



The true cost of ultra high density housing

Councillor Information pack

51-56 Manor Road & 53-55 Drayton Green Road
202231FUL



Our plea to our elected members

- We are contacting you directly as an elected member of Ealing Council as we feel **the fabric of our communities and the essence of what Ealing is as a borough, is at risk** from greedy reckless developers and a Cabinet that is failing to challenge the developers' interpretation of regulations and the London Plan
- We are asking you to **listen to expert advice from:**
 - **Landmark Chambers (a leading planning chamber) and**
 - **James Murray MP who was instrumental in writing the London plan**
- We are asking you to **listen to some 2500 Ealing residents who objected to the current Manor Road proposal** and put the future of our communities and the Borough as a whole ahead of an **ill-conceived strategy of delivering housing through ultra high density tower block developments** in the heart of existing residential areas

As an Councillor your responsibility is to speak out to the Council leadership on the impact their decisions will have on the future of Ealing



Stop The Towers

- Stop the Towers (STT) is a local campaign group which was set up in response to the two proposed tower blocks near West Ealing station.
- We are in favour of development of this site and in particular new high quality housing of the kind Ealing needs and which offers family homes for people on lower incomes
- In its current format, the Manor Road development will **not help resolve the housing crisis** that it claims to address and will have a highly **detrimental impact on the local area**
- We've created this pack to help you understand the **true cost of this development**; why **this development is bad for Ealing**; and why you should **object to it in its current format**
- Our intention is also to show that the key arguments that developers are using to support their application **are a gross misinterpretation of planning regulations and the relevant plans**



Housing – but at what cost?

- There are over 12,000 people on the Ealing housing register and Ealing Council has pledged to build 2500 genuinely affordable homes by 2022
- Southern Grove and Thames Valley Housing Association have submitted a planning application for an **enormous tower block** on Manor Road, a low-rise residential area near West Ealing station. The development claims to be 100% affordable and promoted on this basis
- Our analysis and specialist advice clearly shows that **this development will not help those on the housing list or on low to middle incomes**
- Furthermore our view is that the development would provide **very low quality housing of types that Ealing already has an excess** of and would be particularly damaging for those who entered into a shared ownership agreement



Why the Council must say no!

- In its current format, the **height and massing of this development is totally inappropriate for the area** and will **destroy the character of a vibrant and thriving residential community**
- The plans **contravene Ealing's planning policy and the London Plan**
- The development is aimed at middle income earners and will **not help any of those on the Ealing housing register**
- The huge influx of additional housing units will **pile pressure on already overstretched public services and infrastructure**
- If approved this **opens the flood gates to similar schemes** already being planned

***You can object to this development and save
our Borough from reckless over-development***



Negatively impacting a thriving local community

- The Area adjacent to the Manor Road development comprises of 3 thriving and diverse communities: The Drayton Community, 5 Roads Home Zone (5RHZ) and St Stephen's conservation area
- With a real mix of people, spanning all generations, the area is overwhelmingly popular with families who have often escaped the hustle and bustle of Zone 2, and sought out Ealing for its community feel and green spaces to raise their children
- All three areas have active residents associations and a real community feel which is unusual to find in London. For example:
 - The Draytons have a hugely popular monthly Playstreets event where streets are closed off for kids to play and neighbours to meet
 - 5RHZ have a beloved annual street party and nurture their very own Oasis garden on Arden Road
 - The St Stephen's conservation area is home to a vibrant mix of community and cultural activities
- Flooding the area with 144 flats will dramatically change its social fabric and risks losing the genuine sense of community that makes the area so special





Why you must object to this development

1

**Legally
questionable**

2

**Excessive
height**

3

**Excessive
density**

4

**Contravenes
planning policy**

5

**Not truly
affordable**

6

Not sustainable

7

**Pressure on
infrastructure
& local services**



1. Legally questionable

- Stop the Towers have obtained **legal advice from John Litton QC at Landmark Chambers**. The full text can be found via this [link](#) but their conclusion is as follows:

*“At the heart of STT’s objection is that the Development is **too tall** for the Site resulting in a scheme which is **too dense** and has **adverse impacts on the character and appearance of the area** and on heritage assets. Further, the **residential units will not be affordable** to those most in need in the borough and fail to provide future residents with adequate residential amenity in terms of noise, thermal comfort and amenity space. It makes **inadequate provision for disabled residents** in terms of parking. It is **in conflict with many of the most relevant policies of the development plan** and the development plan as a whole. The **harm is not outweighed by the benefits of the scheme** and **planning permission should be refused**”*



