

Acton Town Hall and Surroundings



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Supplementary Planning Document

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Prepared for the London
Borough of Ealing by:



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1.0 Introduction

- 1.1 The Acton Town Hall site ('the Site') comprises a collection of civic and community buildings in approximately 1.4 ha at the heart of Acton Town Centre. These buildings contain a range of leisure and community uses, such as a swimming pool, which are important to the local community. Figure 1.1 provides the Site in context of the wider urban environment of Acton.

Figure 1.1: Site Location Aerial Photograph



- 1.2 The London Borough of Ealing ('the Council') recognises that the spaces available within many of the Victorian and Edwardian buildings at the Site no longer meet the modern needs of all their users. The maintenance costs of the buildings are significant and many are under-occupied - the Town Hall itself is under-occupied by some 50%. Investment and change is therefore needed to provide better facilities and to help regenerate the wider Town Centre, meeting the needs of current and future users.
- 1.3 The historic nature of the buildings also means that physical change through any redevelopment proposals needs to be carefully considered. The civic complex is a positive asset to the neighbourhood and to the Borough generally. Its conservation

should not be seen as a constraint or a limitation on the future of Acton Town centre but rather as one of the key opportunities. Its rejuvenation will help to strengthen the sense of local identity and this in turn will make the surrounding area more attractive as a place to live and in which to locate public and commercial activities.

- 1.4 Ealing Council is committed to the regeneration of Acton Town Centre and the provision of new and improved leisure and community facilities. As part of this commitment, the Council has undertaken substantial consultation regarding the location of new facilities and the appropriate development of the Site.
- 1.5 The Council has therefore prepared this SPD to:
 - confirm the Council's commitment and promote elements of the Site for development opportunity to the property industry;
 - guide future development proposals through an agreed vision and development objectives (which relate to design, transport, and environmental matters); and
 - clarify town planning policy aspects and how they relate to the Site's development.
- 1.6 Based upon the development objectives identified in Section 9, the vision for the development of the Site as follows:

"A mixed use development incorporating replacement community facilities, leisure facilities and enabling uses, and taking advantage of the accessible location. Conservation and heritage assets should be at the forefront of any development proposals. Any development proposals should also enhance the vitality and viability of Acton Town Centre and demonstrate excellent quality design and sustainable credentials."

Status of the Document

- 1.7 The document has been prepared in the 'style' of a Supplementary Planning Document (SPD). Public consultation appropriate for SPD has been undertaken in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004 (amended 2008).
- 1.8 The planning policy which it supplements is partly contained within the Council's adopted Unitary Development Plan (primarily Development Site 12). It will also be supplementary to policies of the forthcoming Local Development Framework (LDF) –

specifically the Development (Core) Strategy: Final Proposals Development Plan Document (September 2010) and the Development Sites: Initial Proposals Development Plan Documents (2010) specifically Site ACT04.

- 1.9 Until the DPD policies are adopted, this document will act as 'interim' planning policy guidance. Once the DPD policies are adopted, the guidance contained herein will be reviewed to ensure consistency, and subsequently adopted as SPD. Although it does not form part of the statutory Development Plan, the guidance will be a material consideration for planning applications at, and around, the Site.

Structure of SPD

- 1.10 The SPD is structured as follows:

Section 2 sets out the relevant background for the preparation of the SPD;

Section 3 provides detail of the Site and its wider context;

Section 4 includes detail of the transportation and movement context;

Section 5 sets out the planning policy context, including key policies of the Development Plan as well as other material considerations. It also includes relevant planning history;

Section 6 provides urban design analysis relevant to the Site identifying constraints and opportunities;

Section 7 contains assessment of the historic nature of the buildings within and around the site and identifies areas of flexibility;

Section 8 provides consideration of the prevailing property market context and identifies where this may influence development proposals;

Section 9 sets out the vision and objectives which will guide the Site's development having had regard to the above considerations;

Section 10 provides a sustainability overview of the SPD; and

Section 11 contains detail on the implementation and delivery of the development opportunity.

2.0 Background

Wider Regeneration

- 2.1 The Council has been promoting the regeneration of Acton Town Centre and South Acton for a number of years. This forms part of a wider vision for Ealing Borough to 2026.
- 2.2 The strategy for Ealing by 2026 is to comprise a range of prosperous, cohesive and sustainable places and diverse communities. The Council wishes to harness opportunities for growth such as this which will provide new homes and sustain and create jobs. To support this growth the Council has developed and will maintain a clear infrastructure delivery plan that will ensure that the necessary physical, social and green infrastructure and services are provided and enhanced.
- 2.3 A previous vision for the future of Acton Town Centre is set out in the Town Centres Strategies 2002-2012 Supplementary Planning Guidance (SPG) as:

"a thriving, multi-cultural community, with a clear identity and sense of belonging, where all residents and businesses are able to benefit from the opportunities arising from its West London location".
- 2.4 The 2008 Acton Town Centre Development Framework provides an updated vision for the Town Centre as follows:

"the centre of choice for local residents by improving the diverse and mixed retail, leisure and community experience alongside a high quality, attractive physical environment that encourages visitors to stay longer".
- 2.5 The more recent Development Strategy DPD states that the regeneration of Acton Town Centre will benefit from the delivery of over 10,000 sq m of new retail space and over 500 new homes and improvements to the public realm, including the Market Square; public transport; and existing open space including enhanced links to Acton Park. South Acton will provide over 800 new homes as part of a major regeneration initiative. Furthermore, Acton Main Line station will also be regenerated for a mix of uses alongside the new Crossrail station.

Town Hall Complex

- 2.6 As part of this wider regeneration, the Council expects the development of the Site to contribute towards these objectives. As noted in the previous Section, the Council recognises the functional limits of the existing buildings and that the associated costs of maintenance are becoming unviable. Investment is therefore needed to provide better facilities and to help regenerate the wider Town Centre.
- 2.7 The provision of new and improved leisure and community facilities potentially financed through other enabling uses such as residential will need to respect the historic nature of the built fabric.
- 2.8 The Council is the freehold owner of a number of premises including public and municipal buildings in Acton, located on Acton High Street, Acton Lane and Salisbury Street. These premises, which form the Site, include:
- Acton Town Hall (built for Acton Urban District in 1910, and subsequently extended in 1939) ('the Town Hall').
 - Acton Swimming Baths (built in 1905) ('the Baths').
 - Acton Library (opened in 1900) ('the Library').
 - The Salisbury Street Car Park ('the Car Park').
 - Priory Community Centre - a former school building which provides space for community groups (built in 1882) ('the Priory Centre').
 - The Kings Room (built in 1926).
- 2.9 The Magistrates Court on Winchester Street is not owned by the Council. It should be noted that the Government has recently confirmed that Acton Magistrates Court will be closing. On this basis it is appropriate to consider the future potential of this site within this SPD.
- 2.10 In March 2010 the Council approved capital funding to provide modern community and leisure facilities (including new library space, swimming pool, leisure centre and community space) through the regeneration of the buildings. Whereas the capital funding allocation would be sufficient to undertake immediately required repairs to the structure of the buildings, it would be a short term measure and would not be sufficient to refurbish the

Town Hall buildings to contemporary standards or to put the buildings into a long term sustainable use.

- 2.11 The Baths, for example, no longer meet contemporary standards for public leisure facilities and significant money has been spent on repair and maintenance in the past and will be required going forward. The Council has therefore reached the decision that the Baths will need to be decommissioned within the near future and replaced with modern new facilities.
- 2.12 The Priory Community Centre is actively used by community groups. However, the current arrangement is not considered to be the most efficient use for this Site and the Council is considering the relocation of these user groups, either to new purpose built or refurbished accommodation as part of any regeneration scheme.
- 2.13 There also remains a possible education requirement in the short to medium term, for a new primary school, and this property may potentially provide a solution for that requirement. An Ealing Primary School Site Selection report has been produced by consultants for the Council, which includes the Priory Community Centre site as a potential option to accommodate a single form of entry school.
- 2.14 The Council is also considering the opportunity to incorporate future replacement library requirements into the new development.
- 2.15 The Council's operational and related floor space requirements for Adults', Children's and Families' Services are also under review and the Council would like to accommodate a new service hub within the Town Hall complex. The Council is willing to consider options to dispose of the Town Hall building as part of any operational rationalisation.
- 2.16 In general terms, the Council wishes to encourage regeneration of the Town Hall environs, and is looking to explore how the prospects of surplus asset disposals and structured redevelopment of these properties can contribute to these wider regeneration aspirations.
- 2.17 The Council has previously commissioned consultants to consider the development potential for these sites, which indicated a significant financial shortfall. Since that time, the economy and property market has experienced a significant downturn and with previous experience of a failed disposal the Council has commissioned a revised analysis of the options available to it to

bring forward solutions and on site activity in the short to medium term.

- 2.18 Following a comprehensive public consultation the Council has concluded the Acton Town Hall location is the appropriate location for any replacement baths and leisure facilities as well as for one of the new Council 'service centre hubs'.
- 2.19 In this context, this SPD therefore sets out the Council's planning, design and development guidance for the Site and will be used to procure development partners.

Consultation

- 2.20 The Council is committed to best practice in community consultation and engaging local people in the process of establishing the future of the Site, in accordance with the adopted Statement of Community Involvement (SCI) (2006). There has been a significant level of public consultation undertaken over the last four years. This has related to earlier LDF planning policy consultation and work related to an earlier planning application for the Site which halted following the Listing of the Town Hall building in 2003. Since this time, the Council has led a number of consultation exercises which influence the planning policy context for the Site:
- Acton Town Centre Development Framework (2007 / 2008).
 - Town Hall Urban Design workshops (2010).
 - Ealing 2026 Development (Core) Strategy Development Plan Document (DPD): Issues and Options (2006); New Issues and Options (2007); Initial Proposals / Preferred Options (2009); Final Proposals (2010).
 - Ealing 2026 Development Sites Development Plan Document (DPD): Initial Proposals (2010)
- 2.21 In June 2009, the Council distributed some 26,000 consultation documents to households within the four wards of Acton (Acton Central, East Acton, South Acton and Southfield) regarding the provision of replacement leisure and community facilities. The questionnaire was also available online. The results identified that the preferred location for new facilities were at Acton Town Hall (82%). A similar proportion stated that this would be an easier location to visit than South Acton Estate North.

2.22 This SPD has been the subject of formal public consultation between 9th February – 25th March 2011 and the SPD has been amended as a result of this consultation responses. A separate Consultation Statement has been prepared. Furthermore, as part of the usual planning application process for major planning applications as set out in the Council's SCI, any future development proposal will be the subject of further consultation.

2.23 The following key stakeholders have been included in this process to date:

- Existing occupiers and users.
- Adjoining landowners.
- Community groups and organisations.
- English Heritage.
- Greater London Authority.
- Local residents.

