



**RESPONSE BY EALING FIELDS RESIDENTS' ASSOCIATION
TO THE 2014 CONSULTATIONS ON THE
FURTHER ALTERATIONS TO THE LONDON PLAN (FALP) AND
INTEGRATED IMPACT ASSESSMENT OF THE FALP**

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PARTICIPATION IN EXAMINATION

We ask that EFRA representatives are invited to the public examination of the Further Alterations of the London Plan and its accompanying Independent Impact Assessment.

We also respectfully suggest that the Inspector may wish to conduct round table discussions / seminars on the subject of both the housing supply targets and the directly associated subject of the increased demand for transport to service the residents of these developments. We would be grateful if we could participate in any such discussions and seminars.

This document summarises our concerns with the consultation drafts. We understand that the Inspector may invite more detailed submissions as part of the examination process and would be happy to prepare and supply them.

HOUSING

Increase in housing supply targets

Many of the comments in this response relate to the scale of the increase in the housing supply targets contained in this iteration of the London Plan. We have extracted the following numbers from earlier editions of the plan in order to contextualise the proposed increases.

London Plan Edition	Annual Monitoring Target	
	Total	Ealing
2004	23,000	650
2008	30,500	915
2011	32,210	890
2014	42,389	1,297
Percentage Increase 2004 v 2014	84%	100%

Transport Implications of housing growth

Map 1.1 on page 13 shows population growth disproportionately taking place in the Outer London boroughs, while Map 1.2 on page 22 shows employment growth concentrated in the Inner London boroughs.

Paragraph 1.15 identifies a 2011 census household size of 2.47 people.

The increase in the London Annual Monitoring Target from 32,210 in the 2011 plan to 42,389 in the 2014 draft could suggest that up to 250,000 additional adults and children will need to commute to employment or school during the morning commute by the end of the ten year period ($42,389 - 32,210 = 10,179 \times 2.47 \times 10$). Obviously this is a high level number and more detailed analysis would be required to assess the implications of housing growth in particular locations and on those parts of the public transport and road networks which are already operating at capacity.

We therefore suggest that text along the following lines is added to Chapter One, Context and Strategy, and/or Chapter Three, London's People, and/or Chapter Six, London's Transport:

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“The stepwise increase in the need for additional homes, coupled with the geographic locations where those additional homes are likely to be located, is likely to result in a substantial increase in passenger demand on already overloaded key public transport routes and the sections of the road network. Further analysis will be carried out to quantify these pressures across the London-wide public transport and road networks.”

Household size

We note the references in paragraphs 1.15, 1.15c and 3.16 to the increase in average household size.

We are concerned that we cannot locate references in either Chapter Three, London’s People, or the Integrated Impact Assessment, setting out how this need for larger family units will be addressed.

We suggest that an additional paragraph is added to Chapter Three, and propose the following:

“Research indicates a growth in family size. Boroughs are therefore required/expected to disaggregate their total housing targets by accommodation size and demonstrate that sufficient homes will be constructed to meet existing and future demand for family accommodation. Family accommodation should be further disaggregated by family size.”

Housing Growth in Town Centres

We note the emphasis on housing construction in Town Centres contained in the Independent Impact Assessment and paragraph 3.19 of the draft plan.

We cannot locate any analysis which adequately quantifies the deliverability of this approach.

“We therefore ask that a table is added, either following paragraph 3.19 or Table 3.1, which disaggregates each borough’s housing supply target by PTAL band, as a proxy for town centre locations.”

We believe this supporting analysis will be critical for boroughs such as Ealing where the Local Plan Core Strategy is framed around two growth corridors running the length of the borough, with each corridor being two kilometres wide.

Family Housing in Town Centres

We are unable to identify the proportion of the housing supply targets which will be needed, on a borough by borough basis, in order to meet the need for family housing.

We believe that the housing supply targets should be disaggregated to show the homes which will be needed for families with children, and those units which will only be occupied by adults.

We also question the appropriateness of town centres, with their night-time economy, as locations for families with young children, and strongly suggest that such housing should be located in areas with more open space and lower noise and air pollution levels.