2. Excessive height (1/2)

- According to Ealing Council's Planning Portal, the Developers have stated that the development is 18 storeys. However this does not include the 2-3 storey mezzanine or the roof plant. **In reality the development is 21 storeys**
- Disingenuously, this is 3 storeys higher than suggested by the planning application and 2 storeys higher than it states on the Developers website

The proposed application will now deliver **144** residential homes with two commercial units over **19 storeys** as opposed to 26 associated with the previous scheme. The residential

Source: www.55west.co.uk

Construction of a building with a basement level, part double-height ground floor with part mezzanine floor and 18 and 12 floors above with roof plant and communal roof garden to accommodate two

Source: Ealing Council Planning Portal

- 21 storeys is **more than double Luminosity Court** (8/9 storeys) next to Waitrose
- Dominion House (13 storeys) is the tallest in the area however this is a misleading comparison as it is largely hidden as it is stepped down from the road and hidden behind Sinclair House (7 storeys)
- It **dwarfs** and is **not in keeping with the adjacent 2 storey Victorian terraces**



Source: Ealing Council Planning Portal, Manor Road Planning Application Documents

2. Excessive height (2/2)

- At 21 storeys the development will cast enormous shadows over the local area and invade the privacy of the 2/3 storey Victorian homes underneath. Those living in the Draytons will lose morning sunlight; listed buildings, row of shops, cafés and the Drayton Court Hotel garden on The Avenue are in shadow over lunchtime and afternoons; and the Five Roads Home Zone will lose much of their afternoon and evening sunlight.



Source: STT images of the shadows caused by the proposed development

3. Excessive density

- According to the current London Plan, the density level for 2-3 “habitable room” units in a location accessible for public transport is 70-130 units per hectare
- The Manor Road development is 0.11 hectares and contains **144 flats = 1,309 units /ha**
- That’s a staggering 144 units vs. a recommended maximum of 14 **or ten times the sustainable density figure recommended by the current London Plan**

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150–200 hr/ha	150–250 hr/ha	200–350 hr/ha
3.8–4.6 hr/unit	35–55 u/ha	35–65 u/ha	45–90 u/ha
3.1–3.7 hr/unit	40–65 u/ha	40–80 u/ha	55–115 u/ha
2.7–3.0 hr/unit	50–75 u/ha	50–95 u/ha	70–130 u/ha
Urban	150–250 hr/ha	200–450 hr/ha	200–700 hr/ha
3.8–4.6 hr/unit	35–65 u/ha	45–120 u/ha	45–185 u/ha
3.1–3.7 hr/unit	40–80 u/ha	55–145 u/ha	55–225 u/ha
2.7–3.0 hr/unit	50–95 u/ha	70–170 u/ha	70–260 u/ha
Central	150–300 hr/ha	300–650 hr/ha	650–1100 hr/ha
3.8–4.6 hr/unit	35–80 u/ha	65–170 u/ha	140–290 u/ha
3.1–3.7 hr/unit	40–100 u/ha	80–210 u/ha	175–355 u/ha
2.7–3.0 hr/unit	50–110 u/hr	100–240 u/ha	215–405 u/ha

Notes to Table 3.2

Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (PTAL). The setting can be defined as:

Central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre.

Urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes

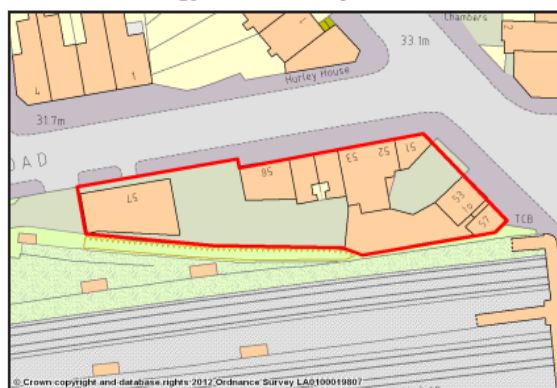
Suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.

Source: Adopted London Plan

4. Contravenes Planning Policy (1/4)

a) Contravenes Ealing Plan – Development Sites EAL12

EAL12 West Ealing Crossrail Station Manor Road / Argyle Road / Drayton Road West Ealing W13



Site Area: 0.11ha
Ownership: Private
Current Use: Retail and vehicle repair
Development Strategy Policies: 1.2(d), 2.5, particularly 2.5(f)
Setting: Urban
PTAL: 4
Planning Designations: Metropolitan Centre
Relevant Planning Applications: None

Allocation: Mixed use development appropriate to the town centre, compatible with the functioning of the Crossrail station.

