**This response is on behalf of Stop The Towers (STT) and Draytons Community Association (DCA) to Application no. 233551FUL (Majestic Wine site, Hastings Road)**

**Stop the Towers (STT)** is a residents group based in West Ealing with the purpose of ensuring sustainable development in the West Ealing area. This includes insuring that new developments provide truly affordable housing and enhance rather than undermine existing communities. STT has been in operation for around four years and has around 2500 members.

**The Draytons Community (DCA)** is a residents association which aims to promote the wellbeing and interests of those living in the Draytons area of West Ealing. The Draytons is a residential area North West of West Ealing station comprised of mainly late Victorian and early Edwardian terraced houses which includes Drayton Green and Drayton Green Primary school. The DCA currently has around 400 members.

While we support the sustainable development of the Hastings Road (Majestic Wine) site to provide housing, particularly affordable housing, we strongly oppose this proposal. Given its position adjacent to a Crossrail station, on several bus routes and near to local shops and schools it has obvious potential to provide affordable housing for Ealing residents. However, the proposal does not offer any affordable housing for Ealing residents and therefore represents a massive missed opportunity.  In addition it proposes a type and density of development which would unbalance and overwhelm the local area while not providing high quality accommodation for students.

 1.       **There is no Affordable Housing**

London and Ealing need new affordable homes and the site specific guidance encourages development of such housing on this site.  The proposal to use this site to provide student housing would undermine London and Ealing plans for developing more affordable housing by taking a prime site that could have been used for family homes and using it for high density student accommodation.

We also believe that the proposal is contrary to the guidance given in the 2021 London Plan, Policy H15 Purpose-built student accommodation which states for student accommodation developments the maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan.

 *We therefore ask the planning committee to reject this proposal on the basis that it does not comply with GLA targets or the Ealing Local plan for building more homes or the 2021 London Plan regarding student accommodation.*

 2.       **The density and massing of the development is not consistent with site specific guidance, the Ealing Plan or London Plan**

The London Plan and Ealing Plan set clear requirements in terms of limiting the density and massing of developments to create communities which are healthy and socially resilient in terms of the quality of life of the individual residents and the wider community.  This proposal falls very short on both aspirations.  This level of density proposed is contrary to the site specific guidance, Local plan and London Plan in that it creates a very dense housing development that is low in amenity space in an area that is already heavily developed.  It should be noted that the design based on a tall tower where each floor contains multiple small student bedrooms around small ‘kitchenette’ spaces means the density is far higher than in any similar development of flats.

The massing also needs to be seen within the context of the plan for redevelopment of West Ealing Town Centre, which includes development of more housing along the Uxbridge Road corridor.  This has progressed significantly over the last five years and has already resulted in a major increase in the population density of the area.  The redevelopment of the Green Man Estate, which is within 200m of the Waitrose site, has replaced the previous blocks of flats which contained 464 homes with 714 homes.  In addition there are several significant private developments approved, in build or proposed within 500m of the Majestic Wine site.  These include the Manor Road tower and BT Exchange on Gordon Road.

 *We ask the Planning Committee to reject this proposal on the grounds of massing and density being too high for the site and the wider West Ealing area.*

3.    **The level of amenity is unacceptably low and it does not contribute to a mixed and inclusive neighbourhood contrary to the 2021 London Plan Policy H15**

The proposed development provides student residents with very little amenity on site or nearby where they could individually or as a community enjoy recreation.  The effect of this lack of on-site amenity is made more intense by the fact that the development has so little shared space in each flat unit.  We also note that the proposal is contrary to the guidance given in the 2021 London Plan, Policy H15 which states that ‘at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood’.  The development is far too large and dense to be accommodated within the area of the ‘Five Roads’ community which comprises Hastings Road, Hartington Road, Broughton Road, Denmark Road, and Arden Road and is a residential community of terraced houses and low rise flats.