3.0 Site and Acton Context

- 3.1 The following Section provides an overview and description of the existing Site and wider context, identifying key features which may influence future development proposals.

Acton Context

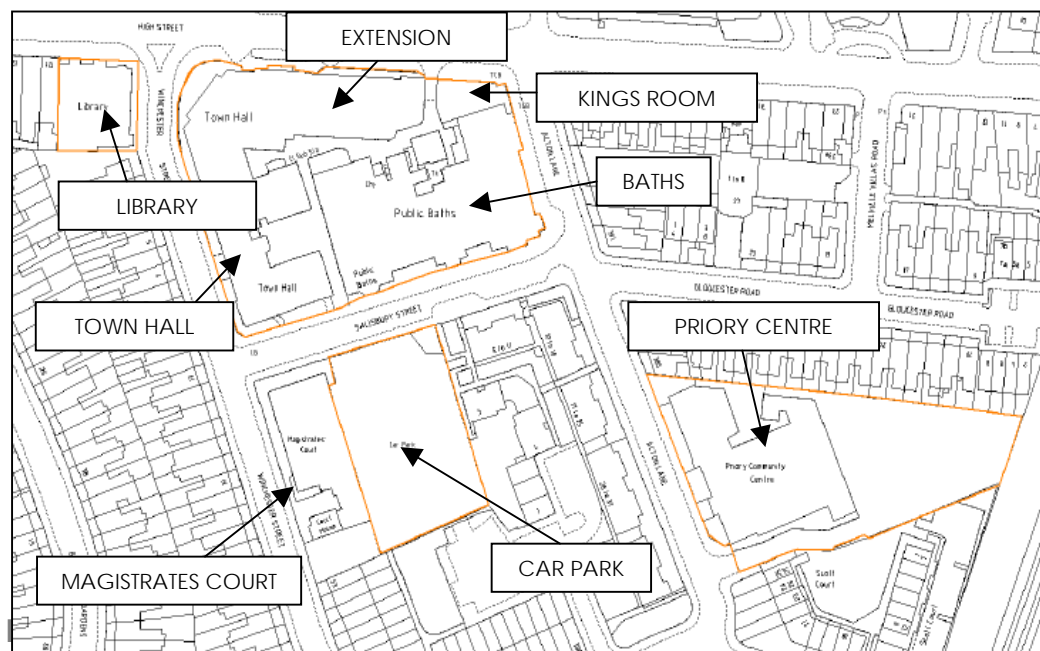
- 3.2 Redevelopment proposals for the Site will need to acknowledge the surrounding context. The following considers the types of land uses which are located within the vicinity of the Site as well as discussing the character and appearance of the surrounding built environment.
- 3.3 Much of the area to the south west of the Site, approximately 25 ha, is taken up by the South Acton Estate, a housing estate predominantly owned by the Council.
- 3.4 Acton is located between a series of neighbouring centres and significant green spaces. The Town Centre comprises a large extent of a Conservation Area.
- 3.5 The Town has been described as having an image problem, due to the fact that it is often difficult to geographically locate it or understand its shape. The gateways into the Town are relatively poor and approaching the Town can be very confusing given the vast differences in environment at each point of entry.
- 3.6 In contrast to this, the area immediately surrounding the Town Hall has a higher quality streetscape.
- 3.7 Acton High Street runs from Uxbridge Road in the west to The Vale in the east. There is a very wide variety of retail businesses operating on the High Street in addition to fast food outlets, pubs, banks and offices.
- 3.8 Winchester Street runs south from the High Street to Acton Lane. The use on this street is primarily residential, with the Town Hall, Library and Magistrate's Court being the only exceptions. The properties are terraced on either side of the street, with the exception of a large detached building on the corner of Winchester Street and Avenue Road.
- 3.9 Acton Lane runs south from the High Street before turning west to meet Winchester Street and Avenue Road. The road continues south until Beaconsfield Road. The housing along this road close to the Site is mainly social housing accessed through Neville Close.

- 3.10 Salisbury Street is a one way road running east to west from Acton Lane to Winchester Street. The Town Hall, Baths, Car Park and Magistrate's Court all back on to the road, in addition to part of the social housing units at Acton Lane / Neville Close.
- 3.11 Further north of the Site lies Churchfield Road, which runs from Acton Central Rail Station in the east to Market Place in the west. This road acts as a secondary high street, once again incorporating a wide variety of businesses, from retail to fast food, restaurants, pubs and offices. In addition to this, there is access to a large car park which serves The Oaks Shopping Centre, and a cemetery adjacent to this.
- 3.12 There are several areas of open space located in close proximity to the Site, the furthest being approximately a six minute walk from the Site. Two of these are parks, the other being home to sports facilities.

The Site

- 3.13 The Site is located in Acton in the north east of the London Borough of Ealing and covers approximately 1.4 ha. The majority of the Site falls within the freehold ownership of the London Borough of Ealing, the only exception being the Magistrate's Court (approximately 0.1ha).

Figure 3.1: Site Location Plan



3.14 The buildings within the Site are currently being used for the following uses.

- The Town Hall and Town Hall Extension is bounded by the High Street to the north, Winchester Street to the west and partly by Salisbury Street to the south. The Town Hall is a four storey building (including lower ground) constructed in 1910 and subsequently extended in 1939. The buildings provide accommodation for a number of Ealing Council's services such as Adults and Children's services, as well as Unison and Ark. The Assembly Hall has until recently been available for hire, but is currently closed due insufficient bookings to support the expense of heating and maintenance.
- The Swimming Baths are bounded by Acton Lane to the east and Salisbury Street to the south. The Baths were built in 1905 and accommodate a 33 yard (approximately 30 metre) swimming pool, a 25 yard (approximately 23 metre) learner pool and a gym and is currently managed in house by Active Ealing.
- The Library is bounded by the High Street to the north and Winchester Street to the east. Residential properties are located directly to the south and west of the building. The building is two storeys in height and is still home to a functioning library with a training room.
- The Priory Centre is bounded by Acton Lane to the west and borders residential properties to the north and south. A small amount of open space separates the building from a railway line to the west. The Centre is a one and two storey former school building and provides space for a variety of community groups and accommodates services such as a day nursery, youth group and after school club amongst others. The Priory Centre also includes a large hall with a stage, which enables theatre groups to operate from the Centre.
- The Car Park is located on the south side of Salisbury Street.
- The Kings Rooms is bounded by the High Street to the north and Acton Lane to the east. It provides front-line and administrative space for Ealing Youth Counselling and Information Services. The top floor is currently unoccupied due to fire damage and related safety issues.

- The Magistrates Court is adjacent to the Car Park, and is bounded by Salisbury Street to the north and Winchester Street to the east. The building is part one / part two storey and has a small associated surface car park to the south accessed from Winchester Street.

Existing Uses

- 3.15 The existing buildings provide approximately 8,429 sq m of gross floorspace, and the site footprint is approximately 12,815 sq m. The following Table provides a breakdown by each building.

Table 3.1: Breakdown of Existing Uses

Building	Gross Floorspace (sq m)	Floors
The Library	493	2 storey
The Town Hall	2,963	4 storey (including lower ground)
The Swimming Baths	1,596	2 floor equivalent
The Priory Centre	1,418	1 & 2 storey
The Car Park	1,959	N/A
Magistrates Court	800*	1 & 2 storey

* Approximately

Conservation Area and Listed Building

- 3.16 All properties with the exception of the Priory Centre are located within the Acton Town Centre Conservation Area.
- 3.17 Acton Town Hall itself, the Library and the chimney structure located between the Town Hall and the Baths are statutory Grade II listed buildings, meaning that they are 'nationally important and of special interest'. The King's Rooms and the Swimming Baths are locally listed buildings.

Existing Employment

- 3.18 There are a number of people currently employed within the various functions at the Site or use the Site as a base. The Site provides a range of full time and part time positions, and generates a range of indirect employment and other local economic benefits.

Environmental Considerations

- 3.19 There is a moderate topographical shift moving downwards from north to south and west to east across most of the sites.
- 3.20 The Site is fully developed and includes a small number of trees at the Priory Centre. There is very little other vegetation on site. It is understood that none of the trees are subject to Tree Preservation Orders.
- 3.21 Due to the fact that the Site is bounded by an adopted highway, sensitivities to adjacent buildings and rights of light issues will to a large extent be mitigated.

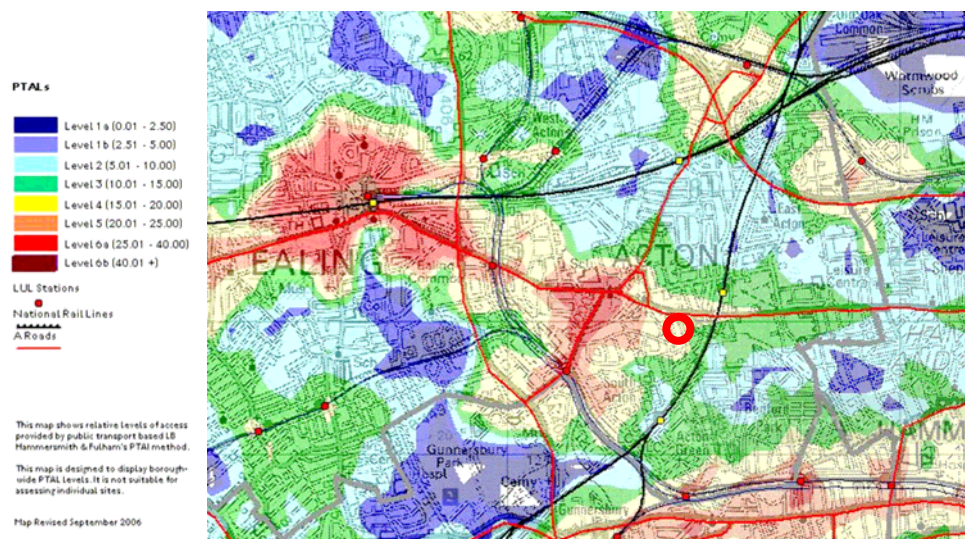
4.0 Transport and Movement Context

- 4.1 The following provides a brief overview of the transport context of the Site.

Public Transport

- 4.2 Figure 4.1 below provides the wider area's Public Transport Accessibility Level (PTAL).

Figure 4.1: Public Transport Accessibility Level Map



- 4.3 PTAL ranges across the Site from 4 in the north to 3 further south. The PTAL Report for the Town Hall is provided in full at Appendix 1.
- 4.4 The nearest bus stops to the Site are located in Salisbury Street and Winchester Street. Five bus routes run past the Site. The bus routes serve Acton Market Place, Brent Cross Shopping Centre, Stonebridge Park, Greenford and Hayes in the west and north, and South Kensington, Hammersmith, White City, Chiswick and Gunnersbury in the south and east.
- 4.5 One of the bus routes travels to and from Acton Town Station, taking between five and ten minutes. Acton Town is on the District and Piccadilly lines of the London Underground and is approximately a 15 minute walk from the Site.
- 4.6 Acton Central Station, which is on the Overground line, is approximately 0.5 km or a six minute walk away. This Station serves Richmond in the south and Stratford in the east. Services in both directions run approximately every 15 minutes during the day.

