**This response is on behalf of Stop The Towers (STT) and the Draytons Community Association (DCA) to Application no. 233076FUL (Waitrose site redevelopment)**

**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 STT and the DAC support the development of the Waitrose 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 housing for Ealing residents.  However, in its current form the proposal would not offer sufficient affordable housing, would not offer an adequate quality of housing and would not support commitments on net zero and sustainability. It is our view that this proposal has four serious flaws, each of which we believe is sufficient grounds in itself for rejecting this proposal.  We also note that The GLA reaches similar conclusions to ours in its planning report GLA/2023/0566/S1 of 14 September 2023.

1. **The Affordable Housing element is inadequate**

The London plan states the GLA targets are that 50% of homes to be affordable; with a minimum requirement of 35% subject to a viability assessment confirming 50% cannot be provided.  The Ealing local plan sets a minimum of 35% (by habitable room). Of this 70% should be “genuinely affordable rent (social rent or equivalent) and 30% can be intermediate rent (shared ownership, discount market rent etc.).

The affordable housing offer in the proposal is very poor.  The proposal has only committed to providing 20% affordable housing vs. the minimum 35% set by the GLA and Ealing Plan.  Of the 20% commitment, 70% (60 flats) are Discount Market Rent (DMR) at blended average 70% of market rent with rents which range from £1,155 pm for a studio to £1,400 for a 3 bed.  We would also argue that in reality these units are not affordable by any stretch of the imagination.  Only 23 flats are at "London Affordable rent equivalent", meaning that only 23 flats out of 428 (5.3%) come close to anything like genuinely affordable rents.  Given that John Lewis Partnership (JLP) has owned this land for several decades it is hard to understand why more affordable housing is not viable.

We also note that the GLA have stated that they believe it does not conform to the London Plan 2021 in terms of affordable housing as…

‘Considering the scale of development proposed on the site, the level of affordable housing proposed is significantly below expectation. Build to Rent tenure requirements would need to be appropriately secured.’  Planning report GLA/2023/0566/S1 of 14 September 2023.

*We therefore ask the planning committee to reject this proposal on the basis that it does not meet the minimum requirements of the GLA targets or the Ealing Local plan regarding affordable housing.*

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

This is a large development set adjacent to low density family housing North of the railway in The Draytons, South in the roads between the site and the Uxbridge Road and East in the Five Roads areas of West Ealing.  The London Plan is clear that the arrival of the Elizabeth Line means that new residential developments in areas around its stations need to increase.  However, the Ealing Plan and London Plan also note the need to create and maintain sustainable communities and envisage nothing of the scale and density that is proposed.

The London Plan and Ealing Plan set clear requirements in terms of limiting density and massing 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 is contrary to the site specific guidance, Local plan and London Plan in that it creates a super-dense housing development that is low in amenity space in an area that is already heavily developed.  The proposal is also clearly incompatible with the Ealing Plan and site specific guidance in terms of the proposed height, density and massing of the development.  Visualisations presented as part of the planning application also show that the new towers will be unacceptably obtrusive from many of West Ealing’s surrounding two or three storey streets, such as Manor Road, Chepstow and Connaught Roads.

The density and massing also needs to be seen within the context of redevelopment of West Ealing Town Centre, which includes existing, approved and proposed high density development 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 site.  These include the Manor Road tower, BT Exchange on Gordon Road, the Tide proposal for Hastings Road and developments on the old BHS and Woolworths sites. Good planning needs to take account of the cumulative impact of all these developments, including the provision of necessary infrastructure and amenities.

 *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 and quality of accommodation are unacceptably low**

The proposed development provides 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 creates an ‘urban island’ surrounded by a railway line to the north, the Luminosity Court to the East, the supermarket and its access road to the south and more flats to the West.