 *We ask the Planning Committee to reject this proposal on the grounds of lack of amenity and inconsistency with the 2021 London Plan.*

4.       **It is not consistent with Sustainability and Net Zero objectives**

Ealing Council declared a climate emergency in April 2019, committing to treat the climate and ecological emergency as a crisis requiring immediate and vital action. In January 2021, Ealing Council’s Cabinet adopted the council’s [Climate and Ecological Emergency Strategy](https://www.ealing.gov.uk/info/201304/climate_action/2691/ealing_s_climate_and_ecological_strategy).  It stated that its aim is to become carbon neutral, as a borough and an organisation by 2030.  This proposal is entirely incompatible with that strategy and goal.  The detailed reasons are set out in Annex A of this response and can be summarised as follows:

**Embodied carbon**.  The proposed design is based on tall towers, which creates a very high carbon footprint due to the need for deep and substantial foundations which require more steel and concrete than low-rise ‘mansion’ style designs.  This proposal represents a very significant carbon footprint.  The developer states that the building’s anticipated lifetime is 60 years.  This is in our view far too short as major developments with a high carbon footprint should have design lives that justify their carbon footprint.

**Carbon Footprint in use**.  The commitment to use air source heat pumps, Mechanical Ventilation Heat Recovery (MVHR) and PhotoVoltaic(PV) panels appears to be an attempt to ‘greenwash’ an inefficient energy intensive tower design.  The proposed 25.80 kWp PV array would be the equivalent to between the output of 2.5 and 5 times that of a standard PV system for a terraced housed and nowhere near what would be needed to generate useful amounts of energy for the development.  When the proposal is considered holistically it is clear that the building will have high energy needs in terms of heating in winter and cooling in summer which cannot be mitigated by the measures proposed.  It will also be reliant on use of lifts which will increase the carbon footprint of the building.  This means that the proposal as a whole will be far more energy intensive than it needed to be to create this number of homes.   Also without a commitment on using green energy to power these heat pumps the carbon footprint could be substantial.

**Biodiversity.**  Given the current site is almost entirely denuded of plant or animal life it would be hard to reduce biodiversity.  However, the proposal adds very little which we feel misses opportunities to add opportunities for bird and insect life and offer green space.

*We ask the Committee to reject this proposal as it is inconsistent with commitments made by Ealing Council and the GLA on net zero and sustainability.  It may have a layer of greenwash applied, but the proposal is not consistent with Ealing or London’s sustainability objectives.*

**Additional issues**

We also ask the Planning Committee to consider the following issues which may not in themselves be grounds for rejection, but we feel should inform the decision.

5. **Transport**

Crossrail is now running six trains per hour to and from West Ealing and is already at or near capacity.  We feel that the capacity of local transport to accommodate additional journeys should be reassessed in the light of existing new, approved and current planning proposals.  We feel that the West Ealing town centre is already over-developed and at risk of becoming gridlocked at peak times. Placing so many students in this location would place major strain on both West Ealing station and the bus routes at peak commuting times.

6 **Fire Safety**

While we realise this is beyond our expertise we feel the proposal has failed to take into account new learning and guidance relating to tall residential towers. In particular safe evacuation routes for a building this tall with a very large number of people in it. This housing density in terms of the large number of persons per floor created by the design does not appear to have been addressed in the proposal. Similarly the positioning of the site adjacent to a railway line which limits access for fire vehicles to the Southern aspect (Hastings Road) is also not addressed.

**Annex A:  Net Zero and Sustainability**

London and Ealing Climate Emergency Pledges

Ealing Council and the Mayor of London, Sadiq Khan, have declared a climate emergency and put the need to achieve Net Zero by 2030 at the top of their plans. In The London Plan 2021, Mr Khan says that major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. This includes a minimum on-site reduction of at least 35 per cent beyond Building Regulations 152. Residential developments should achieve 10 per cent through energy efficiency measures.  The proposal does not do this; while a new build on this site has the potential to be innovative and aspire to ‘passive’ status the proposal is for a highly conventional carbon intensive building design based on towers.