Justification: The location of this underused but strategic site in a town centre on premises adjacent to a Crossrail station and nearby designated shopping parades justify a high standard mixed use redevelopment featuring retail uses, which will complement and enhance the Crossrail station planned for opening in 2019, and respect the character of the adjacent residential area.

Indicative Delivery Timetable: 2016-2021

Site Context: The site is adjacent to the site of the West Ealing Crossrail station along the railway and sits on a prominent corner location at the intersection of Manor Road, Drayton Green Road and Argyle Road. It is within the boundaries of Ealing Metropolitan Town Centre and adjacent to a residential area of predominately Victorian

terraces. Building heights in the surrounding residential area generally range from one to four storeys. High quality buildings are located nearby including the locally listed sorting office on Manor Road, the parade at 4-24 the Avenue and the Drayton Court Hotel.

The small scale one-storey retail units which currently occupy the site, some of which are vacant or partly derelict, do not reflect the strategic corner location, contribute to the vibrancy of the retail offer in the area, particularly the lively shopping parades along the Avenue. The built form does not respond to Argyle Corner, Stowells Corner and the corner element of Sinclair House at the adjacent junction.

Design Principles: The height and massing of development on this site should both respond to the adjacent Crossrail station and to the bulk of the buildings featured at this intersection. Its bulk, scale and design should be sympathetic to the adjacent residential area, seek to enhance the setting of the locally listed sorting office and seek to

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complement rather than compete with the appearance of the new Crossrail station.

Development should be designed to include features reflecting the prominent corner location of the site and respond to the ensemble of corner buildings that characterise the crossroads

A mix of small and medium size retail units and active uses should be provided on the ground floor to provide a lively and agreeable frontage to this increasingly busy thoroughfare and provide continuity with existing retail frontages along a north south axis, from The Broadway to West Ealing station. Careful consideration will need to be given to the location of loading bays and as to how they are accessed to avoid and minimise potential conflict with pedestrian movement along the Manor Road and Drayton Green Road.

Due to the proximity of the railway line, a convincing case would need to be presented that proposals for residential accommodation would have a satisfactory level of amenity. Any residential use on the site must be designed to adequately shield residents from the noise and vibrations coming from the adjacent railway through proper insulation and ventilation.

Residential development must provide adequate levels of communal and private garden space for residents; any balconies fronting the railway must achieve acceptable quality and usability standards particularly with regards to noise and air quality, and the provision of accessible roof space or terraces incorporating biodiversity features will be expected in flatted schemes. Residential units should be dual aspect (north facing single aspect units are not acceptable). Means to provide secure access to residential units on the site will need to be carefully considered. The constrained nature of the site and its location in a town centre next to a Crossrail station would support a car free scheme.

Development must enhance the public realm on the approach from the Uxbridge Road to the Crossrail station, reflecting the standards set by the improvements made along the Avenue and establishing continuity with any public realm provided as part of Crossrail.

“The height and massing of development on this site should respond to the adjacent Crossrail station and to the bulk of the buildings featured at this intersection. It’s bulk, scale and design should be sympathetic to the adjacent residential area”

4. Contravenes Planning Policy (2/4)

b) Contravenes Ealing Plan – Tall and Large Buildings Policy 7.7

*“Tall buildings should...accord with the spatial objectives of the Development Strategy in being **located on specified sites** within Acton, Ealing and Southall town centres, gateways to Park Royal and identified development sites”*

Ealing Development Management, Policy 7.7



Source: STT scale drawing of the proposed development against the 2 storey Victorian terraces in the immediate vicinity

This site is not designated for tall buildings

4. Contravenes Planning Policy (3/4)

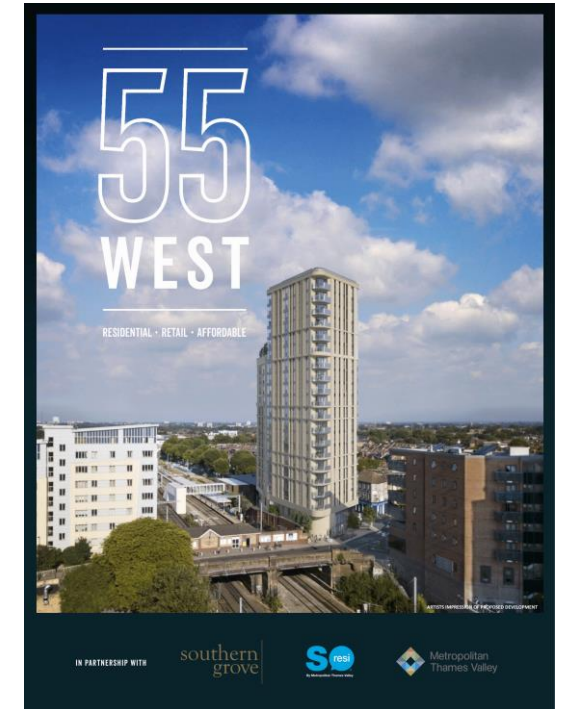
c) Contravenes adopted London Plan – Policy 7.6B