Cars

- 4.7 The four principal roads serving the Town Centre are Gunnersbury Lane (A4000), Uxbridge Road/The High Street/The Vale (A4020), Steyne Road/Horn Lane (A4000) and Acton Lane (B490). The flow of traffic on these links is constrained by 'bottlenecks' at key road intersections. The local highway network is congested and the majority of junctions operate at, or near, capacity during the morning and evening rush hours. Traffic flows on The High Street exceed 1,000 vehicles per hour and long queues build up from time to time. In addition, turning movement conflicts at these locations present road safety challenges.
- 4.8 The main junction in the immediate vicinity of the Site is The High Street/Winchester Street. Current land uses on the Site generate a substantial volume of pedestrian movements. This, combined with substantial flows on the High Street, has led to a significant number of accidents involving pedestrians. However, recent safety schemes on the High Street have sought to address this issue. Pedestrian safety improvements and congestion relief measures as indicated in the Acton Town Centre Framework, are considered to be key priorities.
- 4.9 A number of local roads to the north and south of the Site are being used as 'rat-runs' and there have been complaints of speeding and dangerous driving on these routes. Notwithstanding this, streets to the north and south of the Site are covered by a 20mph zone. However, these need to be reviewed to see if further measures are required.
- 4.10 Car parking space is available in the Car Park on Salisbury Street to access the Town Hall, Swimming Baths, Library and Magistrate's Court. This contains Pay & Display machines with 63 Pay & Display bays. There are 4 x disabled bays, 1 x car club bay and 4 x motorcycle bays. The Council does issue annual permits for this car park of which there are currently 23 valid.
- 4.11 Salisbury Street Car Park is the only public car park within a 500m radius. Current users of the car park are frequently visitors to the swimming pool. An arrangement exists whereby visitors to the baths can claim a rebate on their parking on the production of a pay and display ticket.
- 4.12 The Traffic Order for the car park permits the sale of Season Tickets, Staff Permits, and Car Club Permits. The car park does not

permit parking for coaches, and a physical barrier is used to prevent oversized vehicles from parking.

- 4.13 Contributory funding for Electric Vehicle Charge Points in public car parks is available, and the provision of such facilities should be a consideration at this site.
- 4.14 The Council's Parking Contractor enforces the car park, and in order to enable this, the permit scheme is managed by the Council's Parking Service.
- 4.15 General maintenance of the current car park also falls within the remit of the Parking Service, and in order to sustain the condition of the car park, the Parking Service would also need to manage any fees or charges applied to patrons.
- 4.16 There is a separate car park to the rear of the Priory Centre which can be accessed from Acton Lane.

Pedestrians

- 4.17 Pedestrian access points are located on the High Street for the Library; on both the High Street and Winchester Street for the Town Hall; on Salisbury Street for the Swimming Baths; on Acton Lane for the Priory Centre; and on Winchester Street for the Magistrates Court.
- 4.18 There are no pedestrian / cycle through routes or rights of way within the site.

Cyclists

- 4.19 The only designated cycle route within the vicinity of the Site is the High St/Uxbridge Road corridor.
- 4.20 There are cycle contra flows in Crown Street, Church Road, Burlington Gardens and others.
- 4.21 All shopping streets have cycle stands at frequent intervals; usually a single stand at each location. There are two stands serving the library, one at the town hall entrance and eight near the pool entrance (Appendix 5 provides a plan of existing and proposed stands in the immediate area).

5.0 Planning Policy Context

- 5.1 This Section outlines the key planning policies and guidance relevant to the Site.

The Development Plan and Associated Guidance

- 5.2 The Development Plan consists of the Consolidated London Plan (2008) and the saved policies of the Ealing Unitary Development Plan (UDP) (2004). There are various Supplementary Planning Guidance (SPG) documents supplementing these plans which will be relevant to assessing proposals, along with Supplementary Planning Documents (SPD).
- 5.3 Emerging policy documents include the Draft Replacement London Plan (2009), the Development Strategy DPD (2010); the Development Sites: Initial Proposals DPD; and the Development Management: Initial Proposals DPD (2010). The Development Strategy is at an advanced stage in preparation and as such may include material planning considerations that can be taken into account in determining planning applications.
- 5.4 Policies and guidance from these documents which have particular relevance to the Site are identified and explained in the following sections. A fuller listing of relevant policies is contained in Appendix 2.

Site Specific Policies

- 5.5 The Town Hall, Swimming Baths, Library and Car Park sites form Development Site 12 in the Ealing Development Sites SPG (2004).
- 5.6 The entire Site forms Development Site ACT04 in the emerging Development Sites DPD. The DPD identifies the following options:
- Town Hall and Baths: mixed use retail, replacement office, leisure centre, 25m pool (replacing existing), library (replacing existing), community facilities/education (replacing Priory Community Centre).
 - Library: Retail and element of residential.
 - Car Park: Continued use as car park (possible multi-storey) and/or residential.
 - Priory Centre: Residential or potential for school.
 - Development should respect the site's historic character.

- 5.7 The Development Sites DPD also suggests 120 potential net residential units and 2,000 sq m net retail floorspace. No new employment space is anticipated. The entire site is also identified as a Key Opportunity Site in the Acton Town Centre Development Framework (2008).

Site Designations

- 5.8 The following designations apply to the Site within the context of the UDP.
- 5.9 The Library, Town Hall, Swimming Baths, Priory Centre, Car Park, Kings Room and the Magistrates Court are all located within the boundary of Acton Town Centre (District Centre) and within Parking Standards Zone 1.
- 5.10 All of the buildings are located within an Archaeological Interest Area (A1).
- 5.11 The Library, Town Hall, Swimming Baths, Kings Room and Magistrates Court are located within the Acton Town Centre Conservation Area.
- 5.12 The Town Hall, Town Hall Extension, Chimney & Library are designated as Statutory Listed Buildings (Grade II).
- 5.13 The Town Hall is designated as a Building of Façade or Group Value, in addition to the Kings' Rooms.

Housing Policies

- 5.14 In accordance with the Consolidated London Plan (Policy 3A.2), housing development will be encouraged in this Town Centre location and proposals should achieve the maximum intensity of use compatible with local context, design principles and public transport capacity.
- 5.15 The Development Strategy DPD (Proposal 2.2) identifies Acton Town Centre as a focus for concentrating 525 new mixed tenure homes and refers to allowing residential uses on the Uxbridge Road, east of the old town hall. This aligns with the Acton Town Centre Development Framework which identifies residential as one of the mix of uses for the Acton Town Hall Complex opportunity site.
- 5.16 The Development Sites DPD goes further and indicates that there is potential for 120 residential units in the Acton Town Hall Complex

site (ACT04) and suggests they could be located in the Library Site, the Car Park Site and the Priority Community Centre Site.

5.17 Proposals for residential use should provide affordable housing in accordance with the policies of the Consolidated London Plan (Policy 3A.9), the Ealing UDP (Policy 5.2), the Ealing Affordable Housing SPD (SPD1) and the Development Strategy DPD (Proposal 1.2(a)). In summary:

- 50% affordable housing will be sought in developments of 10 units or more.
- While there is a presumption that affordable housing will be provided 'on-site', any off-site provision should maintain the ratio of one affordable unit to one market unit across the total number of units provided.
- 60% of the affordable provision should be social rented and 40% intermediate.

5.18 The Consolidated London Plan (Policy 3A.10) states that "[affordable housing] targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements". The Replacement London Plan (Policy 3.13) states that "[affordable housing] negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy".

5.19 The Ealing UDP (5.2 j-4) notes that the implementation of the affordable housing policy will also have regard to the economics of provision including the particular costs associated with development that would mean a scheme involving affordable housing would not be viable, or would prejudice the realisation of other planning objectives that need to be given priority.

5.20 Any future planning application(s) proposing residential use(s) for the Site and associated financial viability studies will be assessed in the usual way with respect to the affordable housing targets set out in the above policies. It is acknowledged that the Acton Town Hall scheme experiences a unique combination of circumstances which provides local benefits and influences financial viability, including:

- Delivery of a range of new and improved community facilities and public services;
- Conservation and re-use of historic buildings and assets (see section 7.0);

- The phasing of different parts of the Site over different time periods (see section 11.5 – 11.9); and
- A range of other development requirements and planning contributions for the immediate and local area (see section 11.10 – 11.19).

The attainment of these unique social and physical objectives will be considered as part of the financial viability analysis of any proposed residential development.

5.21 Residential proposals should also accord with the Ealing Indoor Living Space SPG, which gives guidance on minimum space standards, self containment and configuration.

Commercial Policies

- 5.22 Planning Policy Statement (PPS) 4 (Policy EC3) advises that office development will be encouraged above ground floor retail, leisure or other facilities within town centres.
- 5.23 While the Ealing UDP (Policy 6.2) encourages office development in Acton Town Centre at an appropriate scale, the Development Strategy DPD (Proposal 2.2) identifies several uses to be concentrated in Acton Town Centre but these do not include office or commercial development. The Acton Town Centre Development Framework also indicates that other uses would take priority over offices on the Site.
- 5.24 The Development Sites DPD indicates that in the Acton Town Hall Complex (ACT04) some office use would be appropriate on the Town Hall and Swimming Baths site as part of a mixed use development.

Community Policies

- 5.25 In accordance with the Consolidated London Plan (Policies 2A.8), community activities and facilities will be encouraged in Acton Town Centre in order to sustain and enhance the vitality and viability of the Centre.
- 5.26 The Development Strategy DPD (Proposal 2.2) states that improved cultural and community facilities should be provided at prime sites, such as the Town Hall. Proposal 6.2 also states that the Council's own assets and land can be used to stimulate development and provide much of the land for local infrastructure. It also states that these assets can have added value if they also provide accommodation for local service providers, e.g. health, sports and leisure facilities.
- 5.27 This aligns with the Acton Town Centre Development Framework, which indicates that community activities should be concentrated on the Site. In addition to this, the Development Sites DPD (Site ACT04) highlights community facilities as part of a mixed use redevelopment of the Site.
- 5.28 Proposals for community uses on the Site must have regard for the Ealing Community Facilities SPD. Amongst other things, this provides a checklist for the needs of a community facility, in addition to covering design and transport issues and providing guidance on a number of different types of community facilities.

- 5.29 Where there is a change of use from a redundant community use, such as the Library, Baths and the Priory Centre, the Ealing UDP (Policy 8.3) resists change to uses other than alternative community facilities. However, affordable housing will be acceptable in principle on redundant community use sites in residential areas, and mixed development will be acceptable in principle in shopping centres, ideally with some accommodation for community use.

