton Mainline Station and the draft development site allocation for the Friary Park Estate. Modifications were suggested in relation to specific	Noted	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Gary Stevens	Mount Anvil	716	Developer

Scope of representations The focus of these representations is the Council’s approach to Development Management Policy D9: Tall Buildings London Plan – Ealing LPA – Local Variation. Mount Anvil consider the policy as currently drafted is unsound and requires modification. These representations focus on the effects the policy wording as drafted would have on the regeneration of the Friary Park Estate and explain how the policy could frustrate otherwise reasonable development proposals to the detriment of housing supply in the borough. The feedback contained in the previous representations Regulation 18 Draft Local Plan also remains unresolved and should be therefore read in conjunction with these comments. Legislative and planning policy context Reproduction of requirements of: - The Planning and Compulsory Purchase Act 2004, as amended (PCPA) - Para 35 of NPPF, 2023 concerning preparation and examination of Local Plans - Para 36 NPPF - Section 24 (1) (b) of PCPA - general conformity with London Plan - London Plan Review, Feb 2024 - Government consultation on changes to national policy to strengthen planning support for brownfield development	Noted	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Gary Stevens	Mount Anvil	716	Developer

The Council has acknowledged in its Five Housing Land Supply Position Statement and Housing Trajectory (November 2023) that forms part of the evidence base to the Publication Draft Local Plan that it can only demonstrate a 3.7-year housing land supply. A shortfall of units against the London Plan 2020-2040 housing target of 43,190 has been identified by the Council, when accounting for total planning permissions, allocations and small site contributions. When measured against the cumulative requirement, the identified supply equates to 75% of the housing target, with a shortfall of 3,935 homes. In addition, the most up to date Housing Delivery Test: 2022 Measurement published in December 2023 noted that the Council failed to deliver the required number of homes over the last 3 years with only 86% of its housing target met. These representations should therefore be considered in light of the significant unmet need for housing in the Borough. Opportunities to support growth and housing delivery should be strongly supported in accordance with the Government's objective to support brownfield development.	Noted. The Council does recognise the challenge. The targets represent a significant step change from those established previously and the influence of any new policy interventions will take time to impact on rates of delivery. Whilst the shortage of deliverable supply over the next five years is acknowledged, it should be borne in mind that the Council has adopted a fairly precautionary approach when determining which large sites qualify as 'deliverable', i.e. those whose capacity is assigned to the 'next five years'. Only capacity from sites benefitting from full permission have been included, when in reality some capacity might be delivered during that period from sites which are currently less advanced in the planning cycle. It is possible then that the identified deliverable capacity might underestimate what supply could potentially be delivered within that window of time. As detailed in the report itself, the position when examined over a longer timeframe, is more positive. Over the full 19 year trajectory period delivery/supply is expected meet the cumulative requirement with a modest contingency. Whilst it is helpful to examine the position over a longer timeframe to even out the inevitable fluctuations that can occur from year to year, the use of a longer timeframe also poses challenges. This is particularly evident for the latter part of the trajectory period where it is difficult to comprehensively identify which sites might be available and suitable that far into the future. As a consequence it is probable that the trajectory undercounts what capacity might be delivered over the life of the plan.	SP4.3 Genuinely affordable homes		Gary Stevens	Mount Anvil	716	Developer

POLICY D9: TALL BUILDINGS LONDON PLAN – EALING LPA – LOCAL VARIATION [Details of National and Regional planning policy context - NPPF paras 128 - 130 and London Plan Policy D9] Analysing the draft policy and evidence base Policy D9 of the Council’s Draft Local Plan includes an area-based approach to defining different tall building heights across the borough. The building height thresholds have been informed by Tall Building Strategy with site guidance appendix for the London Borough of Ealing (February 2024) (“the Tall Building Strategy”) that forms part of the evidence base to the Draft Local Plan. Tall buildings beyond these thresholds are to be “exceptional and should be located within specified Development Sites as defined in the development plan” (emphasis added). Mount Anvil are supportive of the principle of an area-based approach to defining tall buildings in different locations across the borough. However, the current approach is flawed and does not correctly recognise existing tall building clusters or reflect the up-to-date planning permissions that have already permitted tall buildings.	Support welcomed	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Gary Stevens	Mount Anvil	716	Developer

Table DMP1 and Figure DMP1 of the Draft Local Plan, included in Figures 2 and 3, map out the building height thresholds across the borough. The Friary Park Estate falls within the Area A4, which sets a tall building definition of 14 storeys or 49 metres. Two significant planning permissions (LPA refs: 193424HYBRID & 221747HYBRID) were granted in November 2020 and May 2023 to regenerate the former social housing estate with a high- density development including buildings up to 24 storeys and 106.47 metres in height. Development commenced in March 2021 and is approaching the mid-way point of the construction process with the 24 storey building having topped out. Importantly, the third and final phase of the regeneration, as shaded yellow on the phasing plan included at Figure 1, has yet to be delivered. [Table DMP1 and Figure DMP1 from draft Local Plan Reg 19] Policy A4 of the Draft Local Plan identifies the Friary Park Estate as key to creating a new neighbourhood in and around Acton Mainline Station. Paragraph 4.1.25 of the Draft Local Plan notes that the area has an important role to play in delivering a significant number of new homes and supporting the local economy. Despite this, the Friary Park Estate has not been included amongst in the Development Sites forming part of the Draft Local Plan. The Council's Tall Building Strategy includes a sieving exercise that defines several parts of the borough as 'appropriate locations' for tall buildings. Notwithstanding the implemented planning permission for the site, the Tall Building Strategy identifies Friary	Noted. Friary Park was removed as draft site allocation because the principle of development has already been accepted and Phases 1 and 2 are already under way with the final phase expected to go to planning committee in the New Year (2025).	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation	Policy A4: Acton Main Line Station and Environs	Gary Stevens	Mount Anvil	716	Developer

Regulation 18 representations The Friary Park Estate was included as a Development Site, as shown at Appendix B, as part of the Regulation 18 version of the Draft Local Plan. Mount Anvil’s representations to the Regulation 18 consultation (enclosed at Appendix A) supported the emerging allocation but suggested modifications to correct the inaccuracies in the building height parameters and other aspects of the policy wording. However, at the Regulation 19 stage this draft allocation has been removed. Paragraph 0.23 of the draft New Local Plan states that “regarding the Development Sites that accompany each Town Plan there have also been a number of significant changes to the list published at Regulation 19. These changes are also based upon public and stakeholder feedback at Regulation 18 together with a further assessment of site suitability and deliverability”. Section 2.2 of the Local Plan Regulation 19 Site Selection Report: Main Report (January 2024), which forms part of the evidence base to the Draft Local Plan, adds that 35 sites, including Friary Park, were removed from the Regulation 19 version of the Local Plan for a variety of reasons. These included removing sites where “construction has started/existing planning permission has been implemented” 3. This is despite Development Site allocations being retained	Friary Park was removed as draft site allocation because the principle of development has already been accepted and Phases 1 and 2 are already under way with the final phase expected to go to planning committee in the New Year (2025). The Friary Park development is not comparable with Acton Gardens or Havelock Estate. These schemes are far greater in scale, and are complex projects comprising several phases that will take at least 10 years to complete. It should be noted that the red line boundaries of both Acton Gardens and Havelock Estate have been amended to take into account the phases that have been completed.	Policy A4: Acton Main Line Station and Environs			Gary Stevens	Mount Anvil	716	Developer

Conclusion on soundness The urban context making up Area A4 is comprised of a mixture of building typologies, which include low-rise suburban housing and tall buildings, such as those at Friary Park. The Tall Building Strategy forming part of the evidence base to the Draft Local Plan has adopted a ‘weighted median’ method to defining building heights. However, the absence of a Development Site allocation for the Friary Park Estate and the inaccurate reference to the permitted building heights, means that the as built and emerging tall buildings exceed the tall building threshold in this area. It remains to be seen whether alterations will be required to third and final phase of the regeneration, which currently only benefits from Outline Planning Permission with all matters reserved. With the regeneration of the estate incomplete, Mount Anvil consider that the policy as currently drafted could be used to attempt to unreasonably frustrate future development proposals seeking to complete the Friary Park masterplan. The effect of the above is to create a confusing and contradictory policy framew+A1199+B679+596:596ork that is not consistent with the decisions the Council has already made in respect of the Friary Park Estate that will fail to support the delivery of much needed additional housing in the Borough.	Unclear what is being referred to. The Council is happy to correct matters of fact where they have a material effect on the evidence base, but the direction of policy is not constrained by historic planning approvals.	Policy A4: Acton Main Line Station and Environs		Gary Stevens	Mount Anvil	716	Developer

Table 1 Test of soundness ----Assessment Positively prepared:🔗 The policy as drafted is based upon inaccurate information that does not recognise the full capacity of the previously approved planning permissions for the site. The Council is unable to demonstrate a 5-year housing land supply and is failing to meet the Housing Delivery Test. The Friary Park Estate is sustainably located adjacent to Acton Mainline Station, which the Council has identified as a strategic area of regeneration. The policy wording could create further barriers that may in turn frustrate the delivery of additional homes at the Friary Park Estate that in turn could limit the Council’s ability to meet identified housing needs. Consistent with national policy: Paragraphs 128-130 of the NPPF make clear that policies should support development that makes efficient use of land. Paragraph 129 of the NPPF notes where there are existing or anticipated shortages of land for meeting identified housing needs policies should avoid homes being built at low densities. The consented proposals at Friary Park will result in a step change in the density of development on the site. The Council is, however, encouraging through the Draft Local Plan for the area around Acton Mainline Station to be regenerated. The densification of the area has also already been established through the extant planning permissions for the site. Accordingly, the policy as drafted would not be consistent with the NPPF’s clearly stated requirement for policies to support the efficient use of land and promote housing delivery.	It does not follow that any policy restriction on heights will prevent the efficient use of land or be inconsistent with the NPPF. Ealing's evidence on housing supply is set out in the submission documents.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Gary Stevens	Mount Anvil	716	Developer

SUGGESTED MODIFICATIONS This section of the representations sets out the suggested modifications to Policy D9 to resolve the previously identified soundness issues. Mount Anvil Ltd would recommend that the Development Site allocation included in the Regulation 18 version Local Plan is reinstated and modified as follows: a. ~~Site~~ boundary revised to relate to the phase 3 site area as shown in Appendix C. b. ~~Amend~~ the following allocation details (original text struck through with new text emboldened): i. ~~Site area: 2.79 hectares~~ 2.83 hectares ii. ~~Height: 6-14 storeys~~ 2-24 storeys (up to 107 metres AOD) iii. ~~Flood zone: Flood Zone 3a~~ Flood Zone 1 iv. ~~Ownership: Council/private~~ Private In addition, the following corrections to the Tall Building Strategy are required to ensure that the accompanying evidence base aligns with the associated local plan policy: a. ~~Swap~~ Zone A and B around on appropriate locations diagram at page 13 of the Tall Building Strategy. b. ~~Amend~~ the key to the diagram to refer to the correct ~~building heights as noted above~~	Friary Park was removed as draft site allocation because the principle of development has already been accepted and Phases 1 and 2 are already under way with the final phase expected to go to planning committee in the New Year (2025). The Friary Park development is not comparable with Acton Gardens or Havelock Estate. These schemes are far greater in scale, and are complex projects comprising several phases that will take at least 10 years to complete. It should be noted that the red line boundaries of both Acton Gardens and Havelock Estate have been amended to take into account the phases that have been completed.	Policy A4: Acton Main Line Station and Environs		Gary Stevens	Mount Anvil	716	Developer
SUGGESTED MODIFICATIONS In addition, the following corrections to the Tall Building Strategy are required to ensure that the accompanying evidence base aligns with the associated local plan policy: a. ~~Swap~~ Zone A and B around on appropriate locations diagram at page 13 of the Tall Building Strategy. b. ~~Amend~~ the key to the diagram to refer to the correct building heights as noted above.	Unclear what is being referred to. The Council is happy to correct matters of fact where they have a material effect on the evidence base, but the direction of policy is not constrained by historic planning approvals.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Gary Stevens	Mount Anvil	716	Developer

CONCLUSION Stantec UK Limited have been instructed by Mount Anvil Limited to review the Draft Local Plan dated 28th February 2024 prepared by Ealing Council and submit these representations under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The representations relate to Policy D9: Tall Buildings London Plan – Ealing LPA – Local Variation of the Draft Local Plan and the accompanying Tall Buildings Strategy. The representations consider Policy D9 within the context of the Friary Park Estate in Acton, which is a strategically significant estate regeneration project that is partially complete. Our review of the Draft Local Plan has revealed several errors and inaccuracies with the Council’s characterisation of the Friary Park Estate and an inconsistent approach to the use of Development Site allocations compared to other allocations in the Draft Local Plan. With the regeneration of the estate incomplete, Mount Anvil consider that the policy as currently drafted could be used to attempt to unreasonably frustrate future development proposals seeking to complete the Friary Park masterplan. The policy fails to support additional housing and density in a highly sustainable location. As such, the policy cannot be considered to be positively prepared, consistent with national policy or in general conformity with the London Plan. The draft policy therefore fails the tests of soundness described at paragraph 35 of the NPPE and	Unclear what is being referred to. The Council is happy to correct matters of fact where they have a material effect on the evidence base, but the direction of policy is not constrained by historic planning approvals.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Gary Stevens	Mount Anvil	716	Developer

We are instructed by our client, Wickes Building Supplies Limited (‘WBS’), to submit the enclosed representations to the consultation on the Regulation 19 Version of the Ealing Local Plan. WBS is a key stakeholder in the Borough, with an existing Wickes branch at 89 South Ealing Road, Ealing, W5 4QS (‘the Site’). This existing branch provides an important outlet for residents and local tradesmen and builders, particularly given the shortage of similar facilities in the Borough. The existing branch also generates important employment opportunities for the local community. It is against this background that the representations have been submitted. Context The Site extends to 0.66 hectares and comprises the existing Wickes branch and adjacent car park. WBS has been trading from the Site since 2003. The lease expires in June 2031 however WBS have a strong desire to continue trading from this location given its strong performance and the important role it plays in the local area. Indeed, the Site is strategically located being within the defined Neighbourhood Centre of South Ealing in an easily accessible location.	Noted.	24EA Wickes, South Ealing Road		Adrian Fox	Wickes Build	717	Developer
Draft Spatial Policy E4 Within the Regulation 19 Local Plan, the Site continues to be identified as forming part of the defined South Ealing Neighbourhood Centre. Draft Spatial Policy E4 (‘Southern Ealing and Ealing Common’) outlines that the strong local character and facilities will be maintained and strengthened by reinforcing neighbouring centres at Northfields and South Ealing. The Council’s aspiration to strengthen and reinforce the existing neighbourhood centres is supported by WBS. Indeed, such an approach is consistent with both the National Planning Policy Framework and the London Plan.	Support welcomed	Policy E4: Southern Ealing and Ealing Common		Adrian Fox	Wickes Build	717	Developer

Site Allocation 24EA The Site is allocated under draft Allocation 24EA (Wickes, South Ealing Road) for a residential-led mixed-use development, with an indicative timeframe for delivery of between 2028/29 and 2032/33. However, as previously highlighted WBS has an existing lease until June 2031 and are looking to extend this. Consequently, the delivery of the Site for alternative uses, particularly in the suggested timetable, is unlikely. The supporting text to this allocation, when considering design principles for the site, goes on to state that: “A residential-led mixed use development is preferred, with an approach that responds to the varying residential/retail frontage along South Ealing Road, which may benefit from the inclusion of some small commercial units.” Whilst recognition that commercial units should be provided is welcome, the proposed design principles considers that this will only be ‘small’ units. Such an approach is at odds with the assessment undertaken for the Site as part of the evidence base underpinning the emerging Local Plan (Site Selection Report of Regulation 19 Local Plan1), which recognised that the Site is in active use but that this use could be re-provided as part of the development. However, this suggestion is not reflected in the proposed wording of the draft allocation.	Noted	24EA Wickes, South Ealing Road		Adrian Fox	Wickes Build	717	Developer

Against this background, as currently drafted in reviewing the requirements of the NPPF (paragraph 35) we strongly believe that the Local Plan is unsound for the following reasons: ~~Not~~ positively prepared – the Local Plan fails to provide a strategy to meet the area’s needs. Future needs should not be focused only housing needs. The loss of the existing use on the Site, along with the loss of similar facilities elsewhere in the Borough (as proposed by the emerging Local Plan) and throughout London will mean that local needs are not being met. ~~Not~~ justified – the potential for the existing use to be retaining on site is not considered. All reasonable alternatives have not been assessed and the current approach does not provide an appropriate strategy. ~~In~~consistent with nation [sic] policy – the approach fails to seek to meet all needs in the Borough, contrary to the requirements of the NPPF. Against this background, it is essential that the proposed allocation specifically identifies the need to retain the existing use on site – as was recognised by Council in identifying the site as having potential for redevelopment (Site Selection Report of Regulation 19 Local Plan). This is particularly important to achieve the wider objectives of the Local Plan	Noted	24EA Wickes, South Ealing Road		Adrian Fox	Wickes Build	717	Developer

In this context the following suggested revisions are put forward to the draft allocation for the Site (revised text in bold and underlined and replaced text struck through): PROPOSED USE Residential led, mixed use <u>development, that incorporates the retention of existing builders merchant</u> DESIGN PRINCIPLES A residential-led mixed use development is preferred, with an approach that responds to the varying residential/retail frontages along South Ealing Road, <u>and retains the existing builders’ merchant to retain active frontage at ground floor</u> ~~which may benefit from the inclusion of some small-commercial units.~~ These proposed changes will ensure that the important existing use is retained, which acts as an anchor for the neighbourhood centre.	We consider allocating a specific retail use could constrain proposals for this site. The proposed 'mixed use' is flexible enough to allow the retention of the builders merchant should that be part of any proposal for the site. We suggest amending the first Design Principle to read: A residential-led mixed use development is preferred, with an approach that responds to the varying residential/retail frontages along South Ealing Road, which may be benefit from the inclusion of some ~~small-commercial units~~ <u>provision at ground level.</u>	24EA Wickes, South Ealing Road		Adrian Fox	Wickes Build	717	Developer

Summary The existing Wickes at South Ealing Road is a successful branch and one that WBS want to continue to trade from acting as an anchor for the Neighbourhood Centre and providing an important role in meeting existing and future need. Any allocation that does not seek to retain the existing builders’ merchant is unsound. It is important that local planning policy recognises the important role builders’ merchants play and the implications of their loss. Within this context, and the important role the existing use plays for the wider vitality and viability of the neighbourhood centre, the existing use should be retained as part of any future redevelopment of the Site. This is in line with the policies within the London Plan as well as the NPPF which encourages local planning authorities to seek out opportunities for redevelopment and to not hinder development opportunities. It is against this background that we wish to participate in the hearing sessions, on behalf of our client, Wickes Building Supplies Limited. {Suggested modification:} ~~A currently drafted in reviewing the requirements of the~~	Noted. Amendment to Design Principle has been suggested to address this issue (see above).	24EA Wickes, South Ealing Road		Adrian Fox	Wickes Build	717	Developer

This written representation is submitted by Savills (UK) Limited (hereafter known as ‘Savills’) in response to the London Borough of Ealing’s (‘LBE’) invitation to submit comments in respect of a public consultation on the Regulation 19 draft of the new Local Plan. These comments are submitted on behalf of AAGL Ventures (‘AAGLV’). As a landowner within the Borough, AAGL Ventures welcomes the opportunity to be involved in shaping the future of LBE via the Regulation 19 Local Plan consultation. AAGLV has an interest in the site at 44 Colville Road, Acton, W3 8BL (‘the Site’) in the LBE. The Site has the potential to deliver a number of planning and public benefits through the redevelopment of brownfield land in a highly sustainable location, in accordance with national and regional policy. As such, AAGLV would like to take the opportunity to work with the LBE and other stakeholders to ensure that the development potential of the Site can be optimised. AAGLV supports the preparation of a New Local Plan for the Borough and looks forward to positively engaging with LBE through the plan-making process going forward.	Noted.	Policy A1: Acton Spatial Strategy		Lucy Wakelin	AAGL Ventur	718	Developer

AAGLV, on behalf of the owners of the Site, has been exploring the opportunity for redevelopment and site optimisation at 44 Colville Road. In discussion with Ealing Council, AAGLV has been actively involved with the alterations made to the now approved planning application, 19/5284/FUL, on the adjoining site at Stanley Road, with a view to bringing 44 Colville Road forward in the future. The Site has been under its current ownership since 2002. During this time, the surrounding local area has seen a significant shift from industrial-led development to a more diverse mixture of uses such as residential and commercial, achieved through co-location. The major upgrade of the two local stations, the opportunity to co-locate uses, and the emerging tall buildings context present an opportunity to optimise the Site to deliver a range of complimentary land uses, including much-needed housing across a range of tenures, including PBSA, co-living, open market and affordable housing. More generally, Acton as a whole benefits from excellent connectivity and significant planned infrastructure investment making it a prime location for significant levels of development over the Draft New Local Plan Period. LEGISLATIVE FRAMEWORK	Noted.	Policy A1: Acton Spatial Strategy		Lucy Wakelin	AAGL Ventur	718	Developer

The following section outlines the detailed comments of AAGLV in respect of the draft Local Plan. We hope that the Council find these of use in their ongoing preparation of the draft Local Plan. Draft Policy SP1: A Vision for Ealing (pg. 65) Draft Policy SP1 sets out the 15-year vision for Ealing, which has been aligned with the Borough’s core themes. Draft Policy SP1 (a) notes that ‘The unique characteristics and cultural identities of each of Ealing’s seven towns will be respected and enhanced, through the application of locally sensitive Good Growth principles.’ AAGLV understands the need to have regard to the existing character and identity of a place and respond to existing townscape characteristics. Draft Policy SP1(a) should specify the need to have regard to these matters through the application of the Design-Led approach, as set out in London Plan Policy D3.	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on design. Ealing’s Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. The Mayor of London has not raised any objections to this approach.	Policy SP1: A Vision for Ealing		Lucy Wakelin	AAGL Ventur	718	Developer
Draft Policy SP4: Creating Good Jobs and Growth (pg. 78) Draft Policy SP4 outlines that growth should be directed to sustainable locations that are well-connected to transport modes or within close proximity to town centres. This is supported. Part C outlines the need to ensure that the most efficient use of land is made so that development on sites is optimised. This will be particularly important in locations with excellent transport connectivity if development is to come forward in a sustainable way. Part D outlines that LBE will promote Good Growth by ‘following a character-led and contextual approach to growth that optimises the capacity of sites while reflecting the valuable components of the built environment.’ The ‘character-led and contextual approach’ should be replaced with the ‘Design-Led’ approach, as outlined within London Plan Policy D3.	Noted	Policy SP4: Creating good jobs and growth		Lucy Wakelin	AAGL Ventur	718	Developer

Strategic Place Interventions (pg.87) The spatial strategy is underpinned by a series of strategic place interventions. These are cross-cutting and often support multiple strategic priorities. Number 5 reads as follows: ‘Delivery of moderate levels of development along key north-south corridors in Acton and west of the borough.’ Paragraph 3.66 notes that the planned rail-based public transport investment in the West London Orbital at Acton Central Station and South Acton Station will enable Acton to capitalise on its excellent existing and future connectivity to accommodate significant levels of new development. This is strongly supported. Development sites, such as 44 Colville Road, which are located within proximity to Acton Central and South Acton Station should be optimised in line with national policy. As set out by London Plan Policy Part (B), ‘Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling...’.	Noted. London Plan Policy GG2 D says that a design led approach must be adopted to determine the optimum capacity of sites and the local plan seeks to direct development to appropriate geographies. This is informed by a Spatial Options Report which is part of the local plan evidence base.	Policy SP1: A Vision for Ealing		Lucy Wakelin	AAGL Ventur	718	Developer
Acton Town Plan – Opportunities for Acton (pg. 103) AAGLV strongly supports paragraph 4.1.19 which highlights the opportunity for Acton’s town centres ‘to provide a wider range of housing types and tenures. This could include family housing and alternative accommodation types that provide high-quality affordable housing options that are accessible to low- income and younger people.’ (bold emphasis added). This reflects paragraph 3.58 which states that ‘The Local Plan provides a flexible policy framework to manage housing provision based upon demonstrated needs...’ and echoes national policy in seeking to ‘meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community.’(NPPF 2023, para 60).	Noted. Support welcomed.	Policy A1: Acton Spatial Strategy		Lucy Wakelin	AAGL Ventur	718	Developer

Policy A1: Acton Spatial Strategy (pg. 108) AAGLV strongly supports the spatial strategy set out for Acton which is summarised well by paragraph 4.1.23: ‘Acton represents a significant opportunity for investment to deliver improved employment and housing opportunities. The spatial strategy seeks to capitalise on Action’s excellent transport infrastructure and employment opportunities at North Acton (Central line) and (once completed) Old Oak Common (London Overground, Great Western Railway, Elizabeth line and High Speed 2) and use these as a catalyst for regeneration of the area.’ Draft Policy A1 recognises the opportunity to optimise land and deliver growth within Action, alongside the existing and planned infrastructure and transport connections which the area benefits from.	Noted. Support welcomed.	Policy A1: Acton Spatial Strategy		Lucy Wakelin	AAGL Ventur	718	Developer

Policy A3: South Acton (pg. 116) Draft Policy A3 part (iii) advocates for a master planning-led approach to the South Acton Locally Significant Industrial Site, ensuring industrial employment sites are safeguarded and intensified with improvements to their local connectivity and supporting functions. The draft policy wording does not reference the opportunity for the co-location of uses within the South Action LSIS. Paragraph 6.7.1 of the London Plan clearly sets out that all boroughs are encouraged to explore the potential to intensify industrial activities on industrial land to deliver additional capacity and to consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses. Whilst the opportunity for co-location is covered within supporting text paragraph 4.1.40(i), given the increasing need to deliver housing within London, it is AAGLV view that co-location should be explicitly referenced within the wording of draft policy A3. This would make clear that the co-location of light industrial uses with residential uses to deliver new homes while protecting economically valuable industrial floorspace and jobs is supported where guided by a masterplan approach.	This is addressed in Policy E6 which makes clear that the plan makes no presumption about the suitability of any LSIS for mixed uses.	Policy A3: South Acton		Lucy Wakelin	AAGL Ventur	718	Developer

Policy D9: Tall Buildings London Plan – Ealing LPA – local variation (pg. 458) Draft Policy D9 defines the parameters of taller buildings across the borough in Table DMP1, stating that ‘tall buildings above this threshold should be located upon allocated development sites defined in the development plan’. AAGLV consider Draft Policy D9 to be negatively worded and overly restrictive, contradicting several other strategic objectives of the draft plan, such as the direction of growth to the most sustainable locations across the Borough. This restrictive policy position also conflicts with adopted tall buildings policy at the regional level. For example, Policy D9 of the London Plan does not preclude tall buildings from coming forward outside of ‘appropriate locations’ chosen by the Council. Rather, Policy D9 allows for Local Plans to cite what may be an ‘appropriate’ height while providing the flexibility for judgment through the Development Management process in terms of what an acceptable height may be. As such, Draft Policy D9 should specify that building heights are only indicative and outline that, where a case for taller buildings is capable of being made against London Plan Policy D9(c), this should be subject to a full and detailed assessment against development management policies at the application stage to determine whether it is ‘appropriate’ for the particular site in question.	Maximum heights will now be changed to recommended heights in line with GLA advice on the application of London Plan policy.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Lucy Wakelin	AAGL Ventur	718	Developer

Policy HOU: Affordable Housing – Ealing LPA – local policy (pg. 460) AAGLV question Paragraph 5.18 which states that ‘specialist forms of housing such as co-living and houses of multiple occupation (HMOs) [...] may make a valuable contribution to housing supply in particular circumstances but will not be generally acceptable across the Borough’. Not accounting for types of specialist housing such as that for students, older, vulnerable, and disabled people is contradictory to the strategic aim to deliver residential growth across the borough. Further, AAGLV finds paragraph 5.18 to be directly contradictory to Paragraph 3.58 which states that ‘mixed and balanced communities are [...] important for access to housing, improving inequality, and reducing social isolation’. There is significant local demand for PBSA in LBE, with the student-to-bed ratio for the borough sitting at 4.9, one of the highest ratios in London. Accordingly, there is a clear undersupply of student accommodation in Ealing and a strong demand for additional bed spaces. Further, in the context of the wider housing crisis, the Department for Levelling Up, Housing and Communities recognises the ability of student housing to meet local housing needs by directing PBSA to be counted at a rate of 1:2:5 units within the housing delivery test measurement. NPPF Paragraph 63 also directs planning policies to recognise “the size, type and tenure of housing needed for different groups in the community [...] (including, but not limited to, students)”	None of Ealing's identified housing needs are for LSPBSL or Student Housing and its provision will not meet any of these. Need for individual schemes will need to be demonstrated on a case by case basis.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Lucy Wakelin	AAGL Ventur	718	Developer

Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation (pg. 462) Draft Policy H16 states that the development of large-scale shared living will only be permitted within the Ealing Metropolitan Town Centre. This wording directly conflicts with Draft Policy SP4.3 Part F which states that the council will support mixed and balanced communities by avoiding over concentrations of particular tenures. It also directly contradicts paragraph 3.58 which states that the Local Plan provides a flexible policy framework to manage housing provision based upon demonstrated needs and according to local character and amenity. As currently drafted, the Local Plan on one hand directs development to well-connected locations with high development and investment potential (such as South Acton), whilst on the other hand, precludes the development of a certain type of housing tenure outside of one town centre within the borough. This is contradictory and undermines the strategic objectives of the plan as a whole. All types of residential accommodation contribute to reducing the significant demand for housing and help to address the housing shortage. In this regard, different types of residential accommodation, such as PBSA and co-living, should be positively encouraged to come forward within well-connected and suitable locations across the borough. In line with the comments made in the section above on the rigidity	There is no demonstrated need for LSPBSL anywhere in the borough and this type of development does not therefore meet identified housing needs. LSPBSL is restricted to EMTC because of the negative effects of these types of development in areas with limited facilities.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Lucy Wakelin	AAGL Ventur	718	Developer

Policy E4: Land for Industry, Logistics and Services to Support London's Economic Function – London Plan – Ealing LPA – local variation (pg. 466) Draft Policy E4 Part 2(ii) states that LSIS sites may be acceptable for mixed intensification subject to an agreed masterplan. As per the comments made on Draft Policy A3 regarding co-location, Draft Policy E4 does not reference the opportunity for the co-location of uses within an LSIS. Paragraph 6.7.1 of the London Plan clearly sets out that all boroughs are encouraged to explore the potential to intensify industrial activities on industrial land to deliver additional capacity and to consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses. In the context of increasing housing need, AAGLV feels that co-location should be explicitly referenced within the wording of draft policy E4 to make clear that the co-location of light industrial uses with residential uses to deliver new homes while protecting economically valuable industrial floorspace and jobs is supported where arrived at by a masterplan approach.	This is addressed in Policy E6 which makes clear that the plan makes no presumption about the suitability of any LSIS for mixed uses.	Policy E4: Land for Industry, Logistics and Services to Support London's Economic Function – London Plan – Ealing LPA – local variation		Lucy Wakelin	AAGL Ventur	718	Developer
On behalf of our client, Bellaview Properties Limited and Builder Depot Limited, we hereby make the following representations in respect of the Regulation 19 Consultation of the Draft Local Plan. Comments are raised in respect of the Acton Development Sites Section of the Local Plan, and specifically in respect of the proposed withdrawal of Allocation AC12 (Acton Crossrail Station Sidings) that was previously included within the Regulation 18 draft of the Local Plan.	Noted.	Policy A4: Acton Main Line Station and Environs		Jake Tubb	Bellaview Pro	720	Developer

Bellaview Properties Limited and Builder Depot Limited own the site at 239 Horn Lane, Acton, London, W3 9ED for which planning permission was granted under planning permission reference 225069FUL on 29 December 2023 for: “Construction of a building ranging in height from 6 to 15 storeys, to provide builders merchants (Use Class Sui Generis) at ground floor level, and 185 self-contained residential units (Use Class C3) and associated amenity space at first floor level and above; hard and soft landscaping works; provision of car and cycle parking; works to provide means of access for both pedestrians and vehicles from Horn Lane and all other works incidental to the development. (Following demolition of existing builders merchants)” Whilst 239 Horn Lane benefits from planning permission, to date that permission has not been implemented or built. The site, along with Acton Crossrail Station and 265, 267, 305 and 207 Horn Lane is currently allocated under the adopted Development Sites DPD (reference ACT6). The current allocation (Ref. ACT6) is under multiple ownerships but notably includes the site south of the railway line (i.e. the site under Bellaview Properties Limited and Builder Depot Limited’s ownership that benefits from extant planning permission ref.225069FUL) will be, “...expected to contribute to an improved sense of place around the redeveloped station through delivery of a high density, high quality mixed use	Noted. A decision was made not to include the wider site in the Reg 19 Local Plan because of the opposition of other (major) landowners , safeguarding issues (notably for waste and aggregates) and the fact the overall site is not deliverable over the plan period. Policy A4 B still includes a commitment to explore the potential for mixed use development at Acton Sidings through either consolidation or suitable off site reprovision of the existing waste and aggregates facilities. Regarding the much smaller site at 239 Horn Lane, the principle of development is accepted and is confirmed by the extant planning permission. Policy A4 A sets out proposals to create a new neighbourhood centre at Acton Main Line Station (and the nearby Friary Park Estate) as part of the wider regeneration of the area building upon potential new development opportunities and this site would meet this policy aspiration in particular by providing new homes.	Policy A4: Acton Main Line Station and Environs		Jake Tubb	Bellaview Properties Limited	720	Developer

Development Site AC12 (Acton Crossrail Station Sidings) The Regulation 18 Draft Local Plan included Allocation Ref. AC12 (Acton Crossrail Station and Sidings) which comprised a 11.65 hectare site including land to the north of the railway (the existing waste and aggregate site) and Bellaview Properties Limited and Builder Depot Limited’s site at 239 Horn Lane on the southern side of the railway. The site allocation identified the proposed use of “Residential-led, mixed-use development with significant provision for community space and possibly ground floor retail. Waste and aggregates capacity will need to either be reprovided on site or relocated to a suitable alternative site”. The Allocation identified that the site falls within a potential area appropriate for tall buildings, with an indicative height of 6-18 storeys given. It is noted that proposed Allocation Ref. AC12 has been withdrawn from the Regulation 19 draft of the new Local Plan. The Site Selection Report at Appendix E of the evidence base indicates the reason for the site allocation being removed as follows, “The site scores poorly across the deliverability criteria. Site owners and leaseholders have objected to the allocation of the site, citing the importance of the railway and railhead for waste management and aggregates uses, which would be difficult to reprovide elsewhere.” ~~Whilst not explicitly considered within The Site Selection~~	The withdrawal of a proposed site allocation does not preclude development coming forward on the whole or part of the site. Any proposals will need to meet existing Local Plan policies, and relevant policies contained within the Reg 19 draft Local Plan, which will be given substantial weight in line with Para 49 National Planning Policy Framework (NPPF).	Policy A4: Acton Main Line Station and Environs			Jake Tubb	Bellaview Pro	720	Developer

No objection is raised to the proposed withdrawal of the land located to the north of the railway line from a future site allocation; however, the land under the ownership of Bellaview Properties Limited and Builder Depot Limited which is located to the south of the railway line (see Appendix A) and is currently subject to an allocation within the adopted Development Sites DPD and formed part of draft allocation ref. AC12 in the Regulation 18 draft of the Local Plan should continue to benefit from an allocation in the new Local Plan once adopted. Whilst 239 Horn Lane benefits from planning permission, to date that permission has not been implemented or built. If, for any reason the development as approved under application reference 225069FUL was not to come forward as part of that permission, the site continues to have the potential to contribute to significant regeneration which should be reflected in a site allocation. The site at 239 Horn Lane is highly accessible and a desirable location. Its proximity to the high frequency services on the Elizabeth Line, as well as local bus services would encourage sustainable forms of transportation for future residents. Additionally, the site is particularly accessible via the Elizabeth Line to the University of West London campus and east to central London campuses.	Noted	Policy A4: Acton Main Line Station and Environs		Jake Tubb	Bellaview Pro	720	Developer

Quod is submitting representations on behalf of Berkeley Homes (Southall) Limited (“Berkeley”) to the London Borough of Ealing’s (‘LBE’) new Local Plan titled “Ealing’s Local Plan – Final Proposals (Regulation 19) dated 28 February 2024. The enclosed representations are being submitted to Ealing’s Local Plan – Final Proposals (Regulation 19) and are made primarily in respect of Berkeley’s land interest at the Site known as The Green Quarter (formerly Southall Gasworks). Our representation is therefore tailored to provide comments on the general approach and vision taken by the new Local Plan, the Southall Town Plan, the Green Quarter development site allocation (11SO) specifically, and all relevant development management policies. Berkeley is pleased to have the opportunity to engage with the Local Plan review process and hope that LBE find the enclosed comments helpful and are able to inform the final version of Ealing’s Local Plan that will go to examination later this year. Quod previously submitted representation on behalf of Berkeley as part of the Regulation 18 consultation on draft Ealing’s Local Plan which concluded on 08 February 2023.	Noted.	11SO The Green Quarter (Southall Gasworks)		Ewan Grunwald	Berkeley Hor	721	Developer

Berkeley Homes (Southall) Limited is a division of the Berkeley Group ('Berkeley') responsible for bringing forward the strategic redevelopment of the former Southall Gasworks site, now referred to as The Green Quarter. The Green Quarter is a strategic allocated development site within the LBE situated to the south west of Southall Town Centre and immediately west of Southall station. The Site is bound to the north by Beaconsfield Road, to the south by the Great Western Mainline and London Underground (Elizabeth Line) and to the west by the Grand Union Canal and the A312. The Site extends to approximately 35 hectares. Berkeley first became involved in The Green Quarter in 2014, and since then has invested substantially in site infrastructure, including remediation of the former gasworks, highway infrastructure including new junctions, bridge, and access roads. Berkeley has also delivered Phase 1 (623 homes) which includes new market and affordable homes and is currently onsite delivering Phases 2 and 3 having obtained reserved matters approval for 2,538 homes and 9,383sqm of flexible commercial floorspace across Phase 1, 2 and 3. Berkeley has fully remediated the Site, and completed significant enabling works including the new east/west Spine Road (Seva Drive), the new Western access and bridge via Pump Lane, and the new eastern access from South Road alongside new access	Noted.	11SO The Green Quarter (Southall Gasworks)		Ewan Grunwald	Berkeley Homes	721	Developer

The original (hybrid) planning permission was for: Outline application Demolition of 22 houses, the remediation of the land and redevelopment of site to deliver a large mixed-use development including residential, non-food retail, food retail, restaurant, bars and cafes, hotel, conference and banqueting, cinema, healthcare facilities, education facilities, office/studio units, sports pavilion an energy centre, multi-storey car park and associated car and cycle parking, landscaping and public realm, open space and children’s play. Full application New access roads from the Hayes By-Pass and Southall town centre to the application site for vehicle, cycle and pedestrian access including drainage and a flood relief pond. Widening of South Road across the railway line, for the creation of a bus lane and three new access onto Beaconsfield Road. Two bridges over the Grand Union Canal and Yeading Brook to provide pedestrian and cycle access to Minet Country Park and Springfield Road. Since the grant of outline planning permission in September 2010, both the LBE and LBH original planning permissions have been amended by Section 73 applications as well as a number of non- material amendment applications (LBE extant planning permission reference 171562VAB dated October	Noted.	11SO The Green Quarter (Southall Gasworks)		Ewan Grunwald	Berkeley Hor	721	Developer

Given the age of the original planning consent, the Site’s location within the Southall Opportunity Area, its close proximity to strategic transport and the Site’s strategic designation within the Local Plan; Berkeley in consultation with LBE submitted a new planning application in October 2023 which seeks outline planning permission for a new masterplan for the remaining phases of the original permission. The application seeks permission for the following: Outline planning permission for the demolition of existing buildings and structures on the site, comprehensive phased redevelopment to provide new buildings to accommodate new homes (Use Class C3), flexible commercial uses (Use Classes E and F1 and Sui Generis – drinking establishment), education uses (Use Class F1(a)), new sports hall (Class E), basement, energy centre, associated cycle and vehicle parking, landscaping, public realm, open space and children’s play space, and site preparation works. All matters reserved. The new masterplan has been validated and registered under planning application reference 234110OUT. Discussions between Berkeley, LBE and other statutory consultees are ongoing in respect of the proposals.	Noted.	11SO The Green Quarter (Southall Gasworks)		Ewan Grunwald	Berkeley Hor	721	Developer

Berkeley welcomes the preparation of Ealing’s Local Plan and the opportunity to input into the latest version. As a general principle, Berkeley consider that the new Local Plan should align itself with the requirements of both the National Planning Policy Framework 2023 (NPPF), as well as the adopted London Plan (2021). This approach will ensure consistency and continuity across all Development Plan documents and will ensure sufficient flexibility is incorporated into planning policies that will in turn realise the development potential of strategic development sites, such as The Green Quarter, and which will be pivotal in meeting LBE’s development needs. Paragraph 11 of the NPPF is most relevant, namely the presumption in favour of sustainable development. It requires that “plans and decisions should apply a presumption in favour of sustainable development”. For plan making this means the following: - a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.	Noted.	11SO The Green Quarter (Southall Gasworks)		Ewan Grunwald	Berkeley Hor	721	Developer

Chapter 3 Spatial Strategy Strategic place interventions Strategic place intervention no. 2 (paragraph 3.63) retains only moderate levels of employment-led growth and development above extant permissions in Southall whilst strategic place intervention no. 3 (paragraph 3.64) encourages significant levels of development in proximity to planned and proposed public transport infrastructure, which specifically references the Elizabeth Line. The investment in transport infrastructure has helped to improve connectivity within these area to and from Central London, Heathrow Airport, and other outer London town centres, and accordingly significant levels of development are to be focussed on these location to maximise the benefits of the capital investment and ensure accessibility of residents to opportunities within and beyond Ealing. Berkeley wholly supports the strategic approach to focus significant levels of development in locations that benefit from good public transport connectivity. This approach aligns with both national and regional planning policy approach. It is however noted that there is a disconnect between the levels of development to be accommodated in Southall (moderate) and the levels (significant) directed to locations that benefit from improvement in public transport infrastructure. To this regard, the new Elizabeth Line station site directly to the south	Noted. Support welcomed.	Policy SP1: A Vision for Ealing		Ewan Grunwald	Berkeley Hor	721	Developer

Berkeley therefore recommend that strategic place intervention no. 2 is updated to promote significant levels of employment-led growth and development across Southall to reflect the adopted Opportunity Area designation, and the significant capital investment that has been delivered in the form of the Elizabeth Line. The proposed amendment will ensure that the Local Plan is considered to have been positively prepared in accordance with Paragraph 16 of the NPPF. [Proposed modification] 2. Delivery of moderate levels of employment-led development at Southall 3.63 A range of measures will build upon and promoting Southall's role as a cultural hub and destination of national importance. Office, retail, and leisure-based development will be encouraged and reinforced to develop a more diverse and resilient local economy, while ensuring community and civic infrastructure is delivered alongside residential development. Accessibility to healthcare facilities and provision of new school spaces are key health determinants. Delivery of ~~moderate-significant~~ levels of employment-led growth and development above extant permissions will be brought forward. <u>The focus of growth will be to employment uses with the majority of development directed to locations in proximity to the Elizabeth Line station.</u>	Noted. Policies in the Local Plan were informed by the evidence base and early stakeholder consultation. This included the development of three 'reasonable alternative' spatial options to enable a preferred spatial option to be identified. The Spatial Options Report provides further details related to the strategic place interventions. Nonetheless, the significance of the Southall Quarter is rightly acknowledged and represents one of the largest regeneration schemes in London.	Policy SP1: A Vision for Ealing		Ewan Grunwald	Berkeley Hor	721	Developer
Chapter 4 – Town Plans – Southall Town Plan Issues to address in Southall Berkeley supports the Council's aspiration to create 20-minute neighbourhoods within the borough and specifically within Southall (paragraph 4.7.7). it is however unclear on what the geographic extent that is representative of 20-minute neighbourhood. This should be clarified with an indicative illustration provided.	Noted.	Policy S1: Southall Spatial Strategy		Ewan Grunwald	Berkeley Hor	721	Developer

Opportunities for Southall Paragraph 4.7.13 identified that most of the growth in Southall has been focused on building new homes. To rebalance this, the Local Plan supports moderate levels of development within Southall, which should be employment-led to deliver new jobs. As noted previously in these representations, the third strategic place intervention considers that significant levels of development should come forward in areas that are well connected to existing or proposed strategic transport infrastructure. This is further emphasised in paragraph 4.7.17, which states that the arrival of the Elizabeth line provides a clear rationale for large-scale regeneration at Southall and strategic sites near the new station. Berkeley welcomes this approach, however notes that the aspiration for only ‘moderate’ growth in Southall (strategic place intervention no. 2) does not align with strategic place intervention no. 3, the approach outlined in paragraph 4.7.17 or national and regional planning policy which seeks to maximise the development potential of strategic development sites in town centres and growth areas, including opportunity areas (NPPF paragraph 11 and London Plan polices GG2 and SD1). Berkeley therefore recommends that the strategic place intervention no. 2 and all associated supporting text including Paragraph 4.7.13 is updated to refer to ‘significant’ levels of development in Southall to align with Paragraph 4.7.17 and the significant opportunity presented by the Elizabeth Line.	Noted. Policies in the Local Plan were informed by the evidence base and early stakeholder consultation. This included the development of three ‘reasonable alternative’ spatial options to enable a preferred spatial option to be identified. The Spatial Options Report provides further details related to the strategic place interventions. Nonetheless, the significance of the Southall Quarter is rightly acknowledged and represents one of the largest regeneration schemes in London.	Policy S1: Southall Spatial Strategy		Ewan Grunwald	Berkeley Hor	721	Developer
Southall Spatial Strategy Figure S2: Southall Spatial Strategy Figure S2 provides an illustration of the spatial strategy for Southall. The illustration includes grey dots, which appear as a base layer to the plan. They do not appear to reference anything of significance and should be removed. Figure S2 includes a label reference to Policy S4 (West Southall). A clear boundary line should be provided for this policy area, or the label removed from the plan. The same approach should be applied for the other Southall specific policy areas to avoid any conflict in application of policies.	Noted.	Policy S1: Southall Spatial Strategy		Ewan Grunwald	Berkeley Hor	721	Developer

Policy S1: Southall Spatial Strategy Berkeley is broadly in support of the spatial strategy for Southall, however, wishes to make the following comments on Policy S1: Southall Spatial Strategy: • Part A: Berkeley agrees that new growth should be prioritised around Southall station in order to capitalise from its strategic investment and its highly sustainable location. • Part D: Berkeley supports the ambition for a new residential and commercial neighbourhood and an extension to Southall Major Centre as part of West Southall, however, distinction is required as much of the area identified as West Southall in Figure S2 sits outside of the proposed extension to Southall Town Centre. The areas outside of the extension would be considered ‘edge of centre’ and should not be the focus of the ‘commercial neighbourhood’ development, which should be a prioritised within the town centre in accordance with Paragraph 90 of the NPPF unless suitable and viable town centre sites are not available. • Part G (iii): seeks to identify opportunities for space for health infrastructure/services in new developments. Berkeley suggest that this text is revised to note ‘where there is demand or need’. Health infrastructure/services should not be provided for the sake of it and should only be delivered where there is an identified need. • Part J (ii): promotes innovative design solutions to facilitate inter-generational living both as part of new-build housing developments. Berkeley acknowledges that there is a clear need for intergenerational living in Southall, however intergenerational living cannot be easily met by developments that primarily offer apartment style accommodation, such as the case of The Green	Noted. The town centre boundary is already drawn in the current adopted plan and forms part of Southall Major Centre. Policy S4 covers the entire geographical are of the extant permission and recognises that the place making aspirations for the area are yet to fully achieved.	Policy S1: Southall Spatial Strategy		Ewan Grunwald	Berkeley Hor	721	Developer

