

## Consultation on the Further Amendments to the London Plan Response of Save Ealing's Centre



### Introduction

Save Ealing's Centre, (SEC) is a voluntary non-political alliance of 25 residents' associations and community groups, from Hanwell to Acton who between them speak for over 12,500 members of the Ealing community. The SEC alliance was established in 2007 to provide an organised voice for the local Ealing community in response to a series of major development proposals within Ealing Town centre.

SEC's mission is to promote the revitalisation and overall improvement of Ealing as a town centre that can better serve the needs and aspirations of the entire community that lives or works in the London Borough of Ealing. Ealing should be a town centre that belongs to everyone who uses it. That is why SEC's voice in policy developments that affect a Town Centre like Ealing should be heard.

### Increased Londonwide Housing targets

Table 3.1 summarises the FALP's planned 23% increase in London's housing targets. We are very aware of the shortage of homes for Londoners and the consequent escalation in housing costs but this is a huge rise and it seems to have been proposed with little supporting evidence or consideration of options. An increase of the magnitude proposed will put intense pressure on London's infrastructure, amenities and services and resources must be provided to respond. The FALP gives little idea where these resources will come from. Any national spending – eg through improved transport - to support such a steep rise in homebuilding is likely to unbalance the UK economy further and exacerbate perceptions about the way the national cake is being cut. So the case for the growth that is planned for London needs to be debated nationally and it has not been.

We also think the revised housing targets may have been designed as much to meet the demand for a safe investment for overseas purchasers as to respond to the shortage of homes for London residents. In the London Borough of Ealing new homes are being actively marketed overseas. Some of these are homes that were supposed to be affordable but have been released from this status and are now being advertised abroad. Whatever benefits business of this kind brings to the UK balance of payments, the London Plan needs to respond to the consequences for London and Londoners. This FALP does not do this.

### The 45% increase in Ealing's Housing target

In the case of the London Borough of Ealing, Table 3.1 shows the target for new homes has risen by 45% – twice the rate for London as a whole. This increase is huge and it is very hard to see how it can be achieved without seriously degrading the quality of life here.

We do not understand how the increased target has been arrived at. While the SHLAA's methodology is described in general, the way it is applied in individual boroughs is not open to public scrutiny. The calculations for Ealing's targets are completely opaque. This is undemocratic in approach and contrary to the requirements for open and transparent planning as set out in EU legislation, the NPPF and in the London Plan.

Without any details of the way Borough targets were arrived at, the best way to demonstrate their inconsistent outcomes is by comparing the different figures for different Boroughs with broadly similar characteristics. Ealing, Hounslow and Richmond are three Boroughs in the west and Southwest of London with quite similar locational characteristics, areas, economies

and development histories. If the methodology of the SHLAAs was applied consistently one would expect their targets to be broadly similar. The table below shows this is not the case.

	<b>Ealing</b>	<b>Hounslow</b>	<b>Richmond</b>
<b>Population 2011</b>	<b>339,300</b>	254,900	187,500
<b>Area</b>	<b>55.53 km<sup>2</sup></b>	55.98 km <sup>2</sup>	57.41 km <sup>2</sup>
<b>Population Density</b>	<b>6,100/km<sup>2</sup></b>	4,600/km <sup>2</sup>	3,300/km <sup>2</sup>
<b>London Plan Housing target 2011-21</b>	<b>8,900</b>	4,750	2,450
<b>FALP Housing target 2015-25</b>	<b>12,972</b>	8,222	3,150
<b>Target increase since 2011</b>	<b>4,072</b>	3,472	700

Sources: Wikipedia, 2011 London Plan and FALP.

Comparisons between the three boroughs strongly suggest the application of the SHLAA methodology has not been consistent. How else can it be that Ealing finds itself required to deliver 12,972 new homes, whereas next door Hounslow, which is similar in area and in its location in London but has a far lower population density has a target of 8,222 homes and Richmond just 3150? Ealing's much higher targets are despite the fact the Borough is already starting with significantly higher populations and greater population densities than either Hounslow or Richmond.

An explanation for the discrepancies is required. This must be provided by placing the calculations performed by each borough in the public domain.

The implications of Ealing's very high target need careful consideration. What they mean in terms of population growth is not indicated, but it must inevitably put great strain on essential social infrastructure and other services - most of which are already operating at or in excess of capacity. Adopting the targets without providing the necessary resources to deliver the improvements to all these services will cause serious problems for both existing and incoming residents.

It also needs to be explained where in the Borough it is considered all these new homes will be built. Current targets are already creating considerable local concern for the harm that is being caused throughout the Borough by over ambitious attempts to develop back gardens or redevelop established town centres, often supposed to be protected through the designation as Conservation Areas. If these targets are enforced, planning disputes will become more bitter even than they are now.

Experience in Ealing has shown it is not acceptable to rely on amendments to the Local Plan to clarify these points. The Borough's Core Strategy and other plan documents were pushed through the Plan making process in the face of very strong local opposition and without any effective consideration of the issues and options or the impact on the Borough. There is a growing view that development management systems in Ealing are close to breakdown. Adoption of the FALP's revised housing targets may raise these problems to a critical level.

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