

Mrs Ann Chapman comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

1. The plan is based on a number of aspirational policies, for example policies D2 and D3, and HC1. These, whilst well-meaning in their own terms, will prove impossible to implement in practice and are likely to be overruled by specific targets proposed for, for example, housing numbers.

2. It is disappointing that there is virtually no recognition of Neighbourhood Plans in the draft Plan. Neighbourhood plans have been agreed for central Ealing and are shortly to be subject to referendum in West Ealing centre. These plans have been drawn up after consultation involving local people and businesses and, where they have been approved at referendum, are now part of the Local Plan. We consider that the Plan should recognise that neighbourhood plans are an essential part of a three tier rather than two tier planning system which is currently implied. The growing trend in London, and in Ealing specifically, over recent years has been to exclude communities from decisions that affect them, leaving decisions in the hands of temporary planners who are unfamiliar with the locality and as often as not are less knowledgeable about a development than groups wanting to input into the decisions. A worrying democratic deficit is developing leading to a growing dissatisfaction with the planning system. Neighbourhood plans have been developed to try to address this.

Page: [Policy D2 Delivering good design](#)

Section: [D2](#)

This policy is aspirational, suggesting that good design will be assured through the use of design panels. These are not mandatory and there is no sanction should a developer or planning authority not employ them. There is also no funding or expertise available to establish such panels.

Page: [Policy D4 Housing quality and standards](#)

Section: [Table 3.1](#)

The proposal to drop the density matrix and replace it with a far looser set of criteria for establishing 'optimal' housing densities is a great concern as it implies that it will be open to developers to put forward plans which are significant overdevelopment in terms of number of units, bulk and massing and availability of local infrastructure. We have already experienced in Ealing a complete disregard by planning officers of the maxima in the current plan and the removal of this safeguard will only encourage this further. Also of concern is the proposal to remove the distinction between different settings of sites in London, allowing suburban areas such as Ealing to be approached as if they were inner city areas more able to accommodate intensive development.

Page: [Policy D6 Optimising housing density](#)

Section: [D6](#)

The suggestion that units larger than the minimum as set out in space standards “should be resisted as not efficient” and that build should be at “optimum density” suggest maximisation that will both lead to over-densification and potentially poor living conditions. We are also very concerned that this policy will lead to cramming as many housing units on to a site as possible (i.e. over-densification) according to the availability of public transport (PTAL score) without proper consideration being given to other infrastructure needs such as schools, health and community facilities. It is not good enough to say in B3 that only in "exceptional circumstances" should delivery of housing be contingent upon the relevant infrastructure and transport services. The condition should be reversed so that only in exceptional circumstances should housing be delivered in the absence of relevant infrastructure and transport services. Otherwise, developers will take every opportunity to deliver housing without bearing any responsibility for (and therefore the cost of) the associated infrastructure.

Page: [Policy D8 Tall buildings](#)

Section: [D8](#)

It is not good enough to leave it to boroughs to define tall buildings. Under the previous London Plan a tall building was defined as a building that was substantially higher than the properties in the immediate vicinity (paragraph 3.8.1 says as much). We think that this definition should be carried forward to this version of the Plan. This policy also implies an acceptance that tall buildings are appropriate in all boroughs. We disagree and consider that tall buildings can be completely out of place, for example in parts of Ealing characterised by low rise-Victorian suburbs in the vicinity of Ealing Broadway station, which were developed following the arrival of the tube railways at the end of the 19th century.

Page: [Policy H1 Increasing housing supply](#)

Section: [H1](#)

We are very concerned that the Borough of Ealing is expected to deliver up to 28,700 new homes during the Plan period, a figure which has been arrived at without any public consultation. This is seventh highest of the London boroughs and 4.3% of the London allocation, which is in our view far too high and far in excess of what can be delivered in practice. We are also concerned that of this figure 10,740 are to be built on so-called "small" sites (<0.25Ha), the third-highest Borough allocation. Based on the definition of a small site, this would require at least 428 such sites, but there is no indication of where these will come from and again that figure seems to be totally unachievable. Furthermore, allowing intensive new development within property curtilages will provide new encouragement to "garden grabbing", which had been curbed by the Secretary of State (Greg Clark) in 2010. Such development could have a negative impact on local character through intensification and a proliferation of buildings in gardens and conversions of single properties to flats. In Policy H1 B2 b/c, boroughs are also urged to encourage the development of car parks and 'low-density' leisure centres and retail parks. While there is possibly scope for mixed retail/residential developments, provided these are in character with their surroundings, we are concerned that this encouragement could lead to over-development, the potential loss of green space at leisure locations and loss of necessary surface car parks essential to ensure the viability of both leisure and retail centres.

Page: [Policy H2 Small sites](#)

Section: [H2](#)

While we would support the development of some small sites, see comments submitted for policy H1.

Page: [Policy HC1 Heritage conservation and growth](#)

Section: [HC1](#)

This policy contains thoroughly laudable objectives but given the current severe resource constraints upon boroughs, particularly in relation to conservation expertise (the Borough of Ealing only employs the services of a conservation officer for two days a week) we consider the objectives to be totally unachievable in practice. Only after concerted and lengthy pressure upon the Council has a long-delayed review of conservation areas in the Borough of Ealing now finally started and it has been necessary for them to employ external expertise to carry out the review. Without the exercise being properly resourced, boroughs will be tempted to let applicants carry out such reviews themselves which by definition will be biased in favour of their position. If the policy is to be retained in its current form, boroughs should be offered additional expertise or resource to assist in carrying out the required assessments. If this is not possible, the policy needs to be reworded to ensure that expectations of what boroughs can deliver are properly managed.

Page: [Policy HC5 Supporting London's culture and creative industries](#)

Section: [HC5](#)

We support the vision behind this policy. Our concern is that like similar policies in previous plans, no effort will be made to implement it. Instead, with the very strong drive to provide additional housing on every available site, this policy will carry no weight in practice. For example, where major proposals are referred to the Mayor where cultural or creative industries should be promoted they will not be because additional housing will be seen to be the greater priority.

Page: [Policy HC6 Supporting the night-time economy](#)

Section: [HC6](#)

We generally support the idea of diversifying the night-time economy away from licensed premises. However, we do not consider sufficient attention has been given to the impact of such aspects of the night-time economy as extended hours upon local residents and, in particular, the cumulative impact of such premises in town centres where residential areas now exist in the centre of towns (e.g. as in central Ealing). Protection for such residents should be enhanced.

Page: [Policy G3 Metropolitan Open Land](#)

Section: [G3](#)

Generally, we support this aspirational policy except that we consider A (1) does not fully currently reflect the policy in the NPPF where development on green belt land will only be permitted in "very special circumstances."