Policy S2: Southall Major Centre Berkeley supports the ambition to maintain and enhance the range of retail, commercial, leisure and community uses in Southall Major Centre by strengthening and diversifying the commercial core through active frontages, mixed uses, active travel enhancements, public realm interventions and creating greener and safer spaces. To this regard, the supporting text recognises that the Southall Major Centre benefits from two main shopping parades; the Broadway and South Road. The existing shopping parades should be the priority for all new main town centres uses delivered within Southall Major Centre to ensure a strong commercial core is maintained. Policy S2 (vi) outlines Ealing’s aspiration to improve the out of hours and 24-hour offer of Southall’s centres to support shift workers and long-distance commuters, while avoiding amenity impacts. Berkeley supports the principle of this aspiration, but this must not have a detrimental impact on the amenity of local residents, and it may not be possible to accommodate out of hours offer in primarily residential areas or beyond transport hubs. Policy S2 makes no reference to the extension of Southall Major Centre to the eastern part of the Green Quarter development. This should be rectified and addressed within the supporting text.	Noted. Support welcomed. A suggested amendment is proposed regarding the extension of Southall Major Centre to the eastern part of the Green Quarter development.	Policy S2: Southall Major Centre		Ewan Grunwald	Berkeley Hor	721	Developer

Policy S4: West Southall The policy seeks to ensure the effective delivery of the new neighbourhood for the Southall Green Quarter site over the plan period. Berkeley wholeheartedly supports this. The policy refers to the extension of the Southall Major Centre, which is supported, however distinction should be provided on the boundary of the extension to align with the ‘Town Centre’ designated shown by Figure S2. This should be replicated by Policy S2. It goes on to state that upgrades to the Grand Union Canal towpaths will be delivered, however this would be to the discretion of the Canal and River Trust. The wording should be updated to reflect this: (ii) Improving bus and active travel measures to increase permeability and enhancing the public realm between the site, the town centre, Southall Station, and the Grand Union Canal including upgraded canal towpaths. The supporting text (Para 4.7.53) makes reference to the extant planning permission for the Green Quarter site, which was originally granted in 2010. The supporting text should be updated in the instance that the new masterplan, which is currently being determined by LDF, is approved before the	Noted. A suggested modification is proposed to supporting text that reflects the extant and revised planning permissions.	Policy S4: West Southall		Ewan Grunwald	Berkeley Hor	721	Developer

11SO The Green Quarter (Southall Gasworks) Berkeley continues to support the principles of The Green Quarter site allocation but wishes to make the following comments: • Site area (hectares): The site area for the entire Green Quarter development site is 35 ha. The red line on the site plan should therefore be amended to include the entire Green Quarter site in accordance with Appendix 1. • Proposed use: the proposed uses are in line with the extant planning permission, however this does not reflect the new masterplan application (referenced under the ‘Relevant Planning Application(s) section’), which once approved will grant consent for flexible commercial (Class E, F1 and Sui Generis - Drinking Establishment) and education (Class F1(a)) uses. Proposed revisions to the text are set out below: <u>A new neighbourhood comprising residential, employment and commercial uses, school and health centre (subject to needs-based assessment).</u>	Noted. A suggested modification is proposed to for the proposed use that reflects the extant and revised planning permissions. Policy S4 covers the entire geographical are of the extant permission and recognises that the place making aspirations for the area are yet to fully achieved. The site allocation 11SO covers a smaller geographical area representing Phases 4-9 of the development. This is becasue Phases 1-3 are already completed or have started and are close to completion, therefore the utility of including this within the red line of the site allocation is reduced.	11SO The Green Quarter (Southall Gasworks)		Ewan Grunwald	Berkeley Hor	721	Developer
• Tall Buildings: the principle of tall buildings is supported by Berkeley, however, the following changes are proposed to reflect the new masterplan heights: The site is in principle suitable for a tall building. Design analysis indicates a maximum heights of 63 metres (equivalent of 18 storeys).	The allocation already sets a height of 18 storeys/63 metres, and this will be noted as a recommended height in the final plan.	11SO The Green Quarter (Southall Gasworks)		Ewan Grunwald	Berkeley Hor	721	Developer
• Relevant planning applications: the site allocation refers to the pending planning application for the new masterplan (234110OUT). The application has yet to be determined and its inclusion may need to be reviewed, subject to the status of the application, prior to public examination.	Noted. The planning application is still pending permission. The reference to 234110OUT will be removed.	11SO The Green Quarter (Southall Gasworks)		Ewan Grunwald	Berkeley Hor	721	Developer

The ‘Design Principles’ supporting text should be updated to reflect the proposed revision to the Tall Building heights and provide a methodology as to how the proposed buildings height has been derived. The revised wording is provided below: Ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy. Heights are to range between 2 and a maximum of 18 storeys (63m). The indicative building heights include the top of parapet, excluding rooftop plant. The upper building height shall not exceed the maximum Heathrow CAA Limitation.	There is a note below the summary table on p.48 of the Tall Building Strategy explaining the building height assumptions as follows: "Note: prospective tall building heights are measured from the ground level in metres to the top of the building. An average height of 3.5m metres per storey has been assumed to account for all building types, not just residential ones as their typical floor to floor heights may vary from 3 - 4m per storey." Point on Heathrow limits is accepted.	11SO The Green Quarter (Southall Gasworks)		Ewan Grunwald	Berkeley Hor	721	Developer
Policy D9: Tall Buildings London Plan Ealing LPA – local variation Berkeley notes that LBE are proposing a local variation to the policy on tall buildings and are seeking to set definitions of tall buildings by area (Table DMP1: Definition of tall building by area). Southall is divided into nine location areas. Area S2 relates to The Green Quarter and defines tall buildings in this location as 21 metres (6 storeys). This tall building definition is not in conformity with London Plan Policy D9(A) which states that the definition should be no lower than 6 storeys “measures from ground to the floor level of the uppermost storey” and therefore only buildings of 7 storeys should be considered as ‘tall’. Part F of the policy states that tall buildings above the defined area thresholds are ‘exceptional’, however, this position does not reflect Site Allocation 11SO which supports the principle of tall buildings up to 63 metres. The proposed threshold height does not align with the extant planning permission, which covers the entirety of Area S2 and permits buildings up to 74mAOD in height; or the revised masterplan which seeks permission for buildings up to 89mAOD (equivalent of 18 storeys). Accordingly, we recommend that Table DMP1 – Area S2 is updated to define tall buildings within this part of Southall as buildings at 35 metres (equivalent 10 storeys) and above. Town - Southall Area - S2 Tall Building (m) - 21 35	Ealing defines a storey as 3.5m and so the threshold is entirely compatible with the London Plan policy.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Ewan Grunwald	Berkeley Hor	721	Developer

Policy HOU: Affordable Housing – Ealing LPA – local policy Berkeley strongly oppose Policy HOU: Affordable Housing which seeks to apply a Fast Track route threshold at a minimum 40% affordable housing, where a compliant affordable tenure split is proposed. The higher affordable percentage is not in conformity with the London Plan, which was subject to a robust and sound evidence base. We therefore strongly recommend that the affordable housing threshold is revised to align with the 35% threshold set out in the London Plan. We also recommend that the preferred affordable housing tenures are revised to align with the London Plan Policy H6 to ensure consistency. (contd below)	London Plan policy is owed general not absolute conformity. The policy is tested as viable by the whole plan viability assessment and is a valuable albeit only partial measure to meet overwhelming affordable needs identified in the LHNA.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Ewan Grunwald	Berkeley Hor	721	Developer

Berkeley suggests the following amendments be made to Policy HOU: Policy HOU: Affordable Housing – Ealing LPA – local policy A. Affordable housing contributions must address identified needs in Ealing and will be based upon: (i) A strategic target of 50% as set out by the London Plan. (ii) A split of 70% low-cost rented at social rent levels to 30% intermediate provision (iii) An appropriate mix of tenures and unit sizes B. Development should meet identified local needs for tenure and mix. C. The Fast Track route, set out in Policy H5 B1) of the London Plan, in Ealing will only apply to schemes providing at least 35% 40% affordable housing and a tenure split of 70% low-cost rented social rent and 30% Intermediate. This requirement also applies to Build to Rent developments. D. Provision should be made on site, and units secured in perpetuity for affordable use. (contd below)	London Plan policy is owed general not absolute conformity. The policy is tested as viable by the whole plan viability assessment and is a valuable albeit only partial measure to meet overwhelming affordable needs identified in the LHNA.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Ewan Grunwald	Berkeley Hor	721	Developer

No viability evidence base is provided to support the proposed 40% threshold and in view of the intended adoption of the draft CIL Charging Schedule set at £200/sqm for residential floorspace, the combination is likely to have significant implications on development viability and the subsequent delivery of affordable housing. The Mayor’s adoption of the fast-track threshold route as part of the London Plan has helped to incentivise affordable housing delivery by removing the need to submit viability information, gives greater certainty to the market and helps to speed up the planning process. The proposed adoption of a higher affordable housing threshold in Ealing will make the Borough less attractive to development than other neighbouring Boroughs, and will result in more developments being the subject of viability review resulting in delays and is likely to result in a lower level of affordable housing delivery. Part C also requires affordable housing to meet Ealing’s preferred housing mix and tenure, which is noted in supporting text (Paragraph 5.18) as being set out within Ealing’s Local Planning Policy Guidance. This local planning policy guidance does not currently exist, and should therefore be removed.	This is incorrect; the threshold is assessed in the whole plan viability assessment.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Ewan Grunwald	Berkeley Hor	721	Developer

Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation Berkeley continues to object to Policy E3 which states that “Affordable workspace in Ealing will be provided on the basis of a levy on development of 10% of gross floor area in mixed use schemes, and 5% of net floorspace in office and industrial schemes. Where that levy would result in affordable provision of at least 1,000 sqm of mixed-use space, 2,000 sqm of office space, or 3,000 sqm of industrial space, then provision should be onsite”. “Mixed-use development” is defined in the glossary as development for a variety of activities on single sites or across wider areas such as town centres. The policy therefore would require 10% of any scheme that proposes a mix of planning uses to provide affordable workspace. This is an excessive and an onerous requirement that is not supported by the evidence base or a viability assessment. The cumulative impact of compliance with the proposed affordable workspace and affordable housing fast- track threshold policies in addition to the draft Ealing CIL Charging Schedule will have significant implications on development viability. (contd below)	Noted	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		Ewan Grunwald	Berkeley Hor	721	Developer

A similar policy was proposed by the London Borough of Brent, as part of their Local Plan, which was found to be unsound for the Inspector and was subsequently revised. The policy should be revised to omit “10% of gross floor area in mixed use schemes” in line with the suggested amendments below: Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation F. Affordable workspace in Ealing will be sought, where appropriate from provided on the basis of a levy on development of 10% of gross floor area in mixed use schemes, and 5% of net floorspace in office and industrial schemes. Where that levy would result in affordable provision of at least 1000sqm of mixed-use space, 2000sqm of office space, or 3000sqm of industrial space, then Affordable workspace provision should be onsite where feasible and where it can be demonstrated that it is not possible to provide it onsite. Where the total space provided by development is less than these thresholds then provision should be by means of offsite contributions. G. Where affordable workspace is to be provided onsite then development should be supported by a business plan that demonstrates the viability and suitability of the space for its intended occupants, the optimisation of the site for this use and of the development overall, and appropriate management of the space for the duration of its use as affordable space. H. Affordable workspace will be provided at appropriate and agreed	Noted, in practice Ealing DM policies are normally referred to by officers specifcally as DM Policy E3 etc which should address this.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		Ewan Grunwald	Berkeley Hor	721	Developer

Tide Construction has an interest in land at 42 Hastings Road and 50-54 Drayton Green Road, West Ealing. These representations are submitted primarily in respect of the council’s draft allocation which includes the site and is identified in the draft local plan as an Ealing Development Site 16 EA - West Ealing Station Approach. The representations are also submitted in respect of draft policies on aQordable housing, purpose-built student accommodation, purpose built shared living accommodation and BNG. Tide Construction has submitted a planning application (LPA Reference: 233551FUL) for the land in which it has an interest for a mixed-use purpose-built student accommodation and commercial floorspace development which forms part of the wider Development Site allocation 16EA. The planning application proposals have been subject to significant and comprehensive analysis on a range of matters including Design, Townscape & Heritage Impact. The representations submitted here benefit from the comprehensive assessment of the planning application proposals.	Noted.	16EA West Ealing Station Approach		Mathew Mainwaring	Tide Construc	722	Developer

Draft Development Site 16EA – West Ealing Station Approach Tide supports the council’s in principle support for a residential led mixed use redevelopment of the site. However, given the council’s approach to Purpose Built Student Accommodation and Purpose-Built Shared Living Accommodation in the Development Management section of the plan, and contrary to the approach of the London Plan, Tide objects to the current wording. Instead, it proposes that the wording of the Proposed Uses section should be amended to the following; ‘Residential-led (including Purpose Built Student & Shared Living Accommodation) and mixes-uses appropriate to the Town Centres’ (additional words in bold). The insertion and explicit reference to Purpose Built Student and Shared Living Accommodation would avoid any doubt as to whether the site should only accommodate Use-Class C3 or, as the council has made clear to Tide, it also supports the redevelopment of the site for Purpose Built Student Accommodation. Tide takes the position that this site is suitable for both Purpose Built Student and Shared Living Accommodation. Given that in places, the draft local plan seeks to a draw a distinction between C3 Residential and Purpose-Built Student and Shared Living Accommodation, it is important that the policy is clear on the range of acceptable uses, bearing mind their contribution to the meeting the London Plan’s Housing Requirement.	The site falls within EMTC and so may be appropriate for PBSA or LSPBSL, however need will have to be demonstrated on a case by case basis and cannot be determined by the site allocation.	16EA West Ealing Station Approach		Mathew Mainwaring	Tide Construc	722	Developer

Under the heading of Tall Buildings within allocation 16EA, the reference to 13 storeys should be amended to 17 storeys. As alluded to above, the planning application proposals for Tide’s land interest have benefited from significant urban design, townscape and heritage analysis. This information, which has been the public domain for 8 months, is material in properly understanding the capacity of the site, which is situated at the heart of West Ealing, within the Metropolitan Town Centre and with excellent access to the significantly improved public transport infrastructure at West Ealing Station. The council’s approach to the Design Analysis referred to this in section of the 16EA allocation, is not fully in accordance with latest version of the NPPF which post- dates the design analysis undertaken by the council. For this reason and the availability of much more comprehensive analysis of urban design, townscape and heritage matters provides strong evidence to support the amendment to 17 storeys. Similarly, under the heading of Design Principles, the 2nd bullet point should also be amended to refer to 17 storeys.	Noted. The tall buildings evidence forms a consistent approach to understanding character and height across the borough, it is for applications to demonstrate if there is an case to depart from this based upon the planing balance.	16EA West Ealing Station Approach		Mathew Mainwaring	Tide Construc	722	Developer

Policy HOU: Affordable Housing - Ealing LPA- local policy Tide objects to the draft plan’s proposals to introduce a higher threshold of 40% to qualify for the London Plan’s Fast Track approach to the consideration of aQordable housing matters. As the council, makes clear itself at Paragraph 5.16 of the draft plan, most London boroughs face the pressures of acute affordable housing need that Ealing is facing. Therefore, the level of need and the setting of thresholds for London Plan policy was factored into the 35% threshold approach set out in the London Plan. Given that the significant need for affordable housing will match the significant need in many other boroughs in London, there is no justification for the Ealing local plan to impose a higher threshold of 40% to qualify for the fast-track approach. Furthermore, there is evidence that despite the threshold approach of 35% adopted in the London Plan, the resultant delivery of aQordable housing is not meeting the targets set out in the London Plan. Whilst the pandemic and economic conditions will have bearing on delivery, other councils outside London are making more progress on the delivery of aQordable housing under the same economic conditions. Many housing developers and commentators cite that the current London Plan policies, including the current 35% threshold to the Fast Track approach, as being part of the reason that aQordable housing delivery is not higher than it is. In this circumstance, there is no reasonable basis for the Ealing local plan to introduce a higher threshold and Part C and E of draft Policy	The policy is tested as viable by the whole plan viability assessment and is a valuable albeit only partial measure to meet overwhelming affordable needs identified in the LHNA.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Mathew Mainwaring	Tide Construc	722	Developer

Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation. Paragraphs 32 to 36 of the Executive Summary of the Ealing Local Housing Needs Assessment Update (Report of Findings November 2022) concludes that Co Living (Purpose Built Shared Living) should not play a significant role in meeting housing need. This is based on the council’s consultant’s conclusion that the single person household projections are declining. This an overly simplistic approach which fails to recognise the manner in which in many young single people amalgamate to live together in what is shared accommodation. This can range from HMOs to self-contained flats where 2, 3 or 4 single people (previously not known to each other) live together, to larger C3 houses where 4, 5, or 6 or more live people live together. The provision of Purpose-Built Shared Living accommodation is a modern version of how many young people have established themselves in housing for many decades in London with many people finding the oQering from this type of accommodation attractive. Tide therefore objects to the council’s Local Variation to Policy H16 in seeking to limit the geographical location of such development and to the conditionality set out in parts i), ii) and iii) of the policy. The London Plan has a clear policy position on this type of accommodation and therefore the council’s proposed local variation	There is no demonstrated need for LSPBSL anywhere in the borough and this type of development does not therefore meet identified housing needs. LSPBSL is restricted to EMTC because of the negative effects of these types of development in areas with limited facilities.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Mathew Mainwaring	Tide Construc	722	Developer

Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation The issues facing Ealing in terms of workspace provision are similar to those in other parts of London and therefore there appears no justification to the pursuing a local variation to the London Plan policy. It can be difficult to make mixed-use and or solely commercial development work without the proposed levy in many situations. The requirement for the levy in draft policy E3 will only make that situation more difficult. This measure along with many others in the draft plan creates an extensive list of additional requirements which undermine development bringing brought forward with investors concluding that the overall risks are too great and being dissuaded from bringing development forward. Policy E3 should be deleted in its entirety.	This fails to engage with the AW evidence.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		Mathew Mainwaring	Tide Constru	722	Developer

Policy G6: Biodiversity and Access to Nature London Plan – Ealing LPA – local variation Tide objects to the council’s requirement to double the level of BNG set out in statute. The statutory provisions for BNG are new and time is required to understand how the national 10% requirement will operate. This is particularly the case, when this measure can’t be seen in isolation from all the other measures in the plan which will impose significant additional costs in the delivery of development on brownfield sites which both government and the London Plan want to see prioritised. Tide is committed to improving biodiversity net gain and has a track record for doing so. However, the characteristics of sites vary enormously and is not always possible to deliver on site provision. Having such a high target of 20% and where no on site provision is deliverable will result in punitive payments further eroding viability and the likelihood on some sites of no proposals coming forward at all. For these reasons, the policy should reflect the statutory requirement for 10% BNG.	Noted. It is acknowledged that the National Planning Practice Guidance on BNG seeks to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission. Defra’s own Impact Assessment indicated that the majority of costs associated with biodiversity net gain are incurred to reach a no net less position. The costs associated with moving from 10 to 20% is therefore considered to be marginal. However, the NPPG was published after considerable delays and only on February 14th 2024 (with updates on May 1st 2024) . This was after the Regulation 19 Local Plan and associated evidence base had been finalised ahead of the Full Council meeting held on February 21st 2024 and the beginning of the consultation period that ran from February 28th 2024. The council now acknowledges that additional time and further evidence is needed to prepare evidence to justify a rationale for pursuing a higher BNG percentage target. Therefore, the policy has been modified accordingly and a revised policy potentially containing a higher target will be considered as part of the next Local Plan review.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation			Mathew Mainwaring	Tide Construc	722	Developer

We write on behalf of our client, the John Lewis Partnership PLC (hereafter ‘JLP’). Thank you for consulting us on Ealing’s Local Plan: First Proposals (Regulation 19) (February 2024), (hereafter ‘DNLP’). JLP commend the Borough for progressing a new Local Plan in an effort to replace the out-of-date Core Strategy (2012), Development Management Document (2013) and Development Sites (2013) documents. As a committed community partner and long-standing employer within the Borough, JLP is dedicated to nurturing and enhancing the community it serves and welcomes the opportunity to be involved in shaping the future of LBE via the Regulation 19 consultation. JLP looks forward to continuing conversations with the Council regarding the Waitrose Store in West Ealing (hereafter the Site’) and its potential contribution to the Strategic Objectives of the DNLP and, more importantly, to continue serving thousands of loyal customers, and existing and future residents, across the community. This letter has been drafted further to JLP’s previous Regulation 18 Representations on the DNLP (dated 9th February 2023), where concerns regarding the DNLP’s soundness were raised. JLP looks forward to further discussions on areas of the DNLP where our previous feedback can be integrated more fully.	Noted.	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

Executive Summary 1. Housing delivery in Ealing has faltered and the Borough is unable to demonstrate the required five- year housing land supply for new homes. Across the capital, new home completions have dropped by 50% in 2023 and the rental market continues to face significant supply-side issues which are the result of many private landlords exiting the market and not enough professional build-to-rent (“BTR”) housing being developed, despite the high proportion of rental households locally and within London’s regional context. JLP suggests greater support and flexibility is required from the planning framework and decision-making to support the delivery of residential development in sustainable brownfield areas. Particularly in relation to the delivery of BTR housing which can underpin labour mobility, support productivity and above all, create vibrant and cohesive communities where a committed, long-term steward, such as JLP, can take an active role in curating a neighbourhood and investing in a wealth of amenities to serve it. 2. The DNLP places great weight on sustainably located brownfield sites, such as Waitrose West Ealing, coming forward and delivering high-density residential development to meet its Plan target of 2,157 homes per annum. The DNLP specifically references how Site Allocations have the potential to support the delivery of the spatial strategy. However, the DNLP places unjustified height caps on each Site Allocation that have the potential to greatly constrain sustainable development being delivered on them. 3. In the spirit of open and constructive consultation, JLP believes that the parameters specifically placed on Site Allocation 15EA are not supported by the information provided, nor reflect the existing	Noted, addressed above.	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

[Background information on John Lewis Partnership's retail and property business and opportunity in West Ealing] INTRODUCTION John Lewis Partnership PLC JLP is the UK’s largest employee-owned business, operating two of Britain’s best-loved retail businesses – John Lewis and Waitrose. Founded over 100 years ago, the company has been built on a vision to ensure a better way of doing business by benefitting its Partners, customers, suppliers and the communities in which JLP operates. JLP is a principal source of employment for the local community in Ealing. As JLP's retail business has expanded over many years, it has grown a sizable property portfolio of shops, warehouses and previously developed land. By transforming some of its supermarket and car park ‘brownfield’ sites, it has the opportunity to both upgrade some of its stores and provide much-needed homes, including as much affordable housing as is commercially viable, in the communities it serves. These BTR homes will be purpose-built for renters, developed and managed by the JLP, which means it's in JLP’s interest to deliver high-quality buildings that are thoughtfully designed with the same commitment to high standards as it applies to its John Lewis and Waitrose shops. Residents would rent directly from a trusted business, providing them with greater certainty around areas such as quality, service, community	Noted.	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

The Housing Crisis JLP supports the Borough's desire to address housing needs and provide affordable housing options. However, in its current format, the DNLP references the need to provide affordable homes but does not adequately address pressures within the housing market as a whole. The magnitude of the crisis and the direct cost burdens it is placing on both local authorities and the locality’s entirety emphasises the scale of the problem. Under-delivery is marked in Ealing, which has provisionally only provided 78% of their 2023 Housing Delivery Test target for new homes in the Borough, a target itself set at a level markedly below need. This is a national issue - but one felt most acutely across the capital. National demand for homes is thought to be close to 4.3 million homes; which would take half a century to rectify should the current annual target of 300,000 homes per annum from the Government be met¹. In 2019-20, 248,591 net dwellings were built, falling to 217,754 in 2020-21 and for the subsequent two years the number of new homes has not exceeded 235,000 – this represents a shortfall of 263,655 homes in that four year period, reflecting a downward trend in housebuilding which is expected to continue. Private home starts are forecasted to drop by 25% this year, and completions by 19%.	Noted.	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

Ealing’s Housing Delivery At a local level, Ealing has a 21,570-unit 10-year housing supply target identified in the London Plan for the period 2019-20 to 2028-29. This forms an annual target of 2,157 homes for the rest of the Local Plan period. There has been a shortfall in the delivery of 2,262 homes over the past four years, compounding this target. Furthermore, because Ealing has not met its Housing Delivery Test, a 20% buffer is applied to its housing targets, increasing its annual target to 2,609 homes. According to the Ealing Housing Trajectory Evidence Base, this gives a total cumulative requirement of 15,656 homes over the next five years. Which equates to 3,131 homes a year over the next five years. A significant increase to the 2,157 housing target listed within the DNLP. The DNLP’s own Five Year Housing Land Supply Position Statement and Housing Trajectory evidence base document (Hereafter ‘5YHLS&HTS’) highlights the Borough’s shortfall in delivery and supply, outlining that only 3.7 years’ worth of housing land supply can be evidenced as part of their Local Plan, equating to an absolute shortfall of 3,935 homes. It remains unclear how many homes are attributed to each Site Allocation and thereby how the cumulative 3.7 years has been calculated. This is explored later in the report. If it is to incentivise delivery, any number will need to get	Noted. Housing supply targets are set out in the London Plan and more recent proposals announced by government have not changed this.	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

Value Creation Alongside the acknowledged need to evidence a ‘design-led’ approach, it is clear that the Plan will also need to demonstrate that any strategy to deliver growth to meet need is deliverable. In this regard it is clear that the costs of development have increased in recent years as the cost of complying with regulatory controls has increased and market conditions have deteriorated. The Local Plan presents an opportunity to ensure that unnecessary constraints that might otherwise compromise the viability of development are avoided. In order to adequately facilitate the delivery of homes, any Development Plan needs to set out a framework for growth which incentivises the private sector to bring forward well located brownfield land for development in order to meet need. There are a series of development costs associated with the delivery of higher density development which do not necessarily impact on lower density schemes. These costs drive a need for increased efficiency. Artificial constraints on the capacity of sites such as the height thresholds proposed have a material impact on the ability to bring forward development and/or have a constraining impact on a sites ability to bring forward planning benefits including much needed affordable housing. We support the Council’s public pledge to tackle the climate emergency. However, imposing such height limits on a site adjacent to far taller buildings and right next a maior new Crossrail station	Noted	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

Costs Given the clear priority to be given to housing and affordable housing delivery, we would question whether now is the right time to introduce CIL in Ealing and would expect, if introduced, the Borough to acknowledge that this is expected to have a direct impact on the scale and pace of affordable housing delivery in the Borough. A series of additional costs have been added to development over the last 24 months, including, but not limited to, cost price inflation in construction and the introduction of dual staircases which we support (JLP is committed to ensuring our buildings comply with current best-practice safety standards to ensure the safety of all future residents), and challenging sustainability targets (again which we fully support). However, these additional costs, are beyond individual developer’s control and have added to the cost of development. It is not possible or viable for a developer to pass these additional costs on to a potential buyer or renter, as this would make homes that are already difficult to afford even less affordable, all the more so in the current mortgage climate. JLP is committed to providing competitive rents in line with the market. Where the additional cost needs to be absorbed by the developer, returns fall and the prospect of development commencing reduces with a direct	Noted. A Local Plan Viability Assessment forms part of the evidence base and it tests the ability of developments in the London Borough of Ealing to accommodate emerging policies in the draft Local Plan alongside a range of potential Community Infrastructure Levy (‘CIL’) rates.	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

Affordable Housing Delivery In order to meet growing affordable housing needs, affordable housing delivery over the plan period would need to rapidly increase. It is therefore understood why the Council may seek to target increased affordable housing delivery within any emerging policy. JLP wants to deliver as much affordable housing as is commercially viable. However, development will not come forward where the level of affordable housing that policy requires is above the threshold which it can afford to deliver, rendering it unviable. Whilst the DNLP might rightly target the delivery of 40% affordable housing from all sources, the Plan should acknowledge that individual schemes should be expected to deliver the maximum reasonable percentage of affordable housing, based on independent viability review. Additionally, where a scheme proposes a percentage of affordable housing that is the agreed maximum reasonable, but less than the strategic targets, the local plan should make clear that when assessing proposals brought forward by developers that significant weight should be attached to the benefits of that housing and affordable housing delivery that a specific scheme can bring forward until the housing crisis has been alleviated. To safeguard the LPA’s position, the wording should also be included to make clear that a decision on one site will not necessarily set a precedent for decisions elsewhere and that each site will need to be considered on its merits.	Noted	Policy HOU: Affordable Housing – Ealing LPA – local policy		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

Focus on Character-Led Growth We recognise efforts to align the DNLP with the London Plan’s principles of Good Growth, however current drafting only supports development which align with the character of the Borough and its respective area. This does not align with the intentions of the London Plan’s vision for Good Growth and appropriate densification and change in character where achievable (Policy D3). As such, the weight given to ‘character’ throughout the Plan is unbalanced, resulting in overly constrained policies that do not seek to positively prepare for growth. This is specifically referenced in Para 1.2 of the DNLP, which outlines: ‘Ealing’s Local Plan incorporates the planning principles and strategy of the London Plan and has been prepared to ensure there is a clear framework that will manage growth across the borough that respects the unique character of Ealing and its mosaic of towns. Through this character-led approach, the Local Plan will ensure investment decisions address the issues that concern local residents and businesses.’ Moreover, Para 2.52 outlines the conformity with Good Growth, by the need to enhance Ealing’s character, omitting the need to plan for Good Growth to address set needs: ‘Making sure the growth that takes place in Ealing enhances its character, conserves its future and makes it a great place where people want to live.’ London Plan policy is grounded in an understanding that places should seek to optimise and enable sustainable growth in development according to a balance of material considerations.	Noted	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

Relationship with the London Plan Ealing’s DNLP is uniquely structured, as its development management policies appear to be set out in a series of policy variations concerning the current London Plan. In some instances, the DNLP proposes the same policy names within the London Plan, such as draft policy D9 on Tall Buildings. Whilst the rationale is understood, this has the potential to be challenging in practice, and policy names should be changed to distinguish between London and Ealing’s planning policies otherwise there will be confusion. Moreover, the London Plan is widely expected to undergo a review over the coming years, to manage London’s evolving needs and provide up-to-date policy for Boroughs to adapt accordingly. Therefore, the Plan should clarify how the status of the DNLP policies will change as the London Plan is reviewed and the policies on which the DNLP is based are altered. This is something that arose in the previous Core Strategy and Development Management documents.	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. The Mayor of London has not raised any objections to this approach.	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

LEGISLATIVE FRAMEWORK [National Policy Context - Para 35] In London, Local Plans are also required to be in ‘general conformity’ with the London Plan. Given the tests of soundness, we believe that the Ealing DNLP does not conform for the following reasons: It is our view, in the absence of the changes that we are suggesting that the LBE Plan, as drafted does not meet the requisite tests and that in this regard, and in the context of the ‘tests’ that it is required to satisfy the LBE Plan has not been positively prepared as it does not meet objectively assessed needs. It is not justified as it doesn’t consider reasonable alternatives. It is not effective as it places too much of a financial burden on development. It is not consistent with national policy as it will fail to meet its objectified need for homes and does not given sufficient priority to the delivery of new homes in areas acknowledged as suitable for densification.	Noted. A statement of common ground with the Mayor of London provides evidence of general conformity. Alternative spatial options were considered and are part of the extensive evidence base.	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer
Spatial Strategy For Ealing We understand that a Borough with such a varied character, such as the LBE, should incorporate a spatial strategy with differing policy objectives tailored to the requirements of each area, however a number of Ealing’s Spatial Strategies do not appear to reflect the London and UK-wide housing crisis. As a result, the Plan is unbalanced and doesn’t adequately prepare for constraints on development, nor focus on the need to positively prepare for Good Growth.	Noted.	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

SP1 sets out the 15-year vision for Ealing, which has been aligned to the Borough’s core themes. SP1 (a) notes that ‘The unique characteristics and cultural identities of each of Ealing’s seven towns will be respected and enhanced, through the application of locally sensitive Good Growth principles.’ JLP understands the need to have regard to the existing character of a place and respond to the existing townscape characteristics. SP1(a) should specify the needs to have regard to these matters through the application of the Design-Led approach set out in London Plan Policy D3, Furthermore, JLP supports the strategy to prioritise and strengthen Ealing Metropolitan Town Centre; and agrees that it should be the focus – in spatial planning terms – for high-density residential development considering the location of several key transport nodes in the area. This is reaffirmed in Figure SS1 – which outlines the place intervention to deliver major development within Ealing MTC. JLP recognises and supports the strategic place intervention to deliver significant levels of development at Ealing Metropolitan Town Centre, which will build on its excellent connectivity and enhance the Metropolitan Centre’s role as a strategic destination, with a diverse retail, leisure, and cultural offer and a stronger night-time economy.	Noted. The London Plan is an integral part of Ealing's local development plan. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so.	Policy SP1: A Vision for Ealing			Matthew Lloyd Ruck	John Lewis Pa	735	Developer

SP2 sets out the Borough’s approach to tackling the climate crisis, and how this would aid in delivering the overall vision of the DNLP. JLP supports the overarching principles of SP2.1 to create inclusive economies and SP2.3 thriving communities. JLP recognises the strengthening of this Policy compared to the Regulation 18 DNLP as it seeks the delivery of net zero carbon buildings and the creation of green infrastructure such as a new Ealing Regional Park. Whilst many of the principles set out under SP2.2 have merit these need to be introduced in a proportionate and balanced manner which recognises that the business model which supports the provision of supermarkets which are in themselves necessary to meet need. Indeed the nature of the business model minimises the number of trips taken and provides a competitive, convenient and high quality environment for communities to shop. Trips made by car will remain an important component if these important uses which meet need are to remain viable. JLP also recognises and appreciates that this Policy has been supplemented by more detailed Development Management policies, including the introduction of new policies, to more clearly set out how this goal will be achieved. JLP as a sustainable and ethical business identifies with all efforts to tackle the climate crisis However, pertinent to creating this ~~positive change, policies should be framed and adequately~~	Noted. A Local Plan Viability Assessment forms part of the evidence base and it tests the ability of developments in the London Borough of Ealing to accommodate emerging policies in the draft Local Plan alongside a range of potential Community Infrastructure Levy (‘CIL’) rates.	Policy SP2: Tackling the climate crisis		Matthew Lloyd Ruck	John Lewis Pa	735	Developer
JLP supports the principles of SP3, to create a more equal and affordable borough where the opportunities to access good quality housing are maximised. Paragraph 3.43 of the Plan is noted and supported – the delivery of housing, including rental housing, that can alleviate pressures on the local rental markets, is paramount to meeting the existing market imbalance. Draft Policy SP3 discusses the delivery of affordable homes. Whilst there is clearly a specific problem with the delivery of affordable homes throughout the capital, the Plan should seek to tackle the housing crisis as a whole. Where the DNLP makes the delivery of market homes viable, affordable delivery will follow.	Noted.	Policy SP3: Fighting inequality		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

SP4 outlines that growth should be directed to sustainable locations that are well-connected to transport modes or within close proximity to town centres, which is supported. Part C outlines the need to ensure that the most efficient use of land is made so that development on sites is optimised. This will be important in town centre locations with great transport connectivity, of which the opportunity is noted within Para 2.5, which recognises that the Borough is located uniquely near 5 new Crossrail Stations, making Ealing one of London’s best- connected boroughs. Part D outlines that Ealing will promote Good Growth by following a character-led and contextual approach to growth that optimises the capacity of sites while reflecting the valuable components of the built environment. Part D is an oversimplification of the London Plan’s Good Growth Principles. The ‘character-led’ approach should be replaced with the ‘Design-Led’ approach as currently outlined within London Plan Policy D3. Part F discusses the identification of suitable sites for tall buildings and change. It outlines that in these instances, they should add quality to and complement Ealing’s Character and place-making ambitions. JLP understands and supports the principle of identifying where tall buildings may be accepted, in line with London Plan Policy D9. However, the DNLP’s application of DNLP Policy D9 will heavily curtail the ability of Planning Applications to contribute to the wider aims of the Strategic Policies SP1-4 by virtue of the constraints placed on viability and deliverability. This will be explored later in	Noted	Policy SP4: Creating good jobs and growth		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

Strategic Place Interventions Sitting below the spatial strategy is a set of strategic place interventions. The first is: ‘Delivery of significant levels of development at Ealing Metropolitan Town Centre’. This strategic intervention is strongly supported. The DNLP identifies Ealing Metropolitan Centre as a location for significant, high-density residential and employment growth. It is therefore paramount to the success of the plan that the policy framework enables the delivery of high-density schemes within the Ealing MTC. Chapter 4 of the DNLP sets out Town Plans for Ealing’s 7 towns, as well as identifying several development sites across the Borough. The Regulation 19 DNLP has reconfigured and strengthened each of the town spatial strategy policies to include separate headings on spatial vision and the same three strategic objectives that underpin the borough-level spatial strategy: tackling the climate crisis, fighting inequality and creating good jobs and growth. Each town's spatial strategy also sets out key infrastructure delivery priorities for the area and now has an amended spatial strategy diagram.	Noted.	Policy SP1: A Vision for Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

Ealing JLP maintains strong support towards the vision of Ealing and prioritisation of Ealing Metropolitan Town Centre to be a location for significant, high-density residential and employment growth. The Ealing Town Plan sets out that despite having the highest average resident incomes, Ealing is the second most unaffordable town in the Borough. Accordingly, areas such as West Ealing have been targeted for investment as Areas for Regeneration, which could see new much needed affordable homes delivered. As previously highlighted, JLP supports the prioritisation of Ealing Metropolitan Town Centre to be a location for significant, high-density residential and employment growth and therefore supports the principles set out in Policy E.2. Crucial to the success of the plan will be the delivery of key allocated sites within the MTC. Para 4.2.2 outlines that ‘The character of these neighbourhoods varies, from spacious villas to mansion blocks, garden suburbs, and 1960s townhouses’. Within the Ealing MTC there is also a range of existing and approved high-density development, tall buildings and new developments that all contribute, positively, to the area’s character – this is acknowledged in Paragraphs 4.2.24 and 4.2.25 of the DNLB. There	Noted.	Policy E1: Ealing Spatial Strategy		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

Draft Policy E1 outlines the Spatial Strategy for Ealing. JLP notes the recognition of the need to deliver residential development within the area that Part C, J and Q reference, and places particular emphasis on the efforts to fight inequality caused by housing affordability and access to the housing market by targeting the delivery of housing according to local needs and the character of different neighbourhoods. JLP especially supports the addition of clause Q, which states: ‘Using growth to enhance the character of different areas and centres, reflecting mixed and aided uses below residential in and around town centres, key uses and facilities near to transport hubs, and enhancement of residential neighbourhoods, particularly around major regeneration projects.’	Noted.	Policy E1: Ealing Spatial Strategy		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

JLP strongly supports Draft Policy E2: Ealing Metropolitan Town Centre, which outlines how Ealing Metropolitan Town Centre would be the location for significant high-density residential and employment growth. Specifically, Part B of Policy E2 outlines that ‘Development will focus on delivering strategic [...] residential growth.’ JLP also strongly supports Part C (iii) which outlines that the Metropolitan Town Centre will be maintained and enhanced by: ‘Optimising growth around Ealing Broadway and West Ealing stations to maximise their opportunities to bring people into the borough and reflect the critical mass necessary for their role within London’s office, business, and cultural hierarchy’; and Part G which highlights the importance of ‘Strengthening the local character and distinct offer of West Ealing [...] while realising the potential of identified Development Sites to improve the quality of built environment and deliver new houses and jobs’. The Plan's emphasis on development sites being delivered around West Ealing Station is supported, but is not consistently carried through into the site allocations. JLP notes that the boundary of the Metropolitan Town Centre set out in the Ealing Spatial Strategy in Figure E2 currently bisects Development Site 15EA. It is clear that the existing operation comprises both the store and the supporting infrastructure provided by the car park and ancillary services.	Noted. The boundaries of Metropolitan Town Centres are determined by the London Plan and cannot be changed through the Ealing LPA Local Plan process, particularly at this late stage in the process. However, the matter will be taken up as part of the London Plan review currently scheduled for completion by Spring 2026.	Policy E2: Ealing Metropolitan Town Centre		Matthew Lloyd Ruck	John Lewis Partnership	735	Developer

To achieve the plan’s wider strategic objectives for Good Growth, allocated Development Sites must be delivered within the 15-year plan period, especially for sites within the Ealing Metropolitan Town Centre, where high-density growth in the Borough is directed. Paragraphs 4.2.52 and 4.2.54 respectively reference the importance of development sites to the success of the plan: ‘Development Sites have development potential that could support the delivery of the spatial strategy whilst ensuring the borough meets its housing [...] requirements’. And ‘Development Sites represent site- specific components of the development plan and are intended to deliver the broader thematic policies set out elsewhere in this document’. Considering that the Plan places significant impetus on Development Sites delivering its thematic policies, JLP suggests that the current drafting of the requirements of Development Sites will inadvertently hinder their deliverability. The introduction of unjustified maximum tall building thresholds limits the opportunity for Development Sites to contribute towards the DNLPs wider strategic goals. Considering, the most deliverable and appropriate 82 out of 114 Sites were chosen to be allocated, the plan must ensure there is an appropriate planning framework in place to ensure the deliverability of these sites, so they are not curtailed by the planning system. JLP looks forward to engaging constructively towards these onerous thresholds. JLP encourages a planning approach which addresses the indicative number of homes attributed to each site allocation. The DNLPs evidence base does not include an indicative number of homes.	Noted	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

Waitrose West Ealing is designated as a development site in the DNLP in Draft Site Allocation 15EA. JLP supports and welcomes the principle of the Allocation, which states the Site should deliver ‘residential-led and mixed uses appropriate to the Town Centre (with reprovision of the supermarket on the ground floor)’. Whilst this is in general conformity with London Plan Policy SD7 (6) (a), which outlines and supports the identification of sites, such as supermarkets, suitable for higher-density mixed-use residential intensification, the requirement to deliver the supermarket on the ground floor imposes an artificial and unnecessary constraint on development. As can be seen from the live application for development it is JLPs intention to provide the first-floor level above the car park in order to optimise the potential of the site whilst maintaining active edges around the development. The words ‘on the ground floor’ should be deleted.	Noted. London Plan policies do not support replacement car parking provision for shoppers and TfL in the statement of common ground have sought an amendment that reduces the limited flexibility in the draft site allocation.	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer
There are a number of design principles that Draft Site Allocation 15EA prescribes to the Waitrose site. JLP believe these are not consistent with London Policy and Policy D3 which asserts that ‘all development must make the best use of land following a design-led approach that optimises the capacity of sites, including site allocations’. The principles as drafted are too detailed and as a consequence restrictive. Therefore, site allocations should enable a more flexible and opportunistic approach to development on underutilised brownfield land. The following design principles should provide less prescriptive wording: - ‘Avoid an unrelieved wall of development flanking the Elizabeth Line with sympathetic spacing and separation between new blocks’. - ‘Concentrate taller elements to the east of the site, stepping down to the west to reflect the low-rise residential context south of Alexandria Road and on Felix Road’. - ‘Consider a mews typology at the west of the site to achieve the transition in scale and height’ - ‘Provide active frontages along all streets, whether as part of the new supermarket or in the form of residential front doors’.	It does not follow that any policy restriction will prevent the efficient use of land or be inconsistent with the NPPF.	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

The proposed maximum storey height has been supported by the Tall Building Strategy (hereafter ‘TBS’) , prepared by Allies and Morrison. Sensitivity data provided in the TBS presents a composite heat map which demonstrates the Waitrose Site does not lie in an area sensitive to tall buildings. The TBS also goes on to demonstrate the suitability of certain areas in Ealing for tall buildings. The results evidence that the Waitrose site sits within an area which is entirely appropriate for tall buildings. This is due to several factors, including its location within an area of intensification, existing and proposed tall buildings, town centres, sustainable neighbourhoods, good access to public transport, proximity to Crossrail and good access to open space. In 15EA’s Design Principles, LBE details that development should ‘ensure building height, massing and street layout proposals are developed in accordance with the Tall Buildings Strategy’. ‘Heights are to range between 6 and a maximum of 13 storeys (45.5m) across the site subject to testing in the townscape, heritage impacts and visual/residential amenity terms’. Consideration of the appropriate building heights, townscape impact and architectural form at the Site have been rigorously assessed as part of the planning application 233076FUL whereby JLP is proposing a building with 20 storeys at its tallest point. As part of the current application it has been demonstrated that tall buildings up to 20 storeys are capable of being appropriate on-site, following a thorough assessment of the Scheme against the London Plan Policy D9. The Application’s submitted Environmental Impact	Noted. The tall buildings evidence forms a consistent approach to understanding character and height across the borough, it is for applications to demonstrate if there is an case to depart from this based upon the planing balance.	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

Viability Testing Quod has undertaken viability analysis of the emerging allocation EA15 based on the viability inputs prepared for the scheme by the Council’s independent advisors the DVS with the current proposals for 20% affordable housing and £5.8m of Mayoral CIL and S106 contributions. The analysis assumes 13 storeys or 45.5 metres would be the maximum amount of height that could be achieved. The applicant’s design team have confirmed this would result in the need to reduce the number of homes from 428 to c.318 homes. Quod’s analysis evidences this would have a negative effect on the scheme’s viability rendering it entirely undeliverable, as there would only be a 2% return if the 13 storey scheme were to provide 20% affordable housing and no CIL (which is substantially below the 15 – 20% range advocated by national policy). The assessment also demonstrates that without any change to heights the introduction of the proposed draft LBE CIL charging schedule alone, will increase the cost of delivering the current scheme by c.£7m which would render it unviable. Considering these factors, site allocation EA15 would clearly not be deliverable. Therefore, for the DNLP to place such an emphasis on Ealing Metropolitan Town Centres to deliver homes, the Plan should be deemed unsound.	Noted	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

Retail Parking The design principles of 15EA note that any development should: ‘Incorporate car-free shopper parking for replacement food store/supermarket’. JLP objects to these principles on the basis that the site will not come forward for development if the replacement supermarket has insufficient parking to maintain the commercial viability of the new store. Additionally, a replacement supermarket has an existing customer base whose shopping habits and travel patterns have built up over time. At the moment, 75% of all trips made to the existing supermarket are full weekly shops or large shops, typically undertaken by car due to the number of items and combined weight. If there was no car parking provided at the replacement supermarket, then the store would not be able to cater to the needs of its customer base. It is unrealistic to expect customers to switch their shopping habits which will be determined by many factors including their age, health, dependants, working arrangements and day-to-day schedules. It is far more likely that most customers would switch to competitor supermarkets with ample car parking. As a result, this would render any flagship	Noted. London Plan policies do not support replacement car parking provision for shoppers and TfL in the statement of common ground have sought an amendment that reduces the limited flexibility in the draft site allocation.	15EA Waitrose, West Ealing		Matthew Lloyd Ruck	John Lewis Pa	735	Developer
DESIGN AND AMENITY It is unclear as to how this policy is varied from London Plan Policy D3. To avoid confusion, Policy DAA should be removed from the DNLP.	Noted	Policy DAA: Design and Amenity – Ealing LPA – local policy		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

