Dear Mr Gray

Thank you for your response to my email of 2 October. I have now been able to discuss this more widely within CENF.

We note your assurance that all relevant policies will be taken into account when considering this application. We would like to remind you however that, where there are conflicts or even differences in emphasis between different policies, it is the later statements which should take precedence. Bearing this in mind, there do seem to us to be some important areas where the provisions of the Central Ealing neighbourhood plan (the most recent of applicable local plans) are not adequately adhered to in the development application as submitted.

We would like the opportunity to discuss these with you, but in the meantime I set out our main concerns in the attached summary. We will also submit a full comment on the planning application in the normal way.

Yours sincerely

**Policy Context**

In addition to the site specific policy CENP2: Perceval House and car park (EAL7), CENP policies relevant to the development are:

E3 Mixed use development
HBE1 Quality of design
HBE2 Protecting the townscape
HBE3 Building heights
T2 Parking
T3 Servicing
PR1 Improving public realm
CC1 Social infrastructure.

Areas where we believe the proposed plans significantly fail to observe these policies are as follows.

* **Policy HBE3 and Site Policy CENP2: Massing of the scheme and in particular the height of the tower block at the north-east corner.**

Policy HBE3 states that “Tall buildings … will only be permitted if they … do not have an adverse impact on Conservation Areas and their setting or on other designated heritage assets.” The application is in breach of this clear requirement. The 26 storey tower block would be unacceptably tall for its position adjacent to the Town Centre Conservation Area and directly opposite the locally listed Old Fire Station, a designated heritage asset. It would also dominate the Grade II listed Town Hall.
The Visual Impact Assessment in the application accepts (para D.10) that Ealing Plan policy 7.7 (Tall Buildings), which provides that “tall buildings should be located on specified sites within the Acton, Ealing and Southall town centres, gateways to Park Royal and identified development sites”, is breached as this site is not so identified. It also agrees (D.13) that “the scale of a tall building is inherently in contrast with much of the surrounding townscape context”.
Despite claims that the design has been tested to “reduce or avoid adverse effects”, and that “the Proposed Development would not have an adverse effect on any conservation areas or other designated heritage assets”, it is clear that there would be significant harm by reason of the height and design of the 26-storey tower. This would be clearly visible above the proposed Uxbridge Road frontage from Walpole Park, as well as from closer viewpoints over the Town Hall and Christ the Saviour Church.
Further, CENP2 states “Longfield Avenue should achieve a building height to street ratio which allows an increase in density without creating an overbearing impact on the sense of space at street level…..Redevelopment ….within the site should be of a height and scale that is not intrusive, dominant or overbearing when viewed from neighbouring residential buildings or from locations within and beyond the town centre.” This has not been achieved. Although reference is made to the Arc building on Uxbridge Road at 20 storeys, there is no attempt to show how the tall 26 storey block on the development site fits between the Arc and the tallest block on Dickens Yard (13 storeys), where some stepping down in height between them might have been acceptable. Also, no proper concern has been shown for the impact on the immediately neighbouring, predominantly low rise Victorian and Edwardian, residential area to the north.

* **Policy HBE1: Design detailing.** The cantilevered element of the front block is alien to the traditional townscape in central Ealing and it is unsympathetic to the setting of the neighbouring Grade II listed Town Hall. The particularly large area of glazing facing towards the Town Hall (together with vertical brise soleil elements) was apparently suggested to indicate the so-called ‘transparency’ of the Council, but is not a design sympathetic to the setting of the Town Hall. While some of the concerns of the Design Review Panel about the finishes to the underside of the canopy and supporting columns have been acknowledged, any alterations to the original design have not addressed the adverse impact on the Town Hall.
* **Policy HBE2: Alignment of the Uxbridge Road frontage.** This frontage is brought forward of the existing building line of Perceval House and does not sufficiently respect the office corridor boulevard concept. This is integral to policy in both the Local Plan and Neighbourhood Plan. The 2012 Ealing Borough Plan (Policy 2.5(e)) incorporated the boulevard idea along Uxbridge Road “with an i*ncrease* in the number of street trees, other planting and active ground floor frontages.” (Our emphasis.) This is enlarged on in HBE2, which states that “Redevelopment involving changes to the height or bulk of buildings within the Office Corridor will be expected to contribute to and *improve* the overall composition of the corridor, maintain or create a boulevard of hard and soft landscaping and cause no harm to the character and amenity of occupiers and users of properties in the vicinity of development sites by reason of overshadowing, sense of confinement, loss of privacy and outlook or harmful impact upon microclimate.” This has not been achieved.
* **Policy T3: Servicing access.** Policy T3 states that “Major or Strategic development should aim to provide rear or basement servicing, with particular care to avoid potentially dangerous access points.” However, although vehicle access to the site is said to be ‘controlled’, it would still be the case that vehicles would be using pedestrianised spaces with the attendant risks. We also note that no on-site resident parking (other than limited blue badge provision) is proposed. Residents will thus be particularly reliant on deliveries for many items. We believe that the single loading bay outside the bollards at the north end of the site proposed for deliveries to residential properties is inadequate. It is claimed that this bay would be available for pre-booking, but this would not allow for more than one simultaneous delivery, or ‘within a two hour slot’, or untimed, deliveries such as Amazon or DPD. We consider this servicing and access provision to be inadequate and unsafe.
* **Relationship of the development to the local highway network.** Site Policy CENP2 states that “Vehicular access and servicing should be from Longfield Avenue…Proposals should plan to minimise any adverse impact on residential amenity…”. While the proposals are compliant with the first part of this statement, in order to meet the second part, vehicle access both to and from Longfield Avenue should be directly off the Uxbridge Road which is a major road, and not directed through the residential streets to the north. We recognise that changes to the highway layout are outwith the site development proposals, but consider that the current turn bans at the Longfield Avenue/Uxbridge Road junction work against this and, unless this junction is reopened to all traffic movements, there will be an unacceptable increase in vehicle movements on residential streets.
* **Other issues
Cycling infrastructure.** The Council is currently promoting the cycling and walking agenda. Longfield Avenue has the potential to form part of a valuable north-south cycle route through the town centre and we suggest that suitable S106 contributions should be secured to progress this.
**Outside amenity.** There is very little amenity space proposed within the development and residents will be expected to make use of Walpole Park, which is already widely used by both long-term residents and those from other developments in the Town Centre. The park has limited capacity and cannot absorb such an increase in potential footfall without harm.

In summary, this is an over-development of the site, resulting from an increase in the number of flats well over the number in the original brief to Galliford Try. The site is a “sensitive location” as defined in the London Plan Policy 7.7E, and we consider that the benefits claimed for the scheme do not outweigh the substantial harm that it would cause.