We suggest that the following wording is added to paragraph 3.19:

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“The Mayor expects boroughs to maintain an up-to-date analysis of the quantity and size of new housing needed by families with young children in their borough. He will also expect that housing for families with young children will be located outside town centres in order to provide access to open space and minimise its proximity to noise and air pollution levels.”

Release of Employment Sites for Housing

We appreciate that much of the proposed housing is likely to be built on former employment sites.

However, we are hearing anecdotal evidence that some viable businesses occupying leasehold sites are being priced out of the area because their landlords are anticipating a change of use to housing.

We are concerned that an unintended consequence of the intention to build more housing on former employment sites could result in the loss of employment jobs in the light engineering sector amongst others.

We therefore suggest that The Mayor introduces rigorous tests to protect employment land and ensures that only genuinely surplus land is brought forward for housing construction.

Affordable Housing

We support the proposed additional text in paragraph 3.71. We also note the concerns set out in paragraph 3.47.

We believe that paragraph 3.71 should be supplemented by the following addition:

“The Mayor will work to encourage transparency in the provision of affordable housing and will work to encourage/support the publication of development appraisals.”

Stalled housing construction

We note the wording in paragraph 3.85a and suggest that it should be amplified by the following additional wording:

“The Mayor is concerned that there can be considerable delays in the construction and completion of consented housing planning applications. He will therefore introduce regular London-wide monitoring and public reporting of all consented housing applications for more than 10 units.”

CHARACTER AND CONTEXT

The massive increase in housing supply targets is likely to produce particular problems for boroughs, such as Ealing, which have consciously chosen not to prepare Character and Context Studies for the majority of their boroughs which lie outside conservation areas.

In these circumstances the existence of a Local Plan Core Strategy framed around two growth corridors running the length of the borough, with each corridor being two kilometres wide, is likely to result in unintended developments in residential neighbourhoods.

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We therefore request that the London's Housing Requirements section of Chapter Three includes a statement along the following lines:

“Borough's are reminded of the importance of respecting the provisions of London Plan Policies 7.1 and 7.4 when considering proposals for higher density housing in their low density residential neighbourhoods. They are also encouraged to conduct the character and context studies described in The Mayor's draft SPG throughout their borough.”

For the above reasons we are opposed to the deletion of the following text from Policy 7.1 and ask that it is reinstated:

“Their neighbourhoods should also provide a character that is easy to understand and relate to”

Reinstating this text in the strategic section of Policy 7.1 would also provide the basis for paragraph D in the planning decisions section of the policy. We agree with the retention of paragraph D.

CO-LOCATION OF SCHOOLS WITH HOUSING

We are opposed to the proposed wording of new paragraph 3.18.D.

This is based on the profoundly disturbing and potentially dangerous consequence experienced by a nearby primary school. In this instance the playground of Our Lady and St John's Primary School in Brentford is separated from the neighbouring high rise student accommodation by a service road.

There have been a number of incidents when used condoms have been thrown into the playground from the upper storeys of the student accommodation.

We therefore request that the proposed addition is either deleted, or so rephrased to include the requirement that the housing and school is designed so as to make it impossible for the occupants of the housing to be able to throw anything into the school playground.

INTERNET SHOPPING DELIVERIES

The draft plan and Independent Impact Assessment include numerous references to the increase in both convenience and comparison goods internet shopping. Table 5.6 on page 55 of the Integrated Impact Assessment Scoping Report provides further information on this.

Our experience of high density residential planning applications is that developers are not yet making adequate provision in their designs for the increasing volume of internet deliveries.

We therefore suggest that a paragraph along the following lines is added in either the Housing Supply (Policy 3.3) or Retail and Town Centre Development (Policy 4.7) sections of the plan:

“The Mayor expects all new developments of more than 10 units to include adequate short term parking and storage arrangements to accommodate the existing volume and anticipated growth in internet deliveries.”