Retail Policies

- 5.30 PPS4 advises that retail uses should be focused in town centres, and this is reflected in the Consolidated London Plan (Policy 3D.1), which also indicates that retail, leisure and other related uses will be encouraged in town centres such as Acton.
- 5.31 The Ealing UDP (Policy 7.2) indicates that significant retail development is expected to take place in existing Town Centres. The Development Strategy DPD furthers this by specifying that Acton Town Centre could see development of between 10,000 and 12,000 sq m of retail space (gross sq m, food and/or non-food retail floorspace) in the period to 2026. The Town Hall is identified by this DPD (Proposal 2.2(b)) as one of several prime sites where this space could be concentrated.
- 5.32 The Development Sites DPD indicates that retail use (Classes A1-5) would be suitable both on the Town Hall / Baths site as part of a mixed use redevelopment, and on the Library site. The Acton Town Centre Development Framework states that leisure facilities should be concentrated on the Site, but makes no reference to retail use.
- 5.33 Dependant on the type of retail or leisure uses proposed on the site, further guidance is contained in the Ealing Places for Eating, Drinking and Entertainment SPG 18 (2004). The SPG outlines several considerations which should be taken into account when undertaking development of a food and drink or leisure use, including:
- the protection of residential amenity;
 - the proximity to residential accommodation;
 - the preservation of the appearance and character of the area;
 - hours of operation;
 - traffic implications; and

- pollution.

Urban Design Policies

- 5.34 In accordance with the Consolidated London Plan (Policy 4A.3), any development on the Site should meet the highest standards of sustainable design and construction.
- 5.35 The Ealing UDP (Policy 4.1) provides the overall principles of design that the Council will apply in considering developments, including high quality architecture, inclusive design, safety, legibility, sustainability and the appropriate height, scale and materials.
- 5.36 The Ealing Plot Ratio SPG gives further guidance on scale, bulk and intensity of use which any development on the Site must consider. The SPG indicates that the ability for the plot size of the Site to be maximised will depend on the local context.

Sustainability and Environmental Policies

- 5.37 Existing and emerging policy advances a number of requirements in relation to environmental sustainability, reduction in carbon dioxide emissions, use of renewable sources of energy, water conservation and waste minimisation and recycling. In particular, Policies 4A.3 and 5.3 of the London Plan (2008) and Replacement London Plan (2010), respectively, state that developers will be expected to adopt the highest standards of sustainable design and construction in accordance with the Mayor's supplementary planning guidance on Sustainable Design and Construction¹. It should be noted that the Replacement London Plan will supersede the Consolidated London Plan (2008) when the first will be adopted.
- 5.38 Policy 4A.1 of the Consolidated London Plan requires all developments to make the fullest contribution to the mitigation of and adaptation to climate change and to minimise emissions of carbon dioxide. This involves the adoption of the highest standards of sustainable design and construction, prioritisation of decentralised energy and combined heat and power or combined heating, cooling and power and a carbon dioxide emissions reduction target of at least 20% from on site renewable energy generation.

■ ¹ The London Plan's Supplementary Planning Guidance on Sustainable design and construction.

- 5.39 As part of individual planning applications developers will be expected to submit an Energy and Sustainability Statement to show how the objectives of both the London Plan and existing and emerging local policies are to be realised as part of each individual development and in particular the steps taken to apply the Mayor's energy hierarchy. This should demonstrate the predicted energy and associated carbon dioxide emission savings achieved through the incorporation of energy efficiency measures and low/zero carbon technologies. A feasibility assessment of Combined Heat and Power (CHP), Combined Cooling Heat and Power (CCHP) and community heating systems should also be included in the statement.
- 5.40 The Council will expect all developments within the Acton Town Hall Complex to fully satisfy policy requirements relating to sustainable energy, specifically by achieving significant on-site carbon dioxide emissions reduction through energy efficiency measures first and then through the use of CHP/CCHP and/or renewable energy generation.
- 5.41 The Council has recently produced an energy evidence² base, which while endorses all of the policies in the Replacement London Plan (2010), identifies a number of areas which are supplemented by local policy. The study proposes best practice targets for the different use classes which are designed to ensure general adherence to the Mayor's Energy Hierarchy. In addition, based on the findings of this study, all developments will be expected to achieve as a minimum Code Level 4 of the Code for Sustainable Homes and BREEAM 'Very Good'. Code Level 4 in respect of the energy component at least, is also comparable with the overall CO₂ emission saving targets established in Policy 5.2 of the draft consultation London Plan for the years 2010 to 2013.
- 5.42 The Council, therefore, will expect all developers to demonstrate that they have fully considered measures to satisfy the higher exemplary standards of energy efficiency measures, CHP where feasible and viable, and on-site renewable energy generation according to the energy evidence base.
- 5.43 The Replacement London Plan (Policy 5.6) states that development proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems, and where a new CHP

² London Borough of Ealing: Energy Evidence Base – Towards Zero Carbon Development in Ealing

system is appropriate also examine opportunities to extend the system beyond the site boundary to adjacent sites or make provision for future connection. Section 1.3 of the Development Sites DPD states that “The Council will require all developers to investigate the potential to connect to an existing heat network, to make provision to connect to a future network, to commit to discuss connection if they are approached by a decentralised energy service provider in the future, or even establish new networks.

- 5.44 Given the extent and proximity of the sites in the Acton Town Hall Complex, opportunities for a Combined Heat and Power system should be investigated. In particular, emerging proposals for a decentralised energy network at the South Acton Estate, to the south of the site, should be actively considered as part of any proposal for the Site as identified by Ealing’s Heat Mapping Study³. This study supplements and completes the background documents with regards to energy and sustainability which it has assisted in identifying opportunities for decentralised energy within the Borough.
- 5.45 In relation to flood risk, the Site is located within Flood Zone 1 and Planning Policy Statement 25 (PPS25) defines flood zone 1 as comprising of land assessed as having less than 1 in 1000 annual probability of flooding. There may be other sources of flood risk such as surface water flooding, sewer flooding or groundwater which may affect the area.
- 5.46 The Site has been the subject of a sequential test in accordance with PPS25 as part of the sustainability appraisal process of the Development Sites: Development Plan Document.
- 5.47 Development proposals should be accompanied by a site specific Flood Risk Assessment and where appropriate make reference to the Council’s Strategic Flood Risk Assessment, London Plan policies (in particular Policy 4A.14) and the Environment Agency’s surface water flood maps.
- 5.48 The site specific Flood Risk Assessment should consider the use of Sustainable Urban Drainage Systems (SUDS) and aim to reduce runoff rates to Greenfield rates (8/1/sec ha). Any proposals in relation of SUDS should be prepared in line with CIRCA’s SUDS Manual (C697).

■³ London Borough of Ealing – London Heat Mapping Study

- 5.49 Future proposals should also consider the development's demand for water supply and network infrastructure both on and off site and the development's demand for sewage treatment and network infrastructure both on and off site.

Heritage Assets Policies

- 5.50 Any potential development affecting the heritage assets will be assessed in relation to PPS5, which provides guidance concerning the historic environment. Key aims of PPS5 include the need to recognise that heritage assets are a non-renewable resource; the need to take into account the social, cultural, economic and environmental benefits of heritage conservation; and the need to recognise that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term. In particular, Policies HE7 and HE9 should be considered. These policies provide the principles which guide the determination of applications for consent relating to all heritage assets, and applications which relate specifically to designated assets.
- 5.51 In accordance with the Consolidated London Plan (Policy 4B.12), the protection and enhancement of the listed elements of the Site should be based on an understanding of their special character.
- 5.52 The Ealing UDP (Policies 4.6, 4.7, 4.8, 4.9) provides further detail, making it clear that statutory listed buildings will be refused consent for demolition unless there are exceptional circumstances for their removal. Demolition of locally listed buildings, the King's Rooms and Baths will also be discouraged unless it can be demonstrated that the benefits to the community will outweigh their loss.
- 5.53 All buildings on the Site, with the exception of the Priory Centre and the car parks, are located within the Acton Town Centre Conservation Area. In line with the Ealing UDP (Policy 4.8) any development in or affecting the setting of the Conservation Area should relate to, preserve and enhance the character of the area in terms of its historic or architectural quality. The Acton Town Centre Conservation Area Character Appraisal and the accompanying Management Plan (April 2009) provide further detail.
- 5.54 All buildings on the Site are located in an Area of Archaeological Interest meaning that in accordance with the Ealing UDP (Policy

4.9) any development must not adversely affect any historic remains in the area.

5.55 Proposals for development on the site should make reference to Acton Town Hall Conservation Area and Management Plan accessible at:

http://www.ealing.gov.uk/services/environment/planning/planning_services/conservation/conservation_areas.html

5.56 The Conservation Area Management Plan provides guidance through policy statements to assist in the preservation and enhancement of the conservation area.

5.57 PPS5 Policy HE3 - Regional and Local Planning Approaches sets out how the LDF will set out a proactive strategy for the conservation and enjoyment of the historic environment looking at

- How it influences the character of a place;
- The potential for the historical environment to be the catalyst of the regeneration of a place; and
- The stimulus that the historical environment can provide to inspire new development.

5.58 Clearly, the overarching development objective for the Site is an example of such historical led regeneration. Any proposal that is promoted as 'enabling development' should also be considered against the relevant policies set out in *Enabling Development and the Conservation of Significant Places* (English Heritage, September 2008). A full assessment of relevant historic policies is contained within Section 7 of this SPD.

Transport Policies

5.59 Ealing's overall transport objectives (Ealing UDP Policy 1.9) reflect national guidance (PPG 13) in seeking to:

- Integrate land-use and transport planning in order to reduce road traffic.
- Use parking policy to restrain the use of cars.
- Secure public transport improvements to enable public transport to compete more effectively with the private car.
- Vigorously promote walking and cycling.

5.60 These objectives are reflected in the Development Strategy DPD (Proposal 2.2) which includes making provision for improved public

transport, pedestrian, cycling and public realm enhancements in Acton Town Centre.

