

INDEPENDENT EXAMINATION 2011
2026 Ealing LDF Core Strategy

MATTER NO: 1.10

Eric Leach/West Ealing Neighbours

Rep. No: 214

‘Whether the Core Strategy gives sufficient guidance on the provision of the infrastructure to support existing and future development’.

1. We think the provision of infrastructure to support existing and future development is inadequate. This inadequacy precludes any future residential development until firm plans, available sites and finances are in place to provide infrastructure to support existing and future development.

2. We have chosen to study infrastructure profiles in education, healthcare, the elderly, culture and cremation.

3. For educational and healthcare infrastructure planning we’ve dealt with the Ealing Metropolitan Town Centre (EMTC) which is made up of West Ealing centre and Ealing centre.

4. 1,245 new homes are planned for the centre of West Ealing out of a total of 2,600 for Ealing Metropolitan Town Centre (EMTC). However the LDF Evidence Base at EB25 tells us that by 2026, only 4,002 new residents will arrive in EMTC. This represents a housing occupancy per home figure of just 1.53. This is wildly different to Ealing’s current 2011 occupancy figure of 2.5 (calculated by dividing the EB25 stated 2011 population – 322,300 - by the EB25 number of 2011 households – 127,500). If this calculation is done using Ealing’s 2026 projections in EB25, the occupancy rate for each household, (349,000 residents in 142,500 households) comes to 2.4. So using the EB25 figures and the 2026 calculated occupancy figure, 6,240 will be the number of new residents in the EMTC, and of those 2,988 will reside in the centre of West Ealing.

Reflections on these figures are:

a) A2Dominion, the developer of the new Green Man Lane Estate (GMLE), gives a ratio of homes to residents as 706 homes /2,000 residents (REF:1) which gives us an occupancy per home of 2.8.

b) One of the reasons cited by Ealing Council in 2010 for deciding to demolish the 1975 GMLE was that it contained too many one bedroom flats (REF: 2). In fact 71 % of the 464 homes had single bedrooms and the estate housed 800 residents. The occupancy per home rate was 1.72.

c) If one were to apply the projected 1.53 occupancy per home figure for 2011-2026 development of the EMTC (ie 2,600 households containing 4,002 residents) to the current

number of households in the whole of Ealing (127,500) a wildly inaccurate population figure for Ealing of 195,075 residents would be arrived at.

d) The Strategic Housing Market Assessment (EB22) contains occupancy needs details for Affordable Housing at Table 1-4. It states the need is for 80% of new Social Rented homes to be 2 bedrooms or more and that for Intermediate Housing there is a 65% need for 2 /3 bedroomed homes. Neither of these needs suggest an occupancy per home rate for Affordable Housing of less than 2 is in any credible.

e) Background Paper 2 Housing October 2010 (EB21) at 3. 2. 3. states:
'Furthermore, the SHMA (EB22) indicates that current housing stock under-provides for larger units (3 and 4 bedrooms)...

5. Education

5.1 Additional School Children

Using the 2001 Census figures for Elthorne Ward (where the new Green Man Lane Estate is being built) around 10% of the population were aged between 5 to 15. So we'll apply that percentage to the 2,988 newcomers to West Ealing centre. That gives us 298 children, to which must be added 16 and 17 year olds, which one can assume will be 298 plus 2 x one eleventh of the 5 to 15 year olds' total. So we can assume that 352 of the 2,988 new residents will be of Primary and Secondary School age. This represents an additional 12 full streams of 30 children for which education facilities will need to be built locally. Similarly for the whole of the EMTC the number of children to be educated will be 738 (624 + 114). This represents an additional 25 full year streams of 30 children for which facilities will need to be built locally.

5.2 Primary Schools

There are two State Primary Schools in the northern centre of West Ealing – St John's and Drayton Green. Neither currently has any vacancies in the first four years and no more than 6 places in any of the other three years. There are no LDF plans to expand Drayton Green but 15 pupils are planned to be added to each year at St John's, without any planned spatial expansion.

School vacancy numbers are taken from www.egfl.org.uk and at 29 September 2011 – REF: 3 and REF: 4.

