

CERA

Central Ealing Residents' Association

From The Chairman, [REDACTED]
[REDACTED]

Draft New London Plan

I write on behalf of the Committee of the Central Ealing Residents Association (CERA) to give our comments and concerns on the Draft New London Plan. CERA represents the interests of hundreds of residents who live north of Uxbridge Road/The Broadway in central Ealing.

The whole Plan is based on the need for large amounts of new development due to past and future population growth. So it needs strong, water-tight policies to control growth and ensure a market led free for all is avoided. The private sector needs strong guidance that is enforceable and actually enforced. Our overall concern with the Draft New London Plan is that it is a very long document which reads in places like Motherhood and Apple Pie and could be described as being All things to All People. It sounds good but will mean different things to different people.

Design

The Plan is design led, which is a laudable aim but can be a rather nebulous concept without strong clear guidance. It will be interpreted selectively as the Plan contains so many policies. Stronger guidance is needed using measurable criteria that can and will be enforced.

In our view the importance of listed buildings and conservation areas should be stressed to reinforce the policy of design led development in adjacent and nearby areas to Conservation Areas. For example tall buildings are rarely appropriate in or near conservation areas. We object to the apparent acceptance of the need for tall buildings across the whole of London as higher residential densities do not necessarily require tall buildings. We object particularly strongly to the idea that tall buildings are needed as an aid to navigation, which is a contention without any justification. If a suburban area is largely 2-4 storeys in height, 6-8 storeys in a town centre will stand out sufficiently to aid navigation for pedestrians and car drivers, using their eyes rather than other means of navigation.

Policy D3 talks about accessible and inclusive design, which we support, but what does this mean in practice? An inclusive design statement in the Design and Access Statement accompanying a planning application is too late in the process and means developers will pay lip service to the need to properly involve the local community and take account of the views of people affected by development. A genuinely inclusive design must mean local people being actively involved throughout the planning process, with their views being taken into account.

Housing Supply

We object to Policy H1 as it applies to the London Borough of Ealing. In our view, Table 4.1 imposes a disproportionate burden on the Borough in providing the new homes London clearly needs. The SHLAA does not justify Ealing's targets either in absolute terms nor as they compare with nearby boroughs. Some indication of how this amount of new housing would be distributed within the Borough is needed, and this surely must apply to all outer London boroughs, where much of London's new development is planned to be located. There is a clear danger that the huge amount of new development will destroy many of the Borough's most cherished neighbourhoods, which have already been damaged over the past 10 years by a rising number of poorly planned and insensitive re-developments.

There can be no argument about the need for more homes, but at the scale proposed over a short period of time the population of the Borough would increase dramatically. A huge range of infrastructure and services would be required to support so many new residents, but our borough is currently experiencing a sharp decline in the services our communities rely on. Is anyone considering what new demands the growth in numbers will put on systems that are being reduced this way?

Policy H2 also raises very great concerns for many residents in the Borough of Ealing and we object to it strongly. We are concerned that the presumption in favour of intensifying residential uses will encourage the proliferation of sub-standard housing conversions and homes in residential back gardens.

We are particularly concerned with the very large numbers of new units that Ealing is expected to deliver on small sites, especially when the borough is compared with its neighbours which have similar densities of developments. The presumption in favour of development within the curtilage of a dwelling house would be classified as garden grabbing and would conflict with the safeguards that the government introduced in 2010.

In conclusion we are concerned with the length of the Draft New London Plan, the amount of detail covered and the number of policies. It is full of statements which sound impressive but which mean all things to all people. We support design led planning in principle, but have little confidence in the ability of Boroughs to produce design codes. The decline in planning staff in Ealing, as in many other boroughs, has left the Borough with little capacity to undertake such exercises or even to commission them. We are equally unimpressed by the protection the policy purports to provide to heritage assets. Ealing as a Borough has just one conservation officer who deals with heritage assets on only two days a week. Few other of the Borough's planners appear to have even basic training in this area.

Yours sincerely

Stuart Morley

Chairman of CERA