- 5.61 The Acton Town Centre Development Framework further specifies that on the High Street, and in conjunction with the Acton Town Centre Safety Scheme proposals, key crossing points should be provided along with an extensive raised table at the Town Hall / The Oaks Shopping Centre area. The intention is to enhance the relationship between these two sites and help to prioritise / promote pedestrian movement. It will also help to reduce traffic speed and improve opportunities for increased safety and public activity.
- 5.62 The Acton Town Hall Complex sites fall within Parking Standards Zone 1. The relevant parking standards are in Table 1 of the Transport Appendix to the Ealing UDP. Development should also meet the minimum disabled parking requirement and DDA standards.
- 5.63 These standards should be followed. However, the wider benefits of the development will be taken into account when reviewing parking provision and each site will be judged on its merits. The Council's Cabinet approved revisions to the current parking standards in 2007 will also be a material consideration. It is noted that there are a number of car parks in the area with spare capacity.
- 5.64 As a way of reducing parking on Site, development proposals should also have regard to Policy 9.8 in the UDP which relates to Low Car Housing and City Car Clubs which may be encouraged in any area of the Borough. Further detail is contained in Ealing SPD 7: Car Clubs.
- 5.65 In accordance Policy 9.1(vii) of the UDP, development proposals should provide a Transport Assessment (TA) giving detailed information on a range of transport conditions and related issues; before, during and following the construction of proposed development (including car clubs, parking restraint, cycle training, free oyster cards, promotion events, personal travel planning, etc).
- 5.66 The TA and associated Green Travel Plan must demonstrate that the development will not cause problems of congestion, danger, or inappropriate parking in the area, and will be used in the determination of planning applications. The following junctions should be considered in particular:
- i) High Street / Winchester Street

- ii) High Street / Acton Lane
- iii) Acton Lane / Avenue Road
- iv) High Street / Steyne Road / Gunnersbury Lane
- v) Acton Lane / Southfield Road

5.67 Further guidance on Transport Assessments, and the trigger thresholds for providing them, is contained in Ealing SPG 20: Transport Assessment Reports for Developments. Guidance on Green Travel Plans is contained in Ealing SPG 21: Green Travel Plans.

Planning History

5.68 The following planning decisions which are relevant to the Site have been identified through a review of the Council's records.

Table 5.1: Relevant Planning History

Referen	Buildin g	Description	Date	Decision
On Site Decisions				
P/2008/2 172	Library	Replacement first floor level windows	05 Aug 2008	Approve d
P/2008/2 173	Library	Replacement first floor level windows (Listed Building Consent/ Deemed Consent application by the London Borough of Ealing)	08 Sept 2008	Approve d
P/1994/2 313	Town Hall / Baths	Display of advertisement hoarding.	07 March 1995	Approve d
P/1993/0 335	Priory Centre	Erection of covered refuse bin enclosure.	17 Feb 1993	Approve d

5.69 The above Table shows planning permissions granted on the Site since 1993. The original planning permissions for the buildings on the Site are not available due to their age. None of the permissions in the Table are of any particular note for the purposes of this SPD.

6.0 Urban Design Analysis

Background

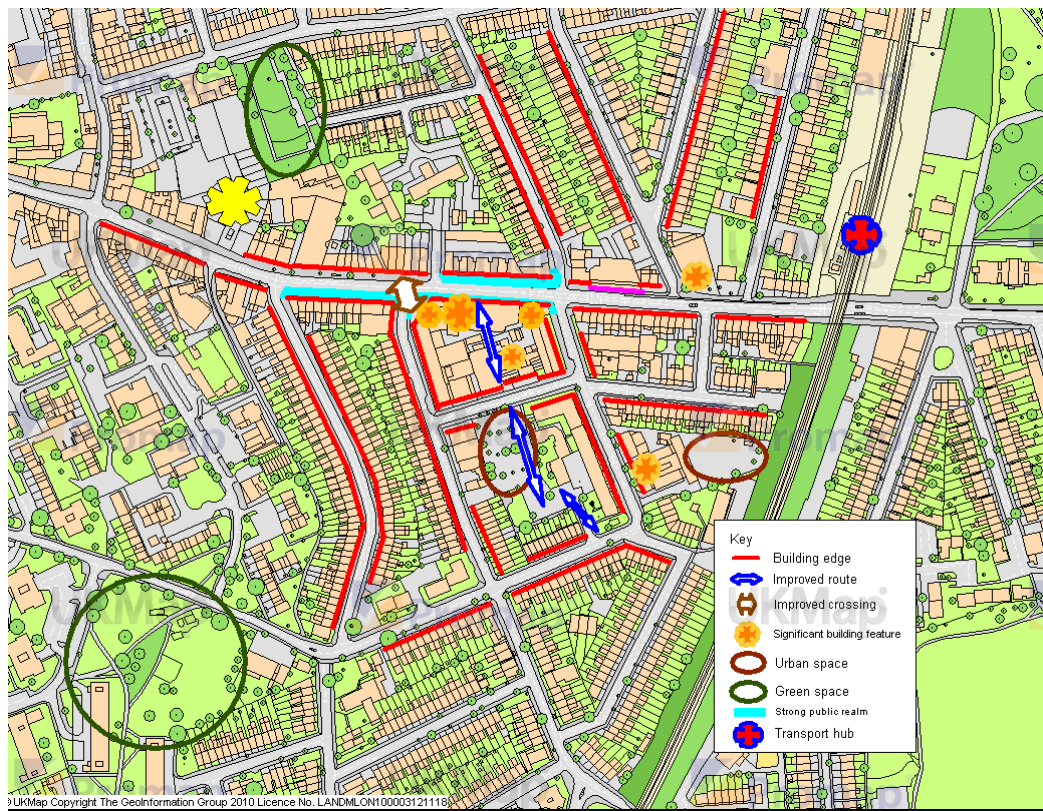
- 6.1 The following section provides a basic review of the urban design context for the Site. It identifies a number of key factors that are relevant to the consideration of local design policies and which will therefore need to be taken into account in the Site's redevelopment. This Section has had regard to the Council's Urban Design related SPG (SPG5) and the Acton Town Centre Development Framework.
- 6.2 This Section firstly provides some basic site analysis which then leads to some urban design objectives for the Site's redevelopment. The importance of place shaping, as discussed in Policy HE3.1 of PPS5, is considered to be a key element of any future development proposals and the following objectives should be considered in the context of the overall place shaping of the Site.
- 6.3 Any applicant for redevelopment at the Site will be responsible for preparing design solutions. It is not the purpose of this SPD to provide design solutions. This Section should be considered alongside the following Section which provides further guidance on the significance of the Site's historic built form.

Strategic Context

- 6.4 The Development Framework undertook a comprehensive Strengths Weaknesses Opportunities and Threats (SWOT) analysis of the Town Centre which led to a development strategy which included the following relevant urban design principles:
- secure public realm improvements maximising linkages throughout the Town (a raised table is proposed at the junction adjacent to the site);
 - encourage active frontages at public spaces and routes;
 - encourage compatible and viable mixes of land use;
 - massing and materiality should contribute to the town as a whole; and
 - ensure servicing does not compromise the quality of public realm.

- 6.5 The area of Acton Town Centre benefits from a rich mix of building types, scales, ages and materials and benefits from a number of good quality open spaces in the wider environment. The Town Hall area has relatively good quality streetscape compared to the rest of the Centre, though this can be congested at times. However, the wider centre suffers from poor legibility as a result of weak signage, gateways and visual connections.

Figure 6.1: Wider Site Influences and Development Objectives



- 6.6 Since the Acton Town Centre Development Framework was produced urban design consultants were commissioned earlier in 2010 by Ealing Council to lead a series of design workshops to inform the regeneration of the Site. The purpose of the commission was to work with local stakeholders, residents and Council officers to explore the development potential and design opportunities for the site.
- 6.7 As a result of this work a shared understanding has been developed that change is necessary at the Site and that trade offs will be required to help make this change possible. The common themes identified within the report include:
- Heritage – preservation and enhancement of the most valuable assets.

- Quality services – retention of existing services where possible.
- Vibrant mix of uses and activities – including enabling uses where necessary.
- Active uses on the High Street.
- Highest standards of design and build quality.

6.8 The following analysis builds on this work and feeds into the development objectives contained within Section 9.

Urban Structure and Permeability

- 6.9 The urban blocks around central Acton are relatively dense with limited relief via open space, rear gardens or highway land. Blocks are generally oriented on a north-west to south-east, east to west grid with the railway line and High Street confines. Residential use is generally in a mid-high density, terrace form. Commercial uses are relatively continuous along the High Street with limited breaks within each urban block.
- 6.10 The four urban blocks that the totality of the Site falls within are typical of the area. They are dense blocks with few undeveloped areas – the most significant being the Salisbury Street car park and the open land to the rear of the Priory Centre.
- 6.11 The future layout of the Site should respond to the existing urban form providing strong edges to the urban blocks but where possible providing breaks which allow for usable space within the block where possible. Given the wider context it would not be necessary to break up any of the urban blocks further by introducing new vehicular routes, though pedestrian and cyclist accessibility might be improved through new development form. On this basis existing routes (e.g. Winchester Street and Acton Lane) should be enhanced where possible to provide safe, attractive pedestrian and cyclist connections through the site.
- 6.12 The form of new development should take a lead from the surrounding fabric in promoting continuity of building line, respecting street scale and enclosure and clearly defining public fronts and private backs of buildings.
- 6.13 The loss of Salisbury Street to create a large block would not be encouraged for the following reasons:
- the block would become overly large, inconsistent with the size of blocks in the area;
 - It reduces physical and visual permeability of the area; and
 - It reduces the potential length of 'active' building frontages.
- 6.14 It is important that north-south pedestrian permeability through the Town Hall block is improved. New development should maximize pedestrian entrances (and thereby 'activity') directly facing Acton High Street, Winchester Street, Salisbury Street and Acton Lane. Vehicular access and servicing should not be from

the High Street to avoid conflicts between cars and pedestrians/cyclists.

- 6.15 Existing pedestrian entrances to the Town Hall building should be retained. Existing pedestrian entrances to the Library should also be retained.

Character and Identity

- 6.16 The majority of the buildings in the area are relatively small in scale, with the exception of a small number of larger buildings on or close to the High Street. The Town Hall, Baths and Priory Centre belong to this group of buildings, and are very different in scale to much of the rest of the area.
- 6.17 Buildings in the area range in height from one to five storeys, however the majority are either two or three storeys. There appears to be little pattern in the location of building heights, although four and five storey buildings are largely concentrated on the High Street and Churchfield Road.
- 6.18 Given the range of building heights along the High Street, there is the potential for imaginative building heights to create an exciting and coherent townscape. Within any development proposal, the Town Hall complex and clock tower should remain the dominant element in this streetscape.
- 6.19 Buildings should have reduced height and massing adjoining existing terraced housing to protect amenity. The currently limited views of the listed chimney could also be enhanced by the new development.
- 6.20 Higher density development is broadly appropriate in the accessible and mixed use town centres. Residential use in the surrounding area is also of a relatively dense nature. Any increases in existing building height should be respectful of setting of listed buildings to be retained and facilitates accessible open space. Development should respond to and respect other surrounding uses and not have an unacceptable impact on those uses, especially on the existing housing to the south, east and west.
- 6.21 Retail uses are largely concentrated on the High Street and Churchfield Road, interspersed with food and drink establishments. Land between these two roads, and land to the south of the High Street is almost exclusively residential. This residential land is dominated by terraced housing.
- 6.22 Community facilities, such as the Swimming Baths and the Priory Centre are largely located in close proximity to, but not necessarily on, the High Street.
- 6.23 Given the nature of the surrounding area the Site lends itself for predominantly residential mixed use development with commercial and community uses. Non residential uses should

generally feature towards the north of the site and have ground floor presence. Residential development will generally be more appropriate adjacent to existing housing.