Fielding Primary (to the south of West Ealing centre) has currently no vacancies in any year except Year 6 with just 3 spare places. It will add another 30 pupils in each year by September 2012 to then become probably the largest Primary School in England with 870 pupils. The National Union of Teachers' Head of Education comments that a Primary School expanding to such a size can be a matter of 'real anxiety' (Mail Online 24 October 2009 – REF: 5). Hathaway Primary (to the north of West Ealing centre) has no vacancies

in the first four years but has vacancies of 4, 15 and 14 places in Years 4, 5 and 6 respectively. There is available public land immediately to the north of the school but the school itself is not a practical walking distance for West Ealing centre residents. There are no LDF plans to spatially expand Hathaway or (thank goodness) to further expand Fielding.

In the centre of Ealing there are no open entry State Primary Schools. There are two faith schools and both have no vacancies in any year. New Catholic parents will benefit from plans to add 30 places to each year at St Gregory's, whilst new Protestant families can also look forward to 30 more places each year at Christ the Saviour Primary. However the children of new families of other faiths and of secular families will have no State Primary School to attend in the centre of Ealing.

No spatial allocations have been made in the LDF CS for any new public, faith or private Primary Schools in the centres of West Ealing or in the centre of Ealing. We do note the Ealing Council commissioned E. C. Harris December 2010 study on Primary School Site Selection in EB25. No site was found in the centres of West Ealing and Ealing, but consideration was given to the NHS Mattock Lane Healthcare Centre site (but no commitment to it) and 22-24 Uxbridge Road site which is currently well on the way to becoming a new hotel and Data Centre early in 2012. Planning permission for the latter was granted in August 2008.

5.3 Secondary Schools

West Ealing has no State Secondary School and there is no LDF plan to build one. There are three State Secondary Schools in the neighbouring town of Hanwell – Drayton Manor, Brentside and Elthorne Park, but none in Ealing centre to the east. None of the Hanwell schools currently have any vacancies in any year. (In fact, almost beyond belief, none of all 13 State Secondary Schools across the whole of Ealing have any vacancies in Years 9, 10 and 11. Only 4 of the 13 have any vacancies at all in Years 7 and 8). There are no LDF plans to expand Brentside and the Labour Government's BSF plans to expand Elthorne Park were abandoned by the current Coalition Government in July 2010. There are plans to add 15 pupils to each class at Drayton Manor which will push total pupil numbers up towards 1,700 which is very high given the small footprint of the school. An added complication is that Drayton Manor has recently opted out of local authority control and adopted Academy status. As such it is no longer bound by the established local public admission procedures and catchment area protocols. The school is now at liberty to adopt its own admission rules which may not favour children living locally.

There are no State Secondary Schools in the centre of Ealing. To the east in Acton is Ellen Wilkinson Girls School and Acton High School. Ellen Wilkinson currently has no vacancies in any year. Acton High has just 7 vacancies in Year 7 and 3 in Year 8. The former was to be expanded to add 30 more girls in each year and Acton High was to add 60 pupils in each year. But these were BSF funded plans which were cancelled by the Government in July 2010. This seems will be even more crippling for new families in

central Ealing when one realises that another 400 new school children will live in Acton in the 1,387 new homes in Acton centre and South Acton. These children will have priority over central Ealing children for places at Ellen Wilkinson and Acton High.

In EB25 under 'Key Risk Analysis' it states:
'Primary and Secondary Education: Impact on LDF:
Should schools be unable to provide places, growth objectives may be reconsidered'.

Anecdotal evidence suggests that this risk is already being realised with parents in Ealing Broadway Ward being unable this year to secure a place for their child locally at Drayton Manor and finding that their only State School Secondary School choice is Toby Young's new Free school in Hammersmith.

With is no LDF guidance about making spatial allocations for the building of any new public, faith or private Secondary Schools in and around West Ealing centre or in central Ealing, we do not regard the LDF CS provides sufficient guidance for the provision of education infrastructure.

Planning Guidance Context

The London Plan

Policy 3.18 Education Facilities

G.

'LDFs and related borough strategies should provide the framework:

b. to secure sites for future provisioning recognising local needs and the particular requirements of the education sector'.