The DNLP Policy D9 local variation defines the parameters of taller buildings across the borough in Table DMP1, stating that ‘tall buildings above this threshold should be located upon allocated development sites defined in the development plan’. JLP considers Policy D9 of the DNLP to be overly restrictive, contradicting a number of other strategic objectives of the Plan, such as the direction of growth to sustainable locations across the Borough. It is important to emphasise that this restrictive policy position in regard to tall buildings conflicts with draft policy at the regional level. Policy D9 of the London Plan, 2021 does not prevent tall buildings from coming forward outside of ‘appropriate locations’ chosen by the Council, but rather, it allows for Local Plans to cite what may be an ‘appropriate’ height while providing the flexibility for judgement through the Development Management process in regard to what an acceptable height may be. Part A of Policy D3 of the London Plan states that “All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations”. Part B states that “Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling”. We consider the approach to tall buildings within DNLP Policy D9 to be inflexible and an inappropriate strategy for the borough to be able to encourage and deliver appropriately optimised sites. Optimising sustainable brownfield sites is a strategy that is reiterated in both Policy D3 (Optimising site capacity through the design-led approach) of the London Plan and the National	It does not follow that any policy restriction on heights will prevent the efficient use of land or be inconsistent with the NPPF. It is for planning applications themselves to demonstrate that there are material reasons to depart from the provisions of the plan.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Matthew Lloyd Ruck	John Lewis Pa	735	Developer
The DNLP adds a suite of new policies and policy amendments addressing climate action, including Policy OEP on Operational Energy Performance, Policy ECP on Embodied Carbon, Policy WLC on the Whole Life Cycle Carbon Approach and Policy SI7 on reducing waste and supporting the circular economy. JLP recognises and supports the importance of environmental sustainability for the future of Ealing. However, it is crucial that proposed policies recognise the practical constraints of development projects, which as drafted, pose a detrimental effect on the developer’s ability to deliver upon sustainability objectives due to issues surrounding cost and value.	Noted. A Local Plan Viability Assessment forms part of the evidence base and it tests the ability of developments in the London Borough of Ealing to accommodate emerging policies in the draft Local Plan alongside a range of potential Community Infrastructure Levy (‘CIL’) rates.	SP2.2 Climate action		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

New Policy OEP requires new dwellings of 500 sqm or more of non-residential GIA to be designed and built as Net Zero Carbon in operation. This includes the requirement for predictive energy modelling to demonstrate compliance with the Space Heating Demand and Energy Use Intensity targets presented in Tables DMP2 and DMP3. New development must achieve an ‘Energy Balance’ or pay for any shortfall through the council’s offset fund, and minimise the ‘Performance Gap’ through an assured performance method of assessment. JLP is committed to becoming a more environmentally friendly and sustainable company and has a target to be net zero carbon in operation by 2035. Currently the Energy Use Intensity (EUI) calculated for the proposal is below 50 kWh/m2/yr. JLP are implementing a fabric first approach in response to recent building regs updates (overheating Part O and energy conservation Part L) and in doing so capture rail noise mitigating measures in the design solutions. Therefore, JLP assert that the standards set in the DNLP are aspirational with the proposed development to come as close as possible to the targets set, within the site constraints.	Noted. The targets are not intended to be aspirational. Such an approach would clearly impact on the achievement of the overall goal and introduce unnecessary uncertainty. Further guidance will be published to support the implementation of this policy, and this will address matters of flexibility etc.	Policy OEP: Operational Energy Performance –Ealing LPA –local policy		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

New Policy ECP requires that major developments should not exceed the embodied carbon limits set out in new Table DMP4. JLP would like to point out, that it appears there is a typo in the second table. In this instance, JLP has assumed the wording to state ‘from 2030’ instead of ‘until 2030’. To date, the draft policy is not in line with current London Plan requirements and the measurements are derived from the Low Energy Transformation Initiative. Embodied carbon within JLP’s development has been considered as early as possible and the upfront carbon is calculated to be 604 kgCO2e/m2 GIA. This represents a significant improvement on the GLA benchmarks for residential buildings but would not achieve the residential target set out in the DNLP, as the measurements are more onerous than those set at a regional level. Therefore, JLP suggests that these measures be imposed as an aspiration for development to meet, balanced against other planning considerations, such as the delivery of affordable housing.	Noted. It is acknowledged that there is a typo in the second part of table DMP4. The heading should read 'from 2030'. The targets are not intended to be aspirational. Such an approach would clearly impact on the achievement of the overall goal and introduce unnecessary uncertainty. Further guidance will be published to support the implementation of this policy, and this will address matters of flexibility etc.	Policy ECP: Embodied Carbon – Ealing LPA – local policy		Matthew Lloyd Ruck	John Lewis Pa	735	Developer
New Policy WLC introduces the requirement for major developments to undertake a Whole Life Carbon assessment in accordance with the requirements set out in the London Plan (2021). Additionally, major developments involving demolition should undertake carbon pioneering to determine the best approach to building form and reuse. JLP would like there to be a consistent framework in regard to Part B of the policy in terms of planning considerations and carbon pioneering which can be applied to every proposal across the Borough. JLP supports the principle of the policy however, would like to afford the same planning considerations to every planning application as opposed to being judged on a case-by-case basis.	Policy WLC 'Whole Life Cycle Carbon Approach' introduces locally the requirement for applicants to undertake an optioneering exercise as part of the Whole Life Cycle Carbon Assessment. The requirement to prepare Whole Life Cycle Assessment for referable applications is currently a feature of London Plan policy SI 2. Local Policy WLC extends this requirement to all major developments. The optioneering exercise seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option. The findings of this optioneering exercise should be considered alongside other planning considerations to determine the most appropriate option, including consideration of a retrofit first approach, and different building forms (heights). The ‘options’ considered should include reuse/refurb options, alongside any new build options if pursued. All options evaluated should be capable of comparison reflecting the same best practice standards. The intention is to prepare additional guidance to support the implementation of carbon optioneering.	Policy WLC: Whole Life Cycle Carbon Approach – Ealing LPA – local policy		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

Draft Policy HOU part C, states that the Fast Track route, set out in Policy H5 of the London Plan, will only apply to schemes providing at least 40% affordable housing and a tenure split of 70% social rent and 30% intermediate in Ealing. This requirement and tenure split also applies to Build to Rent developments. The increase in fast-track thresholds from 35% in the London Plan to 40% is noted and understood. JLP remains committed to delivering the maximum viable amount of affordable homes, in line with the London Plan fast-track criteria. Policy HOU should clarify that development should not be expected to make contributions greater than the reasonable maximum as demonstrated by independent viability analysis. JLP recommends that DNLP Policy HOU be reviewed as it would be very likely to prevent the delivery of Build- to-Rent housing in the borough. Build-to-rent is a typology with the potential to combat some of the rental pressures facing the capital and should positively influence the affordability of the local housing market The London Plan contains a policy specific to the delivery of Build-to-Rent units, Policy H11. H11 recognises the unique benefits of build-to-rent as a product, to offer a home to people who can't afford to buy one in an increasingly difficult ownership environment. To deliver these homes, there is a need to have a development that is single-managed and operated – a factor of the development proposal that is paramount to its success as a product. <u>JLP recommends that Policy HOU should not introduce another</u>	Noted	Policy HOU: Affordable Housing – Ealing LPA – local policy		Matthew Lloyd Ruck	John Lewis Pa	735	Developer
JLP supports the notion that development proposals could provide affordable workspace to cater for SMEs and job growth. JLP is of the view that affordability can be achieved through a range of measures including the specific product, and flexible terms of occupation. JLP suggests a flexible approach to be adopted in the wording of DNLP Policy E3, to recognise to a greater degree the number of different ways in which affordable workspace could be provided considering the needs of workspace to cater to the needs of any specific context. Additionally, the provision of affordable workspace can influence the quantum and impact of other policies set out in the DNLP such as the provision of new homes and levels of affordable housing in the Borough, hence JLP's recommendation to adopt a more flexible approach.	The representation fails to engage with the AW evidence base. In practice the policy is flexible because, 1) the discount is indexed to the actual rents being charged, and 2) contribution is financial except upon sites where on-site provision is viable.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		Matthew Lloyd Ruck	John Lewis Pa	735	Developer

Thank you for consulting the London Borough of Hillingdon ('Hillingdon Council') on the Proposed Submission Local Plan ("Local Plan") for the London Borough of Ealing. Please see the following comments below in relation to proposed policy changes and site allocations in the draft plan. These comments follow on from the two previous responses provided by Hillingdon Council, which have been attached as appendices for ease of reference. Please note that officers have restricted comments to matters that may have a material impact on residents and businesses within Hillingdon. The absence of commentary on other approaches should not be interpreted as support for such an approach, but recognition that they are unlikely to cause harm within Hillingdon. {Specific comments dealt with under separate rows} The Council welcomes the additional information which has been added to the site allocations. However, in line with our regulation 18 response, the allocations should include detail on what use classes are proposed under schemes described as mixed use or employment-led, including if they comprise main town centre uses as defined by the National Planning Policy Framework (NPPF). This is to ensure that officers can assess any impact on the vitality of existing town centres. Next Steps Officers from Hillingdon Council are available to meet to discuss these issues or any other cross-boundary strategic matters, if you	Noted.	General		Tom Campbell	Hillingdon Co	736	Statutory Body
Green Belt and Metropolitan Open Land In the Regulation 18 Consultation, Hillingdon Council had questioned the redesignation of a number of Green Belt sites to Metropolitan Open Land. Hillingdon Council notes that, as set out on Page 12 of the Local Plan, Ealing are not proceeding with the original proposals regarding changes to Green Belt and Metropolitan Open Land designations because of the objections raised, including by the Mayor of London in his Statement of General Conformity, and that Green Belt and MOL boundary changes are proposed only where a site has been identified for development and allocated in this Local Plan.	Noted	SP2.2 Climate action		Tom Campbell	Hillingdon Co	736	Statutory Body

Blair Peach Primary School and allotments Hillingdon Council advocates for the protection of the Allotments adjacent to the Blair Peach Primary School. This site should be retained as allotments. We note that the site is designated as a Community Open Space and as such is protected from development under the plan.	The new Local Plan does not propose any reduction in the allotment space available in the borough. Allotments have Community Open Space designation which reflects their local importance and safeguards them from development. There are no plans that would affect the allotments on this site and the council is keen to retain them.	SP2.2 Climate action		Tom Campbell	Hillingdon Cd	736	Statutory Body
Site Allocations Hillingdon Council previously identified that the draft plan included site allocations with potential for cross-boundary impact. Hillingdon Council noted that site allocations did not include information indicating the scale of the development, design parameters, or adequate information on uses including the proportions of different uses or use classes proposed. The table below includes the sites previously identified in the Regulation 18 response and has been updated to reflect Hillingdon Council's Regulation 19 response. NO04: Islip Manor Housing Estate - Site withdrawn after Regulation 18 stage SO25: Southall TA Barracks - Site withdrawn after Regulation 18 stage. {NB Other sites listed in separate rows}	Noted.	Policy N1: Northolt Spatial Strategy		Tom Campbell	Hillingdon Cd	736	Statutory Body
06NO Yeading Lane I The Council notes that additional content related to use, design, and open space has been added. The site is allocated as not suitable for tall buildings.	Noted.	06NO Yeading Lane I		Tom Campbell	Hillingdon Cd	736	Statutory Body
07NO Yeading Lane II The Council notes that additional content related to use, design, and open space has been added. The site is allocated as not suitable for tall buildings.	Noted.	07NO Yeading Lane II		Tom Campbell	Hillingdon Cd	736	Statutory Body

09NO Kingdom Workshop, Sharvel Lane The site is allocated as a Gypsy and Traveller Site residential providing six pitches. The Council also notes that the boundary of the site has now been defined, so more precise comments can be provided. The Council notes this follows a public consultation exercise in July and August 2023 on the Gypsy and Traveller Pitch Provision Site Assessment, June 2023. The Council responded to this consultation and set out concerns with this site including status as Green Belt, potential impacts on the Down Barns Moat Ancient Monument, site access, transport access and availability. It also highlighted that there were three alternative sites that were more justified when viewed against the evidence presented. Hillingdon Council notes that Ealing Council has responded to some of the issues raised with the site in the document: Summary of Regulation 18 Issues and Responses. While this document responds to some of the broad issues raised, there are others that have not been addressed: Green Belt – The Council previously raised that the great importance Green Belt carries in national policy had not been applied to the site selection process. The allocation now states that the site is Green Belt (adjacent), but the existing site is currently within the Green Belt. Due the prevalence of alternative sites, it is not considered that exceptional circumstances exist to justify changes to the Green Belt boundary. Availability – The Council previously raised issues regarding availability. These have not been addressed in the summary of issues and responses document.	Noted. Alternative sites were assessed and the allocated site is deemed the most suitable. The site fits the government's grey belt definition, as it is previously developed land and makes a negligible contribution to the NPPF's five Green Belt purposes. Moreover, the removal of the GB designation from this part of the site will not affect the greater GB site that includes West London Shooting School. In fact, the proposed G&T site only makes up 0.6% of the wider GB parcel.	09NO Kingdom Workshop, Sharvel Road		Tom Campbell	Hillingdon Co	736	Statutory Body

11SO The Green Quarter (Southall Gasworks) It is noted that a revised masterplan was submitted to Ealing Council in October 2023. Hillingdon Council has provided feedback on the proposed changes. This included concerns regarding: • Design • Highways/Bridges • Education • Minet Country Park • Air Quality It is anticipated that discussions will take place between the two local authorities and the developer to address these issues. Any changes will need to be reflected in the site allocation so that these are secured in the future. It is considered that the site allocation, as currently worded, is not sound due to the fact it is not aligned with discussions that are occurring at present or elements of the original scheme. For example, the allocation currently includes the following: Create new public open spaces and children’s play areas linked with green routes to the canal and Minet Country Park beyond, with a new bridge crossing the canal, and improvements to the canal walk. The existing proposal requires the delivery of three bridges crossing the canal, which consist of the Western Access Road (complete but not open) and two pedestrian bridges crossing the canal. The allocation also seeks to include maximum heights for development, despite this being an area of continued discussion between the two local authorities. It is likely that modifications will	Noted. A suggested modification is proposed to supporting text that reflects the extant and revised planning permissions at Para. 4.7.53 and the proposed use at 11SO.	11SO The Green Quarter (Southall Gasworks)		Tom Campbell	Hillingdon Co	736	Statutory Body

19SO Cranleigh Gardens Industrial Estate & Kingsbridge Crescent The Council notes that additional content related to use, design, and open space has been added. The site is allocated as not suitable for tall buildings. This development has a frontage to the canal. We suggest that the following policy should be added to this site allocation: “Development adjacent to the canal should enhance the waterside environment and biodiversity by demonstrating a high design quality which respects the historic significance of the canal and character of the waterway and provides access and improved amenity to the waterfront. The development should make a significant contribution to the improvement of the Canal” The council supports the requirement that pedestrian access should be provided to the canal towpath via a safe route with good surveillance.	Noted. The suggested additional design principle is accepted.	19SO Cranleigh Gardens Industrial Estate & Kingsbridge Crescent		Tom Campbell	Hillingdon Co	736	Statutory Body
20SO Hambrough Tavern The Council notes that additional content related to use, design, and open space has been added. The site is allocated as not suitable for tall buildings. The Council support the policy requiring improvements to canal access, public realm and landscaping improvements.	Noted.	20SO Hambrough Tavern		Tom Campbell	Hillingdon Co	736	Statutory Body
21SO – Toplocks Estate – This site is located to the north of the Grand Union Canal with the Havelock Road providing some separation between the development site and the canal corridor. However, the provision of an accessible route to the Grand Union Canal mainline via Baxter Close, to avoid the steep ramp beside Norwood Top Lock under Glade Lane Bridge, should be included in the key infrastructure requirements for this site. The site also closely adjoins Maypole Dock which is located to the west of the site. Although not owned by the Trust, Maypole Dock is linked to the Grand Union Canal mainline. There are boats moored along Maypole Dock and any development or proposals to improve access will need to consider these existing moorings and this should be referenced in the contextual considerations. Within the ‘planning designations/site constraints’ Glade has been misspelt as ‘Galde’.	Accepted	21SO Toplocks Estate		Anne Denby	Canal & River	568	Community Interest Group

We support paragraph 3.29 (page 74) of Policy SP2: Tackling the climate crisis: "...the creation of new wildlife habitats and better access to nature will be strongly encouraged" in principle, but it is not sound because there is insufficient detail to be effective, and it is not consistent with national policy, because it does not consider London Plan policy G6 B4 and NPPG 2019 Natural Environment paragraph 023 which highlight the importance of swift bricks. Swift bricks are overlooked by the DEFRA BNG metric so need a separate clear policy. As the London representative of the Swifts Local Network: Swifts & Planning Group, I wish to highlight the minority of local authorities which are not implementing the above planning policy guidance - swift bricks are universal nest bricks, e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf), which are essential to save a variety of endangered red-listed urban building-dependent small bird species such as swifts and house sparrows. Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have improved thermal regulation with future climate change in mind. Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (https://cieem.net/resource/the-swift-a-bird-you-need-to-help/)). The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery & Climate	Noted. The suggested modification is unnecessarily prescriptive and may unintentionally incentivise such interventions over others. Rather than amend the policy a suggested modification to the relevant supporting text is proposed instead.	SP2.2 Climate action		Michael Priaulx	Swifts Local Network: Swifts	Community Interest Group
The Plan is legal because, as far as I am able to ascertain, LBE has followed relevant legal frameworks and has sought to engage local stakeholders at every point, eg. through in-person workshops. The Plan is sound because it is informed by relevant National, London-wide and Ealing-wide policies. The council's key goals, such as creating good growth and reducing inequality, clearly permeate the document. It is also good to see that the plan has been amended in light of feedback from the first draft plan. This will enhance community buy-in.	Noted. Support welcomed.	Policy SP2: Tackling the climate crisis		Simon Piesse	St Nicholas Church, Perivale	Community Interest Group

We have not read every word of the over 500 pages of this Local Plan 2024 for Ealing Borough Council, however we did spend three years with a specially appointed planning officer preparing the draft Generic Management Plan for the 28 (now 29) Conservation Areas within the borough. While we appreciate the importance of the National Guidance on conservation areas and listed buildings in both the Town and Country Planning Act 1990, and the continually updated National Planning Policy Framework, and the requirement of this document to avoid duplication of that guidance, we must bring attention to the importance of the local and specific Generic Management Plan 2023, for all Ealing’s conservation areas, which is ignored in this Local Plan. The topic, not the actual guiding document, is mentioned in passing in item 5.10 on page 457 under the general heading of Design and Amenity. In the Town study covering Acton (para.4.1.5 page 98) there is mention of its seven conservation Areas,.. and a significant number of listed buildings, but no further information regarding the character or importance of these areas setting environmental or design standards and in attracting visitors. In Ealing’s section of the Bedford Park Conservation Area there are 212 listed houses of national and international importance, attracting groups of visitors every year. This fact has been ignored in this Local Plan, together with acknowledgement of the built heritage and cultural importance of the whole borough. The casual reference to the Ealing Character Study is not good enough. The area of Bedford Park is split by the boundary between Ealing and Hounslow, both boroughs have designated conservation areas. In total there are 356 listed Grade II houses, and 3 grade II* buildings: a Church, an Inn and Stores. The area is visited by foreign tourists every year. and they probably	Noted. There is active cooperation between ealing and its neighbours both through the West London Alliance (with specific working groups on strategic planning matters) and bilaterally. The local plan at Policy SP3.3 D seeks to ensure that new development meets the highest design standards, responds positively to the local character and recognises the role of heritage in place-making. There are numerous other references to the importance of heritage and conservation throughout the plan including at Policies SP2.2 F (vi), SP2.2 G (vi), SP3.1 B, SP4.1 A, SP4.1 E, SP4.2 H-I. The plan is also informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Regards the conservation area appraisals, much work has been done to update them and this has involved extensive and detailed consultation with local amenity groups and other interested parties. This body of work is separate from the Local Plan and the council is currently recruiting a new dedicated Conservation Officer whose first key task will be to complete and implement the review, taking into account public and stakeholder consultation earlier in the year.	Policy DAA: Design and Amenity – Ealing LPA – local policy		Carol Woolner	Bedford Park Society plan	Community Interest Group

EA01 Broadway Connection and Arcadia Shopping Centre. This site, which has had a long and highly controversial planning history, has doubled in extent since the Regulation 18 plan was consulted on without any explanation or pre-announcement to the communities who have been long involved with it. Planning consent was granted earlier in 2024 on the eastern half of the site in the face of criticism from local groups, Historic England, GLA officers and the Metropolitan Police, but their comments are not acknowledged and reflected in the site proposals. Previous proposals for the entire site were the subject of a 3 week public inquiry after which the Secretary of State overturned LBE’s planning consent, agreeing with the Inspector that that the bulk, massing and certain aspects of the design of the scheme would be inappropriate in its surroundings and would fail to preserve or enhance the character and appearance of the Town Centre conservation area and the setting of the Haven Green conservation area, as well as harming the setting of the Grade II* listed Church of Christ the Saviour. The entire site also is covered by an existing SPD that was consulted on and approved in 2012 after the Secretary of State’s decision. This set out principles for its development including on pedestrian movement, sight lines and visual impact and built form and height. The current document ignores the contents of the SPD and its principles. Further concerns are that this is not one of the sites considered by Allies and Morrison and British Land, which owns the eastern half of the site, also owns the EAL2 site considered below. The combined impact on the Town Centre if these two significant sites were to be developed as suggested would be immense and has not been considered. This underlines the importance of producing a master plan for the Town Centre in conjunction with all Ealing’s stakeholders, and especially	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	01EA Broadway Connection & Arcadia Shopping Centre		Tony Miller	Central Ealing	487	Community Interest Group

EA02 Ealing Broadway Shopping Centre and Crystal House. This major Town Centre asset was developed and opened by the late Queen less than 40 years ago and has been the subject of recent improvements and refurbishment without a damaging increase in height. It includes a locally well-liked, award-winning shopping centre that was locally listed in Ealing's 2004 UDP. It is also a very busy centre that continues to meet the needs of the Ealing community. Further or upward development would be unacceptable. Again, there has been absolutely no local engagement with any proposals for its redevelopment despite the fact that if it were to proceed, demolition and redevelopment of the site would have a transformative effect on the Town Centre. Allies and Morrison's considerations of the possible height and massing of a new development are buried deep in the evidence base in the Appendix to their Tall Buildings Study as Cluster A. This study has never been discussed locally. It must be brought into the open and the public must be given a fair opportunity to comment on it.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The plan has also been shaped by three rounds of public and stakeholder consultation.	02EA Ealing Broadway Shopping Centre & Crystal House		Tony Miller	Central Ealing	487	Community Interest Group
.EA03 Sandringham Mews. This is a sensitive site at the heart of the Town Centre. Consent has recently been granted to construct buildings from 3-8 storeys over the southern half, despite objections to the maximum height. Consideration of even greater heights is excessive and inclusion of the wider site into Cluster A creates additional issues that need to be examined in connection with the rest of that Cluster. As mentioned above, this should be part of a properly prepared master plan.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	03EA Sandringham Mews		Tony Miller	Central Ealing	487	Community Interest Group
EA04 Eastern Gateway. Consent to redevelop this site with a 6 storey building was granted in 2021 so it is unclear why this site remains in the list of development sites. The suggested 8 storeys would be excessive for this location adjacent to low-rise residential buildings.	Noted.	04EA Eastern Gateway		Tony Miller	Central Ealing	487	Community Interest Group
EA05 Perceval House. Despite the approval of a 26-storey tower on this site, against significant local objection, no precedent has been set that suggests this site would be suitable for the proposed maximum of 21 storeys. This would still have an excessive and detrimental visual impact on important heritage assets. If a new scheme is to emerge it needs to take greater heed of the Central Ealing Neighbourhood Plan as well as Historic England advice, the design principles of the NPPF, and the London Plan.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	05EA Perceval House		Tony Miller	Central Ealing	487	Community Interest Group

EA06 49-69 Uxbridge Road. This is a property that should be refurbished rather than redeveloped for climate change reasons. We note, and generally support the reduction from the Regulation 18 proposals to a maximum height equal to existing or consented buildings.	Noted.	06EA 49–69 Uxbridge Road		Tony Miller	Central Ealing	487	Community Interest Group
EA07 CP House. Consent to redevelop this site for a 12 storey office development was granted in 2022 in the face of objections that the height and bulk would impact detrimentally on the Ealing Green Conservation Area and Walpole Park. This consent has not yet been implemented. We note, and would support, the proposed reduction in the maximum height to 10 storeys, which would reduce the impact on Walpole Park and the Ealing Green CA.	Noted. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	07EA CP House		Tony Miller	Central Ealing	487	Community Interest Group
EA08 Craven House. This long vacant site has consent (164805FUL) for a 10 storey office building and is the subject of revised but not yet applied for proposals that retain this maximum height and include some other improvements on the consented scheme. We note and support the Regulation 19 proposal that no scheme should be taller than the 10 storeys in the consented one; however, we consider that traditional terraced housing would be a preferable use of this vacant site.	Noted.	08EA Craven House		Tony Miller	Central Ealing	487	Community Interest Group

Tall Buildings Ealing Matters/SEC have provided a comprehensive response on policy D9, concluding that this is not sound. We concur. Without repeating the detail in that response, we conclude that the policy as drafted is arbitrary and not based on any rational and agreed evidence base. Such evidence as may be found (Allies and Morrison report) is not being adopted, with excessive and unjustified thresholds for what constitutes a tall building being applied to, in particular, the area covered by the Central Ealing Neighbourhood Plan, where the proposed policy states that only buildings of over 21 storeys would be considered tall. The Town Centre is largely included with two Conservation Areas, has a number of nationally and locally listed buildings and buildings of heritage significance, and is characterised by typically low-rise conventional Victorian and Edwardian housing; it is thus particularly sensitive to inappropriate development. No recognition whatsoever has been given to the objectives and policies of the Neighbourhood Plan regarding building heights, amongst them policy HBE3 – Building Heights – that states ‘Tall buildings (ie those substantially taller than their immediate surroundings and/or which significantly change the skyline) will only be permitted if they are of the highest architectural and sustainable urban design and do not have an adverse impact on Conservation Areas and their setting or on other designated heritage assets.’ {Suggested modification:} Comprehensive redrafting of the policy is required, incorporating the detailed points made by Ealing Matters/SEC. In particular, this should address the need for site appraisals to be more thorough and where in ‘exceptional	There was a transcription error in the Tall Buildings study at R19. The study has now been updated and Table DMP1 will be corrected. TB boundaries will be added to the interactive policies map.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation			Tony Miller	Central Ealing	487	Community Interest Group

Heritage This representation concerns the need for the plan to contain policies for the conservation and enhancement of the historic environment. The Central Ealing area is particularly rich in heritage, with a number of listed buildings, Conservation Areas and architecturally interesting Victorian and Edwardian residential development. These contribute to its particular character, but in the absence of policies to protect them, are at risk. London Plan Policy HC1B: Heritage, Conservation and Growth requires that ‘Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by: - setting out a clear vision that recognises and embeds the role of heritage in place-making - utilising the heritage significance of a site or area in the planning and design process - integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place - delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing. NPPF Chapter 16: Conserving and enhancing the historic environment requires at Para 190 that: ‘Plans should set out a positive strategy for the conservation and enjoyment of the historic	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on design, heritage and culture. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. Neither the Mayor of London nor Historic England have raised objections to this approach. The local plan at Policy SP3.3 D seeks to ensure that new development meets the highest design standards, responds positively to the local character and recognises the role of heritage in place-making. There are numerous other references to the importance of heritage and conservation throughout the plan including at Policies SP2.2 F (vi), SP2.2 G (vi), SP3.1 B, SP4.1 A, SP4.1 E, SP4.2 H-I. The plan is also informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The Site Selection reports also informs any Development Sites whose narrative in the plan includes both contextual considerations and design principles to guide any future development proposals. Regards the conservation area appraisals, much work has been done to update them and this has involved extensive and detailed consultation with the ECS and other interested parties. This body of work is separate from the Local Plan and the council is currently recruiting a new dedicated Conservation Officer whose first key task will be to complete and implement the review, taking into	Policy DAA: Design and Amenity – Ealing LPA – local policy			Tony Miller	Central Ealing	487	Community Interest Group

Design and Amenity The NPPF Chapter 12 sets out requirements regarding the importance of good design, with paragraph 132 stating ‘Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood planning groups can play an important role (our emphasis) in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.’ London Plan Policy D1A) requires that ‘Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas’ capacity for growth. Together, these requirements can be summarised as the need for the plan to work with communities to understand local aspirations and to reflect them to achieve well designed and beautiful places. Policy DAA in the 19 Plan does not respond to these requirements and is thus not sound. The Policy has not been developed with local communities, does not respond to local aspirations and shows no understanding of Ealing’s defining characteristics. We understand that a ‘design panel’ was established to contribute to the development of the Plan, but this was comprised only of professionals selected by the Council. Their recommendations were not subjected to community review and feedback and thus cannot	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and has an extensive policy suite on design, heritage and culture. Ealing's Local plan does not duplicate or repeat London Plan policies as there is no necessity to do so but has supplemented those policies, where appropriate. Neither the Mayor of London nor Historic England have raised objections to this approach. Delivering good design, design scrutiny and maintaining design quality are important. The Local Plan at Policy SP3.3 D seeks to ensure that new development meets the highest design standards, responds positively to the local character and recognises the role of heritage in place-making. There are numerous other references to the importance of heritage and conservation throughout the plan including at Policies SP2.2 B (iii), SP2.2 D, SP2.2 F (i) and (vi), SP3.1 C, SP4.1 A, SP4.1 D–F. The plan is also informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The Site Selection reports also informs any Development Sites whose narrative includes both contextual considerations and design principles to guide any future development proposals.	SP4.1 Good Growth		Tony Miller	Central Ealing	487	Community Interest Group

Infrastructure Planning The NPPF and London Plan include a number of policies that set out requirements that Local Plan policies should provide a broad ‘context framework’ for development, including necessary infrastructure, development contributions, social infrastructure and consideration of development phasing where necessary infrastructure may not be available. We would again refer the Inspector to the detailed commentary on this aspect in the submission by Ealing Matters/SEC, in particular their analysis of the newly introduced infrastructure delivery plan (IDP) included in the evidence base for the Regulation 19 consultation. We would highlight the many existing problems with much of the infrastructure in Central Ealing, including an inadequate and failing sewage system, water supply problems, electricity supply and distribution problems leading to a lack of capacity for new developments and ongoing regular gas leaks. The disruption to the major (and other) road network caused by frequent, lengthy and poorly managed repair works is not acknowledged, nor is there acknowledgement that the much hyped Elizabeth Line, used as justification for proposed massive expansion in housing provision in Central Ealing and elsewhere along the line is already at capacity during some peak hours. Again in Central Ealing, the reductions in library facilities and opening hours and the recent closure of the Town Hall to the community compound the lack of social infrastructure for a growing population. None of this has been addressed with the input of the community affected. The Plan’s response to this appears to be an ‘infrastructure delivery schedule’, but this is merely a list of possible projects, most uncostered and unfunded and unrelated to any needs	Noted. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. IDPs are living documents, acting as a ‘snapshot in time’, and as different infrastructure providers respond to their own unique challenges, the information will naturally date and alter over time. The IDP will require updating on a regular basis to reflect this. The delivery of infrastructure is the responsibility of various different bodies, as detailed within the IDP, including those with a statutory duty to provide sufficient infrastructure to meet identified needs, as well as those who are responding to market conditions. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The planning system can be rightly called upon to fund physical infrastructure (i.e. buildings, roads, railways etc) the need for which is because of new development, but it is not there to deal with demand for services, which is the role of rates and taxes to fund. A lack of doctor appointments or school places as objections are rarely an infrastructure issue, but a result of the way operational activity is funded.	Policy SP3: Fighting inequality		Tony Miller	Central Ealing	487	Community Interest Group
Reg 19 09NO This would not be acceptable in Northolt as we are already a deprived ward. There are lots of gangs already in and around the area. I have knowledge of the amount of crime rg gangs, Grooming, drugs etc a gypsy site would put an enormous amount of strain on the area, schools and children living in Northolt. I believe it will have a detrimental effect on all within Northolt	Noted.	09NO Kingdom Workshop, Sharvel Road		Julie Porter	Alec Reed Academy		Community Interest Group

Whilst we consider the plan to be legally compliant and sound in terms of the matters within the interest and remit of Theatres Trust, we suggest that the effectiveness of the plan could be enhanced through some minor amendments: - SP2.3 - Thriving Communities - With regards to part C, we welcome that the policy seeks to protect and enhance community facilities. However, this could be strengthened by outlining strong criteria by which proposals for loss would be judged, for example robust evidence of marketing, evidence that a facility cannot be used for alternative community uses.	Noted. The point is well made and is already covered by London Plan Policy S1. The London Plan is an integral part of Ealing's local development plan. Ealing's Local Plan does not duplicate or repeat London Plan policies as there is no necessity to do so.	SP2.3 Thriving communities		Tom Clarke	Theatres Trust	Community Interest Group
Tackling the climate crisis to "...the creation of new wildlife habitats and better access to nature will be strongly encouraged" is welcome in principle but is not sound as it is not effective as the text is too vague, and not consistent with national policy, as it does not consider London Plan policy G6 B4 and National Planning Guidance 2019 Natural Environment paragraph 023 which support swift bricks. Swift bricks are not included in the national Biodiversity Net Gain metric so need their own clear policy. Our organisation was set up to protect swifts which are present but declining fast in Ealing due to an increasing loss of nest sites, and these London and national policies need to be urgently implemented for this species to survive in the borough. {Suggested modification:} Please add to Policy SP2 and/ or Policy G6 local variation: Swift bricks are a universal nest brick for small bird species, and should be installed in all new-build developments including extensions, in accordance with best-practice guidance such as BS 42021 or CIEEM. Swift bricks are a significantly better option than external boxes due to their long lifetime, no maintenance requirements, improved thermal regulation, and aesthetic integration.	Noted. The suggested modification is unnecessarily prescriptive and may unintentionally incentivise such interventions over others. Rather than amend the policy a suggested modification to the relevant supporting text is proposed instead.	SP2.2 Climate action		Fiona McIntyre	Ealing Wildlife Group	Community Interest Group
Under Regulation 18 of the draft local plan this site was allocated, Acton-AC05. The majority of the site is used as a car repair garage (MOT centre). We've been in discussions with {redaction} and {redaction} of Ealing Planning for two years about the redevelopment of the site. We are preparing to submit an application which is in context with the proposed use. The application will be submitted on the 22nd and we have been told it will go to committee in May.	Noted	General		Duncan Wilson	Urbane London	Developer

83 - 85 Gunnersbury Lane, 0.14 Acton Town Centre, Acton W3 8HH The site was previously allocated, Acton - AC05 under Regulation 18 of the draft local plan. We have been in discussion with {redaction} (Head of Planning) and {redaction} (Senior Planner) for in excess of two years. Our proposals meet with the Regulation 18 - AC05 proposed use and have been refined and developed working with Ealing planning department. We're preparing to submit a planning application on March 22nd 2024. The site known as 83 - 85 Gunnersbury Lane, Acton, W3 8HH as allocated in the Regulation 18 draft local plan should be allocated in Regulation 19 Local Plan as the site is being brought forward for development. {redaction}, Senior Planning Officer is the relevant planning officer and will make representation on our behalf if required. We have taken part in the Design Review Panel and received back which praised the design and change of use for the two centre location.	It was decided to remove this site as a proposed development site due to its small size (below the 0.25ha threshold). Not allocating a site does not preclude the consideration of a proposal/planning application for the site. It should be noted that planinng officers are not able to make representations on behalf of developers or objectors as this would be a conflict of interest.	General		Duncan Wilson	Urbane London	Developer
Yes, I wish to take part in hearing session(s) To make sure that the repretation is correctly heard and reviewed	Noted	General		Duncan Wilson	Urbane London	Developer

My name is {redaction}, and I am writing to you in my capacity as Rector of St Mary’s Acton, a community that has been at the historic centre of Acton since 1228. We are deeply committed to fostering a sense of belonging, community cohesion, faith presence, support, and outreach that benefit Acton significantly. It has come to our attention that the new Local Regulation 19, Acton Town Plan, St Mary's Acton is mentioned, but it does not consider its impact and role within the community. This oversight concerns us, not only because of the potential implications for our ability to serve our community but also because of the missed opportunities for collaboration that could enhance the well-being and cohesiveness of the local community. St Mary’s plays a vital role not just on the Mount, but beyond, providing much more than just a space for worship. Our programs, such as participation in the night shelter and warm spaces, directly support the local population, especially the most vulnerable members. Our engagement with these initiatives aligns with the broader goals of local planning, aimed at fostering a vibrant, inclusive, cohesive, and supportive community. Inclusion in the local planning process would enable us to contribute our insights, derived from our extensive experience serving the community, ensuring that plans reflect the needs and values of all community members. Moreover, it would allow for a more coordinated approach to addressing social issues, maximizing the impact of both our efforts and those of the local government. It would give representation to one of the key stakeholders in Acton. St Mary’s Acton works closely in partnership with local organisations, in particular Action West London, and Acton Bid, to collaborate on local initiatives to enhance the local community. The Church also works alongside other faiths, such as the Acton Mosque.	Noted. The council would warmly welcome the input of you and your congregation into planning issues and efforts to promote greater social cohesion and notes the essential role you play in enaging with and supporting the local community in your parish. We have added you to the mailing list so that you are notified of any future consultations, events or planning applications in your neighbourhood.	Policy A2: Acton District Centre		Joseph Fernandes	St Mary's Acton	Community Interest Group

I was not aware of the Council's consultation process. I only found out through my neighbour who had stumbled on this through doing some research of their own. Most residence in Agnes Rd and Cowley Rd were also uninformed including the businesses on Cowley Road that you are looking to redevelop. This consultation process is sneaky and sly in that the residents who will be mostly affected were not even informed in any form of matter. The council is trying to hide this from us instead of including us in these important matters Impact on Cowley, Swainson, and Agnes Roads: The construction of a six-story property on Cowley and Swainson Roads will have adverse effects on residents not only on those roads but also on Agnes Road, which connects with Swainson Road. The increased height will overshadow homes and gardens, affecting access to sunlight and privacy. Lack of Additional Services: The plan does not adequately address the strain on existing services. There are no provisions for additional schools, doctors, dentists, or other essential amenities. Further development without corresponding infrastructure exacerbates the strain on these services. Parking Challenges: Despite controlled parking on Agnes Road, parking spaces are often scarce. Additional development, even if declared car-free, will worsen the parking situation for residents.	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development is noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House		Karim Lahoud			Individual

The consultation process was/is flawed as stakeholders were unaware of the process nor had the opportunity to discuss the plan. (para 1.20 of regulations). Residence and stakeholders have a right in this process. I feel that the Council in this instance has done the minimum to raise awareness not creating inclusiveness with its diverse communities who should be important in the decision making process . Being apart of the Webinar, with approximately 10 people observing in Acton Plan Regulation 18 summary and 19 Proposed submission discussion, I am confident that not enough notice or effort was given to the residents or stakeholders with email notification of registration for the webinar being sent on 13 March for a meeting on the 21 March 2024. The Local Plan for the Acton Vale Industrial Park and Westgate House (06AC of the regulation) is not legally compliant and is unsound in a number of ways including: 1. It does not reflect the vision and aspiration of the local community (para 1.15 of the regulation). 2. It is not aligned with the neighbourhood planning framework in that it is not community led (para 1.20 of the regulation) 3. There is limited (or no) provision for greenspaces as set out in Policy SP2 4. There is no connection between this development and the key infrastructure schemes as set out in Tabes SS1 and A1. 5. This area of Acton is not part of the wider area for regeneration as set out in paragraph 4.1.29. 6. The plan only talks of the possible impact on semi-detached houses to the west of the site, omitting to observe the impact on houses also to the south of the site and the existing apartments on both Cowley and Swainson Roads if extra storeys are built on to the existing buildings in the development site. The impact of height and structure as well as lack of light and air flow has encroached on our quality of life. This has severely damage the	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development is noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House			Paul Dunlay			Individual

The plan is legal and sound as far as I am able to ascertain. 1. However, with reference to Perivale, I would like to make the following points: *As part of the aim of supporting and diversifying housing, efforts must be made to better manage and limit the number of HMO's, in particular in the Medway Estate area. This is because they are causing anti-social behaviour, including littering and fly tipping * As part of the aim to improve a sense of community in Perivale, additional focus should be given to the provision for YOUNG PEOPLE, including the creation of a youth club and sporting/leisure facilities, perhaps in the new community hub around the station. This should be a key priority in the disbursement of CIL funding *As part of the aim to protect and enhance the area's unique character, a commitment should be made to support established faith-based communities, such as the Parish Church of Perivale, St Nicholas Church. In particular, the council should commit to resolving the current parking and loading restrictions outside this church, which are making it impossible for disabled/ elderly parishioners from parking outside the church. LBE is aware of a proposal, but, regrettably, there has been no progress since January 2024 on this issue *As part of the aim to improve local realm in Perivale, the plan should set out a commitment to reduce littering, fly tipping and the wide-spread prevalence of on-street drinking, especially along Bilton Road and along Wadsworth Rd 2. With reference to the whole plan: *As part of the overall strategy to invest in economic and infrastructure development, explicit reference should be made to the creation of additional community infrastructure that will be needed to support additional population/workers, namely: *additional provision for Police/ PCSOs *additional provision for GPs and dentists *additional	Noted. Regards, Houses in Multiple Occupation (HMOs) they are an important part of London's housing offer, often reducing pressure on other elements of the housing stock. Policy 4.3 F emphasises the importance of mixed and balanced communities: "by avoiding over concentrations of particular tenures and managing change of use including Houses in Multiple Occupation (HMOs) according to local needs and evidence." However, the quality and management arrangements of some HMOs can sometimes give rise to concern. Therefore, the supporting text (Para 3.58) goes on to say: "New housing and conversions within existing residential areas will be managed to ensure a good range of tenures and sizes and to protect residential amenity. The council will also consider introducing further guidance and/or an Article 4 Direction to manage HMOs." Ealing Council is actively considering a non-immediate Article 4, which means once it is 'made' it will take a year before it can be properly implemented. This does not mean that HMOs will not necessarily get planning permission but that in future applicants would be required to go through the planning process. This should help act as a deterrent against some of the less professional developers. Regards St Nicholas Church, although this is an operational matter and beyond the scope of the Local Plan, meetings were arranged between the representor and the relevant service, in this case the Highways Dept to try and seek either a resolution or discuss possible options going forward. Regards supporting infrastructure, plans are set out in the	Policy P1: Perivale Spatial Strategy		Sulina Piesse			Individual
We have not read every word of the over 500 pages of this Local Plan 2024 for Ealing Borough Council, however we did spend three years with a specially appointed planning officer preparing the draft Generic Management Plan for the 28 (now 29) Conservation Areas within the borough. While we appreciate the importance of the National Guidance on conservation areas and listed buildings in both the Town and Country Planning Act 1990, and the continually updated National Planning Policy Framework, and the requirement of this document to avoid duplication of that guidance, we must bring attention to the importance of the local and specific Generic Management Plan 2023, for all Ealing's conservation areas, which is ignored in this Local Plan. The topic, not the actual guiding document, is mentioned in passing in item 5.10 on page 457 under the general heading of Design and Amenity.	It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and includes a suite of policies on heritage and culture (Policies HC1-HC7). Nonetheless, the local plan at Policy SP3.3 D seeks to ensure that new development meets the highest design standards, responds positively to the local character and recognises the role of heritage in place-making. There are numerous other references to the importance of heritage and conservation throughout the plan.	Policy DAA: Design and Amenity – Ealing LPA – local policy		Carol Woolner			Community Interest Group

I am writing to express my concern that the proposed local plan 1. envisages an excessive growth in the population of the borough over the next 15 years 2. does not place enough restrictions on the height of any buildings which are proposed for areas which are currently relatively low rise residential. There is a real risk that the construction of large numbers of high rise towers will detract from the nature of a Ealing as a community and turn it into a dormitory for people working elsewhere. That will spoil the current atmosphere of the borough and place intolerable strain on transport infrastructure, which is already overloaded. I feel strongly that there should be a cap on any population growth target of no more than 2,000 per annum and that there should be a presumption that all new buildings will be restricted to a maximum of 6 storeys unless they are within a short distance of existing higher rise buildings.	Noted. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Infrastructure needs are modelled variously upon population or household projections depending upon the type of provision, with health, for example, based upon GLA population projections. The local plan is subject to binding housing targets and it is not the role of the LPA to produce population projections. The plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Paul Sawbridge		429	Individual
Regulation 19 Report February 2024 Site 1.4 Acton Vale Industrial Park & Westgate House (06AC) As owner occupiers of premises at {redacted} Agnes Road we support the principle of bringing forward brownfield land for development to provide new homes. However, the proposal for new residential block of up to 7 storeys on this site presents a challenge to the amenity of residents along the south-east side of Agnes Road that does not appear to have been addressed in the council's plan. The development of new and taller buildings within the western rectangular extension of the Industrial Park has potential to cause serious harm to the setting, amenity, privacy and receipt of daylight of the existing houses. We would suggest that this could be mitigated by identifying all or part of this rectangular area for return to the Agnes Road houses as garden land, and requiring the set-back of any new development to at least the line of the rear garden extents to the north. We consider that the Plan would be made sound in respect of this site proposal if these matters were directly addressed in the version of the Plan to be issued to the Secretary of State. We are willing if necessary to attend at the plan inquiry to elaborate on these representations.	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development is noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House		Helen & Don Richards			Individual

The Local Plan for the Acton Vale Industrial Park and Westgate House (06AC of the regulation) is not legally compliant and is unsound in a number of ways including: 1. It does not reflect the vision and aspiration of the local community (para 1.15 of the regulation). 2. It is not aligned with the neighbourhood planning framework in that it is not community led (para 1.20 of the regulation) 3. There is limited (or no) provision for greenspaces as set out in Policy SP2 4. There is no connection between this development and the key infrastructure schemes as set out in Tables SS1 and A1. 5. This area of Acton is not part of the wider area for regeneration as set out in paragraph 4.1.29. As a resident at {redacted} Agnes Road, I see the following issues with the Design Principles: 1. ENABLE INCREASED HEIGHT OF REDEVELOPMENT TO 6 STORIES WHILE AVOIDING CANYON EFFECT: The impact in Cowley Road, would impact on Cowley, Swainson, and Agnes Roads: Cowley Road is already very heavily congested due to residents above Tesco on Cowley Road and customers visiting Tesco as well as visitors to units and residential units on Swainson Road (Morris House). An additional 6 storey building would add to the overall congestion and flow of this area as well as have detrimental affects in terms of polluting this area that is already heavily congested. A building of 21m in this area would definitely create a canyon effect in an area that is congested and has no green space. 2. ENSURE CAREFUL CONSIDERATION OF HEIGHT TO HOUSES ON AGNES ROAD: Current height of the industrial units at the back of the gardens on the west side of Agnes Road are at approximately 5metres at their highest, increasing the height by 4x to 21m would adversely affect our access to light and privacy. It is worth noting that the rooms that would be affected by greatly reduced light and privacy are	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development is noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House			Nathalie Cantor			Individual

kitchens

The Local Plan for the Acton Vale Industrial Park and Westgate House (06AC of the regulation) is not legally compliant and is unsound in a number of ways including: 1. It does not reflect the vision and aspiration of the local community (para 1.15 of the regulation). 2. It is not aligned with the neighbourhood planning framework in that it is not community led (para 1.20 of the regulation) 3. There is limited (or no) provision for greenspaces as set out in Policy SP2 4. There is no connection between this development and the key infrastructure schemes as set out in Tables SS1 and A1. 5. This area of Acton is not part of the wider area for regeneration as set out in paragraph 4.1.29. 6. Impact on Cowley, Swainson, and Agnes Roads: The construction of a six-story property on Cowley and Swainson Roads will have adverse effects on residents not only on those roads but also on Agnes Road (in particular the East side of Agnes Road), which connects with Swainson Road. The increased height will overshadow homes and gardens, affecting access to sunlight and privacy. 7. Parking Challenges: Despite controlled parking on Agnes Road, parking spaces are often scarce. Additional development, even if declared car-free, will worsen the parking situation for residents. 8. The plan only talks of the possible impact on semi-detached houses to the west of the site, omitting to observe the impact on houses also to the south of the site and the existing apartments on both Cowley and Swainson Roads if extra storeys are built on to the existing buildings in the development site.	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development is noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House		Oliver Cantor			Individual
{No text}	Noted.	General		David Randles			Individual