- 6.24 A leisure facility should be orientated toward the northern portion of the site (particularly its access) where accessibility and visibility is greatest, though such a large development form will be guided by historic buildings.
- 6.25 There is potential to refurbish and re-use the Magistrate's Court and to re-develop the southern portion, which is a later extension. The use could be retained together with the building or re-provided elsewhere. There is an opportunity for a variety of uses linking in with the Site.

Legibility and Enclosure

- 6.26 There are no long distance strategic views of the Site, or which indirectly affect the development potential of the site. The Clock Tower located on the northern frontage of the Town Hall building provides a focal point and a marker for the Site, as it can be viewed from a considerable distance in both directions down the High Street, and from the junction of Winchester Street and Avenue Road.
- 6.27 Views of the Chimney are somewhat limited. The only location with a clear view of the structure is from Acton Lane through Neville Close and this is an area with low footfall.
- 6.28 Generally speaking, the signage and accessibility to the Town Centre is poor, as is the linkage and signage to neighbouring areas, creating the sense that the Town Centre is more remote than it is.
- 6.29 The public realm is relatively good quality within the vicinity of the site though the pavement widths can be limiting to pedestrian flows.

7.0 Conservation and Historic Buildings Analysis

- 7.1 Appendix 3 provides description and analysis of the architectural and historical significance of each of the buildings and land which make up the Site. It also explains how several key issues have influenced the sequence of development at the Site. The following guidance therefore builds from this analysis and the planning policies contained in Section 5.

Conservation Strategy and the Future Use of the Site

- 7.2 The conservation of buildings of architectural and historical interest is the central issue for the future use of the site. The Acton civic complex is a positive asset to the neighbourhood and to the Borough of Ealing generally. Its conservation should not be seen as a constraint or a limitation on the future of Acton town centre, but rather as one of the key opportunities. Its rejuvenation will help to strengthen the sense of local identity and this in turn will make the surrounding area more attractive as a place to live, and in which to locate public and commercial activities.
- 7.3 Ealing Council is committed to the continuing public use of the site of the civic complex. This will include the following:
- The replacement of the Public Baths so that they provide facilities appropriate to the twenty-first century.
 - The renewal of the Acton Library within the civic complex
 - Greatly improved space and facilities for the community and cultural organisations which are currently using the Priory Centre
 - Improved office facilities for Council departments based at the civic complex
- 7.4 The realisation of these commitments will also depend on the release for private use of some of the space within the civic complex site. In other words the substantial public benefit that the Council wishes to create by its transformation of the civic complex will only be possible through a balanced approach to public and private benefit. Achieving this balance will be the key task in the formulation of detailed proposals for the site. The overall context for assessing these proposals will be set by PPS 5 *Planning for the Historic Environment*, the following aspects/definitions of which will be crucial in the assessment process.

PPS5 and the Definition of “Significance” and “Heritage Assets”

- 7.5 Significance is a key term in PPS5 and it is made clear that the understanding and assessment of significance is the foundation of planning for the historic environment. The definition of significance, as it is used in PP5 is as follows:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. ”

- 7.6 The archaeological interest of the site, and its implications for policy, is discussed below. Artistic and architectural interest are connected: for example the sculptural decoration of the Library façade has been noted in the analysis of significance at Appendix 3. However the detailed definition of “historic interest” in PPS5 should be noted:

- 7.7 *“An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide an emotional meaning for communities derived from their collective identity of a place and can symbolise wider values such as faith and cultural identity.”*

- 7.8 It is clear from this definition that the significance of the Acton civic complex needs to be understood and assessed broadly, including not only its architectural and institutional history but also its meaning for the local community.

- 7.9 Along with “significance”, PPS5 has introduced the term “heritage asset” in its discussion. It is defined as follows:

“A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated assets (as defined in this PPS) and assets identified by the local planning authority during the process of decision-making or through the plan-making process (including local listing). ”

- 7.10 PPS5 also defines a sub-category of heritage assets, namely “designated heritage assets” as follows:

"A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated as such under the relevant legislation"

7.11 These definitions apply to elements of the site as follows:

Designated heritage assets:	<p>Acton Town Hall and extension (grade II)</p> <p>Public Baths Chimney (grade II)</p> <p>Public Library (grade II)</p> <p>Sub-area 1 of the Acton Town Centre Conservation Area</p>
Undesignated heritage assets:	<p>Public baths and King's Rooms (locally listed)</p> <p>Priory Centre</p> <p>Magistrates Court</p> <p>Site of landscape features of the Berrymead estate</p> <p>Possible site of medieval manor house</p> <p>Archaeological Interest Area</p>

Policy Principles for the Determination of Planning and Listed Building Consent Applications

7.14 PPS5 sets out the principles which are to be applied in considering applications for consent relating to all heritage assets (PPS HE7 and HE8), and additional principles which apply in the case of designated heritage assets (PPS HE9). For two elements of the site, the Public Library and the Priory Centre, which stand alone as separate buildings, the issues will be clear-cut. Policy HE9 will apply to the Library and Policy HE7 will apply to the Priory Centre and Magistrates Court. The principles to be adopted in these cases are outlined below.

The Library

7.15 The determination of any applications relating to Acton Library will be made in the context of Policy HE9. It should be assumed that consent will be refused for any substantial harm to or loss of significance of the historic fabric of the 1900 building, unless the requirements described above are met..

The Priory Centre

- 7.16 The Priory Centre is construed as a “heritage asset” by virtue of its place in the development of civic institutions in Acton, and by virtue of its architectural significance as an example of school building design in the later nineteenth century.
- 7.17 Policy HE7.4 notes “the desirability of sustaining and enhancing the significance of heritage assets, and of utilising their positive role in place-shaping.”
- 7.18 The Priory Centre no longer provides the type and standard of accommodation that is needed by community organisations and it is Ealing Council’s intention to provide appropriate new spaces within the context of an overall plan for the Town Hall “island site”. The site of the Priory Centre is a financially valuable asset, the disposal of which will help to fund the overall rejuvenation of the civic complex. The disposal of the site, enabling a potential developer to demolish all the buildings on the site, would provide the maximum income for the council, which could then be used to cross-subsidise the non-income generating elements.
- 7.19 However this will be balanced against the desirability of sustaining the heritage assets of the civic complex. A summary assessment of the architectural and historical significance of the Priory Centre is included below (Appendix 3, paragraphs 11.24 and 11.25) It suggests that the central front bay of the building is of particular significance. The retention of this part of the building should therefore be considered in assessing the balance of public benefit, conservation objectives and the Council’s own policy objectives, in the determination of a planning application for the site.

The Main Site

- 7.20 For the main part of the site, namely the “island site” which includes the Town Hall, the Town Hall Extension, the Public Baths and the King’s Rooms, the situation is more complex. These buildings are virtually contiguous and clearly form a single townscape group. As the analysis above has shown the architectural and historical significances of the buildings are also interlinked. The heritage status of these elements is split between “designated” and “undesigned” assets but it would be artificial to apply the distinction too strictly. On this basis the future of the buildings should be considered in a “holistic manner”. In any case, all the “island site” buildings are within the Acton Town Centre Conservation Area, and this means that their future should be

considered under the principles of HE9, relating to “designated heritage assets”. Those principles are outlined as follows:

- 7.21 The first principle is the need for a detailed assessment of significance. Policy HE6.1 makes clear that the level of detail in the assessment should be “proportionate to the importance of the heritage asset” and in no more detail than is “sufficient to understand the potential impact of the proposal on the significance of the heritage asset.” A considerable amount of historical work has been done, by consultant conservation architects and archaeologists, and further primary research will not be needed. However two points need to be stressed. Firstly, as outlined above, assessments of significance will need to include reference to the meaning that the heritage assets hold for the local community, with appropriate evidence from public consultation. Secondly, detailed assessments of significance, at a room-by-room level will be required as part of the preparation and presentation of the option appraisals.
- 7.22 The second principle is that any proposals for the island site which will lead to substantial harm or total loss of significance (i.e. through demolition or the removal of historically significant features) will be considered in the light of Policy HE9.2, and the published Guidance to PPS5. The key to these considerations is the requirement for the applicant to demonstrate that “the substantial harm to or loss of significance is necessary in order to deliver substantial benefits that outweigh that harm or loss”. The guidance adds the following important comments: “Where substantial harm to, or total loss of, the asset’s significance is proposed a case can be made on the grounds that it is necessary to allow a proposal that offers substantial public benefits. For the loss to be necessary there will be no other reasonable means of delivering similar public benefits, for example through different design or development of an appropriate alternative site” (paragraph 91).
- 7.23 The implication of the guidance is that option appraisals will need to be presented as part of any proposals that will involve demolition or loss of significant features. They will need to demonstrate that “all reasonable means” have been employed to examine alternative design options which will avoid loss or harm.
- 7.24 Approval of detailed proposals for the island site will include the requirement for liaison with GLAAS (Greater London

Archaeological Advisory Service). At this time it is considered that Historic Building Recording is needed for those buildings which are targeted for demolition or alteration, and that accompanied archaeological work would be necessary for the sites where there will be new ground impact. This work on the Island site and the community centre could be done through planning conditions on consents granted.

Salisbury Road Car Park Site

- 7.25 This site is a sensitive heritage asset by virtue of its history as the site of Berrymead Priory. The Archaeological Desk-Based Assessment (AOC Archaeology Group September 2010) notes that trial trenching may be requested by the GLAAS Archaeological Advisor. This may be complemented by an archaeological watching brief during building work. It would be important to establish if an earlier medieval manor house was on the site to see if impact could be avoided if possible. Planning consent for the Salisbury Road car park will include the requirement for liaison with GLAAS, and for following their recommendations.

Magistrates Court

- 7.26 Although the building is not listed, it does however form part of the nearby Conservation Area. Along with its architectural attractiveness and its significance within the civic complex, means that it should be considered as a heritage asset. The re-use of the building is encouraged, and any proposals for modifications need to carefully respect the existing materials and detailing.
- 7.27 It is understood that the interior of the building has been heavily altered; has lost most of its original fixtures and fittings; and is therefore of lesser significance.

