

To whom it may concern

Re: Planning application for proposed high rise developments at Hastings Road and Manor Road, West Ealing, London W13 by A2Dominion and Southern Grove and Thames Valley Housing.

First of all I am not opposed to the development of housing projects that will provide affordable housing providing they are in tune with the local built environment, there is an infrastructure to service them and they are developed in an open and transparent manner.

Overall two questions need to be asked where are we now? and where do we want to be? The answer to the first is a housing crisis that has developed due to the indolence of successive governments to tackle a problem that has developed as the product of "Right to Buy" and the growth of the "buy to let market" fuelled by the banks' lending at preferential rates allowing private landlords to borrow up to 80% of the property value but first time buyers could only borrow up to 75% of the value of the property.

The second question "Where do we want to be?" is not being answered for existing residents in terms of the proposed developments at Hastings and Manor Road. It appears as if these developments have been formulated behind closed doors at the Ealing Council and about to be foisted on the local population.

I am unable to support these two developments for the following reasons.

1 Objections to the proposed high rise developments at Hastings Road and Manor Road, West Ealing, London W13 by A2Dominion and Southern Grove and Metropolitan Thames Valley Housing.

Set out below are my objections to the two developments:

1.1 Lack of impact analysis on the social and built environment. For example Ealing's historic under investment in primary care in Ealing compared to other parts of North West London which is putting primary care under unprecedented strain. (Please see Ealing Standard - Quality Framework for Primary Care 2017/18 – 2020/21) What will be the impact on existing GP's surgeries? What will be the impact on local schools?

1.2 No attention or recognition has been given to the impact of the incoming residents to these developments who own cars. Both developments have ignored the West Ealing Centre Neighbourhood Plan, section 5.1 dealing with vision, objectives and land use policies which states:

"The vision for the West Ealing Centre Neighbourhood Forum area is that by 2031 it will have: Created an attractive, accessible and commercially successful centre with a diverse and well-balanced retail and leisure offer able to cater for the needs of the West Ealing's residents as well as those from the wider area. An appropriate provision of car parking will be made to ensure that the needs of businesses and residents alike are met".

1.3 The scale and design of both developments are not in keeping with the rest of West Ealing. I believe that the proposed developments is a direct contravention of section 5.1 of the West Ealing Centre Neighbourhood Plan.(WECNP) It does not respect local context and street pattern or, in particular, the scale and proportions of surrounding buildings, and would be entirely out of the character of the area, to the detriment of the local environment. WECNP explicitly states:

"Ensured new development is suitable for its surroundings and of a height and scale that fits within its existing context. Design of all new development will be of a high quality complimenting and enhancing the existing townscape".

Furthermore in respect of the Manor Road Development the WECNP states in sections 5.18 and 5.19 dealing with WEC3: 51-57 Manor Road:

"5.18. The existing building line is set back from the site boundary leaving a wider pavement. Any new development should remain within the existing building line and retain the existing pavement width as a minimum to accommodate the increased level of pedestrian flows when the Crossrail station becomes more operational.

5.19. The building line, massing and detail of any new development particularly at street level will have an impact on the setting, visibility and presence of the Crossrail station. Any new development should therefore have regard to this particularly from the approaches to the Crossrail station along Argyle Road and the pedestrian crossing connection to the Avenue”.

In December 2013 the London Borough of Ealing adopted its Development Sites policy document, which set out specific site proposals in support of the Council's Development Strategy. These proposals are intended to encourage and manage suitable development proposals over the planning period the document identifies sites in Manor Road in the WECNP area:

“EAL11 West Ealing Station approach - for a mixed use development appropriate to a town centre location

EAL12 West Ealing Crossrail Station - for a mixed use development appropriate to a town centre location and a functioning Crossrail station.”

1.4 There is scant recognition of the loss of light or overshadowing – shadows from two towers of 25 and 26 floors will be substantial and not as they say in the consultation report for Manor road, “transient” and will affect all residents north of the development, particularly those in Dominion House, the Avenue, Gordon Road and the Drayton's area.

1.5 These two developments would allow gross overlooking of their neighbours contrary to planning regulations

1.6 The layout and density of building – The density of building is excessive for each development individually and combined (two towers within 50m of each other) exceeds guidelines. Furthermore the size and density of the two buildings are at variance of the West Ealing Centre Neighbourhood Plan and the judgement of the London Assembly which in evidence to the London Plan Inquiry stated: “The Assembly does not believe that tall residential buildings are the answer to London's housing needs and should not be encouraged outside of a few designated and carefully managed areas of London”. West Ealing is not one of them.