Embodied Carbon

It is not possible to check the developers figures on embodied carbon as we are not experts but we refer to a paper produced by Ealing Friends of the Earth (<https://ealingfoe.org.uk/towers-or-terraces/>)  which details studies showing that (1) the embodied carbon in high-rise buildings increases with the height of the buildings, (2) the amount of carbon emissions used in the building rises with the height of the building and (3) that low rise terraces can produce nearly as many homes per hectare as high-rise blocks.  (1) A study published by the International Association for the Automation and Robotics in Construction showed that the embodied carbon per square meter of building area increases with the height of building. The reason is that for short and medium buildings (3 and 10 storeys) an ordinary or intermediate frame system can be used, but tall buildings (20 storeys) need a special lateral load resisting system. This implies that the proposals based on towers of significant height are inherently high in embodied carbon and incompatible with net zero commitments.  https://www.iaarc.org/publications/fulltext/FFACE-ISARC15-3068908.pdf

Also Professor Philip Steadman of University College London speaking at the October 2020 Planning and Regeneration Committees said: “It is certainly true that there is a very large increase in embodied energy in tall office buildings. If you go from low-rise to 30 or 40 storeys you are doubling the amount of energy that goes into construction... The reasons are in the stresses on the steel frame and the foundations... We did a piece of work a couple of years ago, on tall office buildings, mostly in London, 600 of them of different heights. To cut a long story short, if you go from six storeys to 20 storeys, energy intensity per square metre is doubled.”

<https://www.london.gov.uk/sites/default/files/final_tall_buildings_letter_to_mayor.pdf>

(2) Researchers at UCL's Energy Institute have found that electricity use, per square metre of floor area, is nearly two and a half times greater in high-rise office buildings of 20 or more storeys than in low-rise buildings of 6 storeys or less. Gas use also increases with height, by around 40%. As a result, total carbon emissions from gas and electricity from high-rise buildings are twice as high as in low-rise.

The research team also looked at all residential buildings in twelve London boroughs and found that gas use increased substantially with height, while electricity use also increased but less sharply.  UCL's Professor Philip Steadman said: "Air temperature decreases with height, and average wind speed increases. Taller buildings that stand up above their neighbours are more exposed to these strong winds, as well as to more hours of direct sun. Thus energy use for heating and cooling would both be increased."

<https://www.ucl.ac.uk/news/2017/jun/high-rise-buildings-much-more-energy-intensive-low-rise>

(3) Letter to London Mayor Boris Johnson from Nicky Gavron AM, Chair of the London Assembly Planning Committee, 9 March 2015, quoting Peter Rees, planning Professor at UCL, and former City Corporation Chief Planning Officer, who told the committee's June meeting that towers are not a necessary response to London’s housing need, as higher densities can be achieved by alternative means and they are more likely to “appeal to the actual people who need homes in the homes market in London, rather than the international investment market.”

<https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/15-03-09-final-tall-buildings-letter.pdf>

The Brighton Society - Tall Buildings Debate “The reason why tall blocks are still the developer’s favoured model is related far more to the profit motive than it is to providing decent housing for families with ready access to outdoor space, and to creating healthy relationships between individual residents and the community – which tall buildings most certainly do not.”

<https://www.brighton-society.org.uk/tall-buildings-debate>

Air Source Heat Pumps

The plans to heat the housing with air source heat pumps is at face value commendable. Heat pumps are powered by electricity and deliver significant heat per unit of electrical energy consumed.  If that electricity is produced using wind or solar energy then it offers, in principle, a zero carbon heating solution.  However, heat pumps work best when part of a holistic building design that is very well insulated and minimises heat loss.  The design proposed is inherently inefficient as it promotes heat loss by using thin tall towers with large surface areas exposed to wind cooling.  The heat pumps are essentially a green heating solution ‘bolted on’ to a very conventional and energy intensive building design.  This means it is far less efficient than it could potentially be.