6. Healthcare

There are no spatial plans to build new public or private healthcare facilities in the centre of West Ealing or in the centre of Ealing to service the needs of the incoming 6,240 new EMTC residents. Although 'reprovisioning' of the NHS Grosvenor House health centre and the replacement of the Mattock Lane healthcare centres are mentioned in EB6 there is no mention of any spatial expansion of any healthcare centre in the centres of West Ealing and Ealing. In fact a new block of flats is being built immediately to the east of the Grosvenor centre which more or less precludes any future spatial expansion of the current or a new centre on this site. At a public meeting in West Ealing in 2008, residents were told by the NHS that it would be impossible to expand the Mattock Lane facility and for that reason they were planning to close it down and sell the site.

One must accept that the NHS is currently in turmoil with enormous changes being proposed and many local changes taking place in anticipation of new NHS structures. There is much speculation about the possible closure by the NHS of Ealing Hospital by amongst others the Leader of Ealing Council (Ealing Today, May 2011 – REF: 6). If that

hospital is closed down or even if it is sold to a private medical concern, this will cause significant degradation in the provision of local healthcare services for many Ealing residents.

Planning Guidance Context

The London Plan

Policy 3.17 Health and Social Care Facilities

E.

‘Boroughs should work with NHS, social care and community organisations to...

b. secure sites and buildings for or to contribute to future provisions.’

7. The Elderly

A spatial strategy for dealing with the increasing number of aging residents is completely absent from the LDF CS. In October 2009 the Office of National Statistics (ONS) predicted there would be some 7 million UK residents aged 75 or over out of a total population of 67.8 million by 2023. (the ONS further predicted that by 2033 approaching 5% of the total population would be 85 or over). Extrapolating these figures for Ealing in 2026, out of a total population of 349,000 almost 35,000 residents will be 75 years old or over. The 2001 National Census counted 16,382 residents aged 75 or over in Ealing.

It is therefore logical to assume that the need for local nursing homes and care homes for Ealing’s elderly will double over the next 15 years. However out of 103 Development Sites identified in EB6 literature only one site features ‘care home/nursing home’ as a preferred use spatial option (Glade Lane/Maypole Dock, Southall – 24 units).

Planning Guidance Context

See The London Plan Policy 3.17 above.

8. Culture

There is no commitment in the LDF CS to allocating land for building any new cultural facilities in Ealing, except for a cinema on the Southall Gas works site. The LDF plans do indicate the replacement of the cinema on New Broadway in central Ealing and a replacement theatre at The Questors. The LDF CS offers no guidance as to land use allocation for new arts centres, theatres, art galleries, exhibition halls, musical rehearsal rooms, museums and concert halls.

Planning Guidance Context

The London Plan

Policy 3.16 Protection and Enhancement of Social Infrastructure

Strategic

A.

‘London requires additional and enhanced social infrastructure to meet the needs of its growing and diverse population.

E.

Boroughs should ensure that adequate social infrastructure provision is made to support new developments.’

9. Crematorium

Over 70% of all deceased persons are cremated (REF: 7). However none of them are cremated in Ealing as Ealing has no crematorium. No land use requirement for a crematorium has been identified in the LDF CS and consequently no land use allocation has been made as a site for a crematorium in Ealing. The UK average annual death rate in the UK 2005 to 2010 (REF: 8) is 9.9 deaths per 1,000 residents. By extrapolation the current annual death rate in Ealing is over 3,000 deaths. To continue to expect over 2,100 extended Ealing families and their local friends each year to travel many, many miles to Brent, Mortlake or Ruislip for the cremation of their loved ones is intolerable. This omission amounts to a poor quality of life and a poor quality of death.

Planning Guidance Context

The London Plan

Policy 3.16 Protection and Enhancement of Social Infrastructure

Strategic

A.

‘London requires additional and enhanced social infrastructure to meet the needs of its growing and diverse population.

C.

Facilities should be accessible to all sectors of the community (including disabled and older people) and be located within easy reach by walking, cycling and public transport.’

REFERENCES

REF: 1 – Ealing Council Planning Committee papers for Planning Committee Meeting 1 September 2010 for planning Applications P/2010/0418 and P/2010/0419, page 25

REF: 2 – Ealing Council web site

REF: 3 – Ealing Primary School Vacancies, Thursday 29 September 2011

REF: 4 – Ealing Secondary School Vacancies, 30 September 2011

REF: 5 – Mail Online, 24 October 2009

REF: 6 – Ealing Today 18 May 2011

REF: 7 - National Cremation Statistics 1960 – 2010, The Cremation Society of Great Britain

REF: 8 – List of Sovereign States and Dependent Territories by Death Rate, UN List