Scale drawing of proposed development shown against 2 storey Victorian terraced homes

*“Buildings and structures should **not** cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings”*

Adopted London Plan, Policy 7.6B



Source: Developers planning submission

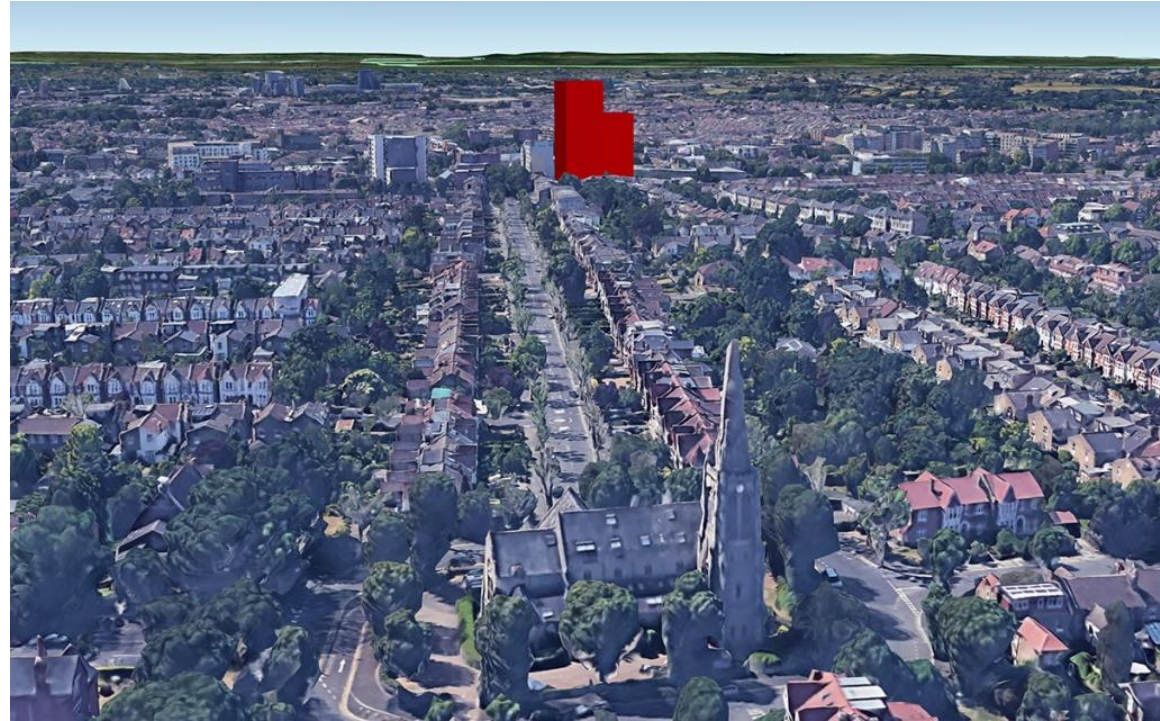
- The towerblock will be highly visible in a predominantly 2 storey residential area and will overlook, overshadow and invade the privacy of hundreds of residential properties

4. Contravenes Planning Policy (4/4)

d) Contravenes adopted London Plan – Policy 7.4

“Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area’s visual or physical connection with natural features”

Adopted London Plan, Policy 7.4



Source: STT scale images of the proposed development from the St Stephen’s conservation area

- The tall tower has no regard for the scale, mass and orientation of the surrounding two storey Victorian residences. It will destroy views of and from the St Stephen’s and Ealing Green conservation areas

5. Not truly affordable

- The Manor Road development provides flats which are 65% London Shared Ownership and 35% London Living Rent (LLR)
- This is in breach of Ealing Policy 3A on affordable housing which states that it should be a “50% provision at a 60/40 split of social or affordable rented accommodation to intermediate provision”
- The draft London Plan supporting evidence base library states that LLR is “**not accessible to those on housing waiting lists**”
- In this development there is **no provision for Social rent or Affordable Rent to help people on Ealing’s housing register**