1.7 The proposed buildings would fly in the face of recent research findings that tall towers are far more energy intensive than low rise building (UCL Energy Institute, June 2017)

1.8 The impact on visual amenity – The height and size of the planned developments will make them oppressive in residential areas of two/three storey terraces and is incompatible with the councils own development plans which require buildings to be complementary in size, density and bulk on both sites.

1.9 Local, strategic, regional and national planning policies – The size and density of the towers within an established residential area goes against the approved WECNP plans and Ealing, London and National planning guidelines.

1.10 The loss of privacy for existing residents – The very close proximity to a residential area means hundreds of families will be overlooked through their windows and into their gardens – again contrary to Ealing's own planning guidelines.

1.11 Previous planning decisions (including appeal decisions) – The rejection of the proposed 'leaf towers' at Ealing Broadway shows this is an unsuitable proposal.

1.12 I have concerns about the potential for conflicts of interest with present and former councillors and ex employees with regard to these two developments.

1.13 There appears to be no examination or development of alternative options by Ealing Council or the developers.

1.14 Lack of transparency in the consultation process by the developers

2 Transparency problems

2.1 Manor Road, West Ealing, London W13 by Southern Grove and Thames Valley Housing

I made an enquiry to Dawn Larmouth (a previous Ealing Councillor, May 2006 – May 2010 and currently the sole director at West5 Consulting Ltd incorporated in March 2007) who is acting on behalf of Southern Grove and Metropolitan Thames Valley Housing (MTVH) to ask: “*What impact analysis has been done to measure the probably effect on the social and built environment in terms of provision for schools, medical care, parking, the built environment for existing residents and new residents?*” Despite an exchange of emails they were unable to provide me with an impact analysis.

I visited the Manor Road consultation website at <https://www.55west.co.uk/proposal> and was disappointed to see very little in the way of impact analysis. For example the statement under the heading under “Design and Appearance” that this “*site provides a unique opportunity to create a landmark building to attract new life, vibrancy and opportunities to West Ealing.*” How will a 26 story building deliver this unique opportunity? What new life, vibrancy and opportunities will it attract?

There is mention of the impact of the shadow cast by the building. The proposal says that:

“all residential neighbours within reasonable proximity to the scheme have been assessed and the results show a high level of compliance with the BRE targets with neighbours retaining good levels of amenity with that expected for an urban location.”

This statement is disingenuous as the neighbours in close proximity will expect the same light that they have had since they moved there. But what is more to the point have MTVH consulted with the immediate neighbours one to one and face to face? I suspect not.

There is then the matter of parking this development assumes – how defies logic as they have no idea who the residents are and who will own a car – a car free development that the new residents do not drive and all use bicycles. According to the Ealing: 2011 Census Factsheet 32.5% of households in Ealing had no car or van, 44.2% of households has one car or van and 20.4% of households had 2 cars or van. It is therefore not unreasonable to assume that of the 149 planned homes 48 households will not have a car but 65 households will have one car and 30 households could have two cars. Where is the parking for 125 cars in the adjoining roads? What will be the impact?

A lot more transparency, detail, information and impact analysis is required with additional information on the likely impact of the building on the social and built environment after completion and over the next 20 years – some form of scenario planning would not go amiss

2.2 Proposed development at the Majestic Warehouse, Hastings Road by A2Dominion Housing Group Ltd.

I also made a Freedom of Information enquiry to Ealing Council asking “*What impact analysis has been done to measure the probably effect on the social and built environment in terms of provision for schools, medical care, parking , the built environment for existing residents and new residents?*”

The reply was:

“These matters will be considered during the assessment of a planning application and the accompanying supporting documents/reports”.

I have written in reply to ask whether an impact analysis exists yes or no. I suspect there is no concrete documented impact analysis as it would have been produced in the interests of transparency.

I asked further questions in my Freedom of Information enquiry to Ealing Council: How does this new development meet the provisions laid out in the West Ealing Central Neighbourhood Plan? The reply was:

“As above, the assessment would need to consider relevant planning policy. The site itself is not identified in the WECNP policies map. Nevertheless, the relevant provisions of the WECNP will be considered during the assessment stage”.

The only conclusion is that there is no assessment or that there is an assessment and Ealing Council does not want to share it with a local resident and council tax payer. The latest response was that the planning department was going to get in touch.

I asked, what is the ratio of affordable housing to private housing that is houses that will be sold on the open market? The reply was:

“As above, however, it is anticipated that at least 35 percent of the proposed residential units would be affordable housing (on a habitable room basis), which would mean 65 percent would be market housing”.

Ealing Council has a target of 2,500 genuinely affordable homes by 2022 a ratio of 35% affordable housing is not particularly helpful in achieving this objective.

