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### Central Ealing Neighbourhood Plan submission response

Make it Ealing (previously Ealing Broadway BID) was instrumental in the designation of the neighbourhood plan area and has worked alongside community partners to help draft this submission version. We as a Board of Directors are proud to support parts of the plan and acknowledge the effort required to produce the plan to this stage.

We wish to make it clear that we do not, in this commentary, represent the interests of all businesses within the BID area. We have severe concerns about the level of understanding in the area about the plan and its consequence on the future growth of the town and would call for far greater engagement and education about the plan prior to any vote.

The following formal comments on the submission are noted for their restriction to business growth in the town centre and which we see as counter to our aims as a business improvement district. Our vision as a business group is 'together we will ensure Ealing town centre leads as a place to do business and thrives as a creative place for culture, arts and enterprise' and any policies which hinder that progress are not supported.

Whilst the underlying sentiment of the draft plan which recognises a need for development to 'respect the character and appearance of the area' - indeed the draw and appeal of Ealing is its buildings, open green spaces and streetscape - is to be appreciated, the plan is overly restrictive and prohibitive towards well designed appropriate development enabling us to 'grasp the opportunity for new jobs, shopping and other facilities.' (Point 4.9.)

Policy HBE1 – Quality of Design '...avoid dramatic contrasts in scale and massing with nearby buildings typical of the Conservation Area...' does not consider whether any designs put forward may in fact preserve or enhance the area. This policy is overly restrictive towards development even if there is no harm caused to the conservation area. The policy should be deleted.

Point 4.11 states '...it is also recognised that it is rarely appropriate to specify a maximum height for any individual new building...' is in direct conflict with HBE3 '...within or adjoining a Conservation Area, any new building taller than six storeys should be set back from the frontage and should not be dominant when viewed from street level.' To place such a blanket prohibition on the scale of new development is inappropriate. Building heights are also restricted in HBE2(iv) '...where it is within, directly abutting or fronting Conservation Areas, restrict the height of frontages to be consistent with those opposite or adjacent to the site.' This gives no regard to whether the existing height (which new development has to be consistent with) is appropriate and should be deleted. The word 'dominate' is used in 5.1.17 and HBE2i and should be deleted. It is overly negative towards development and is highly subjective.

The regeneration of Ealing is key to the growth and success of retailing in the town centre. It is crucial that Ealing 'regain[s] its competitive edge with a renewed shopping experience and a vibrant mix of retail and complimentary uses/facilities...' (Point 3.6). It is agreed 'Ealing wins less than its fair share of retail spending

from disposable income of its own residents.' We need to ensure that residents, employees and visitors from the local catchment dwell in the town centre, through a broad mix of facilities, rather than being lost to neighbouring centres.

The wording of Policy E1 would only allow retail uses within Use Class A1 within the defined primary frontages. On new routes through Ealing, designed in by new development - it is important that cafes or professional services and other uses within the A Use Classes be allowed, so that our high streets can evolve and remain relevant, providing a range of services, the local population wants, needs and expects.

Paragraph 5.1.11 rightly recognises that 'successful towns will move away from a reliance upon retail for the provision of a broader mix of commercial and employment uses' and goes on to state that, 'in order to reposition and reinvigorate Central Ealing, an increase in the amount, quality and diversity of the existing retail and leisure offer will be needed'. This is agreed, but Policy E1 does not allow for it as currently drafted. It is requested that amendments are made to define 'retail uses' as those falling within the A Use Classes.

The success of the 'Filmworks' development site as a vibrant destination bringing greater footfall, street improvements and more activity to the area is fundamental to the prosperity of the town centre. We object to policy CC3 (Cultural Quarter) which states '... to ensure the number and nature of A4 & A5 food and drink outlets, licensed drinking establishments and amusement arcades remain subsidiary to the main cultural activities of the quarter...' The success and enjoyment of the Filmworks site will depend on the combination of entertainment (film and performances) and food and drink establishments, increasing footfall for the town centre and ensuring the local economy strengthens.

Policy E2 which states 'changes will not be allowed where there are existing over-concentrations of certain uses or where proposed uses or where the proposed use, including the need for control of opening hours and types of premises, may erode local amenity. Decisions will take into account the need to avoid over-concentration of licensed uses such as gambling and sale of alcohol...' Is subjective and should be amended as 'erode local amenity' will be translated differently between age ranges or social groups. This is amplified in 5.1.11, which goes onto to say 'uses which are likely to fuel antisocial behaviour should be strictly controlled.' The word 'uses' is subjective. The growth of leisure activities - bowling, theatre, cinema, ping pong facilities - are desired and supported and the growth of restaurants - tapas bars, wine bars and delis or wine merchants - are encouraged and are not a detriment to the local amenity.

Loading and unloading, servicing and car parking is a key concern for businesses. Policy T3 Servicing states 'where on street loading cannot be avoided, plans should where practical include provision for strictly controlled pavement insets with limited hours of operation.' This would be supported with amended wording of 'relevant to business needs and after consultation with businesses concerned' replacing 'limited hours of operation.'

Travel through, movement across and accessibility to the town centre is a fundamental to the success, growth and vitality of the area. It is recognised that Ealing Broadway station area, reinforced with the construction of a new Crossrail station, is a key and crucial interchange and transport hub. Any polices or recommended actions (RA6, RA7, CENP2), which jeopardise transport options or facilities in this area, are not supported. The re-siting of the bus stops away from the Haven Green diagonal is not supported. A growth of cycle parking facilities across the town centre area is required and supported.

In summary, for the reasons and examples given above, we do not consider the submission version of the Central Ealing Neighbourhood Plan as supporting the growth of Ealing town centre as a place to visit or do business.