Gazetteer of Areas of Historical Significance in the Town Hall Buildings

- 7.28 The following drawings show the historical significance of areas within the Town Hall and Town Hall Extension:



Figure 7.1: Ground Floor Areas of Significance



Figure 7.2: Ground Floor Existing Features to Retain



Figure 7.3: First Floor Areas of Significance

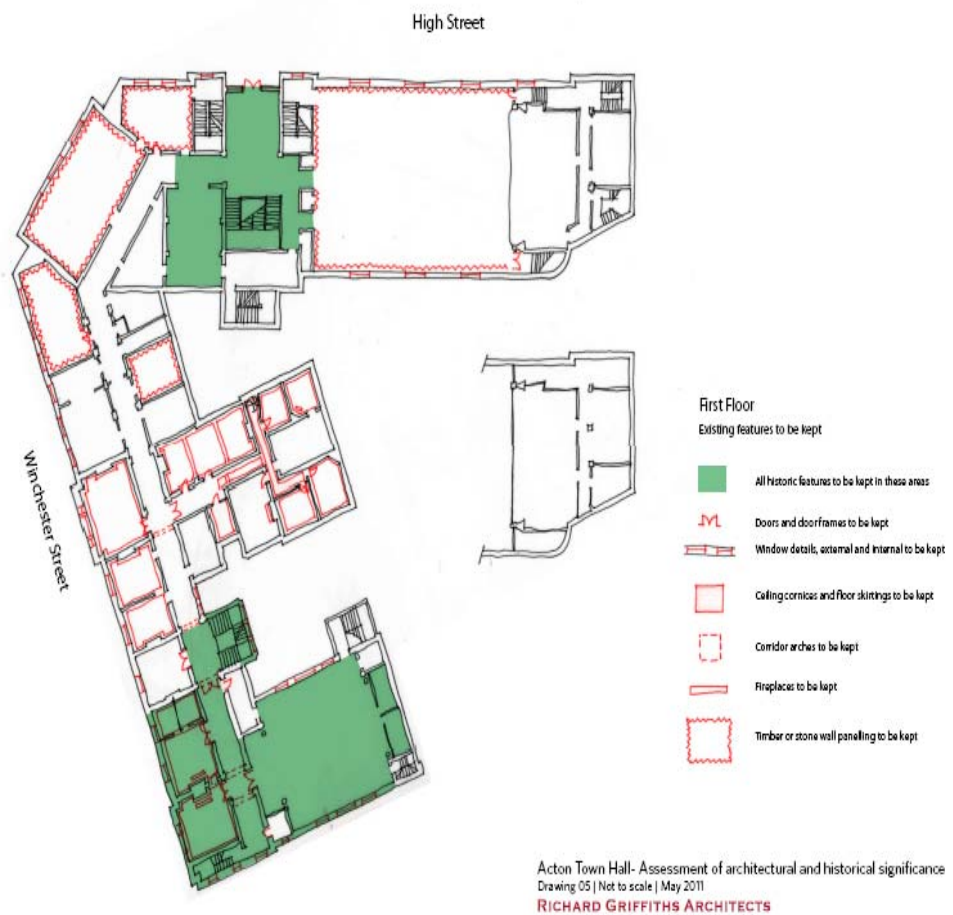


Figure 7.4: First Floor Existing Features to Retain

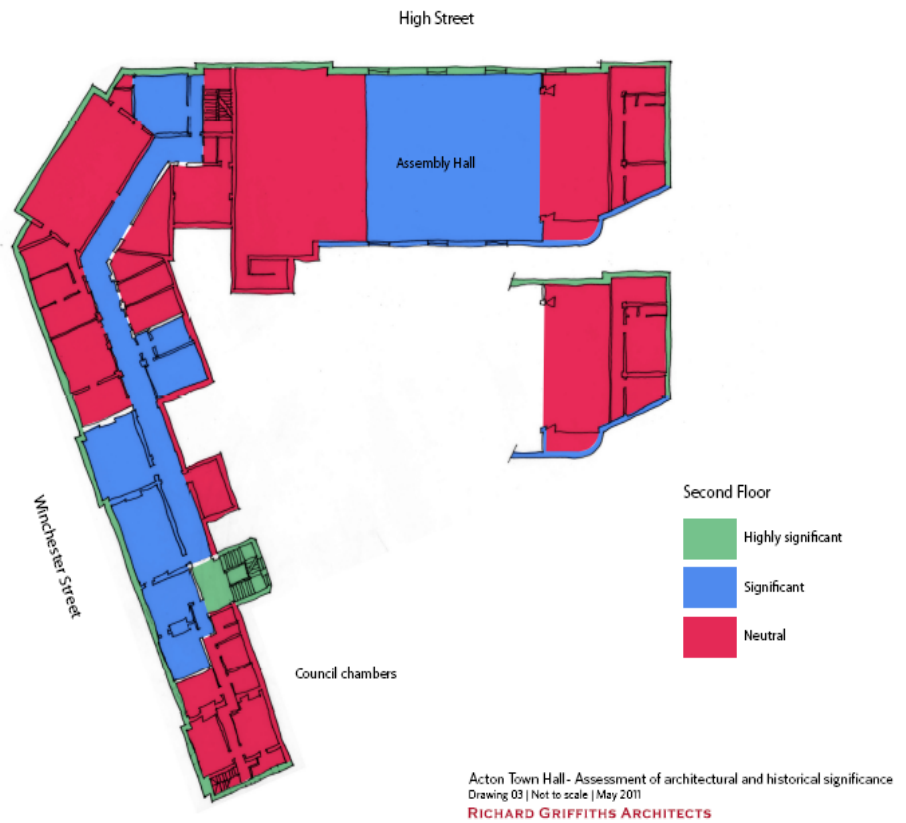


Figure 7.5: Second Floor Areas of Significance

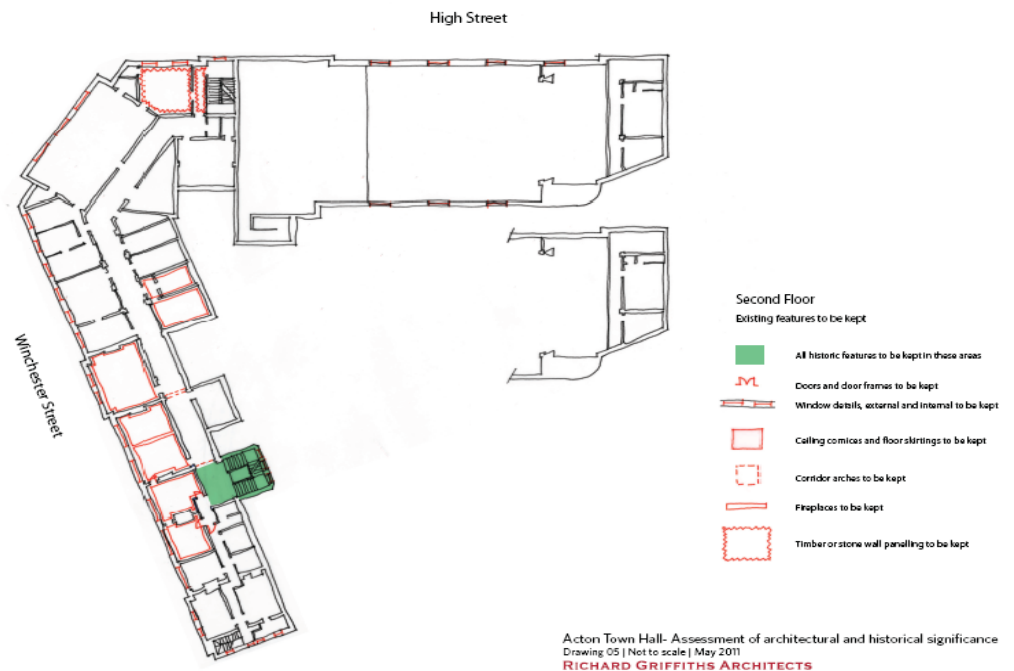


Figure 7.6: Second Floor Existing Features to Retain

- 7.29 They also illustrate individual details and finishes of historical significance, In any development proposals, changes to historically significant or highly significant areas will be assessed within the context of PPS5. The presumption is that changes to highly significant areas will need to be accompanied by a very strong justification.

8.0 Property Market Analysis

- 8.1 This section provides an overview of the property market and how this SPD may influence any redevelopment scheme's commercial and financial viability. Cushman & Wakefield were appointed by the Council in August 2010 to produce a report which reviews the property market and provides strategic disposal advice. This Section draws on the information contained within this report together with the Council's Property Strategy (2010).
- 8.2 The following principal uses proposed for the site are briefly considered below in market terms:
- Residential
 - Retail / Leisure
 - Offices
 - Hotels

Market Overview

Residential Market

- 8.3 The national residential market has witnessed considerable dynamism over the past 3 years. Largely as a consequence of the collapse of the US sub-prime market in 2007, global credit restrictions were put into place as the major banks re-priced property risk. The response was reduced and more selective lending, with expectations for greater deposits and additional risk premiums. The result of this was lower demand for property and price reductions, which varied significantly across the country. In some prime areas prices were almost unaffected, whereas the worst affected properties lost up to 40% of value within the space of 24 months. Typically the worst affected properties were in immature, untested markets and took the form of largely homogenous flatted developments, where there was little ability to distinguish product.
- 8.4 Many economic forecasters now believe that the UK economy has stabilised, and whereas growth over the coming 5-years will be measured reflecting the climate of austerity, the prospects of a 'double-dip' recession appear to be waning. The deficit of supply to the market during the recession has helped to prop up pricing,

and provided that credit restrictions continue to ease, this trend is likely to continue.

- 8.5 Regarded historically as one of the more affordable areas of west London, and a 'poor cousin' to Ealing, Acton is becoming more strongly regarded and benefiting from the gentrifying effect of out-movers from central London looking for better value. Acton is noted as a good neighbourhood for first time buyers and has been popular among renters. The proximity of the subject site to the High Street and its amenities is likely to appeal to a young market.
- 8.6 It is considered that the potential to incorporate residential development within heritage assets on the site could be a differentiating factor from other residential offers, provided that the product is specified and marketed carefully. Residential land values will also be sensitive to construction costs which are less transparent on refurbishment projects than new build.
- 8.7 It is considered that the Town Hall building on Winchester Street could convert reasonably well to residential uses and that this opportunity would appeal to a developer. A ready alternative to residential in this space is use as a hotel, however this is likely to be of lesser appeal to a developer unless a pre-let materialises, or the developer is itself a hotel operator.
- 8.8 The Priory Centre is a well configured site sitting within a residential context. It is considered that marketed as a residential development opportunity, this will attract significant developer interest.
- 8.9 The Car Park site also lends itself commercially to various forms of development, most notably residential. This is set off against the need to re-provide car parking spaces in the event of redevelopment.
- 8.10 Enabling development is therefore proposed on the site of the Priory Centre, the existing Library and within the Town Hall.
- 8.11 Any future planning application(s) proposing residential use(s) for the Site and associated financial viability studies will be assessed in the Council's usual way with respect to the affordable housing targets set out in policies outlined within Section 5 of this document. However it is acknowledged that the Acton Town Hall scheme experiences a unique combination of circumstances which provide local benefits and influence financial viability, including:

- Delivery of a range of new and improved community facilities and public services;
- Conservation and re-use of historic buildings and assets;
- The phasing of different parts of the Site over different time periods; and
- A range of other development requirements and planning contributions for the immediate and local area.