I would like to make the following representation on the regulation 19, chapter 4 Acton- 06AC Acton vale industrial park and Westgate house consultation as a resident of {redacted} Agnes road. I believe this proposal is unsound and is not legally compliant. A draft (forwarded below) was sent in error, please accept this version as the final representation. My representation is as follows: * This is a council-imposed proposal that does not align with the neighbourhood planning framework in that it is not community led (para 1.20 of the regulation). This consultation, as far as I'm aware, has been conducted on-line only which in itself is discriminatory and will exclude members of the community who are not able to access the materials provided or take part in virtual meetings. * The change in proposed land usage is not desirable. Currently the light industrial complex accommodates valuable local businesses (hardware store and garage) which would be displaced. Smaller commercial premises are not being adopted in Swainson and Cowley road. * The proposed height of the development has not taken into account the impact of the flats in Cowley road and Swainson roads. Any new development would result in properties in Cowley Rd, Swainson Rd and Agnes Rd being overlooked and thus leading to a loss of privacy and potentially loss of light as well for the existing residents . * The unnecessary intensification of land use in the proposed 6 story development would create a concrete corridor in Cowley road/Swainson road. This pocket of intense high rise dwellings	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development are noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House			Loretta Smith			Individual

1. “1. The plan itself is verbose and repetitive. It is simply impenetrable to the vast majority of Ealing residents unfamiliar with planning jargon or issues. 2.Ealing’s housing target of more than 40,000 homes over the next 15 years is excessive and undeliverable. But if it were to be delivered, it would create unmanageable population growth of more than 80,000 people (more than the population of Guildford) according to GLA projections. “3. The infrastructure plans to support this very high growth rate are sketchy at best. “4. The plan’s proposals for wholesale redevelopment of relatively new and serviceable buildings will exacerbate climate change. “5. Valuable areas of metropolitan open land (London’s equivalent of green belt) are to be lost. A new policy of ‘enabling development’ will justify developing them in the council’s interests. “6. There are no policies to protect the borough’s heritage. “7. Tall building heights, especially in Ealing and Acton, are excessive and unjustified. “8. There is no vision or strategy for the near total redevelopment of Ealing metropolitan town centre that the plan envisages. “9. The plan’s 82 individual development sites have the potential to have considerable impact on the borough and the proposals for them are totally insufficient. “10. Ealing’s proposals for monitoring the plan are no more adequate now than they have been over the past 10 years.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. The unique role of Ealing Metropolitan Town Centre is recognised by the plan, and the area will be subject to further detailed planning in the same way as the other 7 towns. Proposals on Green Belt/Metropolitan Open Land reflect the	General		Elizabeth Pilgrim			Individual

Acton Vale Industrial Park and Westgate House(06AC of regulations) Please refer to 1.32 Acton Local plan -Consultation. I was not aware of the Council's consultation process. And through my own investigations residence in Agnes Rd nor Cowley Rd were also ill informed or n to at all. The consultation process was/is flawed as stakeholders were unaware of the process nor had the opportunity to discuss the plan. (para 1.20 of regulations). Residence and stakeholders have a right in this process. I feel that the Council in this instance has done the minimum to raise awareness not creating inclusiveness with its diverse communities who should be important in the decision making process . Being apart of the Webinar, with approximately 10 people observing in Acton Plan Regulation 18 summary and 19 Proposed submission discussion, I am not confident enough that notification on all aspects of the consultation got to all stakeholders and the community. To be successful and confident of a thorough consultation process you would expect more attendance. Again not aligned to 1.20 of the Regulation) The question has to be ask why? The recently built apartments on Cowley Road was initially describe as 4 storeys. We find out later they are mezzanine, 8 floors and monumental in the height. The building should never have been built to that height. The exisiting buildings in the area were approximately 2 storey; 10 metres. All surrounding buildings are low rise. The building above texcos on Cowley Rd SHOULD NOT BE USED AS A BENCH MARK for new builds. Future buildings should respect, low rise, the previous limitations, 2 storey, 10 metre, the height of the previous buildings. It has not enhanced the area, the opposite, already creating a ghetto type effect with its blocking light, limiting space, being over looked. Noise is enhanced amd traffic access is appalling. Large lorries use the road	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development are noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House		Simon Marshall			Individual

The Local Plan for the Acton Vale Industrial Park and Westgate House (06AC of the regulation) is not legally compliant and is unsound in a number of ways including: 1. It does not reflect the vision and aspiration of the local community (para 1.15 of the regulation). 2. It is not aligned with the neighbourhood planning framework in that it is not community led (para 1.20 of the regulation) 3. There is limited (or no) provision for greenspaces as set out in Policy SP2 4. There is no connection between this development and the key infrastructure schemes as set out in Tables SS1 and A1. 5. This area of Acton is not part of the wider area for regeneration as set out in paragraph 4.1.29. 6. The plan only talks of the possible impact on semi-detached houses to the west of the site, omitting to observe the impact on houses also to the south of the site and the existing apartments on both Cowley and Swainson Roads if extra storeys are built on to the existing buildings in the development site. In addition: 7. Unnecessary Intensification: Given the significant new development in the area over the past few years, the proposed six-storey height unnecessary. It risks altering the character of the neighbourhood and impacting residents' quality of life. 8. Impact on Cowley, Swainson, Agnes Roads and Valetta Roads: The construction of a six-storey property on Cowley and Swainson Roads will have adverse effects on residents not only on those roads but also on Agnes Road, which connects with Swainson Road as well as a number of properties on Valetta Road. The increased height will overshadow homes and gardens, affecting access to sunlight and privacy. 9. Lack of Additional Services: The plan does not adequately address the strain on existing services. There are no provisions for additional schools, doctors, dentists, or other essential amenities. Further development without	The proposed allocation is consistent with local character and broader plans for Acton, including the 20 minute neighbourhood and infrastructure needs. Cowley and Swainson roads are already home to 5 and 6 storey developments and so the proposals are no significant departure from the existing character of the area. The constraints of Agnes Road upon development is noted in the allocation and will need to be addressed by any proposals for this site.	06AC Acton Vale Industrial Park & Westgate House		Louise Austin			Individual
{No text}	Noted. Support welcomed.	General		Matthew Rodger			Individual

As someone who lives with a family including disabled adults with two of us working in Ealing, I support the points made by Friends of the Earth and the Green Party which indicate that the plan is both unlawful and unsound. In particular: For a plan to be adopted it must pass a serious of legal tests including that it is consistent with achieving sustainable development and alternative strategies have been considered. There is a fundamental flaw in the plan because it envisages accommodating the massive increase in the borough's population up to 2038 mainly in tower blocks. The climate impact of this sort of construction is much greater than low level development or renovating property and it will make it impossible for Ealing Borough to meet its Net Zero target. The Local Plan anticipates that 43,000 extra housing units and much of these will be in tall buildings. However, these new builds will not match with the pattern of demand which is for more affordable housing and that the majority will be marketed to overseas investors for renting out at high levels. Both my sons will not be able to afford housing independently and will be living with us in Ealing for our lifetimes, simply because the housing in Ealing where they need to live near us, is unaffordable. According to an estimate by FOE, the local population is expected to increase by 88,000 by 2038 the equivalent of the number of people who currently live in St Albans or Harrogate with the rise generated by the increased number of people living in the borough. Everyone in the borough will be affected if the council proceeds with its local plan, not just those living in proximity to newly built tower blocks. Ealing is already over-crowded. Hospitals and doctors' surgeries are stretched to breaking point. We in our family cannot get routine GP appointments, that we and our disabled sons need for periods of 6 weeks. Public transport is over- The planned tower blocks proposed for South Acton are not in line with previously agreed policy on the number of floors allowed. The height of the blocks are not suitable to the area and will adversely affect current resident in the area. The infrastructure is not being updated to cope with the additional number of new residents ie transport, school, GP's, dentist and hospitals. The environmental impact of building the number of Tower Blocks proposed will make it impossible for Ealing Council to meet it's net zero target as proposed.	Noted. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. Proposals on Green Belt/Metropolitan Open Land reflect the performance of land against Green Belt policy.	General		Emily Driver			Individual
	Noted.	Policy A3: South Acton		Jane Nielsen			Individual

I cannot comment on the legality of the Local Plan, so therefore stated that it is legally sound. I do however believe that the 'Primary Active Travel Routes' and suggested improvements to connectivity in the Hanwell Spatial Strategy in particular, both to seemingly improve accessibility AND "tackle the climate crisis" fail to address the incredibly high volume of motor-vehicle traffic on these roads. This is the common denominator when it comes to low Active Travel levels and low foot-fall on high-streets. Specifically, Uxbridge Road, through the heart of the borough - it is well known that this road has next to no active travel or cycling infrastructure, currently, and huge changes will be needed to make this a genuinely appealing route for large numbers of people choosing to travel actively. Cars dominate this road all day and throughout the night. If the population of Ealing is to grow by tens of thousands in future years, how and why should we believe that, before any Local Plan developments are agreed upon and undertaken, the general way that people travel in - and through - the borough will change? Infrastructure changes to encourage active travel and discourage driving personal cars should come before any major changes to retail units, industry and large residential developments. Boston Manor Road, too, is not conducive to Active Travel, which has busses travelling along it, HGVs and lots of cars and is fairly narrow. Judging by Ealing Council's current failure to implement proper, positive and effective infrastructure changes to roads in the borough, I would be skeptical of suggestions that roads such as these will become, <u>without a lot of work</u>. 'Primary Active Travel Routes'. Other	The Cycle Network Plan route map, which has recently been completed, is suggested to replace the previously proposed primary and secondary active travel routes. The Cycle Network Plan outlines Ealing's ambition to improve cycling infrastructure to create a network of routes in the next decade, focusing on a network of core routes to be segregated wherever possible; other key routes for improvements to be made even where full LTN 1/20 compliance is not achievable; neighbourhood routes which will see improvements to residential roads to make cycling comfortable; and green links such as the canal towpath. The forthcoming Transport Strategy (still in draft) aims to make the case for changing travel in Ealing, to support residents to travel less by car and more by walking, cycling and public transport. It will include priorities for each of the seven towns, noting transport issues and potential future pressures and prioritising schemes to address them.	SP2.2 Climate action		Rex Baker			Individual
{No text}	Noted.	General		Pankaj Sheth			Individual
I believe this is unsound as it is heavily reliant on building large blocks of flats. These will be unhealthy for people living high rise with no proper outside space. They are unlikely to be affordable. The more likely eventuality is that investors will end up owning them, either kept empty for long term investment, or rented out at unaffordable rents.	Noted.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Valerie Benjamin			Individual
{No text}	Noted.	General		Catherine Booth			Individual
{No text}	Noted. Support welcomed.	General		Thomas Begley			Individual
{No text}	Noted.	General		Jo Thompson			Individual

It fails to comply with the requirement to reduce pollution and achieve net zero. {Suggested modification:} Stop building tower blocks, more protection for green spaces (appreciate some of the latter has already been implemented). There is already too much housing density and air quality, noise and water quality is very poor, access to vital services such as local hospitals, doctors and dentists are a nightmare already.	Noted.	General		Claire Moran			Individual
The plan expects to increase the population of Ealing by 88,000 by significantly transforming the skyline, the resident profile and reducing the resources available to live in the borough. this is a reduction on the quality of life on what is already a poor standard of service in the borough of Ealing. Ealing is not prepared with services, roads and safety to take surplus residents from other areas. We don't have assessed needs, it seems that Ealing council are making agreements for personal or other financial gain. not in the interest of the residents served and not in the interest of improving the area. this is not a sustainable development. The justification lacks benefits for the existing residents. As per other large tower block developments, empty sites are left untouched in West Ealing, diminishing retail is in Ealing Broadway, and shanty town retail is untouched in West Ealing. with regard to the deliverable, the plan is something the council today can decide to proceed with in their personal interest but no one in the council be there to see the plan through and most likely are not going to feel the impact of a flooded population in a already struggling borough. The other way of looking at this is the council seeking more revenues achieved through council taxes which would be in the region of 170 million per year. {Suggested modification:} Consult with the residents justify how the changes will benefit the existing residents explain what actions you are taking to remove the drunks, drug users and petty crime from the west ealing area especially. explain how the developers will be held to account - we have a list of ealing developments that have not gone well at all. Explain how the properties will be sold and prioritised for UK residents and not used to house illegal asylum See model form	Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. Infrastructure needs are modelled variously upon population or household projections depending upon the type of provision, with health, for example, based upon GLA population projections. The local plan is subject to binding housing targets and it is not the role of the LPA to produce population projections. The planning system can be rightly called upon to fund physical infrastructure (i.e. buildings, roads, railways etc) the need for which is because of new development, but it is not there to deal with demand for services, which is the role of rates and taxes to fund. A lack of doctor appointments or school places as objections are rarely an infrastructure issue, but a result of the way operational activity is funded.	General		Michael Keane			Individual
	Noted.	General		Rachel Alexander			Individual

It's 1200 pages of world salad, much of which is contradictory. The presentation of the plan itself seems to discriminate against people who are unable for any reason to read and process that quantity of information whilst the content is of very mixed quality. The failure of Ealing Council to provide a safe borough for residents whilst instead prioritising people traveling from outside the borough either by car or air speaks for itself. There are great examples shown by other London boroughs so there's no need to even have to think for yourselves.	Noted.	General		Tim Doran			Individual
{No text}	Noted. Support welcomed.	General		Sveva Giachetti			Individual
{No text}	Noted.	General		Eamonn Rabie			Individual
{No text}	Noted. Support welcomed.	General		Jimmy Walsh			Individual
The Local Plan proposals have many weaknesses it appears to me to have been drafted carelessly with little regard for the welfare of Ealing residents or climate considerations. The 10 points below were drafted by Ealing Stop The Towers group. As I agree entirely with the carefully written comments, I am sending them verbatim as my response to the Local Plan proposals 1. It's a dangerously poor plan. The plan is critically important for the future of Ealing and its residents, but appears to be built on little or no solid evidence with few, if any, clear measures of success. There are also no strategies to monitor and manage the risks associated with the plan. This plan is so poor in its evidence base that we feel it does not meet the minimum legal requirements for a Local Plan. It has no evidence of need and shows a continuing failure of Ealing Council to define what success for its Local Plan will look like and how it will monitor whether the plan is working. This is particularly evident in regards to its housing targets which have no basis in an assessment of local need in terms of the kinds of housing local people, or Londoners more widely, need and can afford, or the point at which Ealing's infrastructure will fail to support the proposed 80,000 new residents. The plan also grants a 'green light' to developing towers by re-defining what a tall building is without an assessment of the local and wider impact of this kind of ultra-high density housing. It also fails to address growing evidence that developing high density towers as a way of providing housing is environmentally and socially unsustainable. 2. It would have a massive negative impact on the quality of life in Ealing. The plan aims to bring another 80,000 people into the Borough without addressing the issue of how this will impact quality of life and the ability of infrastructure to cope. This is reckless in the	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Ealing's local plan housing target follows the London Plan in annualising the current 10 year housing target. This results in a target of 21,570 over 10 years (between 2019-20 and 2028-29). Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. Infrastructure needs are modelled variously upon population or household projections depending upon the type of provision, with health, for example, based upon GLA population projections. The local plan is subject to binding housing targets and it is not the role of the LPA to produce population projections. The plan follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient. Similarly, the plan is informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height.	General		Colin Lomas			Individual

I'm unhappy with the proposal of the G&T site opposite my home in Harvil Lane farmland. You have failed to take into consideration the objections to this, specifically the already heavily traffic congested areas on West End Road, and the lack of utilities for existing residential properties. In addition this doesn't fit with your alleged objective to promote active travel to help reduce carbon emissions to net zero and improve air quality and the health of residents - nothing is being done about our air quality already drenched with Heathrow flight path and RAF. You are also failing to consult with Hillingdon property owners who will be impacted by this proposal for up to 60 G&T units.	Noted.	09NO Kingdom Workshop, Sharvel Road		Kim Burton			Individual
{No text}	Noted.	General		Malvinder Panesar			Individual
Whilst we understand that a travellersite will be required somewhere, residents have been opposing the current proposal on the basis that; •The land is on the only working farm in the borough and the farmer has stated that if he loses any more land (having lost some to a golf course), the farm will be financially unviable. •The area is on green belt land and should not be developed for residential use. •The land will have to be purchased from the existing landowner (Oxford College I believe) who do not want to sell it, at ratepayers' expense. •Ealing has a considerable amount of unused/derelict land, more distant from existing premises, which would not affect businesses or homeowners as directly. •Houses in the area will be adversely affected. •The adjacent shooting club has opposed the proposal. •The initial proposal documents which recommended Sharvil Lane were riddled with inaccuracy and seems to have ruled out more suitable sites for reasons which could be easily overcome. •The council appeared to have deliberately carried out the absolute minimum of consultation and have failed to give reasonable notice to those who may be affected by the proposal. The only current notification is buried on page 341 of the Local Plan, which most people will be unaware of. In addition, the council have been stating that they wish to improve the area of Northolt stating high levels of need, however the area has been improving with an upmarket shooting club and a golf course opening up. Bringing in a further high need community is likely to be a retrograde step in any attempt to improve the area, and may make these existing businesses unviable. The local residents wanted to explore whether the Conservative opposition in the area would wish to support us local residents in our bid to get this proposal withdrawn? I am mindful that with the forthcoming	Noted.	09NO Kingdom Workshop, Sharvel Road		Michael McAleer			Individual

Policy SP4.2 C proposes: "Setting out a specific strategy for Locally Significant Industrial Sites (LSIS) in line with the London Plan and actively by means of plan-led comprehensive masterplans undertaking mixed intensification. Masterplans are defined in the Regulation 19 draft document at Glossary of Terms, p506: "A masterplan is an overarching planning document and spatial layout which is used to structure future land use and development." The Regualtion 19 Draft local plan appears to continue the Council's current "masterplanning" mode for dealing with new development proposals. A "masterplanning" approach has been referred to in development documentation for recently approved schemes, eg for the TfL Bollo Lane developments, for piecemeal developments along the eastern edge of Bollo Lane opposite the TfI sites and for developments behind these, moving into the South Acton Locally Significant Industrial Site (LSIS). Deficiencies with the current approach have been: - Where a "Master Plan" has been applied, there has been no transparent method for its approval and adoption. For example there has been a "masterplan" for the development of the block that includes varied ownership between Bollo Lane and Stirling Road, stretching southwards from Roslin Road to Colville Road. A version of undefined status of the "masterplan" was included in the developer's documentation submitted for development of two sites within this strip at 29-39 Stirling Road and 2-10 Roslin Road Acton W3 8DJ (Planning ref:204553FUL.) The "masterplan" was included as one chapter (Chapter 5) in the Design and Access statement for this development. The process adopted for dealing with the "Masterplan" for the TfL Bollo Lane development was described the developer as a "co-ordinated illustrative master planning process"	Noted, the requirement for a masterplan originates in the London Plan, further detail on the process for masterplans would be the subject of guidance	SP4.2 Decent living incomes		Steve Bower			Individual
{No text}	Noted.	Policy FLP: Funding – The Local Plan – Ealing LPA – local policy		Steve Bower			Individual

There is no reference to taking advantage of development to mitigate and remove deficiencies in all levels of open space provision from small and pocket parks up to local and district parks. Tackling the climate crisis in Acton in Policy A1 states at J: “Promote and enhance Acton’s parks including better accessibility and the creating green links to connect parks and open spaces.” The measures proposed do not mitigate the overall open space deficiencies that the Allies and Morrison Character Study of the borough has identified in Acton. the Local Plan must identify and address explicitly the open space deficiencies within the Acton area. The Local Plan should make specific proposals for how deficiencies will be mitigated/eliminated. Specific site proposals for residential use in Acton within areas of open space deficiency should each require that the full needs for amenity and open space of its residents are met on site. This must include needs for amenity space, needs for children of all ages including ages 0-5 and ages 6 and above and needs for private open space. The needs for public open space should also be met in full. The Council has from time to time required in-lieu payments under Section 106. These have not been effective in meeting local open space needs as the Council has not had staff in place either to collect Section 106 payments or to plan their use to meet the intended purpose. The London Plan states explicitly that Development Plans should “1) undertake a needs assessment of all open space to inform policy. Assessments should identify areas of public open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for the different types required. Assessments should take into account the quality, quantity and accessibility of open space. 2) include appropriate designations and policies for the protection of open space to meet	Noted. Improving access to the network of open space in the borough remains a key objective of the Local Plan, and is supported through a number of policy principles including 20 minute neighbourhoods and Active Travel. Further modifications are also proposed to policies SP2, SP3, DAA and S5 would promote the concept of Active Environments as well. Forming part of Ealing's Development Plan the London Plan provides clear direction through policy G4 around the significance of deficiency in informing planning decisions. Pending the preparation of a revised Green Infrastructure Strategy it has not been possible to prepare revised deficiency mapping. Once completed, revised mapping will be published as part of the Council's Authorities Monitoring Report, and this will be material in decision making. The AMR recognises that access can be expressed in terms of physical proximity to open space and in terms of the quantity of open space per head of population by geographical area (i.e. by ward), and the intention would be to continue to report against both measures.	Policy A1: Acton Spatial Strategy		Steve Bower			Individual
Building the Gypsy and Traveller site would remove critical income for the last working farm in Northolt causing the farm to be financially unviable. This is definitely not a sound use of resource. The Northolt 09NO document also states the proposal is for 6 pitches. However, the previous document produced by Three Dragons states: “The proposal is for up to 40 pitches”. Presumably, the 6 pitches would be built first which would effectively close down the farm when the remaining 34 pitches could then be built. However, this area would definitely be green belt land so would not be legally compliant to how most people understand green belt land. Strangely, this land has a tendency to flooding which is strange as a number of other sites supposedly considered by Three Dragons were rejected for just that reason.	Noted. The consultants were asked to consider a range of possibilities including the potential relocation of the existing G&T site at Bashley Road. Following representations from a wide variety of organisations, including from the gypsy and traveller community, the potential relocation of Bashley Road was not considered a viable or desirable outcome and was not taken forward.	09NO Kingdom Workshop, Sharvel Road		Peter Kilian			Individual

I don't have a view on whether or not the overview of the Greenford plan is legally compliant or sound but if I ticked yes I didn't get a notes section come up to complete. I thought part of this consultation was to listen to residents views so this from isn't really appropriate but here are my views. On the map 01GR and 02GR are shown as being permitted for high rise buildings of over 10 floors. From what I can read of the map these sites look like the current Greenford town car park and the derelict Stall (ex greengrocers). I don't think either are suitable places for such large buildings towering over the current height of the shops and over the existing busy traffic lights. They will add to the traffic congestion around the area. I don't object to small blocks of flats in the area. Why can't the Stall not have a matching block of flats to match the ones on the adjacent corner where the Red Lion was? This would enhance the aesthetics of the area rather than lots of random buildings being built towering over everything. If Greenford car park is to be built on where will people who want to come to the Broadway to shop park and likewise where will all the new residents park? Will the town plans once approved all be given the same level of urgency as each other and work all started at the same time or will some areas take priority and if so which ones will take priority? The overview says the plans will be reviewed every 5 years, will this delay the current plans by having to go to consultation each time?	Noted. Design analysis for both 01GR and 02GR indicates that a recommended height of up to 6 storeys (21m) is acceptable.	01GR Greenford Hall, Methodist Church former Police Station, former Clinic & Greenford Library	02GR Greenford Broadway Car Park	Anne Quish			Individual
{No text}	Noted.	General		Azhar Sadiq			Individual
{No text}	Noted.	General		Zachary Begley			Individual
{No text}	Noted. Support welcomed.	General		Darren Lawrence			Individual
{No text}	Noted. Support welcomed.	General		Sangita Ranchhod			Individual

The development of a traveller site in this area goes against everything this plan should deliver. It will negatively impact the green spaces around the area. It will further increase deprivation in the area, which is already the lowest in the area. It will negatively impact crime and will encourage other illegal settlers in the area. Ealing is a large borough why would you consider putting a traveller site in one of the most deprived areas rather than providing initiatives that will enhance the area. Northolt residents are always treated unfairly compared to other areas in the borough and this is another example that shows the councils lack of interest in developing a better Northolt. Residents have consistently said they do not want the site here, but you have not listened. It's discrimination and totally unjust to put it in this location. Find another site in a more affluent area that will not be impacted.	Noted.	09NO Kingdom Workshop, Sharvel Road		Atlyn Forde			Individual
{No text}	Noted.	General		Pratik Shah			Individual
{No text}	Noted.	General		D Makkar			Individual
{No text}	Noted.	General		Peter Peploe			Individual
Reasons for objections to gypsy and traveller sites in and around Northolt: - crime rates will inceease - impact on house prices in the area - environmental issues / issues in rodents - local traffic increase - school spaces Overall capacity in the area to cope with such a large community- already councils struggling to cope as an example - unkempt lime tree park not far away from the proposed site. As seen in the recent past having gypsy's in this community was a disaster - safety and enviornmental concerns. This is not therefore fair on the residents of northolt or the gypsy community due to the council struggling to cope.	Noted.	09NO Kingdom Workshop, Sharvel Road		Natasha Budhwani			Individual
I thought we lived in a democracy, we should be asked for our opinions before any decisions are made. A opinion from residents in the area should be listened to.	Noted. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19).	General		David Walton			Individual
{No text}	Noted.	General		Yasir Khan			Individual
{No text}	Noted. Support welcomed.	General		Simon Roadnight			Individual
{No text}	Noted.	General		Frances Pittock			Individual

{No text}	Noted.	General		Dennis Georgiou			Individual
{No text}	Noted.	General		Sarah Trueman			Individual
{No text}	Noted.	General		Karen Thomas			Individual
Paragraphs 4.7.10 and 4.7.11 of the Southall Plan are a critically important section. At the webinar I attended on the Southall Plan on 11 March 2024, I made the same point as below, which the session chair, Steve, concurred with. Southall is a town that clearly needs regeneration, but what it lacks is an overall cohesive plan. Around the train station there are simply far too many developments that have been given permission to build in close proximity, where there is little to give back to the community other than increasing the population for commercial benefit to the various developers. The one and only exception is The Green Quarter, where there are new builds, as well as many local amenities such as a park, coffee shop, local entertainment, etc. The other developments are nowhere close to this level of community benefit. The town is over populated with people, cars, which increases congestion and litter, as well as anti-social behaviour. Without addressing these issues, I don't understand why the Council has given so many permissions to build. From my own experience of contesting planning permission, I know the Council deals with each application in isolation and does not look at the overall impact each build will have on the town. The population of the town has increased and we know that many people are living in sub-standard conditions in garages...clearly, these people will continue to live illegally, whilst new people come in to live in the new builds, further increasing the local population and creating local tension. There is no social cohesion, which is a myth. On the garages, how is the Council getting on with its licensing scheme? Surely, that needs to be impactful before new builds are given permission. What is the Council's masterplan for Southall, i.e., what development cohesion is it seeking with all the new builds? Does it understand what the intended and unintended	Noted. 03SO proposes a residential mixed use scheme with retention of community facilities and design analysis recommends a height up to 6 storeys (21m). 04SO also proposes a mixed use scheme that comprises residential, education and community uses and again design analysis recommends a height up to 6 storeys (21m). 05SO does seek to optimise the use of the land by providing residential uses on upper floors and again design analysis recommends a height up to 6 storeys (21m).	05SO 31 – 45 South Road & Telephone Exchange Quality Foods & Iceland		Tajinder Panesor			Individual
{No text}	Noted.	General		Tom Holloway			Individual
Not sound.	Noted.	General		E Davies			Individual

This representation is about 05EA Perceval House plans - Design principles: 1) Building height and position a) The plan allows tall building up to 21 storeys high. This is out of Ealing character, consider Filmworks as a good representative example of well integrated building in this area. Allowed height should not be more than 6 stories high. b) Height is proposed to be concentrated to the back of the site, where the council parking and power substation is currently located. There are flats in Belgravia House (Dickens Yard) like ours facing north, which already have barely legal access to sunlight. For example, our flat is in the furthest back corner and only partially gets direct sunlight for around 20 mins during sunset. If new building is built according to the current proposal, that allows dislocation of the power substation and building up to 21 storeys high building concentrated at the back, our flat will completely lose the last direct sunlight. I consider this illegal. The plan needs to be changed to mandate full protection of existing sunlight access to all existing flats, especially the most challenging ones like ours. {Suggested modiifcation:} Modify: 1) Policy E2, paragraph 4.2.56 - 05A Perceval House, Tall Buildings section: new statement: maximum height of 6 storeys (21 metres). 2) Policy E2, paragraph 4.2.56 - 05A Perceval House, Design Principles section: Bullet point two: Change: Heights are to range between 3 and a maximum 6 storeys (21m) across the site. Remove: Height should be concentrated to the north east corner of the site along Longfield Avenue and step down to properties on Craven Avenue. Add: Height should be spread evenly. Design must guarantee that any new building along Longfield Avenue facing Dickens Yard does not obstruct or reduce access to direct sunlight to all existing flats in	The consultation version Tall Buildings Study was subject to some transcription errors which have now been corrected in the submission version. The heights recommendations are based upon comprehensive design analysis in the Character Study.	05EA Perceval House		Saso Trendafilov			Individual
{No text}	Noted. Support welcomed.	General		Robert Speirs			Individual
{No text}	Noted. Support welcomed.	General		Zarreen Ajmal			Individual
{No text}	Noted.	General		Maria Winner			Individual
{No text}	Noted. Support welcomed.	General		Mathusha Sabesh			Individual
a. These representations have been prepared by Jon Dingle Ltd on behalf of Culross Properties Ltd, in respect of the Local Plan Final Proposals (Regulation 19) Version (February 2024).	Noted	03NO Northolt Sorting Office		Jon Dingle	Culross Properties Ltd		Developer

b. London Plan Policy E3 (Affordable Workspace) confirms that “in defined circumstances set out in Parts B and C below, planning obligations may be used to secure affordable workspace ...”. The circumstances noted in Part B include locations identified in a local Development Plan Document where cost pressures could lead to the loss of affordable or low-cost workspace, and in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area. Part C confirms that Boroughs’ Development Plans should consider detailed affordable workspace policies in light of local evidence of need and viability. These may include policies on site-specific locations or defining areas of need for certain kinds of affordable workspace. c. The Council have cited the Affordable Workspace Study as providing the evidencial basis upon which they have developed their policy. The draft version of the Study is part of the evidence base for the Regulation 19 version of the emerging Local Plan. d. The Study notes that all end users and developments are unique and a flexible approach can be taken to the provision of affordable space (paragraph 1.6, page 4). The Study found that there are issues with existing Affordable Workspace policies which have been limited in their capacity to deliver	Noted.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		Jon Dingle	Culross Properties Ltd	Developer

f. The Study and Reg 19 Local Plan identify a number of distinct areas within the Borough. Northolt is one such area. The Local Plan notes that Northolt has a small and low-value local economy with a high number of jobs paying under the London Living Wage. The SIL site within Northolt has low employment densities compared to other industrial clusters across Ealing. Alongside this, there is a lack of office space and alternative workspace resulting in office-based workers leaving the town to work (paragraph 4.5.13). g. Paragraph 4.5.14 notes that Northolt’s economy lacks diversity in retail and commercial activity, due to the lack of a strongly defined town centre. In comparison to other parts of the borough there are fewer facilities for arts and culture, fewer jobs, and less provision for skills training and adult education. g. Paragraph 4.5.14 notes that Northolt’s economy lacks diversity in retail and commercial activity, due to the lack of a strongly defined town centre. In comparison to other parts of the borough there are fewer facilities for arts and culture, fewer jobs, and less provision for skills training and adult education. h. In the light of these issues, draft Policy N1 (Northolt Spatial Strategy) seeks to encourage investment and growth to deliver new and improved jobs and services, amongst other things.	Noted	Policy N1: Northolt Spatial Strategy		Jon Dingle	Culross Properties Ltd	Developer

i. Draft Policy E3 part F sets out a basis for affordable workspace to be provided on-site or in the form of an off-site contribution. Paragraph 5.28 of the supporting text confirms that “weight should be given to the need to deliver our employment land use requirements and the wider regeneration benefits of employment led development proposals. The requirements for affordable workspace should be used as a starting point for negotiation within this context”. j. While the London Plan, the Council’s Study and the supporting text note that flexibility is important, the draft Policy contains no flexibility in the application of the threshold, the level of discount, and the basis the determination of whether the affordable space should be on or off-site solely on the size of the scheme. k. The Council’s draft Affordable Workspace Study prepared by REDO and Volterra confirms that there are a great number of variables that go into the determination of the best form in which to provide affordable workspace. The report also notes the great deal of uncertainty that surrounds the delivery of such space. The Local Plan Policy must provide a framework and clarity so that applicants can understand what is expected of their	The need for flexibility set out by the AW study is for the type rather than the quantum of provision. In this context it is acknowledged that reference to 'intended occupants' and the supporting wording in para 5.28 is unclear. This will be revised. There is no requirement for space to secure an occupant as part of planning permission. The on site thresholds are precisely designed to ensure that space is sufficiently large to be lettable, and also that it would be viable and attractive to a commercial AW operator in the event that the site owner does not want to operate the space themselves. Offsite contributions will be pooled by the Council to achieve a the same effect. The only requirement of the policy is that contributions are made at the specified rate. Where provision is to be made on site then a business plan should support the application. In most cases, based upon industrial profile, contributions will be offsite and this supporting evidence will not be necessary.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation	03NO Northolt Sorting Office	Jon Dingle	Culross Properties Ltd	Developer

Policy N.1: Northolt Spatial Strategy a. These representations have been prepared by Jon Dingle Ltd on behalf of Culross Properties Ltd, in respect of the Local Plan Final Proposals (Regulation 19) Version (February 2024). b Part B(i) of Policy N.1 states that Northolt’s existing neighbourhood town centre will be a focus for new, mixed-use development including housing that supports a stronger retail and service offer for those living and working in the area. c. As drafted, the Policy reads as though the Council wishes to focus industrial and commercial uses solely in those areas where they already exist and promote only residential-led development within the town centre. With the economy, technology and ways of working changing so rapidly and significantly, there is a danger that the draft Policy will lack the flexibility required in the years ahead to respond to future development proposals, that may be different to traditional forms of development. d. Industrial and commercial uses can play significant roles in supporting the vitality and viability of town centres. People who work in town centres spend more money in those centres than people who live there. e. At present, the policy is not considered to be prepared with the objective of contributing to the achievement of sustainable development or to be	Noted. This site should contribute to active frontages along Mandeville Park Road. Residential-led, mixed use development will best contribute to meeting this objective, given the surrounding residential context. Class B8 uses would be incompatible with the placemaking objectives as set out in the rest of the Local Plan. A suggested modification is proposed that would delete the first and second bullet points of the Design Principles for clarity.	03NO Northolt Sorting Office	Policy N1: Northolt Spatial Strategy	Jon Dingle	Culross Properties Ltd	Developer

Northolt – 03NO – Northolt Sorting Office. b. For many years this site has accommodated a post office, Royal Mail depot and sorting office. The post office falls within Class E, while most of the site is used as a depot and sorting office (Class B8 uses). c. The draft site allocation identifies the Proposed Use as “residential-led, mixed use scheme”. The proposed uses for this site are too narrowly defined and are not consistent with both the supporting text to this proposed site allocation and other draft policies within the Local Plan. d. The text on page 329 includes “industrial retention and any co-location of residential uses should achieve industrial uplift” and “Create a masterplan for a mixed use scheme comprising of new residential and industrial (B1c and B8) uses, with commercial and residential uses ... “. The identified Proposed Use makes no reference to industrial uses. e. A residential-led redevelopment would see the loss of the employment use from the site. Draft Policy N.2: Northolt Neighbourhood Town Centre does not follow the apparently prescriptive approach of Northolt – 03NO with part (ii) seeking to strengthen and diversify the commercial core through active frontages and mixed uses. Draft Policy N.2 would therefore support the principle of the employment-led	Noted. This site should contribute to active frontages along Mandeville Park Road. Residential-led, mixed use development will best contribute to meeting this objective, given the surrounding residential context. Class B8 uses would be incompatible with the placemaking objectives as set out in the rest of the Local Plan. A suggested modification is proposed that would delete the first and second bullet points of the Design Principles for clarity.	03NO Northolt Sorting Office		Jon Dingle	Culross Properties Ltd	Developer

g. Given the site’s long-standing use for Class B8 purposes and the provisions of other policies within the plan regarding Ealing generally and Northolt specifically, the range of uses identified within the “Proposed Use” section of the allocation should be amended. It cannot be the case that employment-uses are not appropriate on this site. h. The redevelopment of the site would need to avoid causing harm to the homes adjacent to the site on Eastcote Lane and Moat Farm Road. It would therefore be appropriate to identify the employment uses that could be appropriate for the site. i. At present, the policy is not considered to be prepared with the objective of contributing to the achievement of sustainable development, or to be prepared positively, in a way that is aspirational but deliverable. The allocation is not clearly written and unambiguous with a conflict between the Proposed Use and supporting text. It is not currently evident how a decision maker should react to development proposals. j. The “Proposed Use” section should be amended to read: Residential-led, mixed use scheme or employment-led (Classes E(g) or B8), mixed-use scheme k. The proposed changes would reflect elements of the	This site should contribute to active frontages along Mandeville Park Road. Residential-led, mixed use development will best contribute to meeting this objective, given the surrounding residential context. Agree to deletion of 2nd bullet point of Design Principles as discussed above.	03NO Northolt Sorting Office		Jon Dingle	Culross Properties Ltd	Developer

1.1.1. We are instructed on behalf of our client, Luxgrove Capital Partners (‘Luxgrove’), to submit representations to Ealing Council (‘EC’) on the Ealing Regulation 19 Local Plan and Proposed CIL Charging Schedule. 1.1.3. As a key housebuilder operating within the borough of Ealing, Luxgrove specialises in delivering high-quality developments and have engaged with the Council on a number of occasions throughout the years. This representation seeks to build upon previous representations submitted to the Council in the form of Call for Sites and the Regulation 18 consultation which was held from 30 November 2022 to 8 February 2023. 1.1.4. Overall, Luxgrove supports the Regulation 19 Draft Local Plan and considers it to be a highly ambitious, positive plan which focuses on delivering the homes and jobs Ealing need. Luxgrove particularly supports the spatial policies set out within Chapter 3 of the plan, and the principle of cultivating 20-minute neighbourhoods at the heart of the plan in line with sustainable living. The climate crisis objectives along with fighting inequality are considered good core aspirations which are highly regarded. {Policy Context including quotes from NPPF} {Appendix 1 – Heritage and Townscape Addendum prepared	Noted. Support welcomed.	General		Fergus Wong	Luxgrove Cap	725	Developer

3.2. Policy D9 – Tall Buildings 3.2.1. Keni Projects have been instructed to undertake a review of the Regulation 19 Draft Local Plan and associated evidence base documents, with particular reference to heritage, townscape and design matters. This note is included within this submission within Appendix 1. This note makes particular reference to the Tall Buildings policy as well as the contents as set out within two site allocations, also touched upon below in sections 3.9 and 3.10 below. The Council is requested to refer to this submission for a full analysis, however a brief summary has been provided below. 3.2.2. Whilst it is acknowledged that the Council has produced an updated Tall Building Strategy, it is not considered that the strategy goes into sufficient detail to warrant the prescriptive nature of the maximum heights and design comments contained within emerging Policy D9 and respective site allocations. It is noted that there has not been any more detailed design analysis undertaken in this updated Strategy compared to the document submitted as part of There is also reference within paragraph 5.15 under Policy D9 that the ‘heights listed in Development Sites are the product of detailed design assessment’, which again, is disputed, given the high-level nature of the assessment contained within the Tall Building Strategy. It is however acknowledged that this paragraph does state that all sites should be subject to a full design assessment at the point of application. 3.2.3. It should also be noted that there were a number of inconsistencies in the Tall Building Strategy, particularly in Appendix	There was a transcription error in the Tall Buildings study at R19. The study has now been updated and Table DMP1 will be corrected. TB boundaries will be added to the interactive policies map. Maximum heights will now be changed to appropriate heights in line with GLA advice on the application of London Plan policy.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Fergus Wong	Luxgrove Cap	725	Developer

3.3. Policy SSC – Small Sites Contribution 3.3.1. This policy is considered to prevent small scale sites from coming forward as it would be detrimental to the viability of a scheme, and also dismisses the important contribution that small-scale sites provide in providing much-needed housing in the Borough. In this regard it conflicts with national objectives of focusing development on brownfield land and maximising development potential of small sites through. 3.3.2. Quod have been instructed to undertake a review of the Regulation 19 Draft Local Plan and associated evidence base documents, with particular reference to affordable housing and viability matters. This document has been included as part of this submission within Appendix 2, and the Council is kindly requested to refer to this, however a brief summary has been provided below. 3.3.3. First, it finds that the inputs adopted in the viability study are not realistic and accurate in the current market, including build costs, finance costs and projected sales revenues. When the inputs are adjusted to more realistic levels, this has a significant impact on whether schemes would be viable/deliverable. 3.3.4. Quod has undertaken analysis in relation to the impact that the introduction of a small sites contribution would have to the viability and deliverability of proposals of under 10 units, which is set out in Table 2 of the note. The calculation finds that at any level of requested affordable housing contribution ranging from 5% to 50% a 7-unit scheme would not be viable to deliver. This is	The policy has been tested through the whole plan Viability Analysis	Policy SSC: Small Sites Contribution – Ealing LPA – local policy		Fergus Wong	Luxgrove Cap	725	Developer

3.4.2. Policy HOU – Affordable Housing 3.4.1. Quod have reviewed this draft policy and full analysis is contained within the note, however a brief summary has been provided below. 3.4.2. Proposed policy HOU (Affordable Housing) is considered to conflict with strategic policy as set out within the London Plan (2021). London Plan Policy H5 sets out the minimum requirement for Fast Track Route to be 35%. Ealing’s policy for 40% is considered wholly unfounded and presents a clear conflict in policy. 3.4.3. Similarly, the specified contribution of 40% for Large Scale Purpose Built Shared Living (LSPBSL) is considered to be overly onerous in requirement and conflicts with strategic policy contained within the London Plan. The same applies to the requirements for Purpose Built Student Accommodation. 3.4.4. Quod’s report finds that should a higher 40% threshold be introduced for Fast Track compliance, some sites would not be able to come forward if developers are unable to accept a viability review mechanism. This has been demonstrated in the note through calculations based on a currently pending application submitted to Ealing at 99-113 Broadway, West Ealing (ref: 240012FUL), which is also referred to in section 3.9 below. This application has been submitted on the basis of a 35% Fast Track approach, whereby the scheme would be viable, however should the threshold be increased to 40%, the scheme would no longer be viable. The introduction of the 40% threshold would therefore result in the loss of over a	The threshold approach is an approach to apply the fast track, and is still subject to viability testing.	Policy HOU: Affordable Housing – Ealing LPA – local policy			Fergus Wong	Luxgrove Cap	725	Developer

3.5.2. Policy H16 – Large Scale Purpose Built Shared Living (‘LSPBSL’) 3.5.1. The proposed policy, which correlates with London Plan Policy H16, presents a variation in only allowing LSPBSL to be located within Ealing Metropolitan Town Centre. It is considered remiss of the Council to focus this type of development in this singular location and contradictory in policy. 3.5.2. In limiting the location for this type of development, it essentially limits the opportunity for this type of development to come forward, therefore impacting a demographic of people who this style of living is most in demand, most notably young professionals between 25 – 34 years of age. LSPBSL is a key product which plugs the gap for those that are unable the access the housing market through traditional home ownership, whereby an extra 370,000 households are anticipated to enter the private rented sector over the next decade in the post ‘help to buy’ world3. 3.5.3. As set out within paragraph 5.23 under emerging policy H16, it is agreed that LSPBSL works well in well- connected locations, with good access to local amenities. This is in line with the guidance contained within London Plan Policy H16. Given that the emerging Plan seeks to promote development within 7 main town centre areas, which are all areas that are well-connected and have access to a wide range of amenities, it would be counter-intuitive to restrict LSPBSL development to only Ealing Metropolitan Centre and not within other areas of the borough. On this basis, we suggest that the wording of the emerging policy should be updated to allow LSPBSL in all of Ealing’s 7 towns, and in areas of PTAL 4 and above.	There is no demonstrated need for LSPBSL anywhere in the borough and this type of development does not therefore meet identified housing needs. LSPBSL is restricted to EMTC because of the negative effects of these types of development in areas with limited facilities.	Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation		Fergus Wong	Luxgrove Cap	725	Developer

3.6. Policy G6 – Biodiversity and Access to Nature London Plan 3.6.1. Policy G6 sets out the requirement for proposals to achieve a Biodiversity Net Gain (‘BNG’) of at least 20%. The Biodiversity Net Gain Planning Practice Guidance (PPG, February 2024) advises explicitly for Local Authorities to not prescribe a higher level of BNG contribution where it cannot be justified. “Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impact on viability for development. Consideration will also need to be given to how the policy will be given to how the policy will be implemented” – Paragraph 006 Reference ID: 74-006-20240214 3.6.2. There has not been any evidence submitted as part of this emerging Plan to justify the increased target of 20% in line with the guidance as quoted above. It is considered that the 20% requirement would have a detrimental impact on the ability of small sites to be viably brought forward, and that	Noted. It is acknowledged that the National Planning Practice Guidance on BNG seeks to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission. Defra’s own Impact Assessment indicated that the majority of costs associated with biodiversity net gain are incurred to reach a no net less position. The costs associated with moving from 10 to 20% is therefore considered to be marginal. However, the NPPG was published after considerable delays and only on February 14th 2024 (with updates on May 1st 2024) . This was after the Regulation 19 Local Plan and associated evidence base had been finalised ahead of the Full Council meeting held on February 21st 2024 and the beginning of the consultation period that ran from February 28th 2024. The council now acknowledges that additional time and further evidence is needed to prepare evidence to justify a rationale for pursuing a higher BNG percentage target. Therefore, the policy has been modified accordingly and a revised policy potentially containing a higher target will be considered as part of the next Local Plan review.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation			Fergus Wong	Luxgrove Cap	725	Developer