The proposal is disingenuous in the extreme when it claims available local amenity spaces including Kensington and Chelsea graveyard 1.25km away and the already over-used and heavily polluted Dean Gardens could offer genuine amenity value.  The walk to Drayton Green, which is already heavily used but would offer amenity, is around 0.8km for parents with pushchairs who will not be able to navigate the Jacob’s ladder railway bridge and about 0.5 km for those who can. This would create an environment that was of very low quality particularly for families with children, older people or those with mobility issues.  The site is also subject to significant noise from the railway line and traffic movements including visitors to the supermarket making usable outside space very important.

We note the the GLA report highlights problems with the design of the development and residential quality including the number of single aspect North facing units, accommodating the very high density of units on the East of the site and addressing issues of lack of privacy/overlooking.

*‘..concerns remain about the quality and number of single-aspect north-facing homes, particularly at lower levels. Across the scheme, the proportion of dual aspect homes would be relatively low at 61%.’

‘In summary, there are concerns about the visual, functional, environmental, and cumulative impacts of the proposals, which require response. GLA officers will have regard to compliance with Policy D9 as a whole at the Mayor’s decision-making stage.’*

 *We ask the Planning Committee to reject this proposal on the grounds of lack of amenity and poor residential quality.*

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 in our view incompatible with that strategy and goal and the GLA Planning report reaches similar conclusions.

‘The development is estimated to achieve a 72% reduction in CO2 emissions for the domestic element and 51% for the non-domestic element, compared to 2021 Building Regulations. This falls short of the net zero-carbon target in Policy SI2, although it meets the minimum 35% reduction on site.’  Planning report GLA/2023/0566/S1 of 14 September 2023

The detailed reasons are set out in Annex A of this response and can be summarised as follows:

*Reuse buildings instead of constructing new ones***.** These proposals envisage constructing the third Waitrose store on the site in less than 20 years, an approach that is contributing heavily to climate change. Green campaigners have long recognised that the renovation and reuse of existing buildings is far greener than redevelopment. Repurposing typically saves between 50 and 75 percent of the embodied carbon emissions compared to constructing a new building. This is especially true if the foundations and structure are preserved, since most embodied carbon resides there. Options for retaining the existing store and building only over the car park need to be explored.

*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 and claiming its embodied carbon footprint is ‘minor’ or ‘negligible’ is entirely disingenuous.  The developer also fails to adequately address the issue of the building’s anticipated lifetime which is critical in any decision on carbon footprint as major developments with a high carbon footprint should have very long design lives that justify their carbon footprint.

*Carbon Footprint in use*.  The commitment to use air source heat pumps for heating is in itself commendable; but appears to be an attempt to ‘greenwash’ an essentially inefficient energy intensive design.  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.  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.* The claims made on biodiversity appear entirely unfounded.  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 for bird and insect life and to offer green space for residents.

*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**

 The proposal states that there is significant capacity available on local transport; which we believe is untrue due to the massive increase in housing development along the Crossrail route and locally.

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.  Crossrail is now running six trains per hour to and from West Ealing and is already at or near capacity.  We feel that the West Ealing town centre is already over-developed and at risk of becoming gridlocked at peak times. Road traffic in the area is also heavily congested. The Lido Junction creates tailbacks up Drayton Green Road as far as the Avenue and beyond. Although this scheme is car free so many new homes will inevitably generate a large number of new trips that is likely to make the situation very much worse, especially when the additional traffic generated by so many other developments is taken into account.

We also feel that the reduction in car parking capacity and re-positioning of the entrance to the car park near to the junction of Alexandria and Drayton Green Road (B452) is likely to cause significant traffic flow problems and discourage active transport.  Cars are already backing up from the current car park at times of peak use, reducing the car park and having delivery lorries and shoppers using the same entrance could only make this worse.  Furthermore, creating a traffic hotspot at the junction would discourage cycling as it creates a zone of significant danger for them.

The GLA report goes further in implying the site should be car free, which we feel would avoid these issues of cyclists, shoppers and deliveries clasing at a busy junction.  Planning report GLA/2023/0566/S1 of 14 September 2023.