Housing type	The cost in London	Who is it for?	Affordable / Genuinely Affordable																												
Social rent	Average weekly rents and service charges: Council £106 + £9 (2017/18) Housing Association £122 (2018) + £11 Council and housing association rents increased by 70% and 92% respectively between 2002/03 and 2016/07. 1% rent reductions were set by Government (nationally) from 2016-20 because of the impact of rent rises on housing benefit payments.	Households on the waiting list for social housing.	Described as ‘ genuinely affordable ’. Despite high increases and wide variations across the boroughs, social rent is the only housing type really affordable to lower income Londoners.																												
Affordable rent	Rents at up to 80% market rents. Previous Mayor Boris Johnson had two categories - ‘capped’ at 50% market rent and ‘discounted’ affordable rent at up to 80% market rents. These included service charges.	Households on the waiting list for social housing.	Described as ‘ affordable ’.																												
London Affordable Rent	Weekly London Affordable Rents are set out below. A 2017/18 3-bed London Affordable Rent is just less than 50% market rent. ¹ It is 52% higher than the average 2017/18 council rent and 32% higher than the average 2018 housing association rents. Service charges are extra. <table border="1"> <thead> <tr> <th></th><th>2017/18</th><th>2018/19</th><th>2019/20</th></tr> </thead> <tbody> <tr> <td>Bedsit & one beds</td><td>£144.26</td><td>£150.03</td><td>£155.13</td></tr> <tr> <td>Two beds</td><td>£152.73</td><td>£158.84</td><td>£164.24</td></tr> <tr> <td>Three beds</td><td>£161.22</td><td>£167.67</td><td>£173.37</td></tr> <tr> <td>Four beds</td><td>£169.70</td><td>£176.49</td><td>£182.49</td></tr> <tr> <td>Five beds</td><td>£178.18</td><td>£185.31</td><td>£191.61</td></tr> <tr> <td>Six or more beds</td><td>£186.66</td><td>£194.13</td><td>£200.73</td></tr> </tbody> </table>		2017/18	2018/19	2019/20	Bedsit & one beds	£144.26	£150.03	£155.13	Two beds	£152.73	£158.84	£164.24	Three beds	£161.22	£167.67	£173.37	Four beds	£169.70	£176.49	£182.49	Five beds	£178.18	£185.31	£191.61	Six or more beds	£186.66	£194.13	£200.73	Households on the waiting list for social housing.	London Affordable Rent is pretty much the same as the previous Mayor’s ‘capped affordable rent’ (see above) but has been renamed and now described by Sadiq Khan as ‘ genuinely affordable ’. Even more confusingly, the Mayor also sometimes refer to London Affordable Rent as ‘social rent’, which it is not.
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London Living Rent	London Living Rent is set at a third of average gross local earnings. On average, across London, they are about 67% market rents. Renters must also save for a deposit to buy their home. Most households with incomes in the bottom 50% could not afford this without paying more than a third of their incomes on rent ²	Exclusively for middle income (up to £60,000) households who want to buy a home.	Intermediate housing, described as ‘ genuinely affordable ’. While cheaper than private rents they are not accessible to those on housing waiting lists.																												
London shared ownership	Pay a deposit, rent, service charges and a mortgage.	Households with up to £90,000 incomes.	Described as ‘ genuinely affordable ’.																												

Source: Draft London Plan EIP Library, NLP/AD/132



6. Not environmentally friendly

- The **carbon cost of building this development will be very high**. By its nature, a tall thin tower of over twenty stories will require large amounts of steel and concrete in its structure and foundations. The carbon cost of each habitable unit is high and so the development overall has a very negative environmental impact
- The nature of this development means that it is likely to have a relatively **short usable life before requiring a major refurbishment** or demolition and rebuilding. This greatly increases the carbon impact
- The **ongoing carbon impact of this building will be high**. The tall thin nature of this building means that it will be carbon intensive to heat in winter and carbon intensive to cool in summer. The developers' own analysis shows it may be impossible to keep it adequately cool in summer, and residents will have to rely on carbon intensive air conditioning

This development goes directly against commitments Ealing Council has made on climate change and sustainability



7. Pressure on infrastructure and public services

This development will:

Increase traffic

- The “no car” development does not mean residents will not have cars, only that there is no onsite parking. **Residents with cars will park them on already busy, nearby residential streets**
- It also does not take into consideration couriers, maintenance, visitors, food deliveries etc
- Assuming every week, each flat has 1 food delivery, 2 courier deliveries, 2 visitors and a maintenance worker once a month, this puts an **additional 756 vehicles on the road each week** in the area
- This will double if the Hastings Road development also gets approved

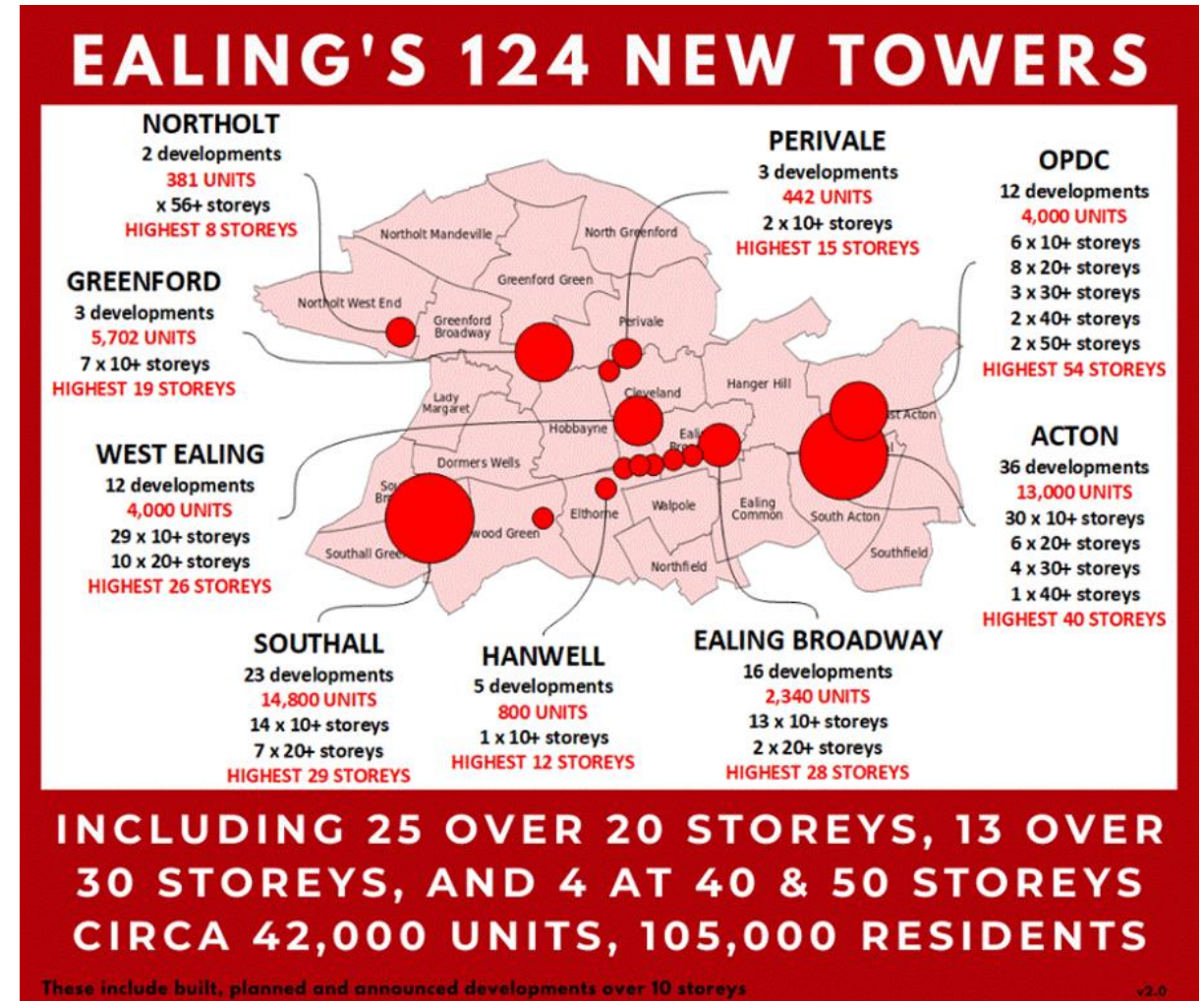
Overburden public services

- Doctors, dentists, children’s centres and schools are already overstretched in this area
- This development will **increase the local population by over 400 people** which will put huge pressure on already limited services
- For example, there are 4 doctors surgeries in the local area and **each GP practice would have to absorb an additional 100 patients**
- Again, this figure will be double if the Hastings Road proposal also goes ahead, not including the plethora of other mass developments in the nearby Green Man estate and old BT site, thus increasing the demand further.