3.7. Policy OEP – Operational Energy Performance 3.7.1. The proposed OEP policy is considered to be overly onerous in its requirements in requiring all new dwellings to be designed to be Net Zero Carbon in operation. It is considered that these requirements should only apply to major developments, in accordance with national policy and guidance, as well as London Plan guidance. The requirement for all new dwellings to demonstrate predictive energy modelling and space heating demands will disproportionately affect the viability of smaller developments, which are integral in overcoming housing demand in a far more sustainable manner through promoting brownfield development. 3.7.2. Requested amendments to draft Policy OEP are shown below: <u>New dwellings or 500 sqm or above, or 1,000sqm or more of non-residential GIA should be designed and built to be Net Zero Carbon in operation. Including:</u> (i) Predictive energy modelling to demonstrate compliance with the Space Heating Demand and Energy Use Intensity targets in Tables DMP2 and DMP3. ~~(ii) Achieving an 'Energy Balance' anywhere this is not~~	The proposed policies as revised have been underpinned by evidence - namely the 'Delivering Net Zero' study. This has tested the proposed policies in terms of technical feasibility and viability. Chapter 9 of the DNZ study provides detailed cost modelling for the various archetypes and scenarios. This demonstrated that policy option 2 (as progressed via Ealing's Local Plan) would result in modest uplift in construction costs of around 1% to 4% relative to a Part L baseline. Viability has also been tested in the round alongside the full suite of local plan policies as part of a whole plan viability assessment. The revised policy approach is considered to be justified, effective and consistent with national policy objectives.	Policy OEP: Operational Energy Performance –Ealing LPA –local policy		Fergus Wong	Luxgrove Cap	725	Developer
3.8. Allocation 12EA – Chignell Place This allocation should be updated to take into account the resolution to grant dated November 2023 under reference 224322FUL, which permitted a building up to 9-storeys in height on this site. The 'Tall Buildings' section of this allocation currently sets out that 'Design analysis indicates a maximum height of 4 storeys', which would not be consistent with the above resolution to grant. The 'Tall Buildings' and 'Design Principles' sections should be updated to reflect the above.	Site allocations follow the evidence base and are not determined in relation to previous planning applications	12EA Chignell Place, West Ealing		Fergus Wong	Luxgrove Cap	725	Developer

3.9. Allocation 13EA – 99 – 113 Broadway 3.9.1. Our client had previously made representations to the Regulation 18 consultation in relation to the maximum heights permitted on this site. We note that the ‘Tall Buildings’ section of the allocation has not been updated, stating that a maximum height of 12 storeys would be acceptable on this site, and therefore set out some further detail in respect of this site below. 3.9.2. There is a currently pending planning application under reference 240012FUL for the demolition of the existing buildings and replacement mixed-use development comprising Class E floorspace and 144 new homes, which steps up to 14-storeys in height. This application was supported by a detailed Townscape and Visual Impact Assessment by Icení which suggests that the area and nearby townscape would be suitable for a building of up to 15 storeys. 3.9.3. The supplementary addendum produced by Icení in support of these representations set out further detail in relation to the Council’s Tall Buildings Strategy and the maximum heights that are set out within this allocation. When considering consents and allocations in the immediate vicinity of this allocation, it does not appear to be cohesive with the maximum heights set out within this allocation. 3.9.4. It should therefore be considered that the ‘Maximum Heights and ‘Design Principles’ sections of this allocation should be updated to reflect the above. It should also be noted that Table E2 on Page	Site allocations follow the evidence base and are not determined in relation to previous planning applications. It is for planning applications themselves to demonstrate that there are material reasons to depart from the provisions of the plan.	13EA 99–115 Broadway, West Ealing		Fergus Wong	Luxgrove Cap	725	Developer

3.10. Allocation 14EA – 131 – 141 Broadway 3.10.1. As set out within our client’s previous Regulation 18 representations, there are inconsistencies within the text of the allocation itself which should be amended. 3.10.2. The ‘Tall Buildings’ section of the allocation identifies that the site ‘is in principle suitable for a tall building’, and that ‘Design analysis indicates a maximum height of 6 storeys’. 6 storeys is at a height which is below the definition of a tall building in the area (7 storeys). There is no recognition of its role as a ‘gateway’ into the town centre and the merits of height here, as is recognised in the name of the Draft Site Allocation (and in the existing Site Allocation). 3.10.3. Notwithstanding this, application reference 225080FUL (as referenced within the ‘Relevant Planning Applications’ section of the allocation) granted permission for a 9-storey building comprising 94 co-living units on the site at nos. 131-137 in November 2023. There is also a currently pending application which includes no. 139 within the application site boundary (ref: 235015FUL), also at 9-storeys in height. On this basis, the site allocation should be updated to reflect that a minimum of 9-storeys in height should be acceptable. The ‘Proposed Use’ section and ‘Design Principles’ sections should also be updated to reflect the above permission.	Heights set through site allocations replace general guidance on heights in policy D9.	14EA Western Gateway, 131–141 Broadway, West Ealing		Fergus Wong	Luxgrove Cap	725	Developer

3.11. Allocation 20EA – Downhurst Care Home 3.11.1. We note that Downhurst Care Home has been identified under allocation 20EA for redevelopment. It however should be of note that part of the above allocation includes a section which has been granted permission by our client. Louisa Chilton Court, towards the east of the site allocation, was granted planning permission on the 17 August 2023 under planning permission reference 232370FUL for “the demolition of 2 existing buildings (Class C3) and erection of 3 new buildings (Class C3) comprising 4 residential units with associated amenity space, car parking, refuse and cycle storage and landscaping”. 3.11.2. On this basis, the site allocation should be updated to either remove the consented site area from the allocation, or to update the text in relation to the relevant planning permissions, timescales for delivery and the text within the ‘contextual considerations’ and ‘design principles’ section to take the above consent into consideration.	We note that work on the consented area has started and we therefore suggest removing the consented area from the red line boundary.	20EA Downhurst Residential Care Home		Fergus Wong	Luxgrove Cap	725	Developer
5. Conclusion 5.1.1. Under the above points, the Local Plan is considered to fail the test of soundness through not being prepared in a positive manner as to set realistic, achievable minimum standards and rather conflict with national planning policy. 5.1.2. We trust the above representations will be taken into account prior to the submission of the Plan for examination stage, and look forward to reviewing following stages of the Plan to ensure that the representations have been taken into consideration. 5.1.3. We would welcome the opportunity for further discussion and engagement with the Council to discuss the representations in this letter and how the next iteration of the Plan could respond to the requested changes and issues raised.	Noted.	General		Fergus Wong	Luxgrove Cap	725	Developer

Appendix 1 – Heritage and Townscape Addendum prepared by Icen Projects 1. This note is prepared as an addendum to the letter of representations to the Regulation 19 Draft New Local Plan Consultation submitted on behalf of Luxgrove Capital Partners. It considers heritage, townscape and design matters in particular. 2. Icen Built Heritage and Townscape are currently supporting two proposals for Luxgrove Capital Partners in West Ealing: one live application for the Kwik Fit site at 131-139 Broadway (235015FUL); and one live application at 99-113 Broadway (240012FUL). We have provided heritage and townscape inputs to both these applications, as well as to the recently consented application for the Kwik Fit site at 131-137 Broadway (225080FUL) for redevelopment of this site for a 4-9 storey co-living scheme. We also previously submitted representations to the Regulation 18 Draft New Local Plan on behalf of the same client. 3. This note assesses both the Regulation 19 Draft New Local Plan (‘NLP’) and the evidence base documents prepared by Allies and Morrison to support the NLP, including the Ealing Tall Building Strategy, Main Report, Appendix Part 1 and Appendix Part 2 (December 2023).	Noted.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Fergus Wong	Luxgrove Cap	725	Developer

6. In particular, we agree with the policy approach of supporting the urban hierarchy of the borough by directing growth and intensification towards Ealing Metropolitan District Centre. In terms of place interventions, this spatial strategy would lead to ‘(i) Significant levels of development at Ealing Metropolitan Town Centre’ which includes ‘significant, high density residential and employment growth’ (para 3.62). This is reflected in Draft Policy E2: Ealing Metropolitan Town Centre. From a townscape and urban design perspective, increasing density in the well- connected Metropolitan Town Centre is a sensible approach to accommodating necessary growth in a sustainable way. We welcome that this Draft Policy E2 includes a specific focus on West Ealing in Part G: ‘Strengthening the local character and distinct offer of West Ealing, including food offer, retail, convenience and leisure while realising the potential of identified Development Sites to improve the quality of built environment and deliver new houses and jobs’.	Noted. Support welcomed.	Policy E2: Ealing Metropolita n Town Centre		Fergus Wong	Luxgrove Cap	725	Developer

7. However, we do not believe that these fundamental principles are reflected in the approach to height and density set out in the Draft Development Sites, particularly in the case of West Ealing. We are also concerned that the issues that we have identified with the Draft Development Sites indicate that, as a whole, the Borough is at risk of unnecessarily stymying its future development potential. While the issues we work through below are specific to the sites in which our client has an interest, they are, as a result of the Plan’s consistent approach to sites, repeated across the borough. 8. While clearly, the Plan is based on detailed analysis of the Borough’s ability to deliver new homes on the basis of current housing targets, these numbers could change, as we have seen in recent years; we are concerned that a clearly pro-active authority is at risk of holding itself back from responding flexibly to changing strategic and national housing demands through an unduly inflexible approach to height in Site Allocations. In our analysis below, we take account of the Supporting Text to Policy D9 (Local Variation), which states that: ‘Heights listed in site allocations are the product of detailed design assessment, nevertheless they remain subject to a full design assessment at the point of application against the impact policies set out in London Plan Policy D9 C.’ 9. While the above clearly recognises that site allocation heights are not ‘fixed’, the inclusion of this text within Supporting Text, as set against specific identified acceptable heights within Site Allocation Policies themselves creates a position where this caveat can be overridden in favour of the Policy text itself in individual Development Sites. This may also lead to inconsistency and	Noted. The tall buildings evidence forms a consistent approach to understanding character and height across the borough, it is for applications to demonstrate if there is an case to depart from this based upon the planing balance.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Fergus Wong	Luxgrove Cap	725	Developer

Development Sites 13EA and 14EA 11. In terms of the site allocations, the two sites owned by Luxgrove Homes (99-113 Broadway and 131-137 Broadway) remain allocated sites as they are currently, and the Ealing Spatial Strategy identifies the two allocated sites as ‘suitable for tall buildings’ (Figure E3). However, the approach to height, density and design guidance on these sites does not reflect the intended urban hierarchy of the borough and their role in the Metropolitan Town Centre. Nor do they take into account the practicalities of delivering these constrained sites without height. • Draft site allocation 13EA: 99-115 Broadway identifies that: ‘The site is in principle suitable for a tall building. Design analysis indicates a maximum height of 12 storeys (42 metres)’. • Similarly, draft site allocation 14EA: Western Gateway, 131-141 Broadway identifies that: ‘The site is in principle suitable for a tall building. Design analysis indicates a maximum height of 6 storeys (21 metres).’ (contd below)	Noted	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Fergus Wong	Luxgrove Cap	725	Developer

12. In both cases, the heights are identified as “maximum” heights, as a result of design analysis in the Tall Building Strategy Appendices Parts 1 and 2. However, neither of these Evidence Base studies can properly be considered to be so detailed as to permit the introduction of maximum heights and they introduce a number of contradictions and errors which are then carried forward in the Draft Development Sites and Tall Building Policy. More specifically, we would note the following: • Firstly, Draft Policy D9 ‘Tall Buildings London Plan - Ealing LPA – local variation’ provides a definition of tall buildings per individual area of borough, apparently following ‘rigorous assessment’ (para 5.12). A definition of a tall building is helpful and adds colour to the existing loose definition (Development Management Policy 7.7, part H). However, the application of varied definitions seems inconsistent and does not match the definitions in the Evidence Base (i.e. area E14 is 21 storeys in Table DMP1, but 9 storeys in the Tall Building Strategy Main Report). Both Draft Development Sites 13EA and 14EA are within area E10 which identifies tall buildings as 7 storeys or 24.5m. Despite this and site 14EA being identified as “suitable for a tall buildings”, it is indicated for a ‘maximum height’ of 6 storeys which would not actually meet the tall building threshold. This is particularly confusing when this site is already consented for up-to 9 storeys. The Council’s decision to grant consent at 9 storeys clearly indicates that following genuinely detailed analysis, a maximum height 30% in excess of the indicated maximum height in the current draft of the Plan is acceptable. This goes some way to demonstrating the limitations of the assessment within the Tall Building Strategy Appendices. We would encourage	Maximum heights will now be changed to recommended heights in line with GLA advice on the application of London Plan policy.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Fergus Wong	Luxgrove Cap	725	Developer

• Secondly, Draft Policy D9 also states that ‘F. Tall buildings above defined thresholds are exceptional and should be located upon specified Development Sites defined in the Development Plan.’ While we recognise that London Plan Policy D9 advocates a plan-led approach, restricting tall buildings to allocated sites does not recognise the judgement of Master Brewer Case [R (London Borough of Hillingdon) v Mayor of London, 15 December 2021] that while boroughs need to identify suitable locations for tall buildings under Parts A and B, tall buildings can come forward outside of allocated sites providing they meet the impact requirements of Part C. We would encourage the Council to revisit this text, such that it can continue to show consistency with D9 B of the London Plan, but also recognise that sites which are not allocated can be appropriate for tall buildings, perhaps, “only where the criteria set out in London Plan Policy Part C are met”. Such an approach would permit greater flexibility, clearly setting out an ‘allocated sites first’ approach to tall buildings, and an accordingly plan-led approach, but with a flexible approach which will not lead to unintended consequences which restrict growth in the future. • Thirdly, the neighbouring allocation 11EA: Sainsbury’s & Library has a maximum height of 16 storeys indicated. It is unclear why 13EA is then capped at 12 as both sites occupy the same place in the urban hierarchy (in the Metropolitan Town Centre, fronting Broadway and near emerging height). We believe this issue stems primarily from the Tall Building Strategy Evidence Base which is investigated further in next section. • We feel there is a fundamental issue with the use of “maximum”	Noted. The tall buildings evidence forms a consistent approach to understanding character and height across the borough, it is for applications to demonstrate if there is an case to depart from this based upon the planing balance.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Fergus Wong	Luxgrove Cap	725	Developer

c. Evidence Base 13. We should note that the approach taken by Allies & Morrison to the Tall Building Strategy is a well-considered one, and is also a well-trodden path. We concur with its general findings in relation to where height is most appropriate and commend the Council and A&M for the thoughtful and careful approach to locating height which has been taken. We are also supportive, furthermore, of the Tall Building Strategy’s approach in principle to ‘testing’ heights. We want to be clear that our criticisms of the Study Site analysis below are not critical of the general methodology, or of A&M’s general approach to locating height, and identifying appropriate heights. 14. Our very real concern, however, is that the approaches outlined are but one designer’s necessarily high-level assessment to testing height and massing, without the detailed knowledge and analysis that comes with a specific application, and through a lengthy, engaged pre- application process. It cannot properly be said that the Site Studies are ‘detailed’ in Development Management terms, as is stated in the Appendix itself: ‘The development scenarios and capacities presented in this appendix are indicative only. They reflect a townscape and character- led approach to optimising the capacity of study sites that have not been subject to detailed design or viability testing’. The Tall Building Strategy as a whole, should be taken for what it is, as a high-level indication of development potential. If used to define maximum parameters, or even to guide development parameters generally, they potentially prevent the creation of creative alternative solutions. They should not, under any circumstances, be used to create definitive or limiting site allocations.	Maximum heights will now be changed to recommended heights in line with GLA advice on the application of London Plan policy.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Fergus Wong	Luxgrove Cap	725	Developer

16. Despite being dated December 2023, there does not appear to be any change to Appendix Part 1 from the previous Appendix which supported the Regulation 18 NLP. Therefore, the analysis is not up-to-date and mapping of consented heights does not include recent consents (i.e. at 131- 137 Broadway for up to 9 storeys). Additionally, the naming of the site allocations reflects the old numbering, not the revised numbering in Regulation 19 which makes this confusing. As such, this Appendix should be reviewed and the updated context taken into account as it would have an important effect on the overall analysis, particularly at site 14EA. 17. There is no more detailed analysis from the Regulation 18 NLP Evidence Base, despite the lack of detail being raised as an issue in informing draft Development Site design parameters at the time, and there are several discrepancies between the Evidence Base itself and the Regulation 19 NLP (which also appear to have been carried forward from the Regulation 18 NLP). While a Part 2 has been introduced to analyse further development sites, this appears to introduce further inconsistencies between Part 1 and Part 2, as well as with the Regulation 19 NLP. Confusingly, both Part 1 and Part 2 assess the Sainsbury's site and 59-65 Broadway (their EA18 and EA17, now 11EA and 10EA) and come to different conclusions on height for EA18 – one says 13 storeys and the other 16 storeys. Furthermore, Part 2 also takes a 'masterplan' approach to Ealing Clusters, but in doing so, includes sites which are assessed in Part 1 – it is unclear and confusing why these are separated, but this cements the fundamental issue of a combined approach to redeveloping several sites without detailed masterplan analysis (not necessarily expected at this stage) which then is taken forward in	The evidence base provides a snapshot in time. If these consents are implemented then that may constitute a material consideration to permit taller elements on proximate heights. However, the existence of tall buildings within the setting of a site does not necessarily form a justification for additional tall buildings to be built and it will be for development proposals to justify this in relation to the planning balance at the point of application.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Fergus Wong	Luxgrove Cap	725	Developer

d. Conclusion: 18. In summary, while we agree with the general approach to the spatial policies and townscape analysis, we do not believe this has wholly translated into the strategies for the Draft Development Sites and approach to tall buildings in the borough. As a result of the issues identified, we would suggest the following changes to the Regulation 19 Draft Local Plan: • Reconsider the maximum height and prevailing height of all Development Sites to include all consented developments coming forward, with particular reference to West Ealing where consented sites already exceed 13 storeys and there is recent consent at 131-137 Broadway (site 14EA) for 9 storeys. • Reconsider how the proposed tall building strategy can better tie in with the spatial policies of good growth, in terms of urban hierarchy, densification, supporting 20- minute neighbourhoods and optimising the capacity of sites. • Instead of maximum height limits suggested by Allies and Morrison, broader height ranges for draft allocated sites are adopted to guide development. In the absence of a more detailed study by Allies and Morrison to justify the heights proposed, the onus would then be on the applicant to provide the detailed design justification of what height might be appropriate, in line with the requirements of Part C of London Plan Policy D9. This can then be assessed by the borough during the application process. • Review and clarify the discrepancies between Tall Building Strategy Appendix Part 1 and Part 2, and between the Tall Building Strategy and the Regulation 19 NLP.	Noted	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Fergus Wong	Luxgrove Cap	725	Developer

Carter Jonas has been instructed by Places for London (Places) and Barratt London (Barratt) to submit representations to the Regulation 19 version of the Ealing Local Plan. Barratt and Places have a joint venture delivery partnership known as the West London Partnership (WLP), to deliver new homes in West London. Places have a 20,000 home new homes programme it is delivering for the Mayor of London on surplus and under-used transport land. Places have identified its operational land holdings known as ‘land at Ealing Common Depot’ (the site) as suitable for housing delivery. These representations are made specifically with the site in mind. It should be noted that these representations are in addition to representations made by Places on the Local Plan (dated 18 April 2024), which cover Places wider ownerships interests in the London Borough of Ealing (Ealing). Carter Jonas makes these representations in the above context and we would like to reserve a position to appear at the Examination to attend any relevant Hearing sessions, as and when these sessions are scheduled. Background Places began looking at the site as a development opportunity as part of a masterplan approach with Bollo Lane in 2018. A series of pre-application meetings were held with Ealing	Noted.	03AC Ealing Common Depot		Alister Hendrerson	West London	604	Developer

Thank you for providing the opportunity for Places for London (‘Places’) to comment on the Ealing Draft Local Plan (Regulation 19). Please note that the views expressed in this letter and attachments are those of Places in its capacity as a significant landowner and developer only, and do not form part of the Transport for London (TfL) corporate / statutory response. Our colleagues in TfL Spatial Planning will provide a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties. Places for London is TfL’s new and financially independent property company, formerly known as TTL Properties under which name our previous representations were submitted. Places for London provides space for over 1,500 businesses in TfL stations and railway arches and on London’s high streets. We are now working to release more of the untapped opportunity in TfL’s property portfolio to deliver much-needed housing to create places to live, work and play which are sensitive to local needs and communities and improve access for all. Places has significant landholdings in the borough, and we are keen to work with Ealing Council to bring forward appropriate development on these very well-connected landholdings to create high quality new homes which benefit communities, help meet the borough’s housing targets and deliver new	Noted.	General		Hermine Sanson	Places for London	604	Developer

Housing Delivery Policy SP4.3 (Genuinely affordable homes) confirms that there is a 10-year housing target of 21,570 from the period of 2019-20 through to 2028-29, which is an annual target of 2157 units for the rest of the Local Plan period. The Site Allocations or ‘Development Sites’ as they are referred to in the draft Local Plan, do not specifically refer to capacity assumptions. This makes it very difficult to understand if these targets are likely to be met in the Plan period. It is not clear if targets have been met to date (from 2019-2024) within the Plan itself. The Five-Year Housing Land Supply Position Statement and Housing Trajectory (November 23) in the evidence base to the Plan shows that there has been an under delivery of 2,262 units in the first four years of the Plan and confirms that there is an overall cumulative requirement of 15,656 net additional units over the next five years. The same document concludes there is currently 3.7 years of supply, but states that the Housing Trajectory (which examines actual and projected delivery/supply over a longer 19-year period), suggests that this longer period will exceed cumulative requirements. It is considered that the current draft Plan should be more transparent about the assumptions made in the Plan to show how these targets can be met and what number of homes have been allocated to the relevant ‘Development Sites’	Noted. Policy SP4.3 confirms the housing requirement. The Council has intentionally chosen not confirm its supply position via the Local Plan itself, as any conclusion in this regard can only ever represent a snapshot in time, and therefore it is considered unhelpful to ‘fix’ this in the plan itself. National guidance is clear that there is a need for LPAs to maintain an update their supply position, recognising that this position changes with each permission given and every home built. For this reason the reader is directed to the latest published 5 YHLS position statement and housing trajectory as per paragraph 3.46.	SP4.3 Genuinely affordable homes		Alistar Hendrerson	West London	604	Developer

Acton Development Sites – Acton – 03AC – Ealing Common Depot Within the Acton Development Sites section of the draft Local Plan, we welcome that the site is allocated as a ‘Development Site’ within the Plan. However, the current draft provides such severe constraints that it would render the site undevelopable. In turn, this severely risks the opportunity to provide an enduring future for the existing transport Museum Depot colocated with hundreds of new homes and a high percentage of genuinely affordable housing. The WLP has strong concerns over a number of factors in this section of the draft Local Plan. In particular, Figure A3 shows that Site 03AC is allocated as a ‘Development Site’, but one which is ‘not suitable for a tall building’. This is supported further in on pages 132 and 133 of the current draft Local Plan. Where the table states that, ‘The site is not in principle suitable for a tall building’. The Threshold for height for a tall building is 7 storeys (24.5 metres). WLP strongly objects to these assertions within the document for the reasons set out in the section below. Attached to this document is a Viability Statement (Appendix 1) produced by Places in conjunction with its West London development Partner Barratt London. This document is a summary of the potential viability position that the current Development Site creates in this location and it is abundantly clear, when you consider the abnormal costs associated with this site that a scheme of c.six storeys in this location would be significantly unviable and therefore undeliverable.	Noted. Notwithstanding the design and townscape evidence that was submitted to support this representation, the threshold remains an accurate assessment of the prevailing character of the area and a building of the height proposed would be a clear departure from this. LBE is clarifying the viability of the site allocation and the capacity for additonal height to support this within the scope of identified character and heritage constraints.	03AC Ealing Common Depot		Alistar Hendrerson	West London	604	Developer

The details are contained in that report, which should be read in full. However, some of the key findings of the report are summarised below to help explain the WLP position in this overarching letter are as follows: Tall Buildings Study Review • Whilst the Study identifies site sensitivity in the borough and clearly shows that the site is in a less sensitive location – these considerations ultimately play no part in the overall selection of the sites. • The report concurs with the study in its view that, finding a site suitable for tall buildings does not mean that a site can be developed without due regard for impacts to heritage and townscape (amongst other considerations). • However, by identifying a site suitable for a tall building development, it must be acknowledged that there would be a significant policy support for a denser development and this would have considerable weight in balancing of impacts versus benefits. It is therefore important to consider potential constraints and sensitivities at site selection stage. • The site selection methodology in the study is flawed as it fails to properly consider the impact of development on sensitive considerations such as heritage. • The sensitivity map shows that Ealing Common Depot is in a low sensitivity area, but this then plays no further role in the selection of suitable sites for tall buildings. This is a significant methodological error, as heritage is not properly considered. • The study sets out that the site meets four of the eight criteria of suitability for tall buildings. The report explains that this should now be five out of the eight, as since it was written a 15-storey building	Noted. Notwithstanding the design and townscape evidence that was submitted to support this representation, the threshold remains an accurate assessment of the prevailing character of the area and a building of the height proposed would be a clear departure from this. LBE is clarifying the viability of the site allocation and the capacity for additional height to support this within the scope of identified character and heritage constraints.	03AC Ealing Common Depot		Alistar Hendrerson	West London	604	Developer

Indicative Views Assessment • An indicative scheme has been assessed with a tall building of 20 storeys high. • Views have been selected carefully to reflect key views and a representative sample of views from different character areas. • Thirteen viewpoints have been selected, it is clear that a tall development would be visible from a significant number of them, though it should be noted that in many cases the visibility of tall buildings on this site is far outweighed by the visibility of the massing of nearby consented schemes and schemes under construction. • Little or no impact on the key long distance viewpoints form Kew or Chiswick due in part to existing and consented intervening developments. • The greatest impact of tall buildings on this location would be on the residential areas close by and it may be necessary to refine proposals accordingly. • Analysis suggests that the site is suitable for tall building/s. Further work would need to be conducted to understand how height and massing might be appropriately distributed across the site.	Noted	03AC Ealing Common Depot		Alistar Hendrerson	West London	604	Developer

Overall, there are concerns that the current tall buildings assessment (which has informed that tall building areas allocated in the draft Local Plan) is flawed and there is scope, subject to detailed design, for tall buildings to be successfully delivered on the site. In addition to the above comments in relation to viability, the methodology for assessing the appropriate locations of tall buildings and the site’s suitability for tall buildings, there are a number of other elements that needs to be considered as part of the allocation as a Development Site. All of these, alongside the points already made are summarised here: • The six-storey limit on the building height severely restricts the capacity of the site to deliver a housing-led scheme collocated with the Museum Depot, particularly given the high abnormal infrastructure costs associated with this development. There can be no viable scheme with a 7-storey height restriction. • The draft allocation does not recognise the changing context within which the site sits, including the recent permission granted for a 15-storey building on the adjacent Women’s Pioneer Housing Association site next door. • The PTAL of the site is very high and the transport links in the local area are exceptional, including its location immediately opposite to Acton Town Station. Access into the site is suitable for development of a much larger scale than currently proposed in the draft Local Plan, particularly noting the ‘car free’ nature of the scheme adjacent to a major station and numerous local bus routes. • The Alan Baxter report identifies concerns with the methodology used to identify areas of tall buildings in the draft Local Plan and also carries out a preliminary assessment to show that tall buildings could be accommodated on this site.	The pioneer housing application was itself granted by exception because of the benefits arising from its particular housing offer and does little to change the character and setting of the depot site.	03AC Ealing Common Depot		Alistar Hendrerson	West London	604	Developer

Policy D9: Tall Buildings London Plan – Ealing LPA – Local Variation This section shows again that the site, it located within area A5, which sets the threshold limit for a tall building at seven-storeys (24.5 metres). There is no reason to repeat them all again here, but for all of the reasons set out in the previous section the WLP would seek to remove this restriction on heights for the Development Site in this location. Height constraints in this location would render the Development Site unviable and undeliverable, thus rendering the Plan unsound. It is also worth noting that paragraph 5.13 states that the London Plan sets the clear presumption that tall buildings should be confined to specified sites and maximum heights. This presumption is not correct, because Policy 9B of the London Plan uses the terms ‘locations’ and ‘appropriate’ tall building heights. This suggests some flexibility which could include a range of heights across an area. Therefore, it is considered that the term ‘appropriate’ should be used instead of a ‘maximum’ in this context.	Noted. Notwithstanding the design and townscape evidence that was submitted to support this representation, the threshold remains an accurate assessment of the prevailing character of the area a building of the height propsoed would be a clear departure from this. LBE is clarifying the viability of the site allocation and the capacity for additonal height to support this within the scope of identified character and heritage constraints.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Alistar Hendrerson	West London	604	Developer
Conclusion The WLP trusts that the above comments are clear and whilst there is strong support for a ‘Development Site’ allocation in the location of Ealing Common Depot, this should not be listed as a site ‘not suitable for tall buildings’. Our analysis of the methodology for selecting areas suitable for tall buildings suggests that this site should be considered as appropriate for tall buildings. Notwithstanding that position, if it is not considered as a site suitable for tall buildings, it will simply not be deliverable for new homes in this location and will not support the reprovision of the museum depot, which is a strategically important asset. Consequently, amendments need to be made to this draft version of the Local Plan to ensure that the Development Site is deliverable, in order to ensure the soundness tests of the NPPF are met. At present this is simply not the case. The WLP has welcomed all of our discussions with the planning team at Ealing and we would like to continue to work collaboratively with the Borough to ensure that the Local Plan is sound and supported by a site allocation which is deliverable and can help to meet housing needs within the borough for both market and genuinely affordable homes into the future.	Noted	03AC Ealing Common Depot		Alistar Hendrerson	West London	604	Developer

Acton - 03AC - Ealing Common Depot We welcome the site allocation. However, the current draft provides such severe constraints that it would render the site undevelopable and severely risks the opportunity to provide for an enduring future for the transport Museum Depot collocated with hundreds of new homes and a high percentage of genuinely affordable housing. Our West London Partnership (WLP) joint venture with Barratt London will be providing detailed representations (coordinated by Carter Jonas) on this draft allocation and other relevant aspects of the draft Local Plan. In the meantime, we summarise: •The six storey limit on building height severely restricts the capacity of the site to deliver a housing-led scheme collocated with the Museum Depot, particularly given the high abnormal infrastructure costs associated with this development (including a new Museum Depot and relocation of TfL engineering facilities). There could be no viable and therefore deliverable scheme with a six storey height restriction. •The draft allocation does not recognise the changing context within which this site sits, including the recent permission granted for a 15+ storeys building on the Women's' Pioneer Housing Association site next door. •WLP's representations will include an assessment of local context, key views and townscape impacts, and further work will be undertaken in advance of the Local Plan EiP. •The provision of a pedestrian link through the site from Phillimore Gardens to Museum Way would require acquisition of third party land and may not be achievable. It may also have implications for the protection of railway infrastructure. We would be happy to look	Noted. Notwithstanding the design and townscape evidence that was submitted to support this representation, the threshold remains an accurate assessment of the prevailing character of the area a building of the height propsoed would be a clear departure from this. LBE is clarifying the viability of the site allocation and the capacity for additonal height to support this within the scope of identified character and heritage constraints.	03AC Ealing Common Depot		Hermine Sanson	Places for Lo	604	Developer

Bollo Lane: Our permitted Bollo Lane scheme will deliver a mixed-use development comprising up to 900 new homes, new business and retail floorspace, new train crew accommodation to support the Piccadilly Line and comprehensive public realm improvements; it was granted planning permission on 22 December 2021 (Council ref: 201379OUT). We are working with our partner Barratt London (as WLP) to deliver this scheme and intend to commence development later this year. As the permission has not yet been implemented, and given the site's substantial contribution to five year housing land supply, we have previously promoted the site for allocation via Ealing's Early Call for Sites (March 22) and in our regulation 18 representations provided to the Council on 8 February 2023 (Consultation Responses table). [Information regarding planning permission] We maintain our view that the site should be brought forward as a Development Site in the Local Plan to confirm and secure its development potential. This would ensure that the Local Plan is positively prepared, meeting the boroughs objectively assessed needs for new homes and affordable housing in particular. It would also make the Local Plan effective, and ~~would be consistent with national policies and in general~~	If the site were allocated, the proposed uses would be entirely different to the extant permission, focusing on industrial-led mixed use development	Policy A1: Acton Spatial Strategy		Hermine Sanson	Places for Lo	604	Developer
Ealing - Ealing Broadway Station Places notes that the proposed draft site allocation EA04 for Ealing Broadway Station in the draft Local Plan Reg 18 has been withdrawn from the draft Local Plan Reg 19 version. As previously indicated, while we would not seek to drive development in this location, we would be happy to discuss the potential for development if the Council or a more substantial land owner wishes to explore this.	Noted. This is a sensible course of action.	Policy E1: Ealing Spatial Strategy		Hermine Sanson	Places for Lo	604	Developer

Ealing - Ealing Riding School Places notes that the proposed draft site allocation EA33 for Ealing Riding School in the draft London Plan Reg 18 has been withdrawn from the draft Local Plan Reg 19 version.	Noted.	Policy E1: Ealing Spatial Strategy		Hermine Sanson	Places for Lo	604	Developer
Northolt-01NO Car Sales Site and Northolt Leisure Centre We welcome the site allocation (01NO), which supports the redevelopment of this well-connected opportunity site. This is a constrained site with challenges including: SINC/Green Corridor designations, TPOs, the HS2 safeguarding zone limiting heights above the HS2 tunnel, level changes, proximity to the railway line and major Mandeville Road, and leisure centre car parking. While the site allocation is generally welcomed, the current draft provides additional constraints that could make the site undevelopable and risks the opportunity to deliver the Council's placemaking and regeneration objectives for the site and Northolt as a thriving town centre. Site boundary- Places notes the change in the boundary of the site which now includes the leisure centre and leisure centre square. Proposed Use and Car parking- Places notes and supports the amended wording of the Proposed Use section which no longer refers to the "reprovision of car parking space". However, we note the introduction of a design principle to "Retain some car parking on site to service the leisure centre". As stated previously in our Reg 18 representation, the site is in a highly accessible location (PTAL 4) and any provision or re-	Support noted and welcomed. Transport for London (TfL) have commented on the Design Principle relating to parking. In our Statement of Common Ground with them, the following amendment to the wording has been suggested: <u>"Retain ~~some~~ disabled persons' car parking and a small number of active EV charging spaces on site to service the leisure centre."</u> The following new/additional Design Principle has been suggested: <u>"Promote active travel to the site including through developer contributions."</u> The site was assessed by Metis as part of the Strategic Flood Risk Assessment part 2, Jnauary 2024. The report indicates that the site is situated in Flood Zone 3a for Surface Water Flooding. A bullet point has been included in the Contextual Considerations section (final bullet point) which states that the site is at high risk of surface water flooding, particularly in the south-eastern section of the site, and that the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment, read alongside the general mitigation requirements. See SFRA Level 2 Assessment, January 2024 in Evidence Base	01NO Car Sales Site and Northolt Leisure Centre		Hermine Sanson	Places for Lo	604	Developer

Tall buildings- Places welcomes the Council's recognition that "the site is in principle appropriate for a tall building", however, we question the new height threshold provided in the draft site allocation Reg 19 version and advice that "Design analysis indicates a maximum height of 10 storeys (35 meters)". This does not align with Ealing Council's Tall Building Strategy Appendix and Guidance for Study Sites, which tests a 12-storey development on the Car Sales site. The reference to 'maximum' height should also be removed and replaced with 'appropriate' height in accordance with London Plan Policy D9B. See also comments below on the Design principles section in relation to tall buildings. Contextual consideration - We welcome the identification of the site as a "key strategic site", where "development proposals for this site should capitalise on its location and potential". HS2 sub surface safeguarding- We welcome Ealing Council's updated wording which clarifies that the site is subject to "HS2 sub surface safeguarding". It should be noted that in this HS2 safeguarding zone, height is limited to 6 storeys due to the HS2 tunnel underneath. This therefore restricts the possible location of tall buildings on the site and also means that height needs to be achieved on other parts of the site to deliver the floorspace required for a viable scheme. Aecom's Foundations and Ground Engineering study for the site can be provided upon request.	The guidance for prospective tall building heights for Zone N (where this site is located) is 6-10 storeys which is an update from the previous draft. Maximum heights will now be changed to appropriate heights in line with GLA advice on the application of London Plan policy.	01NO Car Sales Site and Northolt Leisure Centre		Places for London	Places for London	604	Developer

Design Principles: Places comment on the following design principles: • Ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy. Heights are to range between 4 and a maximum of 10 storeys (35m) across the site, with the tallest elements situated towards the station and the middle of the site". It is unclear why the guidance on tall buildings and height has been reduced from 12 storeys in the draft site allocation Reg 18 version to 10 storeys in the Reg 19 version. This does not align with Ealing Council's draft Local Plan supporting evidence/ Tall Building Strategy and Appendix & Guidance for Study Sites (Dec 23). which provides site specific guidance for the Northolt Car sales site and tests a 12 storey development on the site. In order to give the site and the new town centre the best possible chances of being brought forward and successfully delivered, 12 storeys should be considered as appropriate on the site in line with the Council's supporting evidence and tall building guidance. A contextual, design-led approach should be taken to inform appropriate height. As mentioned above, due to the HS2 safeguarding, it may not be possible to have the 'tallest elements' towards the station. This should be further tested by a ground movement assessment. • Retain some car parking on site to service the leisure centre." See comments above. This should be replaced with:							
Northolt- White Hart Roundabout Places notes that the proposed draft site allocation NO07 for White Hart Roundabout in the draft Local Plan Reg 18 has been withdrawn from the draft Local Plan Reg 19 version. Places remains open to exploring the potential for comprehensive development of the roundabout and surrounding land with the Council and other adjoining landowners.	The TBS takes a consistent approach to the assessment of heights across the borough and the recommendation on this site was updated to reflect this.	01NO Car Sales Site and Northolt Leisure Centre		Hermine Sanson	Places for Logistics	604	Developer
	Noted. Support welcomed.	Policy N3: White Hart Neighbourhood Centre		Hermine Sanson	Places for Logistics	604	Developer

Southall - 02SO - Southall Sidings Through our Connected London Living (CLL) Joint Venture partnership with Grainger, we have obtained planning permission for a 460 home 'Build to Rent' scheme (with 40% affordable housing) in buildings ranging from 6- 16 storeys in height The planning permission was granted on 19 January 2022 (Council ref. 201888FUL) and has been implemented via enabling works. The enabling works commenced in March 2023 and were completed on 4 July 2023. Work was paused after completing enabling works due to uncertainty surrounding fire safety regulations. Subsequently, the scheme is being redesigned following the publication of recent fire safety guidance, and a planning application seeking amendments to the original application will be submitted in Summer this year (2024). We welcome the site allocation for Southall Sidings (Site 02SO) and the recognition that the site is in principle suitable for tall buildings. However, it is unclear in the draft site allocation (Reg 19 version) why the guidance on tall buildings and height has been amended and reduced from "an indicative height ranging between 6 -18 storeys (21- 63 metres)" in the draft Local Plan (Reg 18) to 6 storeys (21 metres) in the draft site allocation (Reg 19). ~~The Reg 19 draft site allocation advises that "Design analysis~~	The site falls within TB zone I where the guidance for prospective tall building heights is 6 - 18 storeys. However, this does not mean that all prospective tall buildings within this zone should reach the upper limit of this range. Hence why the proposed spatial framework for sites nearby SO04 and SO06 show indicative building heights up to 6 storeys.	02SO Southall Sidings		Hermine Sanson	Places for Lo	604	Developer
Development sites - General comments Please reiterate our comments made at the Reg 18 stage that as the development sites do not provide indicative capacity figures, the development potential they can offer is unclear. We can help the Council establish indicative capacity for our sites.	Noted. A number of factors have informed the decision to omit site capacity figures / quantum from the site allocations, including: -Challenges around pre-determining optimal development capacity ahead of more detailed design work at the application stage -Challenges establishing workable capacity figures which will endure for the life of the plan. -Our preference to avoid prescription which may be viewed too rigidly and stifle/constrain different design options for sites. Notwithstanding the above position capacity estimates have been determined for each site, and these estimates have inputted into the Housing Trajectory. A revised housing trajectory will be published in early 2025	General		Hermine Sanson	Places for Lo	604	Developer

Policy D9: Tall buildings Draft Local Pan Policy D9 defines ‘tall building' as buildings ranging between 6 (21m) and 21(73.5m) storeys in height in different parts of the borough. The draft policy allows these defined tall buildings' thresholds to be exceeded in development sites where specified. While this flexibility is welcomed, in accordance with the London Plan Policy D9B, references to "maximum heights" in Ealing's proposed site allocations should be removed and replaced with "appropriate" tall building heights. Additionally, the introductions for development sites in each Town Plan should clarify that, in accordance with the London Plan, a 'design-Led approach supported by' a full design assessment at the point of application should inform appropriate height and massing".	Maximum heights will now be changed to recommended heights in line with GLA advice on the application of London Plan policy.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Hermine Sanson	Places for London	604	Developer

Policy HOU: Affordable Housing Places' housing development is driven by the ambition to optimise the delivery of genuinely affordable housing across our portfolio in Ealing and across the whole of London. In order to achieve this, we need flexibility to balance a portfolio of sites with different characteristics and circumstances across London. The London Plan enables public land owners to enter into a portfolio agreement with the Mayor to provide 50% affordable housing across their portfolio (Policy H4 A(4), Delivering affordable housing). TfL / Places has such an agreement with the Mayor and we can therefore provide between 35% and 100% affordable housing on each site within our portfolio and be eligible for the Fast Track Route. Para 4.4.7 of the London Plan explains further: "Public sector Land represents an opportunity to deliver homes that can meet the needs of London's essential workers who maintain the function and resilience of the city. The Mayor expects that residential proposals on public Land should deliver at Least 50 per cent affordable housing on each site. Public sector Landowners with an agreement with the Mayor may provide 50 per cent affordable housing across a portfolio of sites provided at Least 35 per cent affordable housing is provided on each site. with the required affordable housing tenure split on the initial 35 per cent." We reiterate our Reg 18 comments that Policy HOU should set the affordable housing threshold for the fast track route at 35% (incl. on	London Plan policy is owed general not absolute conformity. The policy is tested as viable by the whole plan viability assessment and is a valuable albeit only partial measure to meet overwhelming affordable needs identified in the LHNA.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Hermine Sanson	Places for Lo	604	Developer

Policy E3: Affordable workspace In principle and practice, as demonstrated by our curation of more than 850 railway arches, 1,000 small shops and numerous other workspaces across London, Places for London supports the provision of different types of affordable workspace to serve a diverse range of small, independent businesses, charities, voluntary and community organisations, social enterprises, creators and makers. While we support the ambition of draft Policy E3 and the provision of affordable workspace in principle, we have concerns that the 10% provision in mixed use schemes with 80% discount to market rents would impact scheme viability, particularly for mixed-use schemes on public land which are expected to deliver 50% affordable housing. We reiterate our comments made in our Reg 18 representation that Policy E3 and supporting text should recognise the viability challenges associated with the development of housing-led and mixed-use schemes on public land, and particularly on sites with transport and other infrastructure constraints. The policy should therefore seek lower provision of affordable workspace in association with mixed use schemes which deliver more than 35% affordable housing; this would ensure that affordable housing remains the priority. We also suggest that it should be made clear that affordable workspace is iust one of a wide range of public benefits which may	The whole plan viability assessment has determined this policy to be viable, it is for individual applications to demonstrate where this is not the case rather than the policy to encumber itself in caveats.	Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation		Hermine Sanson	Places for Lon	604	Developer

Policy G6: Biodiversity and Access to Nature Draft policy G6 introduces a new requirement for development proposals to "achieve a biodiversity net gain of at least 20% or the advised national minimum amount, whichever is greater". This goes beyond the Governments requirement for at least 10% BNG. While Places supports increases in biodiversity and in the amount of vegetation on our land, and encourage our developments to achieve a 10% biodiversity net gain through our Sustainable Development Framework, we do have concerns that a 20% BNG target would impact our schemes viability, particularly mixed-use schemes on public land which are expected to deliver 50% affordable housing. Viability challenges are also exacerbated for TfL by the abnormal and generally higher costs associated with developing sites that have significant transport infrastructure and operational constraints. When scheme viability is an issue, biodiversity net gain should be balanced against other important public benefits such as affordable housing, transport improvements etc in accordance with London Plan Policy (DFID) (Delivery of the Plan and Planning Obligations).	Noted. It is acknowledged that the National Planning Practice Guidance on BNG seeks to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission. Defra’s own Impact Assessment indicated that the majority of costs associated with biodiversity net gain are incurred to reach a no net less position. The costs associated with moving from 10 to 20% is therefore considered to be marginal. However, the NPPG was published after considerable delays and only on February 14th 2024 (with updates on May 1st 2024) . This was after the Regulation 19 Local Plan and associated evidence base had been finalised ahead of the Full Council meeting held on February 21st 2024 and the beginning of the consultation period that ran from February 28th 2024. The council now acknowledges that additional time and further evidence is needed to prepare evidence to justify a rationale for pursuing a higher BNG percentage target. Therefore, the policy has been modified accordingly and a revised policy potentially containing a higher target will be considered as part of the next Local Plan review.	Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation		Hermine Sanson	Places for Lo	604	Developer

These representations to the Regulation 19 Plan are submitted on behalf of Leisure & Entertainment Limited (“L&E”), owners of the Barclays Site as shown in Appendix 1, by MSP+D Ltd as their planning consultants. 1. Background context and summary of sought changes to the Regulation 19 draft plan comprising the Final Proposals of the London Borough of Ealing (“LBE”) for the New Ealing Local Plan (“Regulation 19 Plan”). 2. Representations with regard to the proposed the Metropolitan Open Land (“MOL”) boundary change at the former Barclays Sport Ground (“Barclays Site” or “Site”) as proposed in the Atlas of Change – Map 35 - including proposed MOL boundary changes to only that part of the Site comprising the disused clubhouse building with hardstanding for car parking in the north-west corner of the Barclays Site as shown in Appendix 3 (“Clubhouse Site”) with the retention of MOL for the rest of the Site and the proposed additional designation of MOL to land to the south of the Barclays Site comprising part of the access road of the Ada Lovelace school (“Ada Lovelace Land”). 3. Representations regarding the application of proposed Policy D9: Tall Buildings London Plan Ealing LPA – local variation to proposed site allocation EA 21 – Former Barclays Sport Ground. 4. Representations regarding the application of proposed Policy ENA: Enabling Development Ealing LPA – local variation to	Noted.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

2. Metropolitan Open Land [Origins of MOL; Adopted London Plan 2021, Policy G3 Metropolitan Open Land and supporting text; Green Belt and NPPF] Assessment 2.10 In light of this planning policy context it is considered that: • MOL relates to London’s urban context and has a different purpose compared to the Green Belt designation. • MOL or Green Belt boundaries can only be made or amended by a review of the adopted development plan policy. • Exceptional circumstances need to be demonstrated that the boundaries do need to be reviewed. • Exceptional circumstances exist where it is clearly demonstrated that land subject to MOL or Green Belt designation does not meet the MOL or Green Belt criteria. Borough Plan Reviews of MOL boundaries 2.12 MOL boundaries of other London Boroughs are being reviewed as part of the review of their development plans since the adoption of the London Plan in 2021. 2.13 From a review of published development plans there appears to be broad consensus as to the methodology of assessing how sites are graded, on a scale of low to high, depending on the contribution that the site makes when assessed against the London Plan’s criteria for the designation	Noted.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer
MOL Assessment by Arup November 2022– Background Context and	Noted.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