*‘A total of 133 retail parking spaces are proposed, compared to 220 spaces existing currently. Policy T6(L) states that where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in London Plan Policy’*

6.     **Fire Safety**

While we recognise that fire safety is the responsibility of London Fire Brigade and not Ealing Council, we have significant concerns regarding the safety of the scheme.  The GLA Planning report highlights similar concerns to the ones we have raised which are:

*Emergency Vehicle Access*.  In the event of a fire or major incident in the development it could prove very difficult to get an adequate number of fire appliances onto the site and to use them effectively.  Having a single point of access to the North of the site, where the towers are, via a narrow roadway would appear to create a major risk.

*Evacuation and incident response*.  There appears to be little space available on site for evacuation to create muster points for a response or to allow appliances and equipment to be positioned or moves.  If there were a serious incident it may be difficult to evacuate casualties, move vehicles on site or to manage a response effectively.

*The risk of Electric Vehicles (EV) and a large car park under the housing*.  The understanding of risks posed by EVs within confined spaces and particularly in underground car parks is not well understood.  However, it is clear that they represent a potentially major risk as they create very intense fires very rapidly and require significantly more water or foam to extinguish them than a petrol or diesel fire.  The proposal places a major housing development on top of a carpark likely to be filled with a mix of EVs and conventional vehicles, but offers no analysis of the additional risks or strategy for dealing with them.

7.       **The developers statements on financial viability are inadequate**

Our assessment is that these lack sufficient detail to allow any sensible judgement to be made regarding the viability of the proposals for the following reasons:

 \*  The costs of the supermarket have not been clearly disaggregated from the costs of the housing development.  This is a fundamental flaw and prevents any meaningful consideration of financial viability as it does not compare ‘apples with apples’.

\* The period of the viability calculation is not clear.

 \*  The financing assumptions are not clear in terms of borrowing costs, repayment periods or how the asset values of the site ‘as is’ and ‘to be’ are assessed.
 \*  There is no sensitivity analysis in relation to future interest rate changes, rents or revenue from the supermarket.
 \*  There is no sensitivity analysis in terms of alternative lower height builds which would be lower cost.
 \*  It is unclear how JLP has treated the asset value of the site.  In a new build the developer would be borrowing to buy the site; in this case JLP owns the site and is attempting to extract more value from it.

Overall, given that JLP own the site it seems odd that they claim they will make a loss on the development given that land cost in London is typically a very substantial cost in any development.

**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**

The proposal says (Chapter 12: Climate Change 12.89) that the effect of the massive Waitrose development on the UK, regional and local carbon budget is either negligible or extremely minor.  This is highly disingenuous; any proposal for this site, no matter how carbon intensive, would be unlikely to impact the regional or local carbon budget in a substantial way.  However, the only way that the Council and UK can reach net zero is for all developments to deliver the lowest footprint they reasonably can and if significant developments such as the Waitrose site are allowed to adopt this rationale then the net zero targets will be impossible to deliver.

It is not possible to check JLP's figures on embodies 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.

**Cooling**

Another effect of a tall tower design is that the building may suffer from significant ‘solar gain’ i.e. during periods of hot weather with significant sunshine its high surface area absorbs significant amounts of heat which can become difficult to manage without air conditioning.  This creates a situation where the building either becomes very uncomfortable for residents or consumes significant energy to power air conditioning units.

**Biodiversity**

JLP claims there would be a biodiversity net gain from the development by 72.53% (average of an 84.27% increase in habitat units and 60.79% increase in hedgerow units). Their glossy Landscape Masterplan figure 4.27 gives details.  But a closer look at the diagram shows that much of the nice green spaces in it are not generally considered 'green' e.g. artificial grass, grasscrete (ie grass in concrete blocks), play area or resin-bound gravel.  This claim of a large biodiversity net gain is more likely to come from the current degraded state of the site.