

INDEPENDENT EXAMINATION 2011
Ealing 2026 LDF Core Strategy

MATTER NO: 3.1

Eric Leach/West Ealing Neighbours
Rep. No: 214

‘Does the Core Strategy make appropriate provision for the effective delivery of new housing, including affordable housing, in terms of the amount, distribution, locations, phasing, size, tenure of new housing development, having regard to national policy, and is fully justified and supported by an up-to-date, credible and robust evidence base’.

1. Effective Delivery?

Ealing Council’s recent track record in meeting The London Plan (TLP) housing targets is poor. According to E12 Only 270 ‘New Build’ homes were built in 2009/10 when the TLP target was 848. However The London Plan Annual Monitoring Report 7 February 2011 (REF:1) informs us that Ealing delivered only 37% of its housing target – 343 out of 915. In fact only four London Boroughs performed worse in meeting their targets.

The target for 2011 to 2026 is 890 new homes per year.

Affordable Housing completions over the last three years were 412, 309 and last year 283 – an annual average of 335 (REF: 2). TLP target of 50% Affordable Housing out of Ealing’s target of 14,000 total gives us 7,000 to be built over 15 years. This will mean 467 new Affordable Homes being built each year. So there is no recent historic precedence which even suggests that TLP Affordable Housing targets can be delivered in Ealing.

Where also is the evidence that Ealing Council will achieve these new home building targets 2011 – 2026? There is no evidence that the rate of new home building anywhere in England will treble or even double. The building of 14,000 new homes in Ealing by 2026 is simply undeliverable.

There is plenty of evidence that the rate of home building will not increase:

1.1 Jones Lang La Salle reported in September 2011 (REF: 3) that 50% of Housing Associations expect the cost of borrowing to increase as a result of the Government’s Affordable Rent programme, potentially leading to financial problems and stalled new-build schemes. ‘None of the 41 (Housing Association) respondents thought that the new policy would lead to a major increase in delivery’.

Government has cut the Affordable Housing budget by 63% (BBC News Business 30 August 2011 – REF: 4).

1.2 According to figures from the Government's Homes and Communities Agency, these are the current and predicted Affordable Housing starts in London, 2009 - 2013:

2009-10: 2,000
2010-11: 2,000
2011-12: zero
2012-13: zero

These figures were referenced in a recent House of Commons debate (HC Deb 5 May c830)

1.3 In 2010 only 102,570 new homes were built (REF: 5). In 2007, 185,000 homes were built. So far this year (to 31 August) only 73,000 new homes have been built (Sunday Times 2 October 2011 – REF: 6).

2. Inappropriate Location

We are unhappy with the strategy of locating 1,245 new homes in the built-up centre of our town West Ealing. (In other submissions we have objected to the inadequate planned increase in local, social and community infrastructure to cope with these volumes).

Almost all of the development sites are neither vacant nor derelict but are in use as businesses or as residences. I can find no explicit reference in PPS3 to sanction such wholesale demolition of in-use buildings.

Over 50 shops at 11 'Development Sites' on the Uxbridge Road in the centre of West Ealing are specified in EB6. They will be replaced by residential blocks many of which will have new shops at ground level. There are another 7 residential developments (in EB6) planned close to the Uxbridge Road in West Ealing. It is by no means clear as to how many new shops will be built or what the size of these new shops will be.

No rationale is provided for the strategy of so many new housing sites and why many of these particular sites have been chosen for 'development'. There is no discussion whatsoever as to whether shop owners and occupiers want their shops demolished or whether they will return to re-occupy the new shops.

2.1 EB6 Data:

<u>Address/Site Details</u>	<u>Net Gain in Homes</u>
Green Man Lane Estate	242
Dean Gardens/Sherwood Close Estate	81
Maitland Yard/1-41 Broadway (incl Barclays Bank and Salvation Army Hall)	70
Hastings Road/Drayton Green Road (incl Majestic Wine)	120
51, Drayton Green/St Helena's Home	22
Abacus House, Manor Road (Access Storage)	14
171-175, Uxbridge Road (Bulvinos House – modern brick building)	14
64, Broadway (incl Iceland)	25

66-78, Broadway (incl Boots and Costa Coffee)	40
59-75, Broadway (incl Lidl and Peacocks)	30
77-103, Broadway (incl Sainsburys, Burger King and Greggs)	50
105-119, Broadway (incl KFC and Diligence)	24
131-149, Broadway/1-2 Uxbridge Road (incl Grosvenor House NHS Centre)	50
130-140, Broadway (incl Paddy Power and Master Chef)	40
1-10 Chigwell Place/104-110 Broadway (incl BHS shop)	78
Land adjoining Daniels- east to Arden Road (incl Castlebar Pub)	149
BT, Gordon Road	182
Bridge Garage, Culmington Road	14

Planning Guidance Context

PPS3

36.

‘The priority for development should be previously developed land, in particular vacant and derelict sites and buildings’.

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‘There is no presumption that land that is previously-developed is necessarily suitable for housing developments nor that the whole of the curtilage should be developed’.

3. Size?

3.1 There is a mismatch in the submitted documents about what is needed and what is proposed in terms of population growth predictions, size of homes and occupancy rates per home.

3.2 In EB13 it states that ‘Ealing’, for example, will grow by apparently house just 4,002 residents, 90% of which will be in Ealing Broadway Ward. In EAL5 it states that 2,600 new homes will be built in Ealing town centre. This is an occupancy rate of 1.56 residents per home. At such a low occupancy per home there would be very few three or four bedroomed homes. However in EB21 at 3.2.3 it states: ‘Furthermore the SHMA indicates that current housing stock under-provides for larger units (3 and 4 bedrooms)...’. Also in EB22 at table 1-4 the needs of Affordable Housing are quantified as a Social Rented 80% need for 2 + bedrooms and an Intermediate Housing need of 65% for 2 and 3 bedrooms. As this new homes growth will be in large developments then 1,300 homes will be Affordable Housing.

3.3 However also in EB13 it states that the population of Hanwell will grow by 952 people and that this growth will be in Elthorne Ward. Green Man Lane Estate, in Elthorne Ward (but confusingly in West Ealing and not Hanwell) will grow by 1,200 new residents to 2,000 residents alone by 2026 (REF: 7). This is very confusing data, as in the Development Sites document (EB6) all possible residential sites in Hanwell (including Hobbayne Ward) would result in 342 new homes. 952 new residents in 342 homes would

result in an occupancy rate per home of 2.78. However in EAL5 page 81 it states that the residential growth in Hanwell will be – yet another different number - 280 housing units. This would give us a barely credible occupancy rate of 3.4! None of this constitutes ‘robust evidence’.

REFERENCES

REF: 1 – London Plan Annual Monitoring Report 7: February 2011, Total Housing Provision by Borough and Type of Provision

REF: 2 – London Plan Annual Monitoring Report 7: February 2011, Net Conventional Affordable Housing Supply by Tenure, 2007/08 to 2009/10

REF: 3 – Jones Lang La Salle, ‘Affordable Housing, 2011’ page 10

REF: 4 – BBC Business News, 30 August 2011

REF :5 – www.communities.gov.uk

REF: 6 – Sunday Times, 2 October, 2011

REF: 7 – Ealing Council Planning Committee papers for Planning Committee meeting 1 September 2010 for Planning Applications P/2010/0418 and P/2010/0419, page 25