Arup Stage 1 Report - MOL 20 2.19 The Arup Stage 1 report identified the Barclays Site as being within MOL Site 20 - “Hanger Hill Park & former Barclays Sports Ground.” The boundaries of MOL Site 20 are given in Appendix 3, page 59, to the report. 2.20 What it is important to recognise is that although MOL 20 is identified and assessed by Arup as a single parcel it is actually comprised of four separate and distinct parcels of MOL, each with differing characteristics. 2.21 The Barclays Site and St Augustine’s school and grounds are combined in a single MOL parcel, St Augustine’s school being immediately adjacent to the northern boundary of the Barclays Site. 2.22 To the north- east of the Barclays Site and St Augustine’s parcel of land is a separate parcel of MOL 20 land comprising Chatsworth Wood, a small densely wooded area separated from the other parcels comprising MOL 20 by the North Circular Road. 2.23 To the north- west is another parcel of MOL 20 land, comprising Fox Wood and Hanger Hill Park, a densely wooded area and two separate public parks split vertically by Fox Lane. This parcel of land is separated from the other parcels comprising MOL20 by a significant amount of residential housing and Hillcrest Road. 2.24 To the south is another, small, parcel of MOL 20 land, which comprises the caretaker cottages and part of the playground of the Adolphus school, separated from the	Noted.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

Regulation 19 Submission 2.28 In the report to the full Council on 21 February 2024 entitled “Ealing Local Plan and draft CIL Charging Schedule”, which sought approval for the next stages in the developing the Regulation 19 Plan, – one of the key changes to Chapter 3 – Spatial Strategy -between the Regulation draft and this Regulation 19 iteration of the plan, is identified in paragraph 15.7 as: “To not proceed with the original proposals regarding changes to Green Belt and Metropolitan Open Land designations as a consequence of the objections raised including by the mayor of London in his statement of General Conformity. Instead, Green Belt and MOL boundary changes are proposed only where a site has been identified for development and is allocated in this plan. These are a small number of sites (or part of sites) that do not contribute towards Green Belt/MOL objectives and which could be used to meet identified development needs and thus are identified for a change in designation, demonstrating the corresponding exceptional circumstances. In addition, to ensure defensible boundaries, some boundary corrections have been made that reflect current reality and use of sites. Any changes will be shown in an Atlas of Change and the Interactive Policies Map.” The London Mayor’s letter to the LBE Regulation 18 draft New Local Plan is set out in Appendix 10.	Noted.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

2.30 L&E agrees with the assessment of the Arup report, as set out in Appendix 3 to the Stage 1 report, that MOL 20, as a whole, has no, or only slight or negligible importance as MOL when assessed against Policy G3 criteria of the adopted London Plan. 2.31 Consequently, L&E agrees with the Regulation 18 draft submission proposal by Arup to de-designate the whole of MOL 20, including the Barclays Site, from MOL, including the anomalous very small stand-alone parcel of MOL land to the south of the Barclays Site comprising part of the playground of Ada Lovelace School and the caretaker’s cottages. 2.32 It is L&E’s opinion that there has been no material change in circumstances in respect of MOL20 or the Barclays Site since the publication of the Regulation 18 draft and the MOL assessment by Arup of MOL20, including the Barclays Site, which would justify the change in position of the Council. We also note that the assessment by Arup has not been withdrawn as part of the Council’s own evidence base for its proposed Regulation 19 policies. 2.33 The Council states that the reason for not proceeding with the previous proposals is a consequence of objections raised by the mayor of London. The Mayor’s letter of response to the Local Plan merely restates Policy G3 of the LP2021, set out in part C, that any alterations to the boundary	Noted.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

2.36 In any event, L&E also considers that the Barclays Site should be assessed separately from the other parcels of MOL 20. Generally, if the whole of MOL 20 is assessed by Arup as having no importance or, at best, slight or negligible importance in relation to the MOL criteria (and so warranting de-designation from MOL) then the Barclays Site, which is only a small proportion in area of the whole of MOL 20, is disconnected from the rest of MOL 20, has never been open to the public and contains no heritage or landscape features, is considered to have no importance in relation to any of the MOL criteria, as set out in Table 2 below. 2.37 Specifically, it is noted that the Barclays Site is within a separate parcel of MOL 20 land which includes St Augustine’s School to the north of the Barclays Site. 2.38 St Augustine’s school is a private secondary school for girls comprising a large main school building with numerous secondary school buildings, extensive hardstanding for car parking, an all-weather hockey pitch and athletics track and two all-weather netball pitches/tennis courts. 2.39 To the east is another parcel of MOL 20 comprising Chatsworth Wood which is a is a small remnant of ancient woodland separated from the Barclays Site to the east of the North Circular Road at Hanger Lane.	Noted.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

2.46 Table 2 sets out L&E’s assessment, in section (A), why the Barclays Site as a whole should not be designated as MOL and also, in section (B), why the proposed designation of the Ada Lovelace Land as additional MOL should not be made. Table 2: Former Barclays Site: MOL 20 – Atlas of Change - Map 35 (A) Assessment in support of the deletion of all of MOL land designation at the former Barclays Sport Club site allocation EA 21 - SEE TABLE IN REPRESENTATION (B) Assessment for addition of MOL on land comprising part of the access road of the Ada Lovelace High School (MOL20) - SEE TABLE IN REPRESENTATION 2.47 L&E therefore consider that the whole of the Barclays Site, and not just the Clubhouse Site and the caretaker’s cottages, does not meet MOL criteria as set out in the London Plan and therefore “exceptional circumstances” exist for removing the MOL designation from the whole of the Barclays Site. The proposed Regulation 19 Plan is therefore not sound because all of the Barclays Site, and not just the land comprising the Clubhouse Site and the caretaker’s cottages, should be removed from MOL. 2.48 L&E also consider that the proposed new designation	It has never been the council's intention to remove protection against inappropriate development from the former Barclays Sports Ground. The council is keen to bring sports uses back to the site, with the provision of open-air sports facilities, including hockey. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Removing the MOL designation from the site could potentially undermine these plans and send wrong signals about the appropriateness of the site for development. Therefore, we are only proposing to remove the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. Any development there will be used to enable the sports and leisure improvements on the main site. In accordance with the new Local Plan’s enabling development policy, any enabling development is proportionate to the improvements being enabled. The small boundary correction on the southern edge of the site is to address the current anomaly of the southern edge of the MOL site being artificially disconnected from the main MOL parcel.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

Conclusions and Recommendations 2.49 Whilst the Regulation 19 Plan Atlas of change – Map 35 proposes to de-designate LBE’s own defined boundary of the Clubhouse Site from MOL is supported, it is still considered that all of the Barclays Site needs to be de- designated as MOL in the Regulation 19 Plan because: • The Barclays Site does not meet the criteria for MOL as set out in the adopted London Plan as shown by. - o Arup’s overall assessment of MOL 20 as set out in Table 1 - o L&E’s own assessment that, viewed in its own right separated from the remainder of MOL 20, all of the Barclays Site, and not just the Clubhouse Site as shown in Appendix 3, and the caretaker’s cottages warrants de-designation from MOL as set out in Table 2. • There is no justification for the designation of the Ada Lovelace Land as MOL and such land does not meet the criteria for MOL as set out in the adopted London Plan. • There are other planning policies within the Local Plan which can both protect and promote the Barclays Site for open space for sports use – such as - o Retaining the existing community open space policy in relation to the sports pitches outside the boundary of the Clubhouse Site; - o Having a bespoke site allocation for mixed use	It has never been the council's intention to remove protection against inappropriate development from the former Barclays Sports Ground. The council is keen to bring sports uses back to the site, with the provision of open-air sports facilities, including hockey. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Removing the MOL designation from the site could potentially undermine these plans and send wrong signals about the appropriateness of the site for development. Therefore, we are only proposing to remove the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. Any development there will be used to enable the sports and leisure improvements on the main site. In accordance with the new Local Plan’s enabling development policy, any enabling development is proportionate to the improvements being enabled. The small boundary correction on the southern edge of the site is to address the current anomaly of the southern edge of the MOL site being artificially disconnected from the main MOL parcel. There are no plans to designate the site as Green Belt.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

2.50 Therefore in order to be sound insofar as it relates to the Barclays Site, the Regulation 19 Plan should: -de-designate the whole of the Barclays Site from MOL; and -allocate Site EA 21 for a mix of residential and open-air sports use as per L&E’s sought changes to draft policy in relation to EA 21, where new built development of up to 10 storeys high to provide a new club house and residential development is to be only developed within the Clubhouse Site boundary at the north-west corner of the Barclays Site as shown in Appendix 3 to this representation. Our reasons for this assessment are given separately in L&E’s representation to the draft site allocation policy EA 21 as set out in section 5 of this representation. -not designate the Ada Lovelace Land as MOL for the reasons given in Table 2 and paragraph 2.48	It has never been the council's intention to remove protection against inappropriate development from the former Barclays Sports Ground. The council is keen to bring sports uses back to the site, with the provision of open-air sports facilities, including hockey. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Removing the MOL designation from the site could potentially undermine these plans and send wrong signals about the appropriateness of the site for development. Therefore, we are only proposing to remove the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. Any development there will be used to enable the sports and leisure improvements on the main site. In accordance with the new Local Plan’s enabling development policy, any enabling development is proportionate to the improvements being enabled. The small boundary correction on the southern edge of the site is to address the current anomaly of the southern edge of the MOL site being artificially disconnected from the main MOL parcel.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

2.51 In the event that the Inspector does not agree with L&E’s and Arup’s assessment that there are exceptional circumstances which justify the removal of the MOL designation from the whole of the Barclays Site and that only the land containing the existing club house building and should be de-designated from MOL as given Map 35 of Atlas of change to the Regulation 19 plan, L&E consider that the proposed site boundary change by Map 35 is unnecessarily tightly drawn. The MOL boundary should therefore exclude the Clubhouse Site as indicated in Appendix 3 to this representation. 2.52 The slightly enlarged Clubhouse Site boundary is necessary because the wider boundary is necessary to able to position the residential element as far as possible to the west within the Clubhouse Site away from Park View Road and also accommodate private open space required by the residential component of the proposed new built development and improve the access from the new club house facilities to the sports pitches. 2.53 Development of the Clubhouse Site for this mixed- use development is necessary in order bring back into use the former sport fields. The Clubhouse Site is a brownfield site which is a sustainable location for a high quality mixed use development of higher density, as illustrated in Bryden Wood’s feasibility assessment in Appendix F and the	In accordance with the new Local Plan’s enabling development policy, we are keen to ensure any enabling development is proportionate to the improvements being enabled.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment Ltd	Developer

3.1 L&E note Policy DP 9 – Tall Buildings – section E and F as given below: E. The definition of a tall building in different parts of Ealing is set out in Figure DMP1. F. Tall buildings above the specified threshold should be located upon allocated development sites defined in the development plan. 3.2 The Barclays Site is allocated as site EA31 in the Regulation 18 draft plan and EA21 in the Regulation 19 Plan and the Site is identified as being within Ealing as defined in Figure DMP1 which limits building heights to six storeys. 3.3 For the reasons set out in supporting evidence given in these representations L&E consider that a tall building of up to ten storeys high can be located within the vicinity of the Clubhouse Site within site allocation EA21 – former Barclays Sports Ground. 3.4 This assessment is based upon the following supporting evidence: Appendix 5 - Feasibility Assessment undertaken by Bryden Wood. Appendix 6 – Townscape and Visual Appraisal (TVA) undertaken by FPCR. Appendix 7 – Heritage Assessment undertaken by Cogent Heritage.	Noted	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Mike Straw	Leisure & Entertainment L	Developer
Bryden Wood have undertaken a feasibility assessment for the development of a building with a height of up to ten storeys in height within the vicinity of the built space in the Clubhouse Site in the north west corner of the Barclays Site. [See Appendix 5]	Noted. Notwithstanding the design and townscape evidence that was submitted to support this representation, the threshold remains an accurate assessment of the prevailing character of the area and a building of the height proposed would be a clear departure from this. LBE is clarifying the viability of the site allocation and the capacity for additional height to support this within the scope of identified character and heritage constraints.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Mike Straw	Leisure & Entertainment L	Developer

Townscape and Visual Appraisal (TVA) undertaken by FPCR 3.8 The primary purpose of the TVA study is to provide an initial appraisal of the likely townscape and visual effects of proposed development on the Clubhouse Site. The potential townscape and visual effects have been considered in relation to emerging development proposals as prepared by Bryden Wood as outlined above. [See Appendix 6] 3.7 Section 6 of the Bryden Wood feasibility assessment concludes that the land in the vicinity of the built space within the Clubhouse Site is an appropriate location for the incorporation of a taller building of up to 10 storeys in height and Option 1 represents the optimum indicative site layout and massing solution based upon the masterplanning principles as set out in the site feasibility assessment study.	Noted	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Mike Straw	Leisure & Entertainment L	Developer
Heritage Assessment – Cogent Heritage 3.19 The heritage assessment follows the basic, stepped approach propagated in Historic England’s Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (GPA 3), albeit slightly adapted. [See Appendix 7] 3.21 The assessment has demonstrated that a ten-storey development on the PDA would not result in harm to the setting of any heritage assets. 3.22 The report concludes in section 6 that there is “a sound case in heritage terms for an allocation of this land for a development of up to ten storeys.”	Noted	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Mike Straw	Leisure & Entertainment L	Developer

Planning Assessment – Planning Policy Considerations 3.23 We note the following planning policy documents and guidance relating to the development of tall buildings as given by LBE. Existing Policy Framework relating to Tall Buildings is set out in the adopted LBE Tall Buildings Guidance of 2022 which states that “Ealing’s policy on tall buildings is set out in the adopted Ealing Local Plan (Development Strategy and Development Management DPD), and by the London Plan (2021). Development Strategy Policy 1.2(h) specifies that ‘Tall buildings may be suitable in specified sites within Acton, Ealing and Southall town centres, gateways to Park Royal and identified development sites only’. The policy also states that sites may be identified as suitable through other parts of the development plan or through supplementary planning documents. Tall buildings also generate greater impacts on their surroundings than other forms of development whether due to their visual prominence or functional impacts such as their transport, servicing and construction needs. For all of these reasons, the development of tall buildings should be tested at the plan-making stage and their development be plan-led.” 3.24 The policy guidance further defines tall buildings as; ‘those that are substantially taller than their neighbours and/or which significantly change the skyline’. London Plan Policy D9 similarly sets out a plan-led approach to	Noted. Notwithstanding the design and townscape evidence that was submitted to support this representation, the threshold remains an accurate assessment of the prevailing character of the area a building of the height proposed would be a clear departure from this. LBE is clarifying the viability of the site allocation and the capacity for additional height to support this within the scope of identified character and heritage constraints.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Mike Straw	Leisure & Entertainment L	Developer

3.25 The detailed impact tests relating to tall buildings contained within the guidance – and which are part of the Regulation 19 Plan evidence base documents - are given below: The Ealing Character Study of January 2022 and Housing Design Guide of November 2022 provide generic design principles that will be applied to the consideration of tall buildings and future development in general. These include responding to character, context and identity, scrutinising the built form in terms of scale, massing, density, plot coverage, building heights and rooflines and ensuring that developments are well connected with their surroundings. For tall buildings, the visual impact on views, the integration with neighbourhoods, the effects on the microclimate and the sustainability of the buildings will also be of particular importance. These design principles will be used to assess planning applications as they come forward. 3.26 The guidance further states that the location of tall buildings will be particularly sensitive within or close to areas in Ealing that contain the following assets: • Statutory listed buildings: Special regard needs to be had to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses. • Designated Conservation Areas: Proposals for tall buildings need to ensure that Ealing’s 29 conservation areas continue to be preserved and enhanced. • Designated Heritage Land: The impact on the setting of as open land of historic value, including sites listed on the on the Register of	Noted. Notwithstanding the design and townscape evidence that was submitted to support this representation, the threshold remains an accurate assessment of the prevailing character of the area a building of the height propsoed would be a clear departure from this. LBE is clarifying the viability of the site allocation and the capacity for additonal height to support this within the scope of identified character and heritage constraints.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Mike Straw	Leisure & Entertainment L	Developer

Regulation 19 Evidence Base - Tall Building Strategy with site guidance appendix - Allies and Morrison - February 2024 3.27 We note that the Allies and Morrison report sets out the criteria for assessing whether a tall building is acceptable within Ealing when set against the following “sensitivity” and “suitability” tests: [Details of sensitivity and suitability tests] 3.28 We note that on page 11 of this document it states that although the Barclays Site is identified as a 0 or 1 suitability score on the composite heat map for sensitivity testing for tall buildings, immediately adjacent to the site the suitability categories are 5, 6 or 7 where category 8 is identified as the highest score for suitability. Such disparity in approach is not justified. 3.29 The Barclays Site scores low points on the suitability test because the Site is not within a town centre or allocated in the plan for a tall building and it is not in use. For reasons given below we consider that this suitability assessment is misconceived when set against the other criteria, including access to good public transport/proximity to Crossrail stations/ open space – as shown in sections 1.2.3 and 1.1 4 of the feasibility assessment submitted by Bryden Wood – the site is within 5 minutes walk of Hanger Hill Wood/Park and Montpellier Park and 12 minutes walk to Ealing Broadway and hence Crossrail. 3.30 We also note that all of the Barclays Site is identified in the Planning Assessment – Conclusion	Noted. Notwithstanding the design and townscape evidence that was submitted to support this representation, the threshold remains an accurate assessment of the prevailing character of the area a building of the height propsoed would be a clear departure from this. LBE is clarifying the viability of the site allocation and the capacity for additonal height to support this within the scope of identified character and heritage constraints.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Mike Straw	Leisure & Entertainment L	Developer
3.31 In light of the evidence set out in the Feasibility Study by Bryden Wood (Appendix 5); the Townscape and Visual Assessment by FPCR (Appendix 6) and the Heritage Assessment prepared by Cogent Heritage (Appendix 7) it is considered that: - Proposed Site Allocation EA 21 – the Clubhouse Site as shown in Appendix 3, located in the north-west corner of the proposed Site Allocation 21 - former Barclays Site - is an appropriate location for a taller building of up to ten storeys. - Site specific policy EA 21 should be amended as per Table 3, section 5, of this representation.	Noted. Notwithstanding the design and townscape evidence that was submitted to support this representation, the threshold remains an accurate assessment of the prevailing character of the area a building of the height propsoed would be a clear departure from this. LBE is clarifying the viability of the site allocation and the capacity for additonal height to support this within the scope of identified character and heritage constraints.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Mike Straw	Leisure & Entertainment L	Developer

3.32 We therefore consider that a tall building of up to ten storeys high within the vicinity of the existing built space in the Clubhouse Site is supported by the tall building policy and guidance as given in paragraphs 3.5 to 3.29 because: (1) The Heritage Assessment provided by Cogent Heritage concludes that in terms of sensitivity: The assessment has demonstrated that a ten storey development on the PDA, as per Illustrative Option 1, would not result in harm to the setting of any of the nearby heritage assets. This demonstrates that there are no heritage constraints or ‘in principle’ issues that would prevent the allocation, or development, of a tall building (up to ten storeys in height), provided it is located within the vicinity of the existing club house buildings and broadly corresponds with the indicative layout and massing as is shown in Illustrative Option 1 of Brydon Wood’s feasibility report. It is also noted that the Site is not located within a conservation area or has any on-site heritage assets.	Noted. Notwithstanding the design and townscape evidence that was submitted to support this representation, the threshold remains an accurate assessment of the prevailing character of the area a building of the height propsoed would be a clear departure from this. LBE is clarifying the viability of the site allocation and the capacity for additonal height to support this within the scope of identified character and heritage constraints.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Mike Straw	Leisure & Entertainment L	Developer
(2) The feasibility study, with proposed illustrative redevelopment options within the vicinity of the built space in the Clubhouse Site, provides evidence that the Clubhouse Site is a suitable location for a tall building of up to ten storeys high because: •The Site is accessible by public transport and within walking distance of Ealing town centre. •The Site has good access to public open space. •The proposed development, including a new sports clubhouse facility, will enable the re-use of the sports ground comprising the rest of the Site for outdoor sports use. •The proposed development would have no adverse impact on any adjacent protected nature sites. •The proposed development would not cause any adverse impact on neighbouring residential properties in terms of overshadowing/rights of light or residential amenity due to the proposed layout as given in the identified options.	Noted	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Mike Straw	Leisure & Entertainment L	Developer

(3) The townscape and visual impact assessment as given by FPCR provides evidence that there would be no adverse impacts on existing townscape and visual impacts from key public viewpoints. On the contrary, the assessment highlights the opportunity the Site presents in development with a higher quality and higher density incorporating a tall building ten storeys high. (4) Such development is supported by proposed Policy DAA – Design and Amenity – Ealing LPA – local policy.	Noted	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Mike Straw	Leisure & Entertainment L	Developer
These representations relate to the application of the draft Policy ENA: Enabling Development Ealing LPA – local policy – as set out below –to proposed site allocation EA 21: Policy ENA: Enabling Development Ealing LPA [Policy ENA] L&E object to this policy being specifically referenced within proposed site allocation EA 21. L&E consider that the policy should not be applied to any development anticipated by site allocation EA21 at the Barclays Site for the reasons given under the following three headings. 1. Contrary to National Planning Policy Framework (NPPF) 2. Contrary to other guidance given in National Planning Policy Framework 3. Contrary to Adopted London Plan Policy GG2 Making the best use of land	Policy ENA clarifies rather than expands the scope of enabling development, which is a case that is available to development whether or not a policy exists. As the policy makes clear, only development that is 'demonstrably led by the objectives of the designation in question' can qualify as enabling development. The policy further clarifies that the benefits should be to the designation itself and must outweigh any harm, as well as being the minimum necessary to deliver the identified benefit.	Policy ENA: Enabling Development – Ealing LPA – local policy		Mike Straw	Leisure & Entertainment L	Developer

4.3 The National Planning Policy Guidance does not define “Enabling Development” and the only specific reference to enabling development in the NPF relates to heritage assets” only - as set out in NPPF paragraph 214 below: “Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.” 4.4 Historic England's Planning note 4 of 2020 sets out advice on the financial evidence requirements for Enabling Development proposals, requiring two development appraisals (essentially viability assessments) to be completed. 4.5 Standard viability assessments are now common practice for such developments justifying why the enabling development is required to preserve or enhance the heritage asset. 4.6 A Residual Land Value (RLV) is calculated for a policy compliant scheme and then compared against a development sites Benchmark or Threshold Land Value (BLV), typically Market Value, in order to assess whether a scheme is viable. If the RLV does not meet the BLV, the proposal is unviable. Sensitivity testing will typically follow to identify what quantity of Section 106 obligations a scheme can deliver whilst remaining viable. 4.7 The Heritage assessment undertaken by Cogent Heritage as	Policy ENA clarifies rather than expands the scope of enabling development, which is a case that is available to development whether or not a policy exists. As the policy makes clear, only development that is 'demonstrably led by the objectives of the designation in question' can qualify as enabling development. The policy further clarifies that the benefits should be to the designation itself and must outweigh any harm, as well as being the minimum necessary to deliver the identified benefit.	Policy ENA: Enabling Development – Ealing LPA – local policy		Mike Straw	Leisure & Entertainment L	Developer

We note the following headings and associated paragraphs from the National Planning Policy Framework: In connection with the consideration of the relevant policies of the NPPF we note that the Clubhouse site is “Brownfield Land” which is defined in the NPPF glossary of terms as “previously developed land” which is: “Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape. Making effective use of land 123. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or ‘brownfield’ land	Noted	Policy ENA: Enabling Development – Ealing LPA – local policy		Mike Straw	Leisure & Entertainment L	Developer
Development contributions 34. Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.	Noted.	Policy ENA: Enabling Development – Ealing LPA – local policy		Mike Straw	Leisure & Entertainment L	Developer

Planning conditions and obligations 55. Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. 56. Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. 57.Planning obligations must only be sought where they meet all of the following tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development. 58. Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any <u>change in site circumstances since the plan was brought into force</u>.	Noted	Policy ENA: Enabling Development – Ealing LPA – local policy		Mike Straw	Leisure & Entertainment L	Developer
3. Contrary to Adopted London Plan Policy GG2 Making the best use of land 4.9We note that this policy states that: To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must: [Reproduction of London Plan Policy GG2 Making best use of land]	Noted	Policy ENA: Enabling Development – Ealing LPA – local policy		Mike Straw	Leisure & Entertainment L	Developer
Contrary to New Ealing Local Plan Policy SP4.1 – Creating Good jobs and Growth [Reproduction of Local Plan Policy SP4.1 - Creating good jobs and growth]	Noted	Policy ENA: Enabling Development – Ealing LPA – local policy		Mike Straw	Leisure & Entertainment L	Developer

4.11 We consider that in light of the evidence in Appendices 5,6 and 7 the development of the Clubhouse Site comprising a higher density development incorporating a taller building of up to 10 storeys is supported by the draft policy SP4.1 A - G. 4.12 However, it is L&E's opinion that the delivery of the good growth objectives as set out in policy SP4.1 (A to E) will not be achieved if the proposed enabling policy restrictions are incorporated in the site allocation.	Noted	Policy ENA: Enabling Development – Ealing LPA – local policy		Mike Straw	Leisure & Entertainment L	Developer
IIA Arup Report – page 95 – 2.4.18 Enabling Development 4.13 We note that the IIA Arup report in relation to its integrated impact assessment of development management policies in the Regulation 19 plan (referred to in paragraph 6 below) scores the Enabling Development policy as “blue ?” in relation to Housing and Communities and states, in relation to the effect of the proposed Enabling Development policy on Housing and Communities, that “Housing targets alone are not considered enabling development and therefore this policy is unlikely to sustainably contribute to housing need. The policy does however allow for the delivery of development which could outweigh harm which may facilitate the delivery of housing. Nevertheless, housing sites could be put at risk if they were subject to the application of enabling development.” 4.14 L&E agree with this assessment – application of the Enabling Policy at the Barclays Site would mean under providing for needed housing within on the Borough on a highly sustainable brownfield site.	Noted	Policy ENA: Enabling Development – Ealing LPA – local policy		Mike Straw	Leisure & Entertainment L	Developer

Strengthening planning policy for brownfield development. Open consultation – 13 February 2024– Department for Levelling Up, Housing and Communities. 4.15¶In Appendix 8 to this representation we note paragraph 15 of the above open consultation document which shows that the Government is proposing changes to national planning policy to: “make clear that when considering planning applications, local planning authorities should give significant weight to the benefits of delivering as many homes as possible, especially where this involves land which is previously developed”. 4.16¶In this regard we note that LBE has not yet identified the amount of residential units on proposed allocated sites which can brought forward over the 6-10 or the 11-15 year time period. 4.17¶The feasibility assessment provided by Bryden Wood in Appendix 5 shows that the Clubhouse Site can assist LBE in meeting its projected housing needs over the plan period. The Clubhouse Site is on brownfield land and can sustainably deliver a mixed- use development, including a 10 storey component, which would provide around 100 new residential units. 4.18¶Redevelopment of the former Barclays club house building would provide a higher quality building – which would include new club house facilities at lower ground floor level serving the re-opened sports fields for the local community on land outside the Clubhouse Site boundary.	Noted	Policy ENA: Enabling Development – Ealing LPA – local policy		Mike Straw	Leisure & Entertainment L	Developer

4.19 We note the London Plan Review – Report of Expert advisors, dated 15 January 2024 as given in Appendix 9 to this representation. In particular, we note the following paragraphs: [Paragraph 4] [Paragraph 8] [Paragraph 12] The Presumption For qualifying local planning authorities, there is a strong presumption in favour of granting planning permission for proposals which comprise or include residential development on Brownfield (Previously developed) land. Qualifying local planning authorities are those where the net housing completions since 2019/20 have fallen below the cumulative annualised total of their Table 4.1 ten-year target. The presumption does not apply to sites which are in the Green Belt or Metropolitan Open Land or a Strategic Industrial Location. In the case of proposals which would cause harm to the significance of a designated heritage asset, the presumption only applies where any such harm is clearly outweighed by the public benefits of the proposals. Where it applies, the presumption means granting planning permission as quickly as possible unless the benefits of doing so would be significantly and demonstrably outweighed by any adverse impacts which would arise from not according with policies in this plan.	Noted	Policy ENA: Enabling Development – Ealing LPA – local policy		Mike Straw	Leisure & Entertainment Ltd	Developer

Planning Assessment. 4.21 We consider that all references to the “enabling development” policy in the Barclays Site allocation EA 21 should be deleted because the enabling policy is contrary to the NPFF and the London Plan GG2 and the Arup IIA assessment because: • The proposed enabling policy would not maximise the opportunities for effectively making the best use of the highly sustainable brownfield land/previously developed land at the Clubhouse Site in delivering needed new residential development. • BE are not developing enough homes to meet their acknowledged requirements as shown in Appendix 8 and no assessment has been made by the Regulation 19 Plan of the contribution the Barclays Site can contribute in delivering the projected housing needs during the plan period. • The feasibility study in Appendix 5 demonstrates that the Clubhouse Site is a brownfield site location suitable for the development of a well-designed building(s) incorporating a ten-storey building which will create a higher density development appropriate for such a location and deliver much needed new housing. • New built development will not cause any harm to heritage assets and will result in significant townscape and visual improvements as evidenced by the townscape and visual assessments as given in Appendix 6 and Heritage assessment given in Appendix 7.	Noted	Policy ENA: Enabling Developme nt – Ealing LPA – local policy		Mike Straw	Leisure & Entertainment L	Developer

5. Representations with regard to the proposed Site Allocation 21 EA – Former Barclays Sport Ground 5.1 In addition to the reference to “enabling” residential use, which is dealt with in the previous section, the site allocation seeks to further limit any development of the Clubhouse Site in that, in the Contextual Considerations, it states that, in order to.... secure replacement supporting leisure facilities and enable enhancements to the wider sports ground, including securing community access, some enabling residential development is foreseen as necessary” but that the quantum of residential should be limited to... “the amount absolutely necessary to financially secure the delivery of the replacement leisure centre and limit the amount of development on open space” and that, in addition, it should be ensured that ... “that an optimised housing mix includes the maximum amount of genuinely affordable housing that is possible within scheme viability.” 5.2 We would note, first of all, that if development was limited to the amount absolutely necessary to financially secure the delivery of the sporting leisure facilities then clearly it would not be possible to deliver any affordable housing, so that the aspirations set out in the site allocation are self-defeating. 5.3 More generally however, it is submitted that the purpose of de-designating the Site and allocating the Clubhouse Site	It is recommended that the third and fourth bullet point under Design Principles is revised as follows: • ~~Limit the quantum of residential development to the amount absolutely necessary to financially secure the delivery of the replacement leisure centre and limit the amount of development on open space.~~ • ~~Ensure that an optimised housing mix includes the maximum amount of genuinely affordable housing that is possible within scheme viability.~~ • The quantum of facilitating residential development should be no more than is necessary to financially secure the delivery of sports facilities within the allocation site and across the wider sports ground and to optimise the quantum of genuinely affordable housing secured through the development. • The proposed housing mix should represent the optimum one from the perspective of limiting the quantum of development on open space, whilst maximising the genuinely affordable offer.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

5.5In light of the assessments set out in sections 2 to 4 of these representations, in order to make the Regulation 19 Plan sound insofar as it relates to the Barclays Site, the amendments to the proposed text relating to site allocation EA21 – former Barclays Sport Ground set out in Table 3 below are required. [Table 3 - see representation, and detailed in separate rows] Changes sought: SITE ADDRESS <u>Former Barclays Sports Club Site, Park View Road, Ealing W5 2JF</u>	Noted. Proposed change not agreed. The title of the site allocation does not cover just the site intended for future development but the playing fields as well. This is because there is an important relationship between the site where the sports facilities will be located and the wider green space.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer
Changes sought: SITE AREA (Hectares)~~6.59~~<u>6.72</u>	Accepted. Site Area will be corrected.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer
Changes sought: CURRENT USE ~~Playing field, with an ancillary building located in the north-west corner of the site.~~ <u>The site is not currently in use. Previously sports club for use of Barclays Bank employees, now comprising club house building and car parking area in the north- west of the site and green space previously used for outdoor sports.</u>	Noted. Proposed change not agreed. The contextual considerations already notes that the site is disused and therefore not currently operational..	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

Changes sought: Proposed Use ~~Leisure-led scheme with enabling residential use facilitating access to sports and play pitches~~ <u>Redevelopment of former club house building and hard standing area for new built development including a tall building not exceeding 10 storeys high for residential use with ground floor sports club and indoor leisure facilities to facilitate access to the use of sports and play pitches to the local community.</u>	Noted. Proposed change not agreed. This level of detail is better addressed within the Design Principles section.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer
Changes sought: Relevant Planning Applications ~~None~~ <u>Development of land to the south of the former Barclays sport Ground for the development of the Ada Lovelace school and land to the north-east for permission 202253FUL for a HMO developing resulting in de-designation of MOL land.</u>	Noted. Proposed change not agreed. Relevant planning permissions only refer to extant permissions within the red line boundary. However a suggested amendment is propped for the contextual considerations.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer
Changes sought: Setting/Typology ~~Green spaces~~ <u>Former club building of 2-3 storeys with car parking in the north-east of the site; disused private open space formerly used for open air sport uses.</u>	Noted. Proposed change not agreed. Typology here refers to the task of identifying and grouping buildings and urban spaces according to the similarity of their essential characteristics. Ddevelopment proposals must respond to relevant contextual design guidance provided in Part 2 of the Ealing Character Study.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

Changes sought: Tall Buildings? The site is not in principle suitable for a tall building. The threshold height for a tall building is 6 storeys (21 metres)? The site is suitable for a tall building of up to 10 storeys high.	Noted. Notwithstanding the design and townscape evidence that was submitted to support this representation, the threshold remains an accurate assessment of the prevailing character of the area and a building of the height proposed would be a clear departure from this. LBE is clarifying the viability of the site allocation and the capacity for additonal height to support this within the scope of identified character and heritage constraints.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer
Changes sought: PLANNING DESIGNATIONS/ SITE CONSTRAINTS? ~~Flood Zone 3a (surface water), Metropolitan Open Land (adjacent); Community Open Space, Green Corridor, SINC (borough)(adjacent), Hanger Hill Haymills CA (adjacent); Ealing Cricket Ground CA (nearby) and locally listed building (nearby); TPO. ?~~ ~~Removal of all of the Metropolitan Open Land designation.~~ ~~Community Open Space to exclude the existing developed land comprising of the former club house building and car parking/servicing areas.~~ ~~Green Corridor (eastern site boundary).~~ ~~TPO's along Parkview Road boundary.~~ Nearby Local Plan Designations ~~Ealing Cricket Ground Conservation Area.~~ ~~Hanger Hill Conservation Area~~ ~~Locally listed building~~ Adjacent Local Designations ~~Metropolitan Open land~~ ~~Green Corridor~~ ~~Site of nature conservation importance~~ ~~Environment Agency: Flood Zone 1~~	Noted. Proposed change not agreed. However there is an error in the reference to MOL and a sugested modification is proposed. MOL does cover the majority of the site allocation part from the NW corner.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

Changes sought: Key Infrastructure requirements? Sport, leisure and recreational facilities? <u>Re use of open space for sport, leisure and recreational facilities; indoor club house facilities.</u>	Noted. Proposed change not agreed.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer
Changes sought: ~~• Adjacent to the club house building are sport grounds which were designated as Community Open Space and Metropolitan Open Land(MOL)~~ <u>MOL site designation is removed because the site does not comply with criteria for designation of MOL as set out in the London Plan; Community Open Space designation applicable to the site's open space and not on land that contains the footprint of the existing and former club house buildings, car parking and service areas.</u>	Noted. Proposed change not agreed.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

Changes sought: Design Principles Secure replacement supporting leisure facilities and enable enhancements to the wider sports ground, including securing community access. Some enabling residential development is foreseen as necessary. <u>Secure the re-use of the open space for sporting and leisure facilities for use by the local community. Redevelopment of the brownfield land containing the existing club house building and hard standing areas to provide a high-quality development of up to 10 storeys high comprising residential and indoor club house facilities serving the open space sports and leisure uses.</u>	Noted. It is recommended that the text be amended as follows: Secure replacement ~~supporting~~ <u>ancillary sports</u> leisure facilities and enable enhancements to the wider sports ground, including securing community access. Some enabling residential development is foreseen as necessary.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer
Changes sought: Design Principles ~~Limit the quantum of residential to the amount absolutely necessary to financially secure the delivery of the replacement leisure centre and limit the amount of development on open space.~~ <u>To redevelop the sustainable brownfield site of the former club house and car parking/servicing area for a high quality and well-designed development up to 10 storeys high for new residential and club house facilities at ground floor serving use of open space for local community sports and leisure uses.</u>	Noted. It is recommended that the third and fourth bullet point under Design Principles is revised as follows: ~~Limit the quantum of residential development to the amount absolutely necessary to financially secure the delivery of the replacement leisure centre and limit the amount of development on open space.~~ ~~Ensure that an optimised housing mix includes the maximum amount of genuinely affordable housing that is possible within scheme viability.~~ The quantum of facilitating residential development should be no more than is necessary to financially secure the delivery of sports facilities within the allocation site and across the wider sports ground and to optimise the quantum of genuinely affordable housing secured through the development. The proposed housing mix should represent the optimum one from the perspective of limiting the quantum of development on open space, whilst maximising the genuinely affordable offer.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

Changes sought: Design Principles •~~Ensure that an optimised housing mix includes the maximum amount of genuinely affordable housing that is possible within scheme viability.~~	Noted. It is recommended that the third and fourth bullet point under Design Principles is revised as follows: •~~Limit the quantum of residential development to the amount absolutely necessary to financially secure the delivery of the replacement leisure centre and limit the amount of development on open space.~~ •~~Ensure that an optimised housing mix includes the maximum amount of genuinely affordable housing that is possible within scheme viability.~~ • The quantum of facilitating residential development should be no more than is necessary to financially secure the delivery of sports facilities within the allocation site and across the wider sports ground and to optimise the quantum of genuinely affordable housing secured through the development. • The proposed housing mix should represent the optimum one from the perspective of limiting the quantum of development on open space, whilst maximising the genuinely affordable offer.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer
Changes sought: Design Principles •~~Minimise impacts on the existing residential properties on Park View Road in particular through transitioning building heights down to Beechcroft House.~~ Minimise impacts on the existing residential properties on Park View Road <u>by ensuring that the proposed layout, scale and landscaping details for redevelopment of the brownfield site at the former club house building and car parking areas do not have any significant adverse visual/townscape or heritage impacts.</u>	The design gudiance is sound in relation to the context and surroundings of this site.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

Representation relating to Public Document Pack/Supplementary Documents Appendix D – Arup Integrated Impact Assessment (IIA) – Regulation 19 Report - Appendix D IIA Sites Appraisal Section 2.6 Ealing Sports Grounds (EA 21) [Details of IIA methodology used by Arup] In its assessment in the Arup report, the Barclays Site, identified as site 21EA, is bundled together with two other sites, 19EA and 23EA (both sports facilities) so that all three sites are commented on as one although there are individual scores and, in some cases, there are individual comments in relation to each site. In any event the scores for and comments applicable to 21EA are as follows against the various IIA objectives: [Details of assessment of 21EA in IIA] 6.7 The IIA site assessment undertaken by Arup demonstrates that the Barclays Site should be allocated for development as proposed in this representation submitted by L&E in Section 5, Table 3 because: 1. The Site has no overriding environmental constraints preventing the delivery of the proposed development. 4. The Site has good connectivity to existing education and	Noted.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer

7. Conclusions and Recommendations For the Regulation 19 Plan to be sound, insofar as it relates to the Barclays Site, for the reasons given in the representations made on behalf L&E, the Regulation 19 Plan should have the following modifications: 1. Metropolitan Open Land Boundaries. • De-designate all of the Barclays Site from MOL because the Barclays Site does to comply with the criteria for designation as MOL as set out in the adopted London Plan. • If the Inspector does not agree with the complete removal of the MOL designation from all of the Barclays Site, remove the MOL designation of the land defined as the Clubhouse Site in Appendix 3 to this representation because the Clubhouse Site is previously developed land and does not comply with London Plan’s criteria for MOL designation. • Remove the parcel of proposed new MOL land as shown in the Atlas of Change Map 35 comprising part of the access road of the Ada Lovelace school. • L&E agree to the removal of the MOL designation from the anomalous square of MOL comprising the caretaker’s cottages. 2. Site Allocation EA 21 • Amend the wording of the proposed uses and site specific designations for the proposed site allocation EA 21 as set out in Table 2, section 5 to this representation.	Noted. Regards MOL, it has never been the council's intention to remove protection against inappropriate development from the former Barclays Sports Ground. The council is keen to bring sports uses back to the site, with the provision of open-air sports facilities, including hockey. We are keen for these sports uses to be accessible to the nearby Ada Lovelace High School as well as the wider community. Removing the MOL designation from the site could potentially undermine these plans and send wrong signals about the appropriateness of the site for development. Therefore, we are only proposing to remove the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government’s “grey belt” category that should be considered for development. Any development there will be used to enable the sports and leisure improvements on the main site. In accordance with the new Local Plan’s enabling development policy, any enabling development is proportionate to the improvements being enabled. The small boundary correction on the southern edge of the site is to address the current anomaly of the southern edge of the MOL site being artificially disconnected from the main MOL parcel. There are no plans to designate the site as Green Belt.	21EA Former Barclays Sports Ground		Mike Straw	Leisure & Entertainment L	Developer
Housing Not possible to understand if the draft Plan meets housing target between 2019 and 2029 without site capacities. Plan should make clear housing delivery between 2019 and 2024. If there has been a shortfall, the deficit will need to be made up by the end of the LP2021 housing period by 2029	Noted. This will be addressed in a Statement of Common Ground.	SP4.3 Genuinely affordable homes		Hassan Ahmed	Greater Lond	759 Statutory Body

Affordable Housing On average, schemes that were referable to the Mayor that followed the Fast Track Route provided 44% affordable housing in 2022, whereas viability tested schemes provided only 28%. Applicants also typically seek to demonstrate the existence of ‘viability deficits’ through the viability assessment process and use these as a credit in viability review mechanisms which can reduce the likelihood that additional affordable housing is secured over the lifetime of the development. There is a significant risk that the borough would secure fewer affordable homes through a blanket 40% requirement than could be achieved through the 35% threshold for sites that are not on public or industrial land. The Mayor is therefore concerned that, in reality, a headline threshold target would achieve less than a more feasible, lower one. As currently written, it isn’t clear if the 40% threshold is intended to be applied to all residential proposals and more clarity on this point is considered necessary. To be consistent with the LP2021, Policy HOU should include that the thresholds for affordable housing are set at 50% on publicly owned land where there is no portfolio agreement with the Mayor and where the introduction of residential development into industrial sites would result in a loss of industrial capacity.	Noted. This will be addressed in a Statement of Common Ground. HOU C) sets out that the new threshold applies only to that defined in “Policy H5 B 1)” which sets only the general threshold, not that required or publicly owned land etc. For the sake of future-proofing a suggested modification is proposed.	Policy HOU: Affordable Housing – Ealing LPA – local policy		Hassan Ahmed	Greater Lond	759	Statutory Body
Industrial Monitoring The Mayor strongly suggests that LBE commits to regularly monitoring industrial capacity in the borough over the life of the Plan to ensure that proposals for development do not result in borough-wide deficits in industrial capacity. Doing so would help to meet the requirements of Policy E4C of the London Plan 2021, which makes it clear that industrial	Noted. This will be addressed in a Statement of Common Ground.	SP4.2 Decent living incomes		Hassan Ahmed	Greater Lond	759	Statutory Body

Policy E4 It is strongly recommended that Policy E4 is amended to provide a firmer focus on increasing industrial capacity over the life of the Plan, especially those related to Class B, where LBE is able to exert control.	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	Policy E4: Land for Industry, Logistics and Services to Support London’s Economic Function – London Plan – Ealing LPA – local variation		Hassan Ahmed	Greater Lond	759	Statutory Body
Industrial Capacity The draft Plan proposes masterplans for three areas of SIL in the site allocations, to deliver what is described, unspecifically as, ‘industrial-led mixed-use intensification’. This raises uncertainty and the draft Plan should establish why these particular sites have been selected. The associated site allocations for them should set out the industrial floorspace to be reprovided and the industrial Use Classes to be accommodated. We do not currently consider that the intention in the draft Plan to downgrade the Hangar Lane Gyratory SIL to LSIS is underpinned by evidence which would support it. The draft Plan suggests that downgrading the site to LSIS will facilitate the reintroduction of industrial uses through enabling development, but it is unclear what this would mean in practice and how it would meet key requirements. The Mayor considers that a plan, monitor and manage approach is required to allow the potential downgrading of the site (particularly given its positive attributes for SIL). Policy E6 should be amended so that the intention to accommodate businesses with high job densities does not happen at the expense of important industrial activities such as those which fall within Class B8	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	Policy E6: Locally Significant Industrial Sites (LSIS) – London Plan – Ealing LPA – local variation		Hassan Ahmed	Greater Lond	759	Statutory Body

Policy E7 To be consistent with Policy E7D of the LP2021, the allocations should be clear that the industrial elements of proposals are to be delivered ahead of any residential components and the implementation of the Agent of Change principle applied to ensure that industrial activity within the areas of SIL can effectively operate 24 hours a day, seven days a week.	Noted. This will be addressed in a Statement of Common Ground.	General		Hassan Ahmed	Greater Lond	759	Statutory Body
Town Centres The draft Plan should apply a town centre first approach towards office development as set out in Policy SD7 of the LP2021. This means that where there is a clear need for office development within LBE, the Council should allocate sites within town centres considering site suitability, availability and viability, with limited exceptions for existing viable office locations.	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	Policy SP4: Creating good jobs and growth		Hassan Ahmed	Greater Lond	759	Statutory Body

Green Belt/Metropolitan Open Land The proposed site allocations do not provide detail on potential development capacities. In the absence of that information, it is not clear if LBE could meet the borough's growth needs over the lifetime of the Plan without relying on GB and MOL sites. It also means that one cannot determine what the GB and MOL sites could contribute in terms of housing numbers and other growth. Furthermore, the Mayor questions the proposals to de-designate some areas which are not included in site allocations. The LP2021 sets out a strategic approach for all London boroughs to avoid resorting to the capital's valuable GB and MOL for development opportunities. LBE should adopt a 'brownfield first' approach exhausting all suitable brownfield development opportunities before considering the potential for development on GB and MOL sites. In order that the draft Plan is in general conformity with the LP2021, LBE will need to establish the exceptional circumstances that are required by national policy before it can release and reconfigure the borough's GB and MOL.	Noted. This will be addressed in a Statement of Common Ground.	SP2.2 Climate action		Hassan Ahmed	Greater Lond	759	Statutory Body
19EA Gurnell Leisure Centre The proposed allocation lies completely within MOL and is currently home to a leisure centre. As set out in Policy G3 of the LP2021, MOL is afforded the same level of protection as Green Belt land. The proposed use is for residential development which the Mayor considers is inappropriate development in MOL.	Noted. This will be addressed in a Statement of Common Ground.	19EA Gurnell Leisure Centre		Hassan Ahmed	Greater Lond	759	Statutory Body

04GR Westway Cross The existing use is a retail park and a large part of the site lies within MOL. As set out in Policy G3 of the LP2021, MOL is afforded the same level of protection as Green Belt land. The proposed use is for residential-led mixed use development including retail and office space which the Mayor considers is inappropriate development in MOL. However, LBE are proposing a MOL boundary change which would remove the designation and this will require evidence to demonstrate exceptional circumstances. LBE should also note that office development should be part of a town centres first approach as set out in Policy E1 of the LP2021.	Noted. This will be addressed in a Statement of Common Ground.	04GR Westway Cross		Hassan Ahmed	Greater Lond	759	Statutory Body
04NO Northolt Driving Range The site lies completely within the Green Belt (this is not currently recognised in the allocation which should be amended to reflect this) and has most recently been used as a sports facility with a golf driving range. In Policy G2 of the LP2021 it is clear that the Green Belt should be protected from inappropriate development. The proposed use is for an employment-led mixed-use scheme which the Mayor considers is inappropriate development in the Green Belt. It is clear the site is being considered for industrial and residential use but it is not clear how the site could contribute towards the borough's industrial needs over the plan period. It is noted that LBE plan to release the site from its Green Belt designation, which would require exceptional circumstances to be established before that can happen.	Noted. This will be addressed in a Statement of Common Ground.	04NO Northolt Driving Range		Hassan Ahmed	Greater Lond	759	Statutory Body
09NO Kingdom Workshop, Sharvel Road The site lies completely within the Green Belt (this is not currently recognised in the allocation which should be amended to reflect this) and is currently used for lorry repairs. In Policy G2 of the LP2021 it is clear that the Green Belt should be protected from inappropriate development. The proposed use is for a Gypsy and Traveller site which the Mayor considers is inappropriate development in the Green Belt. It is noted that LBE plan to release the site from its Green Belt designation, which would require exceptional circumstances to be established before that can happen.	Noted. This will be addressed in a Statement of Common Ground.	09NO Kingdom Workshop, Sharvel Road		Hassan Ahmed	Greater Lond	759	Statutory Body