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TRANSPORT IMPLICATIONS OF INCREASED HOUSING TARGETS

While the draft plan and the Integrated Impact Assessments assume that much of the incremental housing growth resulting from the difference between the 2011 and 2014 projections can be accommodated in town centres with high PTAL's, it has not been possible to locate numerical projections which support this aspiration.

We therefore suggest that some of the incremental housing is likely to be located outside town centres and in areas with lower PTAL rates.

We therefore believe that there needs to be an early and more comprehensive review of the public transport networks in Outer London.

We suggest that this requirement is reflected by the following addition to the proposed amended wording of the Bus Network Development Scheme in the Buses and Bus Transit section of Table 6.1:

“The Mayor will carry out an early and comprehensive review of the bus network in outer London to ensure that it will reflect the changing travel patterns and volumes resulting from the delivery of the increased housing supply targets and the reconfiguration of hospital provision across London.”

CYCLE PARKING AT STATIONS

We endorse the penultimate bullet point in paragraph 6.34 on page 219.

We also ask that it is amplified along the following lines:

“The Mayor will require Local Planning Authorities to review cycle parking at every London Underground and national rail station and to bring forward detailed proposals showing how capacity can be increased at every station in order to encourage the maximum use of cycling as a means for commuters to access the rail networks. The Mayor reminds Local Planning Authorities that he considers the use of LIP funds as an appropriate means of achieving this increase in capacity.”

NHS HOSPITAL RECONFIGURATION & PUBLIC TRANSPORT ACCESS

The NHS is reconfiguring hospital provision across North West London and other parts of the capital. This involves the closing of facilities and concentrating hospital provision, including its out-patient services onto a smaller number of sites. This will mean that historic public transport patterns will no longer service an aging and increasingly infirm population.

We therefore ask the proposed revisions to the paragraphs supporting Policy 3.2 are amplified to reflect this need for an early and comprehensive review of the outer London bus network, and suggest the following additional wording:

“The reconfiguration of both in and out patient hospital services across London poses particular issues for residents reliant on public transport. The Mayor will therefore support an early review of bus routes to ensure the maximum accessibility by patients, their families and staff to the reconfigured hospital provision. Particular attention will be paid to ensuring that route changes maximise the accessibility of the reconfigured facilities to those living in locations (census super output areas) with the greatest health deprivation and multiple deprivation.”

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It may also be appropriate to include references to the public transport issues associated with the hospital reconfiguration in the paragraphs supporting Policy 3.17, including paragraphs 3.87A, 3.88 and 3.94A.

Suggested changes to the wording of the Bus Network Development Scheme in the Buses and Bus Transit section of Table 6.1 are noted above.

NOISE

With an intensification of residential development in former employment/light industrial areas, there is a real risk that the employment use of sites neighbouring new housing could change and the future employment use could be louder than the use which was extant at the time the neighbouring housing was constructed.

Having experienced a protected planning noise enforcement case, accompanied by parallel activity in the Magistrates Court, we are concerned that the proposed revisions to policy 7.15 could result in a dilution of the strength of the policy.

We would appreciate the opportunity to discuss this with others at the Examination.

In the meantime, we ask that:

- the words “and manage” are deleted from paragraph 7.15.A,
- the original wording of paragraph 7.15.B.a is reinstated and the bolded proposed additional text is deleted,
- the original wording of paragraph 7.15.B.b is reinstated and the bolded additional text is deleted,
- the proposed wording of paragraph 7.15.B.e is deleted.

PROTECTING PUBLIC OPEN SPACE AND ADDRESSING DEFICIENCY

We ask that the amended wording contained in and supporting Policy 7.18 is amplified to require that deficiency is measured using the distance residents would follow on foot to access the space.

We are encountering repeated incidents where the distance between a proposed housing development and public open space is measured “as the crow flies”, and therefore implies a far greater accessibility to residents than actually is the case.

We suggest the following wording is added to either the policy or its accompanying paragraphs:

“The distance for both LDF preparation and planning decisions should be measured using the most direct route which can be followed by residents; it should not be based on “as the crow flies” measurements where there are buildings between the public open space and residents homes, or future homes.”

Ealing Fields Residents' Association
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