Opening the floodgates

- This development is part of a **gross over-development of the Borough**
- There are currently **124 towers under construction or planned** across the Borough
- If all of these tower blocks are built it will **seriously change the character and heritage of Ealing**. Ealing will fast lose its reputation as the “Queen of the Suburbs” but will become Croydon’s twin
- You can act now to stop this shocking destruction of Ealing

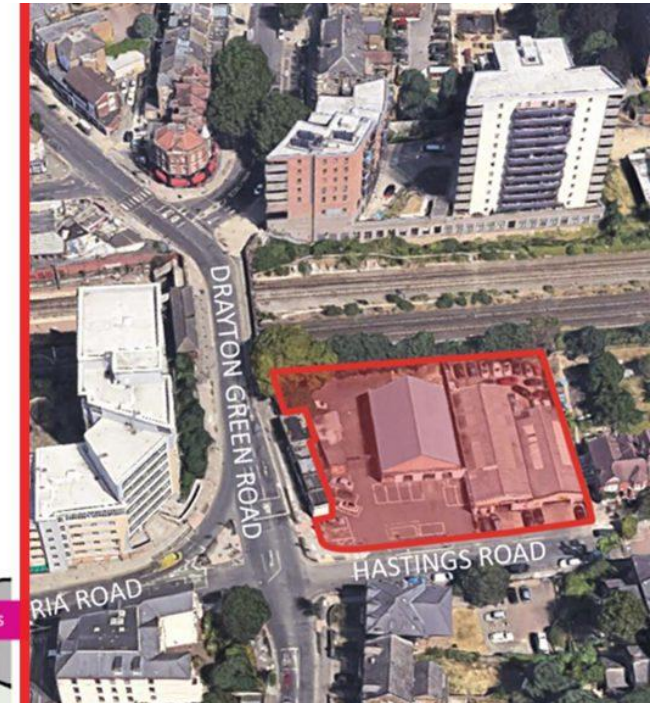
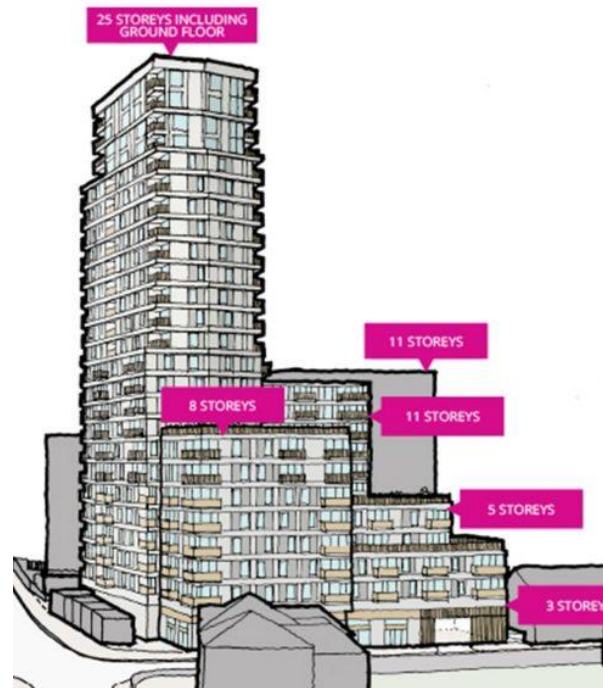
You have the power to act now to stop the shocking destruction of the Ealing that we know and love



Source: Based on current and future planned developments in Ealing

The immediate ramifications of your decision

- There is a **second development** planned for the same area on the Hastings Road site, currently occupied by Majestic wine
- While the plans the committee are considering are only for the Manor Road development, the decision is likely to be replicated for the Hastings Road site
- The current plans for the Hastings Road site are for a **25 storey skyscraper** containing **183 units**



***If you approve Manor Road, you are approving Hastings Road
and the impact will be doubled***



Our political supporters

"I completely and unreservedly oppose this monstrosity as completely out of character with the low-rise Victorian and Edwardian character of the neighbouring streetscape"

Rupa Huq, MP



"We share the concerns voiced to us by residents...The height, scale and massing of any new developments should reflect the character of the surrounding areas, create a harmonious streetscape and respect the existing building lines. It should be sympathetic to the look and feel of the area"