16SO Warren Farm and Imperial College Land The proposed allocation lies completely within MOL and covers 33.81ha. As set out in Policy G3 of the LP2021, MOL is afforded the same level of protection as Green Belt land. The proposed use is for an outdoors sports facility and nature reserve which the Mayor considers is inappropriate development in MOL. LBE is not proposing to remove the sites MOL designation.	Noted. This will be addressed in a Statement of Common Ground.	16SO Warren Farm and Imperial College Land		Hassan Ahmed	Greater Lond	759	Statutory Body
Tall Buildings Figure DMP1 has some areas which overlap and there are other blank areas which seem to have no corresponding tall building definition. Neither are the tall building definition zones included in the borough’s proposed policies map. Given this, the proposed approach does not currently meet the requirements of Policy D9 of the LP2021 and this should be addressed. We would note that there are only five different proposed building heights cited in Table DMP1, and therefore consider that this information could be better conveyed in a simplified form. The Mayor notes paragraph 5.13 of the draft Plan which states that the London Plan sets the clear presumption that tall buildings should be confined to specified sites and maximum heights. The presumption is not correct – rather Policy D9B of the LP2021 specifically uses the terms ‘locations’ and ‘appropriate’ tall building heights. This implies some flexibility which could include a range of ‘appropriate building heights’ across an area. This is considered to be practical in terms of enabling boroughs to focus the tallest buildings in a particular more central part of a tall building zone and perhaps seeking lower building heights towards the edges of that zone (if that is for example what a borough wishes to do). In light of this, we advise LBE to use the term ‘appropriate’ instead of ‘maximum’ throughout the document. For practical reasons, the use of ‘locations’ rather than more specific sites	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Hassan Ahmed	Greater Lond	759	Statutory Body

Kew WHS The Mayor stated in his Regulation 18 response that LBE’s tall building approach should ensure that the Outstanding Universal Value (OUV) of Kew Gardens World Heritage Site (WHS) is preserved (including its setting and key views from within). This is an issue which remains unresolved and the Mayor strongly advises LBE to follow the guidance set out in Policies HC2 and HC3 of the LP2021	Noted. This will be addressed in a Statement of Common Ground.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Hassan Ahmed	Greater London	759	Statutory Body
Policy Format and Heritage Specific Policy In our view it is important that the plan contains heritage specific policies which guide decision makers as to how to respond to development proposals that may come forward. Not all development will be on the specified development sites and therefore overarching policy is necessary to ensure heritage assets may be conserved and enhanced recognising them as an irreplaceable resource. We recognise the Council’s desire to streamline policy and not repeat that which is already within the NPPF or the London Plan. Nevertheless, we consider there are issues for the historic environment that the Council should address through its Local Plan. - Requirements for development proposals to be clear as to how they will affect the significance of heritage assets; - Making it clear that great weight will be given to the conservation of heritage assets and the more important the asset the greater the weight that will be given to conserving those assets and the justification required for any harm or loss to its significance; - Ensuring that proposals demonstrate that change of use of designated heritage assets is necessary and that alternatives have been considered; - For conservation areas, ensuring that development proposals draw on relevant management plans and appraisals, and take appropriate account of key buildings, landmarks and the overall setting.	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	Policy SP4: Creating good jobs and growth		Henry Cumbers	Historic England	760	Statutory Body

Policy D9 Criteria F – we note the policy provides for exceptions for tall buildings proposals above defined thresholds. In our view any proposal above the height threshold should be a departure from the London Plan, with local policy setting a maximum height. By allowing for exceptions this provides a pathway for additional height without policy provision to determine what would be acceptable. This would also conflict with the evidence base in the Tall Buildings Strategy. We are supportive of the policy intention to allow tall buildings on some specified development sites. However, in our view this needs to be strengthened to ensure that tall buildings only come forward on allocated sites in the plan. This is important in order that proposals do not undermine the plan-led system, by coming forward in untested locations that may result in harm to the historic environment. The London Plan Policy D9 criteria point B(3) states ‘Tall buildings should only be developed in locations that are identified as suitable in Development Plans.’ We therefore consider this amendment important for alignment with the objectives of the London Plan. Criteria G – we are pleased to see that our comments on lifting this wording to within the policy rather than the reasoned justification has been reflected in the Regulation 19 draft. Criteria H – we are concerned that the policy enables provision of tall buildings on some industrial sites without	Noted. This will be addressed in a Statement of Common Ground.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Henry Cumbers	Historic England	760	Statutory Body

Heights in site allocations We note that the evidence base is not reflected by the policies for defining tall buildings in West Acton (evidence states the tall buildings threshold is 6 storeys, policy D9 states 14 storeys), Horn Lane, Acton (evidence states the tall buildings threshold is 6 storeys, policy D9 states 14 storeys) and particularly Ealing Town Centre (evidence states the tall buildings threshold is 6 storeys, policy D9 states 21 storeys). We would argue for example whilst there have been cases where 21 storey buildings have been approved in Ealing Town Centre they should not be the threshold for defining tall in this area where the prevailing height is only 4.4 storeys. The impact of buildings of this height is clear from those that exist already and in our view has resulted in a negative effect on the character and appearance of the Ealing Town Centre and Haven Green Conservation Areas.	Noted. This will be addressed in a Statement of Common Ground.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Henry Cumbers	Historic Engla	760	Statutory Body
Views and Kew World Heritage Site We also remain concerned that it does not appear that views assessments have been carried out. As such the potential impact of tall buildings on significance of heritage assets across the borough and in neighbouring authorities has not been fully evidenced. The Tall Buildings Strategy Main Report December 2023 Sensitivity Section states that Views assessments will be required at the application stage to take account of potential impacts on important heritage assets such as Kew Gardens WHS. We do not find this appropriate and advise that it should be undertaken prior to allocating sites for development.	Noted. This will be addressed in a Statement of Common Ground.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Henry Cumbers	Historic Engla	760	Statutory Body

Archaeological Priority Area Archaeological Priority Areas in Ealing are yet to be put into tiers and are due for review by 2026. We request that this is mentioned within the emerging local plan as it will have an impact on development in certain areas. Ealing has several areas with archaeological remains of very high significance which could potentially become Tier 1 APAs. These are notably around Down Barns, Horsenden Hill, Hanwell Locks, Northolt Manor and the early prehistoric remains found in Creffield Road area among others Tier 1 APAs help to identify where undesignated archaeological assets of equivalent to national significance to a scheduled monument, and which are known or likely to be present (London Plan). Therefore developments in these areas in particular would likely be very sensitive, with attention paid to the setting of assets. This would; be best addressed through a development management policy for archaeology or the historic environment.	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	Policy SP4: Creating good jobs and growth		Henry Cumbers	Historic Engla	760	Statutory Body

Para 3.45 There are many examples in the draft plan where the rich and varied heritage of the borough is mentioned as something to be celebrated, to inspire good growth and to add value to developments. We support this element of the plan which helps to put heritage at the heart of placemaking. We advise that more specific references are made to buried archaeological remains as well as above ground assets. Section 3.34 (3.45 in Reg. 19 version) makes a brief comment on non-designated heritage assets which is an ideal place to add a sentence about archaeological remains and the potential that archaeological discoveries have in offering opportunities for place making. More could be done to draw on London Plan HC1 which specifies improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area; and the creative re-use of heritage assets and how this might be achieved by reflecting existing or original street patterns and blocks or revealing and displaying archaeological remains.'	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	Policy SP4: Creating good jobs and growth		Henry Cumbers	Historic England	760	Statutory Body
Policy DAA We welcome the change made to policy DAA. We recognise criteria point (i) seeks to protect sensitive uses within or outside the development,' in our opinion this should be further strengthened by referring to important features as this infers it only relates to land use and not surrounding context or identity.	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	Policy DAA: Design and Amenity – Ealing LPA – local policy		Henry Cumbers	Historic England	760	Statutory Body
Design Codes In our opinion the policy would also benefit from an express commitment from the Council to produce a borough wide design code as required by paragraph 133 of the NPPF. Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high-quality standard of design. Much of the early baseline work has been achieved already on this through the 2022 Character study prepared by Allies & Morrison.	Noted. This will be addressed in a Statement of Common Ground.	Policy SP4: Creating good jobs and growth		Henry Cumbers	Historic England	760	Statutory Body

Enabling Development - Policy ENA Whilst policy ENA doesn't specifically refer to enabling development in relation to the historic environment/heritage assets the NPPF (para 208) is clear that enabling development is development that is not otherwise in accordance with adopted policy. In our view a policy on enabling development is therefore not a necessary component of a local plan document as a result should be deleted from the plan. A local plan should adequately set out a positive strategy for the historic environment without the need to include such a policy. Please see GPA4 Enabling Development and Heritage Assets https://historicengland.org.uk/images-books/publications/gpa4-enabling-development-heritage-assets/ for further advice on this subject.	Noted. This will be addressed in a Statement of Common Ground.	Policy ENA: Enabling Development – Ealing LPA – local policy		Henry Cumbers	Historic England	760	Statutory Body
Glossary There are a number of inaccuracies in the glossary that should be amended. Archaeological Interest Area – the correct terminology for this is Archaeological Priority Area. Any reference to Archaeological Interest Areas within the plan should be replaced with Archaeological Priority Area. Grade I / Grade II Listed Building – this omits Grade II* listed buildings Heritage Asset – this should reflect the NPPF glossary which states heritage assets are ‘A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).’ Heritage at Risk Register – this is current inaccurate as it only refers to listed buildings. Historic England may place any type of heritage asset on the Heritage at Risk Register.	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	General		Henry Cumbers	Historic England	760	Statutory Body

Monitoring and Review We commented at Regulation 18 stage that the effectiveness of the Local Plan, the delivery of its proposals and evidence to inform future Local Plan reviews is done through monitoring using appropriate indicators. It is important key indicators include those relating to the historic environment. This will contribute to the monitoring and review of local plan policies and ability to deliver positive outcomes for the historic environment. We are disappointed to note that the Regulation 19 plan continues to provide no indicators that relate to the historic environment and therefore no provision to monitor the effects of the plan on the historic environment.	Noted. This will be addressed in a Statement of Common Ground.	General		Henry Cumbers	Historic England	760	Statutory Body
Site Allocations Our guidance set out in HEAN3 The Historic Environment and Site Allocations in Local Plans, https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/, identifies a five step approach based upon the methodology: • identify which heritage assets are affected by the potential site allocation • understand what contribution the site (in its current form) makes to the significance of the heritage asset(s); • identify what impact the allocation might have on that significance; • consider maximising enhancements and avoiding harm through maximising enhancement and avoiding harm; and • determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness.	Noted. This will be addressed in a Statement of Common Ground.	General		Henry Cumbers	Historic England	760	Statutory Body

Ealing Town Centre sites Ealing Town Centre where this is most pressing, as the scale of change in the context of a high number of heritage assets including Ealing Town Centre Conservation Area and Christ the Saviour Church (Grade II* listed building). This remains the case whilst recognising the recent consent at 9-42 The Broadway. We recognise the tall buildings work that has been done in this location, but do not consider this a sufficient assessment of the impact on significance to allocate sites in this area for buildings of up to 12 storeys without a current planning consent at sites 02EA and 03EA. We also note that site 01EA has not been modelled, with no planning permission extant for redevelopment of The Arcadia Centre. We are also concerned that the cumulative impacts have not been fully tested.	Noted. This will be addressed in a Statement of Common Ground.	Policy E1: Ealing Spatial Strategy		Henry Cumbers	Historic Engla	760	Statutory Body

01AC Paragraph 195 of the NPPF sets out a requirement for Local Plans to conserve heritage assets in a manner appropriate to their significance. When considering the impact of a proposed development upon the significance of a designated heritage asset, Paragraph 205 of the NPPF makes it clear that great weight should be given to the asset’s conservation and explains that significance can be harmed by development within its setting. St. Mary’s Church, Grade II Listed Building In order to demonstrate that the allocation of this area is not incompatible with the requirements of the NPPF, as part of the Evidence Base underpinning the Plan there needs to be an assessment (often referred to as a Heritage Impact Assessment) of what contribution this currently undeveloped area makes to those elements which contribute to the significance of this Listed Building and what effect the loss of this site and its subsequent development might have upon its significance. Harm should be avoided in the first instance. Paragraphs 205 and 206 of the NPPF make it clear that great weight should be given to the asset’s conservation. Any harm to, or loss of, the significance of a designated heritage assets should require clear and convincing justification.	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	01AC Acton Gateway (Morrisons)		Henry Cumbers	Historic Engla	760	Statutory Body

01EA Whilst recognising the recent planning consent for Broadway Connection and Arcadia Centre, we are concerned by the potential impacts of a building on the junction Spring Bridge Road and The Broadway without consideration of the impact on significance of the Grade II* listed Christ the Saviour church and Ealing Town Centre Conservation Area. This site has not been modelled through the Tall Buildings Strategy, and only partly has consent. Paragraph 195 of the NPPF sets out a requirement for Local Plans to conserve heritage assets in a manner appropriate to their significance. When considering the impact of a proposed development upon the significance of a designated heritage asset, Paragraph 205 of the NPPF makes it clear that great weight should be given to the asset’s conservation and explains that significance can be harmed by development within its setting. Grade II* Listed Parish Church of Christ the Saviour National policy guidance also makes it clear that Grade I and II* Listed Buildings are regarded as being in the category of designated heritage assets of the highest significance where substantial harm to their significance should be wholly exceptional. <i>Items should be avoided in the first instance. Paragraphs 205</i>	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	01EA Broadway Connection & Arcadia Shopping Centre			Henry Cumbers	Historic Engla	760	Statutory Body

02EA We are concerned by the potential individual and cumulative impacts of a tall building of up to 12 storeys on the junction of High Street and The Broadway location without consideration of the impact on significance of the Grade II* listed Christ the Saviour church and Ealing Town Centre Conservation Area. Paragraph 195 of the NPPF sets out a requirement for Local Plans to conserve heritage assets in a manner appropriate to their significance. When considering the impact of a proposed development upon the significance of a designated heritage asset, Paragraph 205 of the NPPF makes it clear that great weight should be given to the asset’s conservation and explains that significance can be harmed by development within its setting. Grade II* Listed Parish Church of Christ the Saviour National policy guidance also makes it clear that Grade I and II* Listed Buildings are regarded as being in the category of designated heritage assets of the highest significance where substantial harm to their significance should be wholly exceptional. Harm should be avoided in the first instance. Paragraphs 205 and 206 of the NPPF make it clear that great weight should be given to the asset’s conservation. Any harm to, or loss of, the significance of a designated heritage asset should require	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	02EA Ealing Broadway Shopping Centre & Crystal House			Henry Cumbers	Historic Engla	760	Statutory Body

03EA We are concerned by the potential individual and cumulative impacts of a tall building of up to 12 storeys on the junction of High Street and New Broadway without consideration of the impact on significance of the Grade II* listed Christ the Saviour church and Ealing Town Centre Conservation Area. Paragraph 195 of the NPPF sets out a requirement for Local Plans to conserve heritage assets in a manner appropriate to their significance. When considering the impact of a proposed development upon the significance of a designated heritage asset, Paragraph 205 of the NPPF makes it clear that great weight should be given to the asset’s conservation and explains that significance can be harmed by development within its setting. Grade II* Listed Parish Church of Christ the Saviour National policy guidance also makes it clear that Grade I and II* Listed Buildings are regarded as being in the category of designated heritage assets of the highest significance where substantial harm to their significance should be wholly exceptional. Harm should be avoided in the first instance. Paragraphs 205 and 206 of the NPPF make it clear that great weight should be given to the asset’s conservation. Any harm to, or loss of, the significance of a designated heritage asset should require	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	03EA Sandringham Mews		Henry Cumbers	Historic England	760	Statutory Body

11EA The Tall Buildings Strategy identifies a potential building of up to 13 storeys here. However, the policy exceeds this with allowing a building of potentially up to 16 storeys. Royal Borough of Kensington and Chelsea Cemetery (GII Registered park and Garden) and City of Westminster Cemetery In order to demonstrate that the allocation of this area is not incompatible with the requirements of the NPPF, as part of the Evidence Base underpinning the Plan there needs to be an assessment (often referred to as a Heritage Impact Assessment) of what contribution this currently-undeveloped area makes to those elements which contribute to the significance of this Historic Park and Garden and what effect the loss of this site and its subsequent development might have upon those significances. Harm should be avoided in the first instance. Paragraphs 205 and 206 of the NPPF make it clear that great weight should be given to the asset’s conservation. Any harm to, or loss of, the significance of a designated heritage assets should require clear and convincing justification. Hanwell Cemeteries Conservation Area The Council has a statutory duty under the provisions of the <i>Planning (Listed Buildings and Conservation Areas) Act 1990</i>	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	11EA Sainsbury’s & Library, West Ealing		Henry Cumbers	Historic Engla	760	Statutory Body
01GR The policy does not include retention of the GII listed War Memorial	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	01GR Greenford Hall, Methodist Church former Police Station, former Clinic & Greenford Library		Henry Cumbers	Historic Engla	760	Statutory Body

01NO We are concerned that despite the potential for a tall building on this location, no assessment of impact on the wider setting of Grade I Listed Church of St. Mary nor Northolt Village Green Conservation Area has been undertaken. Paragraph 195 of the NPPF sets out a requirement for Local Plans to conserve heritage assets in a manner appropriate to their significance. When considering the impact of a proposed development upon the significance of a designated heritage asset, Paragraph 205 of the NPPF makes it clear that great weight should be given to the asset’s conservation and explains that significance can be harmed by development within its setting. Grade I Listed Church of St. Mary National policy guidance also makes it clear that Grade I and II* Listed Buildings are regarded as being in the category of designated heritage assets of the highest significance where substantial harm to their significance should be wholly exceptional. Harm should be avoided in the first instance. Paragraphs 205 and 206 of the NPPF make it clear that great weight should be given to the asset’s conservation. Any harm to, or loss of, the significance of a designated heritage assets should require ~~clear and convincing justification~~	Noted. This will be addressed in a Statement of Common Ground. A suggested modification is proposed.	01NO Car Sales Site and Northolt Leisure Centre			Henry Cumbers	Historic Engla	760	Statutory Body

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Places for London to reflect TfL's interests as a landowner and potential developer. Thank you for giving Transport for London (TfL) the opportunity to comment on the Regulation 19 version of the Ealing Local Plan. The London Plan was published in March 2021. Local Plan policies and site allocations should be developed in line with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network. We note that the approach of Ealing's Local Plan is not to repeat London Plan policies as they already form part of the statutory development plan for the area. We welcome additional text in the wayfinding section to clarify this point although as stated below we would strongly recommend that there is an explicit policy <u>supporting car free development to ensure consistency with the</u>	Comments noted and support welcomed. Detailed responses to TfL's comments are set out in Statement of Common Ground (SoCG)			Richard Carr	Transport for London	734	Statutory Body
We welcome clarification that London Plan policies will apply (including London Plan policies T1 – T9) where there are no development management policies	Support welcomed.	General		Richard Carr	Transport for London	734	Statutory Body
The map could be revised and updated to show proposed Lionel Rd WLO Station (which is missing) and remove proposed Kew Bridge station	Noted. A suggested modification is proposed.	General		Richard Carr	Transport for London	734	Statutory Body
Maintain support for part C (Policy SP1)	Support welcomed	Policy SP1: A Vision for Ealing		Richard Carr	Transport for London	735	Statutory Body

To ensure soundness and consistency with the London Plan explicit support should be given in Policy SP2 to car free development which will be necessary to reduce car ownership and use, and to achieve the Mayor’s mode share targets. If support for car free development is included we maintain our broad support for SP2.2 part B (as amended) although we advise that part (v) ‘Reducing the number of motor vehicle trips in and through Ealing’ should include the agreed mode share target for sustainable transport of 76% by 2041 (an increase from 63% in 2021) which sets out the scale of the challenge in reducing car travel.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	SP2.2 Climate action		Richard Carr	Transport for	737	Statutory Body
We reiterate our comment that ‘reducing car use and supporting car free development’ are essential preconditions to ‘tackling congestion’ and should be included in Part A and that the Policy should include a commitment to adopting the Healthy Streets Approach and Vision Zero. In addition, a key element in fighting inequality and delivering a vibrant night-time economy as outlined in the individual Town Plans, is the inclusion of women and girls in the design process and ensuring they feel safe when moving around at all times of day and night, in line with the Mayor’s strategy to eliminate Violence Against Women and Girls (VAWG). To this end, TfL recommends that reference to the Mayor’s VAWG strategy in this policy and that it highlights the need for inclusion of women and girls at consultation and design stages, and use of tools such as night-time active travel zone assessments to identify where interventions are needed. Design guidance such as GLA’s Safety in Public Spaces: Women, Girls and Diverse People should be referenced.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	SP3.3 Healthy lives		Richard Carr	Transport for	738	Statutory Body

To ensure soundness and consistency with the London Plan explicit support should be given in Policy SP4 to car free development which will be necessary to deliver Good Growth (SP4.1) to reduce reliance on the car (SP4.1 part B) and ensure that the most efficient use of land is made so that development on sites is optimised (SP4.1 part C). If support for car free development is included, we maintain our broad support for SP4.1 part B and C (as amended). To ensure soundness and consistency with the London Plan the Policy should provide protection for existing active travel and public transport infrastructure in line with Policy T3 of the London Plan and the Sustainable Transport, Walking and Cycling London Plan Guidance. This should include operational rail infrastructure, bus stops and stands, drivers facilities, bus stations and bus garages. If protection for existing transport infrastructure is included, we maintain our broad support for SP4.1 part G (as amended) including references to the Infrastructure Delivery Plan and schedule (part G (ii)) and the intention to create a new framework for negotiations on planning obligations (part G (iii)). We note inclusion of the Brentford to Southall line in part G (i).	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	SP2.2 Climate action	Policy SP4: Creating good jobs and growth	Richard Carr	Transport for	739	Statutory Body
We welcome inclusion of a table showing borough wide infrastructure schemes, although we recommend that ‘Supporting and investing in public transport across the borough’ is expanded to the following: ‘Supporting and investing in public transport including bus capacity, access and infrastructure across the borough.’ The infrastructure provider should be amended to clarify that development contributions will be expected where justified. This would be consistent with the entries for step free access and West London Orbital. The three active travel entries should also include references to development contributions.	Support welcomed. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	SP4.1 Good Growth		Richard Carr	Transport for	740	Statutory Body
We reiterate comments about showing the existing North London line (London Overground) and the Brentford to Southall line on the key diagram (figure SS3)	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	General		Richard Carr	Transport for	741	Statutory Body

We reiterate comments that WLO service/stations should be removed from this existing context map due to the status of the proposed scheme.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	General		Richard Carr	Transport for London	742	Statutory Body
We reiterate our comment that the proposed WLO route should be shown (under the new heading title). The existing North London line Overground service also does not appear with an orange line on this map as the key would indicate, and other lines such as the Elizabeth line do not appear with the colour according to the key. Bollo Lane is shown as a proposed primary active travel route, however, one of the level railway crossings on this street is proposed to be closed to accommodate additional trains with the WLO service. While pedestrian/cycling/step-free access is planned to be maintained across the crossing, this should be duly considered in the spatial strategy development. The specific infrastructure (eg, footbridge, ramps, lifts) has yet to be defined.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	Policy A1: Acton Spatial Strategy		Richard Carr	Transport for London	743	Statutory Body
We reiterate comments made in response to the Regulation 18 consultation regarding developer contributions towards West London Orbital and North Acton station; and the retention and enhancement of bus infrastructure. It should also be noted that some currently unused TfL/Network Rail land alongside existing rail routes will be required to accommodate the West London Orbital and so may not be available for permanent wildlife corridors.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	Policy A1: Acton Spatial Strategy		Richard Carr	Transport for London	744	Statutory Body
The reference in the final sentence should be corrected to refer to proposed West London Orbital stations at Acton Central and South Acton rather than Acton Town.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	Policy A1: Acton Spatial Strategy		Richard Carr	Transport for London	745	Statutory Body
North Acton station improvements should be added to the infrastructure delivery schedule with the infrastructure providers listed as OPDC/TfL/Development contributions	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	Policy A1: Acton Spatial Strategy		Richard Carr	Transport for London	746	Statutory Body

We reiterate our Regulation 18 comments that a commitment to upgrading North Acton station should be included in the policy. For completeness it is important that reference is made to North Acton station improvements because it serves residents and business within the area covered by Ealing as planning authority. Contributions have been secured towards station improvements by Ealing from developments such as Cloister Corner which are within the catchment of the station and it is important that the Local Plan is clear that this will continue. We suggest that the following point is added to Policy A6: ‘secure funding towards public transport improvements including at North Acton station which serves a catchment extending beyond the OPDC boundary.’	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	Policy A6: North Acton and Park Royal		Richard Carr	Transport for	747	Statutory Body
We note the design principle ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential and retail development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. To reflect the site PTAL of up to 5 and to ensure consistency with the London Plan, the design principles should be reworded to state that ‘Residential uses should be car free’. The London Plan also requires retail uses in PTAL 5-6 to be car free. The design principle ‘Provide an appropriate quantum of car parking for other uses in this town centre location and consider utilising underground parking utilised [sic], if viable’ should either be removed or reworded to state that ‘Retail uses should be car free’. Any limited public car parking to serve the town centre as a whole would need to be clearly justified.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	01AC Acton Gateway (Morrisons)		Richard Carr	Transport for	748	Statutory Body
We reiterate comments that operational transport infrastructure on the site must be protected or appropriately relocated subject to agreement with TfL to ensure consistency with London Plan Policy T3 and London Plan guidance. To ensure consistency with the London Plan a design principle should be added to require car free residential development given the site PTAL of up to 5.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	03AC Ealing Common Depot		Richard Carr	Transport for	749	Statutory Body

We reiterate the comment made in response to the Regulation 18 consultation that the existing context should not show a London Overground route via the Dudding Hill line even though this line is shown as greyed-out background.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	General		Richard Carr	Transport for London	750	Statutory Body
We note the infrastructure scheme ‘Rationalisation of bus stopping arrangements in Ealing Town centre, Broadway Haven, Green Area.’ However the rationalisation of bus stopping arrangements has already been implemented and there is no scope for further rationalisation so any further changes should be to improve existing facilities for buses. The entry should be reworded as ‘<u>Improvement</u> of bus stopping <u>and standing</u> arrangements in Ealing town centre, Broadway and Haven Green area’. The infrastructure provider is correctly listed as TfL but it will also require the involvement and support of Ealing Council as local highway authority. As such, Ealing Council should be added.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	Policy E1: Ealing Spatial Strategy		Richard Carr	Transport for London	751	Statutory Body
The London Plan requires all residential and retail development in PTAL 5-6 and residential development in metropolitan/major town centres to be car free. A design principle should be added to state that ‘Residential and retail uses should be car free’. The following contextual consideration should be amended as shown to highlight the importance of safety: ‘Movement around and through the site is a key consideration as well as managing complex servicing requirements on and adjacent to <u>the busy</u> Uxbridge Road. Development should create permeable <u>and safe</u> pedestrian links and public spaces within the urban block away from surrounding traffic movements’. The following design principle should also be amended as shown: ‘Carefully consider the movement hierarchy for the site, integrating servicing internally where possible and avoiding blank frontages. Ensure the pedestrian network is attractive, <u>safe and perceived to be safe at all times</u>, and well-integrated with ‘desire lines’ between Ealing Broadway Station and the rest of the town centre. Improve routes around the site, lining these with active frontage and set back the building line where necessary to address pinch points.’	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	01EA Broadway Connection & Arcadia Shopping Centre		Richard Carr	Transport for London	752	Statutory Body

The PTAL should be corrected – no part of the site is PTAL 0. [TfL acknowledged issues with WebCat tool and suggest amending PTAL rating to read 5 – 6a]. We note the design principle ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. The London Plan also requires retail uses in PTAL 5-6 to be car free. To reflect the site PTAL of up to 6a and the location in Ealing metropolitan centre, and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential and retail uses should be car free’.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	02EA Ealing Broadway Shopping Centre & Crystal House		Richard Carr	Transport for	753	Statutory Body
We note the design principle ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. The London Plan also requires retail uses in PTAL 5-6 to be car free. To reflect the site PTAL of up to 6a and the location in Ealing metropolitan centre, and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential and retail uses should be car free’.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	03EA Sandringham Mews		Richard Carr	Transport for	754	Statutory Body
We note the design principle ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. The London Plan also requires retail uses in PTAL 5-6 to be car free. To reflect the site PTAL of up to 6a and the location in Ealing metropolitan centre, and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential and retail uses should be car free’.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	04EA Eastern Gateway		Richard Carr	Transport for	755	Statutory Body

We note the design principle ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. The London Plan also requires retail uses in PTAL 5-6 to be car free. To reflect the site PTAL of up to 6a and the location in Ealing metropolitan centre, and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential and retail uses should be car free’.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	05EA Perceval House		Richard Carr	Transport for	756	Statutory Body
We note the design principle ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. The London Plan also requires retail uses in PTAL 5-6 to be car free. To reflect the site PTAL of up to 6a and the location in Ealing metropolitan centre, and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential and retail uses should be car free’.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	06EA 49–69 Uxbridge Road		Richard Carr	Transport for	758	Statutory Body
We note the design principle ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. The London Plan also requires retail uses in PTAL 5-6 to be car free. To reflect the site PTAL of up to 6a and the location in Ealing metropolitan centre, and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential and retail uses should be car free’.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	09EA 66–86 Broadway, West Ealing		Richard Carr	Transport for	758	Statutory Body

We note the design principle ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. The London Plan also requires retail uses in PTAL 5-6 to be car free. To reflect the site PTAL of up to 6a and the location in Ealing metropolitan centre, and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential and retail uses should be car free’.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	10EA 59–65 Broadway, West Ealing (Lidl)		Richard Carr	Transport for	758	Statutory Body
We note the design principle ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. The London Plan also requires retail uses in PTAL 5-6 to be car free. To reflect the site PTAL of up to 6a and the location in Ealing metropolitan centre, and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential and retail uses should be car free’.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	11EA Sainsbury’s & Library, West Ealing		Richard Carr	Transport for	758	Statutory Body
We note the design principle ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. To reflect the location in Ealing metropolitan centre and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential uses should be car free’.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	12EA Chignell Place, West Ealing		Richard Carr	Transport for	758	Statutory Body
The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. To reflect the location in Ealing metropolitan centre and to ensure consistency with the London Plan, a design principle should be added to state that ‘Residential uses should be car free’.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	13EA 99–115 Broadway, West Ealing		Richard Carr	Transport for	758	Statutory Body

We note the design principle 'Incorporate no/low levels of car parking for any residential development given the town centre location.' The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. To reflect the location in Ealing metropolitan centre and to ensure consistency with the London Plan, the design principle should be reworded to state that 'Residential uses should be car free'.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	14EA Western Gateway, 131–141 Broadway, West Ealing		Richard Carr	Transport for	758	Statutory Body
We note the design principle 'Incorporate no/low levels of car parking for any residential development given the town centre location.' The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. To reflect the site PTAL of up to 5 and the location in Ealing metropolitan centre, and to ensure consistency with the London Plan, the design principle should be reworded to state that 'Residential uses should be car free'. The London Plan also requires retail uses in PTAL 5-6 to be car free. Although we support the intention of the design requirement 'Incorporate car free shopper parking for replacement food store/supermarket' to restrict retail car parking this could be misinterpreted and so we strongly recommend that the following wording is adopted to avoid ambiguity: 'Retail uses, including any re-provided supermarket/food store should be car-free'. We note that one of the design principles is 'Provide vehicular access to the rear of the site and along the railway tracks.' TfL has concerns about the proposed vehicle access strategy in the current planning application and recommends that all the requirements for vehicle access are set out clearly in the design principles.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	15EA Waitrose, West Ealing		Richard Carr	Transport for	758	Statutory Body

We note the design principle ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. The London Plan also requires retail uses in PTAL 5-6 to be car free. To reflect the site PTAL of up to 5 and the location in Ealing metropolitan centre, and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential and retail uses should be car free’. The design principle ‘Incorporate satisfactory off-street servicing and delivery arrangements ~~for new or replacement commercial uses~~’ should be amended as shown because servicing for residential uses should also be off street.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	16EA West Ealing Station Approach		Richard Carr	Transport for	758	Statutory Body
Although we welcome the following design principle it should be amended as shown to reflect ongoing discussions: ‘Provide <u>vehicle access to on site servicing and a coach drop off facility within the site</u> from Ruislip Road East’. We also recommend another design principle is added to reflect ongoing discussions: ‘Minimise car parking and promote sustainable travel for the leisure centre and proposed residential development and provide public realm improvements on Ruislip Road’	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	19EA Gurnell Leisure Centre		Richard Carr	Transport for	758	Statutory Body
We note the design principle ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. The London Plan also requires retail uses in PTAL 5-6 to be car free. To reflect the site PTAL of up to 5 and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential and retail uses should be car free’.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	01GR Greenford Hall, Methodist Church former Police Station, former Clinic & Greenford Library		Richard Carr	Transport for	757	Statutory Body

We note the design requirement ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. The London Plan also requires retail uses in PTAL 5-6 to be car free. To reflect the site PTAL of up to 5 and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential and retail uses should be car free’. We note the design requirement ‘Consider retention of short stay public parking.’ Any car parking should be public car parking which serves the town centre as a whole and must be clearly justified in accordance with London Plan policies.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	02GR Greenford Broadway Car Park		Richard Carr	Transport for	757	Statutory Body
We welcome the design principle ‘Create amenity space in the area currently used as parking’ although it would be helpful to make it clear that the existing multi storey car park should be removed as part of any (re)development of the site	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	05GR Former Greenwich School of Managemen t		Richard Carr	Transport for	757	Statutory Body
We reiterate our Reg 18 comments about re-providing car parking at current levels in the Proposed Use. Although there are no specific standards for hospitals set out in the London Plan, we would expect that any re-provision of car parking would have to be justified on the basis of operational requirements or special needs eg disabled persons’ parking. The design principle ‘Provide new podium car parking for ~~both~~ hospital and limited residential parking’ should be amended as shown to refer to hospital parking only. It would be appropriate to encourage car free/low car residential development given the PTAL of 3-4 in the design principles.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	01HA Land to the front of Ealing Hospital		Richard Carr	Transport for	757	Statutory Body
We note the design principle ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ This is appropriate given the PTAL of 4. The existing car park should not be re-provided.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	03HA George Street Car Park		Richard Carr	Transport for	757	Statutory Body

We note the design principle 'Incorporate no/low levels of car parking for any residential development given the town centre location.' This is appropriate given the PTAL of 4. The re-provided supermarket should have reduced car parking in line with London Plan standards.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	04HA Site of Lidl and discount store		Richard Carr	Transport for London	758	Statutory Body
Reference should be made to the provision of step free access at Northolt station which is a fully funded and committed project. Development contributions could be used to provide access and public realm improvements on routes to the station to complement this project.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	Policy N1: Northolt Spatial Strategy		Richard Carr	Transport for London	758	Statutory Body
The entry for 'White Hart roundabout reconfiguration' should be removed from the table. Although we support aspirations to regenerate the area around the roundabout, changes that would be required to TfL highways infrastructure to deliver benefits from a sustainable transport perspective have not been agreed and there is no funding currently available to progress this project. The site is no longer included in the site allocations. We note the entry for 'Introduction of a multi-mode transport interchange in Northolt, including a bus hub, Northolt station (served by the Central line) and active travel improvements.' There should be an additional entry for 'Provision of step free access at Northolt station' which is a fully funded and committed TfL project.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	Policy N1: Northolt Spatial Strategy		Richard Carr	Transport for London	758	Statutory Body
We note and support the amended wording of the Proposed Use which no longer refers to re-provision of car parking space. However, we note that one of the design principles is 'Retain some car parking on site to service the leisure centre' As previously stated 'The site has a PTAL of 4 and any re-provision of car parking will need to take this into account. Although parking spaces for disabled users of the leisure centre will be needed, general car parking is unlikely to be justified. Promotion of active travel would be more appropriate.' We note the design principle 'Incorporate no/low levels of car parking for any residential development given the town centre location.' This is appropriate given the PTAL of 4.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	01NO Car Sales Site and Northolt Leisure Centre		Richard Carr	Transport for London	758	Statutory Body

Any changes to access should be discussed with TfL and designed to minimise the impacts on the A40. Given the location on the A40 we would like to see support for a car free or car lite development added as a design principle.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	01PE BP Garage		Richard Carr	Transport for	758	Statutory Body
Any changes to access should be discussed with TfL and designed to minimise the impacts on the A40. Given the location on the A40 we would like to see support for a car free or car lite development added as a design principle.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	02PE Land on the South Side of Western Avenue		Richard Carr	Transport for	758	Statutory Body
Although we welcome a reference to the bus depot in the contextual considerations, the wording should be amended to make it clear that this is an operational bus depot run by Metroline and that any alternative site will need to be agreed with TfL and the operator as follows: 'The existing bus depot capacity and access should be retained and improved in line with London Plan Policy and London Plan Guidance unless a suitable alternative location for the bus garage is agreed with TfL/the operator and is operational before any redevelopment of the site.'	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	04PE Alperton Lane South and Metroline Depot		Richard Carr	Transport for	758	Statutory Body
Although we support the 'Aspiration to improve bus connectivity in Southall' this should also refer to measures to assist buses, including provision of bus infrastructure. Development contributions should be added as a source of funding for both bus services and bus infrastructure improvements.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	Policy S1: Southall Spatial Strategy		Richard Carr	Transport for	758	Statutory Body

Although we support part ii ‘Improving bus and active travel measures to increase permeability and enhancing the public realm between the site, the town centre, Southall Station, and the Grand Union Canal including upgraded canal towpaths’, this should be expanded to refer to improved connectivity to destinations across the boundary in Hillingdon. If Southall major centre is extended to include parts of the Green Quarter site, London Plan policy will require all residential development proposals within the defined area to be car free. London Plan Policy T6.1 requires car free residential development on all sites in metropolitan and major town centres. The wording is ambiguous and refers to ‘extending and complementing Southall major centre’ in part I and ‘delivering an extension to the Southall major centre’ in part VI. This point needs to be clarified so that the correct London Plan parking policies can be applied to current and future applications.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	Policy S4: West Southall		Richard Carr	Transport for	758	Statutory Body
We strongly support part vi ‘Ensuring that the proposed east-west active travel and public transport route, Healum Avenue, is delivered in full to connect Havelock Estate to Merrick Road and connects with the Merrick Road footbridge.’ However, an optimal route may not be possible unless the Southall site allocations include the Honey Monster site and specify the need for a new road for buses and active travel to be constructed through the site. If the Honey Monster site is not included, the preferred option for the proposed Healum Avenue connection between the Middlesex business centre (08SO) and Havelock Estate (09SO) may not be delivered in full, contrary to part vi of this policy.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	Policy S5: East Southall		Richard Carr	Transport for	758	Statutory Body
‘A312 Bulls Bridge roundabout and M4 Junction 3 mitigation scheme’ should also include TfL under infrastructure provider. ‘Aspiration to improve bus connectivity in Southall’ should also include development contributions under infrastructure provider.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	Policy S1: Southall Spatial Strategy		Richard Carr	Transport for	758	Statutory Body

We note the design requirement ‘Incorporate no/low levels of car parking for any residential development given the town centre location but some parking provision may be appropriate to improve the accessibility of the new Gurdwara.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. To reflect the location in Southall major centre and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential uses should be car free’.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	01SO Southall Crossrail Station & Gurdwara		Richard Carr	Transport for	758	Statutory Body
We note the design requirement ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. To reflect the location in Southall major centre and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential uses should be car free’.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	02SO Southall Sidings		Richard Carr	Transport for	758	Statutory Body
We note the design requirement ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. To reflect the location in Southall major centre and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential uses should be car free’.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	03SO Former Sorting Office & Kings Hall Methodist Church		Richard Carr	Transport for	758	Statutory Body
We note the design requirement ‘Incorporate no/low levels of car parking for any residential development given the town centre location.’ The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. To reflect the location in Southall major centre and to ensure consistency with the London Plan, the design principle should be reworded to state that ‘Residential uses should be car free’.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	04SO Southall West London College		Richard Carr	Transport for	758	Statutory Body

We note the design principle 'Incorporate no/low levels of car parking for any residential development given the town centre location.' The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. The London Plan also requires retail uses in PTAL 5-6 to be car free. To reflect the site PTAL of 5 and the location in Southall major centre, and to ensure consistency with the London Plan, the design principle should be reworded to state that 'Residential and retail uses should be car free'.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	05SO 31 – 45 South Road & Telephone Exchange Quality Foods & Iceland		Richard Carr	Transport for	758	Statutory Body
We note the design principle 'Incorporate no/low levels of car parking for any residential development given the town centre location.' The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. The London Plan also requires retail uses in PTAL 5-6 to be car free. To reflect the site PTAL of 5 and the location in Southall major centre, and to ensure consistency with the London Plan, the design principle should be reworded to state that 'Residential and retail uses should be car free'.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	06SO Fairlawn Hall and Science of the Soul		Richard Carr	Transport for	758	Statutory Body
We note the design principle 'Incorporate no/low levels of car parking for any residential development given the town centre location.' The London Plan requires all residential development in PTAL 5-6 or metropolitan/major town centres to be car free and Policy T6.1A states that the more restrictive standard will apply. This is appropriate given the site PTAL of up to 4.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	07SO The Limes, Maypole Court, Banqueting Centre, 13 – 19 The Green		Richard Carr	Transport for	758	Statutory Body

Although the infrastructure requirements includes ‘New road and highways improvements...’, a new design principle should be added as follows: ‘A new road through the site including supporting bus infrastructure should be designed to provide access for buses and active travel.’ The Honey Monster site which lies between Middlesex business centre and Havelock estate will also be important for completion of the new road and should be included as part of a wider site allocation so that the preferred option for a proposed bus route through the area can be delivered. There is a risk that without inclusion of the Honey Monster site, there will be areas that are beyond the 400 metres threshold for access to a bus service. It could also result in a sub-optimal solution to the provision of improved bus services to the Havelock estate (also see comments under policy S5 and site 09SO).	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	08SO Middlesex Business Centre		Richard Carr	Transport for	758	Statutory Body
There are proposals for improved bus connectivity to East Southall and the Havelock Estate. For a bus to serve the redeveloped Havelock Estate there will need to be improvements to roads within the site to accommodate buses alongside bus infrastructure. Key infrastructure requirements should therefore include 'Measures to include highway improvements and supporting infrastructure to enable improved permeability by bus'. This should also be backed up by including a design principle requiring roads to provide access for buses and supporting bus infrastructure.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	09SO Havelock Estate		Richard Carr	Transport for	758	Statutory Body
We reiterate Reg 18 comments about the Proposed Use including ‘parking’. We note the design principle ‘Incorporate no/low levels of car parking for any residential development given the town centre location but some parking provision may be appropriate to improve the accessibility of any social infrastructure provision on site.’ No/low levels of car parking for residential development is appropriate given the PTAL of up to 4. Although disabled persons’ or operational parking may be appropriate to improve accessibility to social infrastructure, general parking should be minimised in line with the London Plan.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	10SO The Green		Richard Carr	Transport for	758	Statutory Body

Key infrastructure requirements should include active travel and Healthy Streets improvements within and beyond the site and appropriate bus infrastructure (stops, stands, turning and drivers' facilities) to allow bus services to be extended into the site. These requirements should also be added as design principles. Reference should be made in the design principles to the two proposed canal crossings and improvements to pedestrian underpasses. The following design principle should be amended as shown: 'Ensure that the site layout prioritises pedestrians and cyclists, creating a grid of streets and pathways that are pleasant to use, <u>safe, and perceived to be safe at all times of the day and night</u>, and legible.' See comment under Policy S4 above. Because part of the site is identified as being within an extended Southall major centre, London Plan parking standards will require car free residential development for any current or future planning applications within the major centre. It should be noted that the quoted PTAL of 0-1b is expected to increase when bus services are extended into the site using development funding because this will bring all parts of the development within 400 metres of a bus service. The quantum of car parking for all uses should reflect future year PTAL as well as the location within Southall major centre. References to Southall Crossrail station should be updated to refer to the Elizabeth line.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	11SO The Green Quarter (Southall Gasworks)		Richard Carr	Transport for	758	Statutory Body
We note the design requirement 'Provide separate service access with retail/commercial and residential spaces concentrated to Uxbridge Road and Bankside and ancillary spaces located to the rear of the site or via Bankside'. Servicing or access to servicing should not be from the Uxbridge Road frontage and the design requirement should be reworded to make it clear that all vehicle/servicing access should be from Bankside.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	20SO Hambrough Tavern		Richard Carr	Transport for	758	Statutory Body
Infrastructure Delivery Schedule – Step Free Station Access It should be noted that the total cost of providing step free access at stations is only indicative and takes a standard assumed cost which has been applied to ten London Underground stations along with the estimated cost of North Acton station improvements.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	General		Richard Carr	Transport for	758	Statutory Body

Infrastructure Delivery Schedule – Omission North Acton station improvements should be added as a separate entry to the infrastructure schedule. The project is led by OPDC and TfL and will be part funded through development contributions. We believe it should be added to the IDS for completeness as a critical piece of infrastructure for the borough given that developer contributions have been secured from development within the area covered by Ealing, outside the OPDC area. North Acton station is already referenced under step free access improvements. The same argument about the project being located within OPDC area would apply to North Acton gyratory improvements which are included as a separate entry in the IDS.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	General		Richard Carr	Transport for	758	Statutory Body
Infrastructure Delivery Schedule – Omission Northolt station step free access should be added to the infrastructure schedule. The project is fully funded and committed unlike aspirations for step free access at other stations in the borough.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	General		Richard Carr	Transport for	758	Statutory Body
Infrastructure Delivery Schedule – Bus Fleet Modernisation It is not clear how the estimated cost has been sourced. Funding has been committed for a zero emission bus fleet by 2034, although the completion date could be brought forward to 2030 if additional funding were to be secured. It may be better to change to TBC because it will depend on timeframes and technological development and any cost estimates will be for London as a whole.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	General		Richard Carr	Transport for	758	Statutory Body