The A2Dominion Housing Group consultation on the Hastings road development is regrettably flawed. There is no impact analysis of an influx of residents in terms of schools, doctors, dentists. Again the problem with cars, the development can provide as many cycle spaces as it wants but the fact remains that of the 183 new households where will the new residents park 155 cars?

Other failures of transparency are as follows:

The “Policy D2 Delivering good design” in the London Plan, December 2017, states:

C. Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process.

It would be helpful to residents if A2Dominion Housing Group provided:

- 3D Virtual Reality
- Modelling
- Interactive digital models
- CGIs (Common Gateway Interface) from various angles not artists' impressions

3 Potential conflicts of interests regarding the Hastings Road and Manor Road developments

There have been reports in newspapers and the magazine Private Eye that have raised the matter of conflicts of interests of ex-employees and councillors at Ealing Council with regard to these two developments.

In the Mail Online on the 13th December 2014 ([Brendan Carlin, political reporter for the Mail on Sunday](#) Published: 23:40, 13 December 2014) it was reported that Julian Bell has been a social housing tenant of the A2Dominion Housing Group since at least 2007.

My Freedom of Information enquiries were”

What is the relationship and potential conflict of interest between Julian Bell and A2Dominion?

What is the relationship and potential conflict of interest between cabinet member for finance Bassam Mahfouz and A2Dominion?

What is the relationship and potential conflict of interest between Noel Rutherford, formerly Ealing Council's director of built environment and A2Dominion?

The reply stated that:

“These three questions do not fall within the definition of information that the council is required to provide until FOI, as the information is not “held”. However, we would make the following general points in response:

The council does not own the property at Hastings Road. Our understanding is that it is owned by a third-party developer.

Any development or redevelopment proposals will require planning permission and a proposal of this size would mean that the decision would rest with the Council's Planning Committee.

Neither Cllr Bell or Cllr Mahfouz are members of the Planning Committee and so they take no part in any planning decisions.

Cllr Bell holds a tenancy, as a private individual, with A2Dominion, which is listed in his declaration of interests. To avoid any potential conflict of interest, Cllr Bell generally takes no part in Ealing Council decision making relating to A2Dominion projects

Cllr Mahfouz is employed, entirely independently from his council role, as a community investment manager at A2Dominion, which is listed in his declaration of interests. To avoid any potential conflict of interest, Cllr Mahfouz takes no part in Ealing Council decision making

Mr. Rutherford does not work for Ealing Council. He was formerly employed by the council but left more than two years ago. The council does not hold any information on the relationship between Mr. Rutherford and A2Dominion."

Private Eye (No 1500 12th July -25th July 2019) reported that the Ealing council leader Julian Bell led a delegation from Ealing Council to **MIPIM** an international property event hosted in Cannes, France each March. It includes an exhibition area and networking events. Ealing Council were reported as saying that the cost of flying the delegation to Cannes and hotel costs were £59,995 and that "sponsors" picked up the bill at no expense to the tax payer but the names of the sponsors were not mentioned. But among the attendees at the event were A2DominionHousing Group. Yet the response to my Fol inquiry stated " The Council were reported as saying that "Cllr Bell generally takes no part in Ealing Council decision making relating to A2Dominion projects", but nevertheless he has a relationship with A2Dominion Housing Group.

Reported in Private Eye (No 1500) that Ealing Council responded:

"Sponsorship in no way influences the planning committee's decisions and Cllr Bell does not sit on the planning committee." According to the Council the reason for this trip was to help the council "showcase Ealing on a global stage and this year gave us the opportunity to meet potential partners to help deliver on our target of 2,500 genuinely affordable homes for 2022"

Ealing Councils "Code of Conduct for Members" under section 12 Gifts and Hospitality states:

"Councillors receive an allowance for their service on behalf of the council and their constituents. However, some people may believe that they will get a better service or receive more favourable treatment if they provide additional payments or offer you favours; this is not the way the council operates.

All excessive gifts or hospitality should be refused or returned. Any gifts or hospitality with a value exceeding £100 should in any event be declared to the Director of Legal and Democratic Services, who will enter it onto your register of interests".

Clearly councillor's time in attending an event in Cannes to meet potential partners could provide opportunities for conflicts of interests, and in any event it flies in the face of the Councils own guidelines. Furthermore as Ealing is not a "supplicant" for the largesse of property developers, it is the developers who should be beating a path to the council's door where any meetings can be attended by officers of the council and properly recorded and minuted.

It appears that Councillors and ex employees are or potentially involved in projects that could give rise to a conflict of interest and as a tax payer I would feel more confident if this potential for a conflict of interests was removed

Yours sincerely

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