Henrietta Bewley & Sonul Badiani, Liberal Democrat Party



"The height of the towers is totally at odds with the local context and surroundings, and I believe the plans should be rejected by the council"

James Murray, MP



"I share the concerns of many residents who've contacted me about the application for a development on Manor Road. I'll be compiling objections I receive, to raise with the Deputy Mayor for Planning in the event that it gets passed by the Council and referred to City Hall"

Onkar Sahota, GLA Member for Ealing & Hillingdon



"Ealing was once known as the "Queen of the Suburbs" if these proposed towers go ahead, it's safe to say that accolade would be well and truly lost"

Anthony Pickles, Conservative Party



"If the Council does not uphold the integrity of the planning process for such monstrous proposed developments we will not hesitate to call their decisions in for questioning to The Secretary of State"

Julian Gallant, Conservative Party



"I fully support the Stop The Towers campaign...Building large towers on these sites is not the solution to the housing problems our city faces"

Dr Kate Crossland, Green Party





Voices of local residents

- *"We are in a climate emergency. The proposal shows no sign that it is even close to achieving zero carbon status. In summary, the proposal is substandard, unsustainable, out of keeping with its setting and monumentally excessive for this constrained site."* **Mr Robert Coomber**
- *"Shoehorned into a tiny stretch of land right beside the railway line, this is an inappropriate location for new housing, with major issues of safety, security, fire hazards, and the danger of wind tunnels"* **Mrs Hilary Sewell**
- *"Goodbye to democracy & goodbye to Labour & Julian Bell if this is passed. Outrageous disregard for public feeling if it does. I am not sure if the planning department or councillors understand the growing discontent with this type of development."* **Mr Paul Flaherty**
- *"This must be one of the least suitable sites in the whole of Ealing to erect this proposed densely occupied housing development on a confined area of space"* **Miss Mary Raynes**
- *"Does Ealing Council ever take into consideration the well-being of existing residents or is this just part of their endlessly trumpeted push to build modern day slums regardless of the consequences?"* **Mr Gerard Lichoskey**
- *"I object to the development of this monstrosity. Anyone with eyes can see that the towers are not in keeping with the character of the town... we're not in Manhattan!"* **Ms Rajneeta Udhian**
- *"These proposed towers are a monstrous carbuncle on the face of Ealing. This Council has no respect for the residents of Ealing, and under the guise of providing Ealing with affordable homes are building flats for wealthy investors, many of whom will not even live in them."* **Mrs Penny Hanson**



Voices of local residents

■ Who is this planning proposal for? Mr Robert Posner

“It is not for those on the current social housing list as there are no flats at London Affordable Rents for Ealing residents or any social rents.

It is not for local residents as their privacy will be compromised by gardens and properties being overlooked with significant loss of light.

It is not for future residents of the development as putting this number of flats onto such a small footprint will lead to an oppressive living environment prone to fast spreading of viruses.

It is not for families as the majority of flats are small and there are too many studio, one and two-bedroom flats.

It is not for children as there is too little outside space to play.

It is not for the environment as the carbon footprint of such a large development is far higher than low-rise properties.

It is not for the disabled as only one blue badge parking place is being provided.

It is not for the community as there will be irrevocable adverse impact on local amenities and transport.

It is not for the heritage of Ealing as the development is half as high again as the tallest nearby building and is totally out of keeping with neighbouring conservation areas and Victorian two-storey homes.

It is not for Ealing Council as it contravenes their own existing planning guidance in the West Ealing Neighbourhood Plan and Site Specific Guidance EAL12.

So, if it is being built for none of the above, who is it being built for?”



Ealing's not listening to residents

Residents across the borough are taking to the streets to take on a council leadership that has stopped listening and to them.



Towering tensions in Ealing: The local council's readiness to allow taller buildings in a largely low-rise borough has been meeting determined resistance [7th September 2020](#)
[ONLONDON](#)



Furious residents condemn Labour council over traffic scheme 'lack of reasoning!'
(Express September 2020)





You have the power to stop this

- There are good planning reasons to object to planning application 202231FUL (51-56 Manor Road & 53-55 Drayton Green Road)
- Leading planning barristers and James Murray MP (who was instrumental in writing the London Plan) advise that this application should be rejected
- Thousands of local residents have objected (the highest online objection rate in Ealing's planning history) and there's growing local discontent about the council's decisions in other areas
- This application has no merit as a social housing solution. There is no moral argument for approving it.



YOU HAVE THE POWER AND RESPONSIBILITY TO STOP THIS APPLICATION. WE URGE YOU TO REJECT IT.