Infrastructure Delivery Schedule – Bus Improvements Ealing The first sentence which refers to ‘Rationalisation of bus stopping arrangements in Ealing Town centre, Broadway Haven, Green Area’ should be deleted because the rationalisation of bus stopping arrangements has already been implemented and there is no scope for further rationalisation. Any further changes should be to improve existing facilities for buses. The entry should be reworded as ‘Improvements to bus stopping and standing arrangements in Ealing town centre, Broadway and Haven Green area’. The infrastructure provider is correctly listed as TfL but it will also require the involvement and support of Ealing Council as local highway authority. As such, Ealing Council should be added.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	General		Richard Carr	Transport for	758	Statutory Body
Infrastructure Delivery Schedule – Bus Improvements Greenford The entry doesn’t make it clear whether this refers to bus services, bus infrastructure or both. The costs are assumed to relate only to bus infrastructure because the cost of providing bus service improvements would be much higher including development contributions. The costs of bus service improvements will be ongoing. We suggest this is changed to TBC or the total cost is clearly marked as relating to bus infrastructure only.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	General		Richard Carr	Transport for	758	Statutory Body
Infrastructure Delivery Schedule – Bus Improvements Southall The entry doesn’t make it clear whether this refers to bus services, bus infrastructure or both. The costs are assumed to relate only to bus infrastructure because the cost of providing bus service improvements would be much higher. We suggest this is changed to TBC or the total cost is clearly marked as relating to bus infrastructure only	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	General		Richard Carr	Transport for	758	Statutory Body
Infrastructure Delivery Schedule – West London Orbital Additional potential external funding sources for the project such as central government should be noted alongside Ealing and developer contributions.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	SP4.1 Good Growth		Richard Carr	Transport for	758	Statutory Body

Infrastructure Delivery Schedule – White Hart roundabout reconfiguration The entry for ‘White Hart roundabout reconfiguration’ should be removed from the schedule. Although we support aspirations to regenerate the area around the roundabout, changes that would be required to TfL highways infrastructure to deliver benefits from a sustainable transport perspective have not been agreed and there is no funding currently available to progress this project. The site is no longer included as a site allocation.	Noted. Please see Statement of Common Ground between Ealing Council and Transport for London (TfL)	Policy N1: Northolt Spatial Strategy		Richard Carr	Transport for London	758	Statutory Body
I support the submissions made by {name redacted} for Save Ealing Centre copied below: We have four concerns - which we call matters - with this policy. These arise from the fact that Policy D9 is not clearly written (or otherwise presented) and unambiguous which means it fails to meet the test in NPPF Para 16.(d) and is therefore unsound. Matter 4, in addition, is not justified as it is not based on proportionate evidence. Table DMP1 of the plan provides thresholds for what the Borough considers to be tall buildings across 59 different zones in the Borough. The thresholds range from 6 storeys in many parts of the Borough to 21 storeys in Ealing Town Centre. The justificatory text (para 5.14) explains that the policy 'builds upon comprehensive evidence developed in line with the London Plan'. Although this is not specified, this evidence is understood to relate to a series of reports by Allies and Morrison which culminated in a final report dated December 2023, posted in the evidence base on the New Plan website with all the other Regulation 19 documents. It is worth noting that the Allies and Morrison reports appear to be the only evidence speaking to this part of the Plan. Figure DMP1 on page 45 of Chapter 5 of the plan is of such small a scale that it is unclear in which area some streets lie. This matters because there are significant differences in the thresholds for tall building in some adjoining areas. In its present form, the Policy D9F says that 'tall buildings above defined thresholds are exceptional and should be located upon specified Development Sites defined in the Development Plan. There is no definition in the policy of the word	Heights boundaries will be set out on the interactive policies map. The policy clearly sets out that 6 storeys constitutes a tall building across most of the borough. The consultation version Tall Buildings Study was subject to some transcription errors which have now been corrected in the submission version.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation		Minni Dogra		761	Individual

Modification 1: To resolve Matter 1, the boundaries of tall building threshold areas need to be depicted at a proper scale on the Interactive Policies Map. Modification 2: To resolve Matter 2, site appraisals need to be much more carefully done. Where, in 'exceptional circumstances', a site is deemed appropriate for a tall building a proper justification is required. Modification 3: To resolve Matter 3, and to avoid any dangers of it being misinterpreted, Policy D9F should be amended to read 'tall buildings of, or above defined thresholds are exceptional and should be located upon specified Development Sites defined in the Development Plan. Modification 4: To resolve Matter 4, Table DMP1 needs to be replaced with the Tables from pages 9 to 11 of the December 2023 Allies and Morrison Tall Building strategy. There is nothing wrong with the Southall OAPF 2014. What was envisaged then was agreed after a lot of negotiation and consideration by the council and Boris Johnson Mayor of London. The framework was sympathetic to the way Southall town managed itself as a vibrant place and successful micro economy. The OAF 2014 should now be carefully considered, reviewed properly and not be allowed so easily to be superseded by the Reg 19 new Local	Heights boundaries will be set out on the interactive policies map. The policy clearly sets out that 6 storeys constitutes a tall building across most of the borough. The consultation version Tall Buildings Study was subject to some transcription errors which have now been corrected in the submission version.	Policy D9: Tall Buildings London Plan – Ealing LPA – local variation			Minni Dogra	761	Individual

LBE has persistently failed to comply with national planning policy with regard to the review and monitoring of its current Local Plan. The NPPF December 2023 (para 33) states that: Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; There has been no published review of the current Plan since its adoption in 2012 even though LBE's annualised housing targets increased massively over the last 12 years (from 890 to 1,297 in 2015-16 and then to 2.157 in 2019-20). • The Planning and Compulsory Purchase Act 2004 Provision 35 states at point 2.(2)(b): Every local planning authority must prepare reports containing such information as is prescribed as to - the implementation of the local development scheme the extent to which policies set out in the local development documents are being achieved. And at point 3. (3): A report under subsection (2) must - (a) be in respect of a period - (i) which the authority considers appropriate in the interests of transparency, (ii) which begins with the end of the period covered by the authority's most recent report under subsection (2,) and (il) which is not longer than 12 months or such shorter period as is	Noted Section 35 of the Planning and Compulsory Purchase Act 2004, has been amended by Section 113 of the Localism Act. The 2011 Localism Act removed the requirement to publish/submit reports annually, and renamed Annual Monitoring Reports as Authority Monitoring Reports. Ealing published an Interim AMR in October 2021, a Housing Supply Topic Paper in November 2022 and a 5 Year Housing Land Supply position statement and trajectory in November 2023. A revised 5 year housing land supply position statement and housing trajectory will be published in early 2025. The decision to place the monitoring framework in the appendix is a reflection of the cross cutting nature of monitoring covering many aspects of the plan. It is not considered that this downgrades its status in anyway. The indicators described in the monitoring framework will be defined further via future AMRs and other monitoring reports / outputs, and will need to respond to the available data sources. As noted in the framework, new and additional measures may be identified over-time, and these will be reported through the AMR. Again it is difficult to define these at this stage, as this is contingent on the availability of data which can evolve overtime. The process of monitoring the Local Plan is not confined solely to the output of an AMR. The process of monitoring is an ongoing exercise and beyond the AMR itself the Council is required to	General		Minni Dogra		761	Individual

Modification 1: We recommend that there should be a specific policy dealing with review and monitoring in the main body of the Local Plan to reinforce their status as statutory requirements. This should set out what the local planning authority can be expected to produce to what time scales. In our opinion, LB Wandsworth's Policy is a good model and is reproduced below. LP61 Monitoring the Local Plan A. The Council will complete a review of the Local Plan policies and publish its conclusions at least every five years. Conclusions from the first review will be published no later than five years from the adoption date of the Plan. B. The Council will have particular regard to the following factors when reviewing policies within the Local Plan and determining whether or not relevant policies require updating: The Monitoring Framework; The latest Authority Monitoring Report, including reported progress against the requirements for the planned delivery of development and infrastructure; Conformity of policies with national planning policy; Changes to local circumstances (including a change in local housing need); 5. Significant local, regional or national economic changes; and 6. Progress in plan-making activities by other local authorities and the Mayor of London. C. Where appropriate, the Council will commence an earlier review of the Local Plan to address significant changes in circumstances.	Noted Section 35 of the Planning and Compulsory Purchase Act 2004, has been amended by Section 113 of the Localism Act. The 2011 Localism Act removed the requirement to publish/submit reports annually, and renamed Annual Monitoring Reports as Authority Monitoring Reports. Ealing published an Interim AMR in October 2021, a Housing Supply Topic Paper in November 2022 and a 5 Year Housing Land Supply position statement and trajectory in November 2023. A revised 5 year housing land supply position statement and housing trajectory will be published in early 2025. The decision to place the monitoring framework in the appendix is a reflection of the cross cutting nature of monitoring covering many aspects of the plan. It is not considered that this downgrades its status in anyway. The indicators described in the monitoring framework will be defined further via future AMRs and other monitoring reports / outputs, and will need to respond to the available data sources. As noted in the framework, new and additional measures may be identified over-time, and these will be reported through the AMR. Again it is difficult to define these at this stage, as this is contingent on the availability of data which can evolve overtime. The process of monitoring the Local Plan is not confined solely to the output of an AMR. The process of monitoring is an ongoing exercise and beyond the AMR itself the Council is required to	General		Minni Dogra		761	Individual

Note that this representation concerns the need for the plan to work with communities to understand local aspirations and to reflect them better to achieve well-designed and beautiful places. The National Planning Policy Framework Chapter 12 establishes that 'creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. NPPF Para 132 states 'Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.' London Plan Policy D1A: London's form, character and capacity for growth (Defining an area's character to understand its capacity for growth) requires that 'Boroughs should undertake area assessments	NPPF requirements noted refer to the whole plan and broader expectations for character and design are set out in strategic policies rather than the development management section of the plan.	Policy DAA: Design and Amenity – Ealing LPA – local policy		Minni Dogra		761	Individual

Proposed Policy ENA lacks reasoned justification, and therefore does not comply with section 8(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is therefore not legally compliant and unsound. Historic England summarises enabling development as 'development that would not be in compliance with local and/or national planning policies, and not normally be given planning permission, except for the fact that it would secure the future conservation of a heritage asset. The NPPF uses the term only in connection with conserving the historic environment, saying that 'Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.' Application of the concept of enabling development to permit development on MOL sites thus appears a novel idea. Its use to develop Metropolitan Open Land in general would depart considerably from the principles that apply in the context of protecting historic assets. Enabling development policies do not appear to feature in the NPPG or and in the NPPF's terminology they seem to constitute neither a strategic policy (para 20ff), nor a non-strategic one (para 28ff). MOL falls under the aegis of the London Plan which safeguards it to the same extent as the Green Belt which means that inappropriate development on it is only permissible in 'very exceptional	Policy ENA clarifies rather than expands the scope of enabling development, which is a case that is available to development whether or not a policy exists. As the policy makes clear, only development that is 'demonstrably led by the objectives of the designation in question' can qualify as enabling development. The policy further clarifies that the benefits should be to the designation itself and must outweigh any harm, as well as being the minimum necessary to deliver the identified benefit.	Policy ENA: Enabling Development – Ealing LPA – local policy		Minni Dogra		761	Individual

London Plan Policy S4A Play and informal recreation requires Boroughs to 'prepare Development Plans that are informed by a needs assessment of children and young person's play and informal recreation facilities. Assessments should include an audit of existing play and informal recreation opportunities and the quantity, quality and accessibility of provision. Para 5.4.6 of the supporting text describes the London Plan's approach to off-site provision. London Plan Policy D6 sets out minimum housing space standards. This includes at AF9, minimum standards for amenity space but indicates that borough development plan documents may have higher standards. London Plan Policy Table 3.2(iv) and (v) Qualitative design aspects to be addressed in housing developments sets out how private and communal amenity spaces should be addressed London Plan Policy H16 on Large-scale purpose-built shared living with its supporting text sets out considerations for amenity space that should apply in shared living developments. Table 7D.2 of Ealing's current Development Management Plan document (adopted in December 2013) sets out the space provision requirements for new developments. These will still be in force, presumably until the new plan is adopted: Unlike in Ealing's current Plan, the Regulation 19 Plan fails entirely to consider standards for, or the design of, amenity and play space in new developments and it should. With so many new homes proposed, many of them in large residential blocks, it is essential that due provision is made for residents to be provided with outside space to enjoy and play in. As it is not an inner city borough, and one	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan and was published in 2021. This contains Policy S4 which deals with play and informal recreation and is used to help determine planning applications in Ealing. There is no need to repeat or duplicate these policies. Indeed, there are inherent risks in doing so. The use of quantitative amenity standards such as those currently set out in Adopted Policy 7D are considered to be less effective relative to more recent policy interventions including the Urban Green Factor tool, which allows officers to assess both the quantity and quality of provision together, and this leads to better outcomes in terms of the provision of urban greening in new developments.	Policy DAA: Design and Amenity – Ealing LPA – local policy	Policy G4: Open Space – London Plan – Ealing LPA – local variation	Minni Dogra		761	Individual

1. Public engagement based on the work by Allies and Morrison (and presented at the LDPAC meeting on 22/03/23) is required to establish the Borough's design expectations as NPPF Chapter 12 and London Plan Policy D1 require. 2. Policy DAA needs to be reworded and expanded to respond to these higher level policies. Policy D1 Design in the London Borough of Camden's plan provides a good template: The Council will seek to secure high quality design in development. The Council will require that development: a. respects local context and character; b. preserves or enhances the historic environment and heritage assets; c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation; d. is of sustainable and durable construction and adaptable to different activities and land uses; e. comprises details and materials that are of high quality and complement the local character; f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage; g. is inclusive and accessible for all; h. promotes health; i. is secure and designed to minimise crime and antisocial behaviour; j. responds to natural features and preserves gardens and other open space; k. incorporates high quality landscape design (including public art	NPPF requirements noted refer to the whole plan and broader expectations for character and design are set out in strategic policies rather than the development management section of the plan.	Policy DAA: Design and Amenity – Ealing LPA – local policy	Policy G4: Open Space – London Plan – Ealing LPA – local variation	Minni Dogra		761	Individual

Appendix C is somehow supposed to be a summary and a response by Ealing Council to representations (about 6000 or 10,000) in relation to the local plan . Unprecedented numbers of representations have been made by people throughout the borough and Southall in particular. Even I don't know when Ealing refers to whatever consultation numbers they have access to. I do get the impression that all of the responses have not been properly analysed. It may be that the council is referring to 10,000 responses to the Shaping Ealing / Shaping Southall surveys that were conducted (which I now know) between about November 2020 and May 2021. Perhaps I am confused. But after reading all of the documentation I have a better understanding through all the confusion of how the council has been conducting consultations and surveys, left right and centre, but never really engaging people. I don't make this criticism lightly. Appendix C cannot possibly be a proper summary of the 10,000 responses at shaping Ealing / shaping Southall stage all 6000 responses made in February 2024 Reg 18 stage. The planning inspector should be interested to learn how 6000/10,000 responses were collated, considered , organised , weighed subject by subject so that the council could give a true and better reflection after considering such extensive responses from right across the borough. The most important question is how come the council ever received an unprecedented 10000 responses (1000 from Southall) to the Shaping Ealing survey or unprecedented 6000 responses to a local plan that had been drafted already by the council at Reg 18 and published in November 2023? The council has said that they are “a victim of their own success” , because they have been so good at reaching out for consultation processes and that is why there was	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19).	General		Minni Dogra		761	Individual

It is most concerning just how disjointed the whole process has been. I see now that Southall's response of 1000 to the Shaping Southall Survey, had already according to the council started feeding into a regulatory process as at May 2021. But at the same time on 21 May 2021 the leader of the council sent a letter to the London Mayor ready to abandon the 2014 OAPF South Road bridge widening scheme. It would seem that the Council had already created a "Southall Reset" policy at that point. But most importantly, without consulting people of Southall. There were no real consultation processes that any of us were aware of. For more than a year (May 2021 to July 2022 the council presentation at the SCA) I was ignorant about anything called Shaping Southall. But so were the great many people in Southall. We used to attend our Ward Forum meetings and they all stopped by January 2020. Consequently , any relationship that we had will elected councillors have been brought to an end. Had we had Ward meetings, our councillors no doubt would have ensured that we understand the importance of Shaping Southall Survey. But, would are councillors have known that the leader of the council had submitted a letter dated 21st of May 2021 re. Southall Reset and abandonment of OAPF and the South Road bridge widening infrastructure which supported the green quarter (11SO). At that point who engaged in consultations from Southall with the council? Is that in the evidence base to the Reg.19. It is apparent that big decisions were made in relation to Southall without the involvement of residents and businesses. In this sense the process Reg 18 / Reg 19 is disjointed and things don't add up. Not until, we really start examining documents and papers and dates and not forgetting that	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. The plan has already been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19). Regarding ward forums these are to be replaced by new Town Forums in the seven towns of: Acton, Ealing, Greenford, Hanwell, Northolt, Perivale and Southall. The commitment to establishing town forums is outlined in the Council Plan 2022 to 2026. The council has listened to residents and knows it needs to do more to be a listening council that effectively engages with residents, to better inform service design and delivery in neighbourhoods. It also needs to work harder to ensure all voices can be heard and express their views about the issues, challenges and solutions that are important to them. By understanding residents' issues better, we can focus on the root causes of inequality and disadvantage. Residents know their communities and what they need better than anyone else.	General		Minni Dogra		761	Individual

Modifications: I would suggest that there should be more consultation with local people who are genuinely interested in the better development of Southall as a good place to live and proud to call your hometown. It is no good for the council to just consult with their own funded organisations. The truth is that we need residents groups who really care about doing something for their town. When the council consults with its own funded organisations such as the Southall Community Alliance (for voluntary organisations and care homes) or “Let’s go Southall” or “Let’s get Southall Moving” or just the faith communities who keep close links with their Southall councillors at their faith buildings, then in these situations the council is effectively disassociating itself from the majority of the businesses and residents and that is why there is little positive engagement with the council and very little progress being made. There are residents and businesses who would like to work with the council to improve the town and its facilities and outlook. But the council need to instigate it and also allow these groups a place to meet (funded by the council) by letting us use our own Southall Manor House building rather than keeping it empty mostly and locked up. I can see there is a sense of criticism here and it is not helpful. But to put it bluntly the council needs to engage with businesses and residents because without us on board little can be achieved by the council on its own and it’s chosen few organisations. The people of Southall cannot tolerate any more tall buildings or high-rise blocks/towers. Tall buildings are defined as having a minimum of six storeys and without a maximum being stated, although Southall the indication is 18 storeys in height. Although tall	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. The plan has been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19). Regarding the existing Southall Opportunity Area Planning Framework (OAPF), it was adopted in 15th July 2014 and is now over 10 years old. As the new Local Plan has adopted a town based approach including a chapter on Southall it will be superseded and replaced. Until the new Local Plan is adopted it remains in use.	General		Minni Dogra		761	Individual

The Plan has not been produced in accordance with legislative requirements. In particular: 1. This plan is the second to have been prepared by LBE under the Planning and Compulsory Purchase Act 2004. The first was adopted in 2012. The Act and its associated Regulations make no provision for sequential plan-making. Instead, Regulation 10A provides that plans must be reviewed at least every 5 years. 2. Ealing's 2012 Plan was not reviewed. Instead, under the current exercise, it is simply to be ditched with no consideration given to its performance or its continued relevance. 3. For Southall there was the Opportunity Area Planning Framework 2014 (OAPF) and that planning framework was consulted on extensively direct with the local residents. There was the Southall Big Plan for Big Streets , basically to improve pavements and public realm. There were aspects Not consulted on , but the council officers were engaged on the ground direct with businesses and residents between 2008 – 2012. I know because I had my business in Old Southall and engaged with council officers. I still have a record of all my letters , Notes of meetings with them. 4. In 2021 the Leader of the Council wrote to the London Mayor to say the OAPF for Southall was never consulted with the Public and that the document is “...no longer fit for purpose” in his letter dated 20/05/21 (copy attached to “Appendix B”). Since when can a major planning framework like the OAPF be ditched so easily ? Does the Council Leader have that kind of power? It is this personal “decision” (to ‘dump’ the OAPF) from which the council’s attitude to reviews , planning protocols , AMRs appear to have swayed away from following some regulatory framework and must be considered	Noted. It should be borne in mind that the London Plan is an integral part of Ealing's local development plan. This provides a strategic framework for Ealing that includes, for example, housing delivery targets and detailed developmenmt management policies. Ealing does seek to not repeat or duplicate policies in the London Plan. Regards the Southall OAPF, it was adopted in 15th July 2014 and is now over 10 years old. As the new Local Plan has adopted a town based approach including a chapter on Southall it will be superseded and replaced. Until the new Local Plan is adopted it remains in use.	General			Minni Dogra		761	Individual

8. The 2014 Southall OAPF set out details for building heights being no more than 6 - 8 storeys in height and such tall buildings would be appropriate e.g close to railway lines and the Crossrail Station (Elizabeth Line). But , that started to be disregarded by the LPA. The Southall OAPF is still a valid policy as confirmed by LBE in Shaping Ealing Survey 2022. Is anything actually wrong with it ? 9. No consideration or Review of OAPF ever took place in the last 10 years to assess impacts , effects , achievement of aims that were clearly stated at the start in the Southall OAPF. That is where the issue lies. How can we judge OAPF is a failure or inappropriate? And yet the council intend the OAPF to be superseded by this New Local Plan. 10. Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that a Local Planning Authority must notify persons, including residents ‘of the subject of a local plan which the local planning authority propose to prepare’, and to invite them ‘to make representations to the local planning authority about what a local plan with that subject ought to contain’. In preparing its plan, the authority ‘must take into account any representation made to them’. 11. Under Regulation 18 Ealing Council did not invite any representations about what the ‘New’ local plan should contain and so there was no opportunity for residents to make representations as to the things that should be in it. There should have been extensive workshops / engagement once the council had worked out a proper consultation strategy before carrying out any initial surveys. Had they been so invited they may well for example have proposed the plan include policies on the conservation and enjoyment of the historic	Noted. The plan has been shaped by three rounds of public and stakeholder consultation and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1. This document and the accompanying consultation statement summarises further changes proposed since the council published its Final Proposals (Regulation 19). Regards the Southall OAPF, it was adopted in 15th July 2014 and is now over 10 years old. As the new Local Plan has adopted a town based approach including a chapter on Southall it will be superseded and replaced. Until the new Local Plan is adopted it remains in use.	General		Minni Dogra		761	Individual

20. The reality was the Reg 18 plan was drawn up with the council's own 3 key policies in mind: Housing, Climate and Inequality. With hindsight, it can be seen the council were trying to fit the Shaping Ealing survey results in to their already draft Reg 18 local plan. These things only began to make sense once the Reg 18 draft local plan was published in December 2022. 21. In 2021 the council commissioned various reports from consultants / experts. I read many of these reports relating to Southall. The council was in control of exactly what reports were being commissioned. Therefore the Reg. 18 local plan was exclusively council led from the very start. Reg 18 local plan was not lead by any proper public consultation. In January 2023 the council were merely going through the motion of asking the public what we thought of the councils' own Reg.18 plan. 22. This current plan is not based on information that Government legislation and regulations require it to be based on: - Section 35 of the 2004 Act requires planning authorities to prepare and publish Authority Monitoring Reports (AMRs) over no more than a 12 month period which describe 'the extent to which the policies set out in the local development documents are being achieved'. Regulation 34 of the Town and Country Planning Regulations 2012 requires that AMRs showing progress with policy implementation must be published every year. No AMRs for Ealing to inform this plan with regards essential housing delivery data have been published since the year 2013-2014. - With an 'interim' and incomplete AMR covering the years between 2014/15 and 2018/19 published in 2021, no AMRs of any description covering the past 4 years inform this draft plan. In October 2022 I engaged in a Public Inquiry concerning the	Noted. Section 35 of the Planning and Compulsory Purchase Act 2004, has been amended by Section 113 of the Localism Act. The 2011 Localism Act removed the requirement to publish/submit reports annually, and renamed Annual Monitoring Reports as Authority Monitoring Reports. Ealing published an Interim AMR in October 2021, a Housing Supply Topic Paper in November 2022 and a 5 Year Housing Land Supply position statement and trajectory in November 2023. A revised 5 year housing land supply position statement and housing trajectory will be published in early 2025. The decision to place the monitoring framework in the appendix is a reflection of the cross cutting nature of monitoring covering many aspects of the plan. It is not considered that this downgrades its status in anyway. The indicators described in the monitoring framework will be defined further via future AMRs and other monitoring reports / outputs, and will need to respond to the available data sources. As noted in the framework, new and additional measures may be identified over-time, and these will be reported through the AMR. Again it is difficult to define these at this stage, as this is contingent on the availability of data which can evolve overtime. The process of monitoring the Local Plan is not confined solely to the output of an AMR. The process of monitoring is an ongoing exercise and beyond the AMR itself the Council is required to report regularly against local, regional and national indicators and performance measures, all of which are placed in the public	General		Minni Dogra		761	Individual

Local Plans should comply with higher level policies including the NPPF and the London Plan. The NPPF says The development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development; b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); c) community facilities (such as health, education and cultural infrastructure); and d) conservation and enhancement of the natural, built and historic environment {reproduces entire Reg 19 Policy S1: Southall Spatial Strategy} The spatial vision stated by the council for Southall does not reflect what the people of Southall see around them every day. The OAPF 2014 has been in place, in reality for more than 10 years. The words all sound so great and positive and the impression given is very different from what is being achieved on the ground. Progress is too slow. Instruction too fast and what started out as "regeneration"	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base.	Policy S1: Southall Spatial Strategy		Minni Dogra		761	Individual

Local Plans should comply with higher level policies including the NPPF and the London Plan. The NPPF says The development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development; b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); c) community facilities (such as health, education and cultural infrastructure); and d) conservation and enhancement of the natural, built and historic environment. {reproduces entire Reg 19 Policy S2: Southall Major Centre} The Southall Major Centre stated by the council for Southall does not reflect what the people of Southall see around them every day. The OAPF 2014 has been in place, in reality for more than 10 years. The words all sound so great and positive and the impression given is very different from what is being achieved on the ground.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base.	Policy S2: Southall Major Centre		Minni Dogra		761	Individual

Local Plans should comply with higher level policies including the NPPF and the London Plan. The NPPF says The development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development; b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); c) community facilities (such as health, education and cultural infrastructure); and d) conservation and enhancement of the natural, built and historic environment. {reproduces entire Reg 19 Policy S3: King St neighbourhood Centre} The Southall King Street area has a character of it's own. Old Southall has a character worth saving. Read the OAF 2014. That framework showed empathy with the development of the town. What the council is doing is not something that the people of Southall ever wanted for King Street and surrounds. The OAPF 2014 has been in place, in reality for more than 10 years. However positive interest was shown in this neighbourhood from about 2005 onwards. Council	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base.	Policy S3		Minni Dogra		761	Individual

This is all very important since the council removed Ward Forum meetings throughout the borough. Just when people started attending Ward Forum meetings more frequently, 2018 onwards and started raising more concerns about planning permissions and developments, the council stepped in stock the Ward Forum meetings. In the Southall Reset papers in July 2022 the council informed the London Mayor that the Borough would have Town Forum Meetings. Nobody knows how they work and they were possibly introduced at the start of this year. The councillors liaison officer at the council (who used to run all the Ward Forum meetings and who has all the contact details of the residents to call them to meetings) never contacted any of the residents to come forward and attend any Town Forum meeting. The council has not been engaging with the businesses and residents for a number of years. We can explain issues to our councillors in relation to the onslaught of development or things are not being improved e.g in the King Street Neighbourhood, but our councillors cannot take the issues any further because it goes against the leadership of the council. The party whip system operates in favour of the one-party system in London Borough of Ealing. In the circumstances our councillors are no longer in a position to help us forward any of our concerns as residents or businesses. The Council should take steps to engage both businesses and residents to find a way forward on how to achieve high street / town centre/ King Street Neighbourhood improvements. The council should positively support residents and businesses to form groups of their own with direct links to council officers to help make positive and achievable plans for improvements.	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Regarding ward forums these are to be replaced by new Town Forums in the seven towns of: Acton, Ealing, Greenford, Hanwell, Northolt, Perivale and Southall. The commitment to establishing town forums is outlined in the Council Plan 2022 to 2026. The council has listened to residents and knows it needs to do more to be a listening council that effectively engages with residents, to better inform service design and delivery in neighbourhoods. It also needs to work harder to ensure all voices can be heard and express their views about the issues, challenges and solutions that are important to them. By understanding residents' issues better, we can focus on the root causes of inequality and disadvantage. Residents know their communities and what they need better than anyone else.	Policy S3		Minni Dogra		761	Individual

There is the OAPF which is still valid. It needs to be reviewed to see what has worked and what has not. But it appears that the council has no plans of reviewing this planning framework. The council cannot simply write to the London Mayor and declare it to be no longer "fit for purpose" (attached Appendix B). The King Street neighbourhood people relied on the OAPF to protect the character of their town. How was it ever possible for Ealing Council to collaborate with private developers to investigate the market and surreptitiously arrange for surveys to engage business owners to find out how much they were willing to sell their properties for on The Green, car repair workshops adjacent to St Anselm's church behind Tudor Rose ? How was it possible for Ealing Council to leave the Tudor Rose building out of the CPO that was hurriedly signed off by a one man Good Growth Committee? How was it ever possible to breach the provisions and design guidelines of OAPF? How was it possible to pass planning permissions (215058FUL) for something that was described as three blocks, initially of 10 storeys height to be situated at the back of the shops on The Green and develop on the main community car park (Featherstone Terrace/Dominion car park) that serves all the faith buildings in the centre of King Street neighbourhood? How was it possible that the development which was described as "three blocks", actually turned out to be one block of four separate towers? It was not until we actually attended the first day of the CPO enquiry that we learnt that Peabody intended to place one tower block in	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Regards the Southall OAPF, it was adopted in 15th July 2014 and is now over 10 years old. As the new Local Plan has adopted a town based approach including a chapter on Southall it will be superseded and replaced. Until the new Local Plan is adopted it remains in use.	Policy S3		Minni Dogra		761	Individual

I do not think I have the relevant skill set to make any alternative suggestions except to re-examine Policy S3 to make it more digestible and something people can understand rather than just paragraph after paragraph of words. I would suggest that there should be more consultation with local people who are genuinely interested in the better development of Southall as a good place to live and proud to call your hometown. It is no good for the council to just consult with their own funded organisations. The truth is that we need residents groups who really care about doing something for their town. When the council consults with its own funded organisations such as the Southall Community Alliance (for voluntary organisations and care homes) or "Let's go Southall" or "Let's get Southall Moving" or just the faith communities who keep close links with their Southall councillors at their faith buildings, then in these situations the council is effectively disassociating itself from the majority of the businesses and residents and that is why there is little positive engagement with the council and very little progress was improvement in the King Street Neighbourhood. There are residents and businesses who would like to work with the council to improve the town and its facilities and outlook. But the council need to instigate it and also allow these groups a place to meet (funded by the council) by letting us use our own Southall Manor House building Rather than keeping it empty mostly and locked up. I can see there is a sense of criticism here and it is not helpful. But to put it bluntly the council needs to engage with businesses and	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base.	Policy S3		Minni Dogra		761	Individual

Local Plans should comply with higher level policies including the NPPF and the London Plan. The NPPF says The development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development; b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); c) community facilities (such as health, education and cultural infrastructure); and d) conservation and enhancement of the natural, built and historic environment. {reproduces entire Reg 19 Policy S4: West Southall} Read the OAPF 2014. That framework showed empathy with the development of the town. The OAPF 2014 has been in place, in reality for more than 10 years. The council are not engaging with people of Southall. The words all sound so great and positive and the impression given is very different from what is being achieved on the ground. Progress is too slow. Construction too fast and what started out as 'regeneration" feels more like "degeneration". The various projects detailed above, generally cannot be seen as being achieved. Each numbered paragraph needs careful examination in	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Regards the Southall OAPF, it was adopted in 15th July 2014 and is now over 10 years old. As the new Local Plan has adopted a town based approach including a chapter on Southall it will be superseded and replaced. Until the new Local Plan is adopted it remains in use.	Policy S4		Minni Dogra		761	Individual

Local Plans should comply with higher level policies including the NPPF and the London Plan. The NPPF says The development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development; b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); c) community facilities (such as health, education and cultural infrastructure); and d) conservation and enhancement of the natural, built and historic environment. {reproduces entire Reg 19 Policy S5: East Southall} Read the OAPF 2014. That framework showed empathy with the development of the town. The OAPF 2014 has been in place, in reality for more than 10 years. The council are not engaging with people of south! The words all sound so great and positive and the impression given is very different from what is being achieved on the ground. Progress is too slow. Construction too fast and what started out as "regeneration" feels more like "degeneration". The various projects detailed above, generally cannot be seen as being achieved. Each numbered paragraph needs careful examination in	Noted. The Local Plan will shape and guide future development and is by necessity a technical and highly specific document. The Local Plan is also based on an extensive technical evidence base. Regards the Southall OAPF, it was adopted in 15th July 2014 and is now over 10 years old. As the new Local Plan has adopted a town based approach including a chapter on Southall it will be superseded and replaced. Until the new Local Plan is adopted it remains in use.	Policy S5		Minni Dogra		761	Individual

Infrastructure I agree with Ealing Matters and thank you for setting out the details of the frameworks and policies that are applicable when addressing the issues arising in connection with this Reg. 19 local plan. NPPF Para 20. Requires that: ‘Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat). NPPF Para 34 requires that: ‘ Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).’ London Plan Policy D1.B states that: ‘In preparing Development Plans, boroughs should plan to meet borough-wide growth requirements, including their overall housing targets, by: 2. assessing the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth; London Plan Policy S1.A states that: When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure	Noted. It should be noted that the housing target is set out in Policy 4.3 A and the the Mayor of London has raised no objections in his statement of general conformity regarding infrastructure delivery. Infrastructure needs are modelled variously upon population or household projections depending upon the type of provision, with health, for example, based upon GLA population projections. The local plan is subject to binding housing targets and it is not the role of the LPA to produce population projections. Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. IDPs are living documents, acting as a ‘snapshot in time’, and as different infrastructure providers respond to their own unique challenges, the information will naturally date and alter over time. The IDP will require updating on a regular basis to reflect this. The delivery of infrastructure is the responsibility of various different bodies, as detailed within the IDP, including those with a statutory duty to provide sufficient infrastructure to meet identified needs, as well as those who are responding to market conditions.	SP4.1 Good Growth		Minni Dogra		761	Individual

Southall will bear the brunt of the increase in population. There is a transient population as evidence in Southall schools where families and children are documented as moving in or out. There are many people without children and it is much harder to track just how transient they are. Even without the current cost of living crisis/affordable rent issues, it is common to find four adults in a two-bedroom flat. It is also quite common to find in an intergenerational family consisting of five people in the flat for perhaps seven people in a three bedroom house. Another serious issue facing Southall presently is the number of young single men who have arrived from the Indian subcontinent (with the appropriate care worker visas), only to find that there are no jobs in the care industry because of local authority funding restraints. These single men are basically unemployed and often sharing a room with others on sleep only basis. They are on the precipice of homelessness. Considering the quote “infrastructure delivery schedule” it is concerning that there is nothing concrete about the provision of infrastructure to support the high volume of construction already underway. Most of the infrastructure provision is marked “TBC”, presumably means “to be confirmed” (“MD A”). The infrastructure matters are long-term projects and provision takes a great deal of time to put in place e.g schools, GP practices, medical centres etc. not something that you are just waiting to confirm. Provision of infrastructure services need longterm planning. There is no indication in this table which gives confidence that infrastructure matters are in hand. The developments that are envisaged for Southall must be supported with appropriate and proper infrastructure. During the past two years the electricity National Grid	Comments noted. The Infrastructure Delivery Plan (IDP) considered a wide range of infrastructure needs including energy, water, and health. It was informed by engagement with key stakeholders including Scottish & Southern Electricity Networks, Affinity Water, Thames Water, and the NHS. The delivery of many types of infrastructure, including new energy, water, and health infrastructure is primarily the responsibility of these organisations. The council will continue to work closely with partners and key stakeholders to positively plan for the borough's infrastructure needs.			Minni Dogra		761	Individual

An Infrastructure topic paper prepared for the Council by Ove Arup published in October 2022 as part of the regulation consultation found huge existing gaps in most of the Borough’s infrastructure which it attributed to the age of Ealing’s existing infrastructure as well as recent population growth. Recognising this, the Regulation 18 consultation promised that an infrastructure delivery plan (IDP) would be published in early 2023. This only appeared, and without good notice, in February 2024 along with thousands of pages of other new documents in the Regulation 19 evidence base, allowing no time at all for the public to comment or input into it. Part 1 of the IDP reviews the provision of different infrastructure categories. It seems to have been written by individual service providers, and there was no public input. This is unfortunate as it makes for self-congratulatory and uncritical reading. For instance, while the opening of the Elizabeth line is noted, the public had no chance to say that just a year into its operation the service is already operating at above capacity so that at the smaller stations like Hanwell and West Ealing passengers are unable to board at peak times. Had they had a chance to comment, people would say that with the situation as it is now, things look like being much worse at the end of the plan period when 15,000 new homes in Southall alone will significantly increase commuter demand. With no input from the public, the plan cannot be deemed to have been positively prepared and is therefore unsound. Another concern that would doubtless emerge from a proper public consultation is the extent to which the Part 1 baseline report down	Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. IDPs are living documents, acting as a ‘snapshot in time’, and as different infrastructure providers respond to their own unique challenges, the information will naturally date and alter over time. The IDP will require updating on a regular basis to reflect this. The delivery of infrastructure is the responsibility of various different bodies, as detailed within the IDP, including those with a statutory duty to provide sufficient infrastructure to meet identified needs, as well as those who are responding to market conditions.	SP4.1 Good Growth		Minni Dogra		761	Individual
Continuation sheet for Tables SS1 , A1, E1, G1 ,H1, N1 , P1 , and S1 INFRASTRUCTURE (this sheet has been added at the end of the form) Southall Roads, transport and public realm etc. are very important for the infrastructure of Southall especially because of the level of developments and the rapidly increasing population. Below are some important points that need to be made to emphasise the seriousness of the lack of supporting infrastructure for the many new developments. The perception and concern is that infrastructure is not a relevant and proper consideration for the Council in the planning and policy process:	Comments noted. Infrastructure planning is an important part of the new Local Plan. As outlined in the Infrastructure Delivery Plan (IDP), a wide range of organisations (beyond the council) are responsible for delivering the infrastructure the borough needs. The council will continue to work closely with partners and key stakeholders to positively plan for the borough's infrastructure needs.			Minni Dogra		761	Individual

Schools, education , recreational community facilities etc – social infrastructure 1. With the increasing population Southall continues to be a popular place for families of different cultural and ethnic origins. Consideration must be given to the need for more schools and education facilities as well as recreational facilities. When pupil numbers swell, local schools are required to build an extension to house more classrooms or facilities. Inevitably open green space is built upon through the back door, by using school land/fields. Without affecting the open green space/ POS data (in AMRs) Southall already minimal green areas are lost through the back door. The AMRs data must be examined to appreciate the points made and consider just how many school extensions are allowed by the council. Open green space/POS is supporting infrastructure. Southall and South Acton towns both have very little, yet are designated for large-scale housing developments. 2. New schools are required, but in the dense low level urban build of Southall there is no large area of land available to build a new school. Therefore, when the need arises schools are extended and their green field/land (if any) is used for the extensions. Ironically the infrastructure school is then provided, but at the cost of real reduction in green space.	Noted.			Minni Dogra		761	Individual
Waste water , Drainage , Sewers etc. 3. There must be adequate provision for water waste. People complain (anecdotal evidence) that the drains, wastewater, blockages occur regularly in the new developments. There are problems in Southall’s new developments with reference to supporting infrastructure for waste water, drains , sewers which need to be investigated and addressed. This infrastructure appears to be inadequate for the level of development taking place in Southall.	Noted.			Minni Dogra		761	Individual

Industry, jobs, roads, transport etc. 4. The council wants to create industrial places to encourage industry, businesses, employment and jobs as set out in Reg. 19 local plan. These places and buildings can be built on designated land, but they need a proper road and transport infrastructure. Many existing businesses have huge problems in navigating the narrow roads of Southall. The increasing population has exacerbated the problems with the narrow roads. These are physical limitations. Coming off the M4 may be relatively easy, but then it can take another hour from Western Road to, say Bridge Road industrial estate. The businesses who are flexible manage to adjust their times to avoid the worst traffic congestion times (just like the local residents do). In time, given a chance many of these businesses will leave Southall because the internal road logistics are so poor. 5. There is no proper road infrastructure supporting the local industries. You can get off the M4 or at busy Heathrow airport, but Southall itself is a bottleneck. The issues can only be addressed if serious consideration is given to road and transport infrastructure. This would be a massive undertaking and requires years of planning. And there was a plan related to the gasworks site (approved in 2014), for the South Road Bridge Widening scheme to also support the gas works development / the Green Quarter and Crossrail Elizabeth line station. A copy is attached “MD C” . Reg 19 has no such provision. 6. People don’t cycle generally in Southall, but nevertheless cycle lanes can be created for future generations since the council wants to bring about a culture change. That doesn’t mean that Southall people are lazy and obese. Southall population is ageing. High poverty factors impact health outcomes. But cycling is not seen as	Noted.				Minni Dogra		761	Individual

Climate Change , Health , Mental well-being , Pollution, Overdevelopment etc. 9. Climate change policies are arguably a part of supporting infrastructure for clean air and reduce pollution. At the same time there are too many demolitions and new build developments which carry their own huge carbon footprint and high levels of pollution as well as disturbance of contaminated land/brownfield land. Indeed the development of the gasworks site caused huge issues of escape of contamination and pollution causing many people in Southall to become ill about 2018 – 2020. During Covid (it is well documented) Asian / African origin people and others of dark skin were found to have more respiratory / health issues and poor health outcomes. Southall’s high poverty factors and ageing population (well-documented) was also relevant. The irony of it all is the council pushes for development / overdevelopment and people’s health and mental well-being suffers more due to high levels of pollution, respiratory issues, overcrowding and mental stress of living in Southall. 10. Community facilities are important for the existing population as well as taking into account the increase in population (increased from 70,000 to at least 81,000 in 10 years). Due to the various housing developments (that continue) and other factors such as the “hidden” population and transient people, it is more likely that the population is in the region of 90,000. In February 2022 the Council intended to demolish the Southall Youth Centre building (hardly 20 years old) in favour of yet another housing development. The Southall community objected strongly. I refer to a detailed response by letter 12/05/22 made to the consultation carried out by	Noted.				Minni Dogra	761	Individual

To quote “Over the life-span of the local plan.....likely to experience a continued aging population.” No where in the plan do I see any proper response to this democratic fact. Many residents my age use a car (and share cars) to access activities and attend medical appointments. I am 77. The plan seeks to support local assets, 20-minute neighbourhoods, but doesn’t explain how these will work. At a recent LBE meeting the facilitators were unable to explain 20 MN. Is it just words? Building on car parks reduce choice and quality of life for those over 70. 20 minute is a long walk if your over [text discontinued] ...West Ealing there are two infrastructure projects that stand out.....but are barely mentioned in the plan. 1. Step-free access to Northfields station 2. Jacobs Ladder Such improvements make life easier for everyone not just the elderly.	Noted. On 20 minute neighbourhoods, the plan aims to give people more choices about how they want to travel in their local community without a car if they want or need to. More options can benefit physical and mental health and help to create a stronger sense of community, boost the local economy, and increase resilience to the effects of climate change. Ealing is bringing forward a new Transport Strategy, which will include specific priorities for each of the seven towns, acknowledging their very different transport contexts and requirements. This Strategy will provide more detail on Ealing's approach to transport, including accessibility and cycling infrastructure. The Cycle Network Plan, which will be a component of the new Strategy, is submitted as a suggested addition to the Local Plan evidence base. Regards investment in station step-free access, this is determined by Transport for London, through the Mayor's Transport Strategy, and its target of 80% of journeys being made by walking, cycling and public transport by 2041. It is included in Table SS1 as one of the borough wide infrastructure projects. Regards Jacobs Ladder, this is referred to in development sites 15EA and 16EA under key infrastructure requirements.	SP2.2 Climate action		Arthur Breens	Ealing Save	762	Community Interest Group
Ealing has a wealth of designated heritage assets.....etc etc....” But strangely no conservation officer. Just words. We have lost 1930’s facades in W13 and all officers and member[s] can say is that these are not important. Some heritage assets like the town hall and Victoria Hall are not properly used.	Noted.	SP4.1 Good Growth		Arthur Breens	Ealing Save	762	Community Interest Group

Proposed Change from Current Car Parks Visitor and Staff to Residential 9-12 storeys. Reinstate some podium car parking. (What is podium parking?) 1. Many residents and politicians {names redacted} marched 12 years ago to protest against the "Shaping a Healthier Future" Tory plan to close Ealing Hospital. London we were told was over-bedded. 2. It is now far from being surplus to requirements it is completely full, evidenced by my friend who recently had to be found a bed in A&E as there were no spare beds in the hospital and lengthening waiting lists. 3. Now investment is being made to expand investigation and testing facilities. This is the future of the NHS. To get to medical problems before they demand expensive intervention. For elderly patients that means many more short visits. 4. This makes the patient car park vital. Friends and neighbours cars support the ambulance services in transporting patients for these short visits. They need places to park. That demand will only increase. 5. Ealing Hospital is adjacent to very deprived areas, populations with particular medical problems eg diabetes and "hard to reach" groups 6. Much of the recent debate about the NHS includes :- a) The need to cope with an increasing aging population b) Recruitment/retention of staff c) Emphasis on early diagnosis and intervention by testing 7. Ealing Hospital is uniquely placed to service a very large	Noted. The Local Plan does not propose the closure or reduction of services at Ealing Hospital.	01HA Land to the front of Ealing Hospital		Arthur Breens	Ealing Save	762	Community Interest Group
The Uxbridge Road is dangerous for cyclists a. Potholes / poor road surface b. Buses stopping and starting c. Vehicles parking turning stopping starting doors opening etc d. Smart phone users. Don't look. A much better route exists parallel to the Uxbridge Road. It is:- Ealing Common Grove Road Mattock Lane Leeland Terrace LBE produced a poorly designed crossing to Northfield Ave.	Noted.	Policy E1: Ealing Spatial Strategy		Arthur Breens	Ealing Save	762	Community Interest Group

The Council declared a climate emergency in 2019 and in pledge to make Ealing Carbon Neutral by 2030. However its track record is poor. A recent development in Somerset Road W13 demolished a sound building and replaced it with a number of flats including 3 extensive troglodyte flats with external light shafts. This involved large number of lorry trips through the borough. Sites demolished and left vacant for years. Again not green. Victoria Hall and Town Hall closed asset not used for no good reason. Houses nearing completion supplied with gas c/h.	Noted.	SP2.2 Climate action		Arthur Breens	Ealing Save	762	Community Interest Group
The Plan needs to be informed by an assessment of the Borough’s physical and social infrastructure needs as London Plan Policies D1 and S1 require. Working with local people as NPPF Para 15 requires, the Plan then needs to make provision for infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, and energy (including heat) as NPPF Para 20(b) requires. In accordance with NPPF Para 34 the Plan should set out the contributions expected from development. Along with setting out the levels and types of affordable housing provision required this should include that needed for education, health, transport, flood and water management, green and digital infrastructure and it should form part of this plan, and not a separate document. Policy DAA of the Plan also needs to respond to London Plan Policy D2B by making clear that development must be contingent on the provision of required new infrastructure, including public transport services, and that if necessary it must be phased accordingly.	Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4. The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. IDPs are living documents, acting as a ‘snapshot in time’, and as different infrastructure providers respond to their own unique challenges, the information will naturally date and alter over time. The IDP will require updating on a regular basis to reflect this. The delivery of infrastructure is the responsibility of various different bodies, as detailed within the IDP, including those with a statutory duty to provide sufficient infrastructure to meet identified needs, as well as those who are responding to market conditions.	SP4.1 Good Growth		Minni Dogra		761	Individual
DO NOT ADD ANYTHING BELOW THIS ROW - INSERT ABOVE TO KEEP FORMATTING OF DROP DOWNS ETC							

