

Dr Robert Gurd comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

We are concerned about the general approach of the draft London Plan which, unlike previous versions which have generally taken an incremental approach to planning, seems to have concentrated upon a series of aspirational policies. These, whilst well-meaning in their own terms, will prove impossible to implement in practice. One of the few areas where specific targets have been applied is housing and we are very concerned that these targets will take priority over the aspirational policies expressed elsewhere. This is already evident in decisions taken by the Mayor where the highest priority appears to be delivering ever more housing units regardless of the lack of supporting infrastructure.

The growing trend in London 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 a 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. This tendency is borne out by the virtually complete absence of any 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.

Object - 'Undertaken an evaluation' in policy D2 (A) is rather vague: how is our Borough expected to undertake such an evaluation given their severe lack of planning expertise, particularly in planning policy? This shortage will also have an effect on delivering inclusive design under Policy D3. In any case, both these policies are aspirational and impossible to implement in practice.

Similarly, the reference to Design Analysis in D2(C) is also vague. We note that paragraph G indicates that the format of the design review should be agreed with the Mayor and should be "carried out transparently by independent experts in relevant disciplines". On the face of it, this should mean that boroughs would need to appoint an independent design review panel but we are concerned that they will be very reluctant to do so in practice, mainly because of resource constraints, and will instead expect developers to carry out such an analysis themselves with the inevitable bias that this brings.

Whilst there are various welcome references to understanding and respecting the value of heritage assets, there does not appear to be any reference to heritage-led regeneration in this policy which we find surprising. This omission needs to be corrected so that it is made clear that heritage-led regeneration is to be preferred and existing heritage assets should be retained, restored as necessary, and incorporated sympathetically into any new development.

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

Section: [D4](#)

The proposal to replace the density matrix with a far looser set of criteria for establishing optimal housing densities is a great concern because the proposed design-led approach to replace it is far too imprecise in its wording. Also of concern is the proposal to remove the distinction between different settings of sites in London, leaving the determination of the appropriate density of a new development to the discretion of a design review panel.

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.

There seems to be a variety of definitions of tall buildings employed in this section. 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. Although the paragraph on visual impact of tall buildings (C1) is helpful we note there is no reference to encouraging active uses on the ground floor which we consider to be an omission. There are other vague terms used such as "architectural quality and materials should be of an exemplary standard" (C(c)) or "proposals should take account of ... significance of London's heritage assets" (C(d)). These need to be clarified and expanded upon as necessary. This policy seems to imply an acceptance that tall buildings are appropriate in all boroughs. We disagree: we 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.

In Policy D8 C(2) (functional impact), paragraph e) (infrastructure improvements) is too vague and needs to be strengthened to make clear that the appropriate infrastructure needs to be delivered before or upon completion of the development and sanctions (e.g. fines) will be applied if this is not the case. This is to ensure that developers do not sidestep the need to provide appropriate infrastructure for development sites.

In policy D8 D (public access) wording should be clarified to make clear that public access should be freely available and not restricted to certain times or only at prohibitive cost.

We are very concerned that the Borough of Ealing is expected to deliver during the Plan period up to 28,700 new homes, a figure which has been arrived at without any public consultation as far as we are aware. 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.

We are concerned that under Policy H2(B) boroughs are expected to draw up a design code to promote good design, the absence of which would mean that there would be a presumption in favour of development of small sites even if this caused harm to heritage assets, biodiversity etc. Again, given the severe pressure on planning officer resource we fear that boroughs will fail to draw up such codes leading to unacceptable impacts upon the vicinity of small sites where development takes place.

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 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 the night-time economy upon local residents and, in particular, the cumulative impact of such premises in town centres where residential areas can encroach into 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 the 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." This needs to be clarified in the policy.