8.12 The ability to attain these social and physical objectives will be taken into consideration when assessing the financial viability of any proposed residential development.

Retail / Leisure Market

- 8.13 The principal destination for comparison retailing for residents of Acton is likely to be either Ealing Broadway, Westfield in Shepherds Bush or the West End. The newly opened Westfield London Shopping Centre at Shepherds Bush is 1.8 miles from the site. Westfield London is home to 1.615m sq ft of shopping space, comprising a total of 265 stores over 5 floors, with car parking for 4500 vehicles. The Centre is the largest indoor urban shopping area in the European Union, and the third largest shopping centre overall in the United Kingdom. Westfield has 5 anchor tenants, including Marks & Spencer and The House of Fraser. The development also incorporates a high end retail area known as 'The Village'. It has established itself as a rival to luxury retail destinations in the West End and Knightsbridge.
- 8.14 Acton High Street is principally dominated by retail uses at ground floor, with the Town Hall building forming notable exception to this trend. The retail provision is relatively weak and is comprised predominantly of value orientated independent traders, with a relatively high proportion of cafes, pubs and independent grocers.
- 8.15 Moving west along the High Street the retail offer improves modestly, and includes The Oaks Shopping Centre, which whilst value oriented is home to a number of multiples including Netto. The nearest foodstore of any significance is Morrisons on Kings Road, some 200m from the site.
- 8.16 It is considered that in its current guise, the Town Hall is unlikely to appeal to unit shop retailers for two reasons:
1. The pillars on the ground floor level of the Town Hall, with frontage on to the High Street, constitute a particularly unappealing facet to prospective tenants as they prevent the installation of full width glass shop frontages.
 2. Assuming it were possible to overcome this obstacle, another factor which may render the site of limited interest to retailers is the distance from the prime retail pitch and will therefore attract significantly less footfall.
- 8.17 Unit retail is therefore unlikely to be viable in this location. The only exception may be the Library site, however, it is considered that its structure and size means it is more likely to be of interest to a restaurant / leisure operator.

- 8.18 It is noted that the above could change in the event that a foodstore takes space within the proposed development as this would generate a significant number of visits to the area with retailers willing to occupy units adjacent to the proposed supermarket in order to benefit from increased traffic to the area. Other things being equal the use that delivers the highest site value is food retail.

Office Market

- 8.19 London is the primary office market in the United Kingdom, and is split between the two centres of the West End and the City. The momentum in take up of office space in these areas was not maintained in the second quarter of 2010 compared with the first three months of the year. The impact of slow economic growth, the general election and concerns over the budget resulted in occupier decisions being stalled.
- 8.20 While the development site is not situated within the core London office markets, Ealing is one of three London boroughs which are home to Park Royal. Spread over 750 hectares and comprising more than 2,000 businesses which employ 40,000 people, Park Royal is Europe's largest industrial estate. In addition to a plethora of small industrial firms, Park Royal also houses a number of large multi-national corporations, such as McVities, Heinz and the drinks company Diageo, owner of the Guinness brand, amongst others.
- 8.21 It is noted that there is a limited supply of purpose built Class B1 office space in close proximity to the site. The upper floors of the Town Hall may suit office use.
- 8.22 Ealing's Employment Land Review (ELR, September 2010) considered the property market context of the Acton Town Centre area, amongst other areas within the Borough, and concluded that it "does not appear to be suitable for supporting employment (B1/B2) uses due to the lack of demand for commercial properties, highlighted by the absence of business properties in the area".
- 8.23 It is considered that new build offices in particular are unlikely to be financially viable. With a pre-let to an occupier, refurbished space would require subsidy, dependent on the specification of the refurbishment.

Hotel Market

- 8.24 In order to establish whether there would be demand from hotel operators for space within a refurbished Town Hall, enquiries have been made both with operators directly and with Cushman & Wakefield's Hospitality and Leisure teams.
- 8.25 It is evident from enquiries that the nature of the building is such that the relatively high operating costs and inefficient division into rooms would prove unattractive to most budget hotel operators. Conversely, the more up-market operators, who tend to occupy period buildings, do not have requirements for Acton.
- 8.26 Even assuming that an operator could be secured, it is considered that a hotel conversion would not return a higher premium than renovation for residential use.
- 8.27 Subject to the above, it is considered that the Winchester Street frontage to both the Town Hall and the Library are more flexible, and more suitable for residential or hotel accommodation. The Town Hall, having both a prominent frontage onto the High Street and a more secluded aspect to Winchester Street / Salisbury Street may suit a hotel user if there is demand and appropriate values.

Commercial Overview

- 8.28 As noted in Section 1 of the SPD, the Baths no longer meet contemporary standards for public leisure facilities and significant money has been spent on repair and maintenance in the past and is required to be spent again to secure continued use.
- 8.29 The Council has approved capital funding to provide modern community and leisure facilities (including new library space, swimming pool, leisure centre and community space) through the regeneration of the buildings.
- 8.30 The key driver behind this development is therefore the provision of a new Council owned leisure facility.
- 8.31 There are limited options to site a facility of this size, and so to some extent the form of development is dictated by this.
- 8.32 The configuration of the remaining site should be designed to maximise the potential sales value so as to provide cross-subsidy for the non-income generating uses, whilst taking account of the competing desire to house the other required Council facilities.

8.33 The strategic disposal advice provided to the Council previously therefore focuses on the following approach:

- The Town Hall Extension is refurbished as civic space and community space including Council office space.
- The Priory Centre site is sold subject to planning consent and vacant possession for a housing scheme.
- The Swimming Baths / Kings Rooms are demolished and a new leisure facility with civic space above is procured on this site. The leisure centre element of the project is not intended to be brought to the market as an investment.
- The Town Hall is converted for residential use and a further infill residential block is added to the site.
- The Library is let and sold as a restaurant / bar / pub, subject to first obtaining planning consent. It is considered that the Library is capable of being treated as a stand-alone disposal following re-provision.
- The Magistrates Court which is in third party ownership, might only be considered as part of an enlarged car park site if the land and buildings would significantly add to the development options and associated values.

9.0 Development Guidance and Potential Option

- 9.1 The development should have regard to the Council's vision for Acton Town Centre. Set within this vision, in a complementary way, is the vision for the development of the site as follows:

"A mixed use development incorporating replacement community facilities and other enabling uses, and which takes advantage of the accessible location. Conservation and heritage assets should be at the forefront of any development proposals. Any development proposals should enhance the vitality and viability of the town centre and demonstrate excellent quality design and sustainable credentials."

- 9.2 Flowing from this vision, and drawing from the analysis contained within the proceeding chapters, Table 9.1 below provides some 'core' and 'non core' development objectives for the development of the site. These are set out against the principal development themes:

Table 9.1: Core and Non Core Development Objectives

Development Theme	'Core' Objectives	'Non Core' Objectives
Property, Uses & Delivery	<ul style="list-style-type: none"> • New leisure and community uses must be accommodated (swimming baths, library, new civic space and Council office accommodation). • A viable mix of enabling land uses, including residential and retail, compatible with the wider Town Centre should be delivered in a phased manner. • The preferred land use locations are as follows: <ul style="list-style-type: none"> ○ The Town Hall Extension – refurbished as civic space and community space including Council office space and the relocated library. ○ The Priory Centre site – residential use is the preferred use and community functions may also be appropriate. ○ The Swimming Baths / Kings Rooms – a new leisure facility including a swimming pool with civic space. ○ The Town Hall – conversion to residential use is the preferred use and community functions may also be appropriate. ○ The Library - restaurant / bar / pub use is the preferred use and community functions may also be appropriate. • Target 50% affordable housing on site subject to development viability. 	<ul style="list-style-type: none"> • The leisure facility should be located toward the northern portion of the site where accessibility and visibility is greatest. • Educational use (1Form entry primary school) on the Priory site • Magistrates Court redevelopment / reuse

Development Theme	'Core' Objectives	'Non Core' Objectives
Urban Design	<ul style="list-style-type: none"> Layout should respond to the existing urban form and provide strong edges to the urban blocks. Given the range of building heights along the High Street, there is the potential for imaginative building heights to create an exciting and coherent townscape. Within any development proposal, the Town Hall complex should remain the dominant element in this streetscape. Buildings should have reduced height and massing (comparative to the northern part of the site) to protect amenity and provide appropriate scale related to existing terraced housing. Higher density development will be broadly acceptable subject to detailed considerations. Active ground floor use encouraged particularly on to High Street, Winchester Street / Acton Lane and at public spaces. Provision of consistent and complimentary landscaping of high quality 	<ul style="list-style-type: none"> Taller landmark buildings may be appropriate to the Town Hall Extension and land at the south of the 'main / island' site. Clearly defined public fronts and private backs of buildings should be provided. There is scope for an imaginative public realm scheme which provides a safe and secure environment. Non residential uses should generally feature to the north of the site and have ground floor presence. The currently limited views of the listed chimney should be enhanced where possible.
Conservation and Historic Buildings	<ul style="list-style-type: none"> The Town Hall and Extension, Chimney and Library should be retained. A case could be made for the partial / total demolition of the Baths, King's Rooms and Priory Centre and any such proposals will be considered against the guidelines in PPS5. Proposals should be of the highest design excellence and have clear regenerative benefits in order to support the justification for any demolition of heritage assets. 	

Development Theme	'Core' Objectives	'Non Core' Objectives
Transport & Movement	<ul style="list-style-type: none"> Existing routes (e.g. Winchester Street and Acton Lane) should be enhanced where possible to provide safe, attractive pedestrian and cyclist connections. Vehicular access and servicing should not be from the High Street. Car parking design should be integral to the built form, although a two-decked solution on Salisbury Street car park may be appropriate. Maximum parking standards should not be exceeded. Car Clubs or similar initiatives could be provided to help to reduce overall car parking demand. Secure cycle parking for staff, users and residents should be provided. Pedestrian safety improvements and congestion relief measures 	<ul style="list-style-type: none"> Ensure servicing does not compromise the quality of public realm or conflict with pedestrian / cyclist movement and is carried out within the Site. Pedestrian entrances should be maximised directly facing Acton High Street, Winchester Street, Salisbury Street and Acton Lane.
Environment & Sustainability	<ul style="list-style-type: none"> Development must take into account the impact of noise affecting the site, especially from cars, but also aircraft. New residential development will be expected to meet lifetimes homes standards. Development will be expected to fully satisfy policy requirements relating to sustainable energy by submitting an Energy and Sustainability Statement to show how the objectives of both the London Plan and existing and emerging local policies are to be realised as part of each individual development and in particular the steps taken to apply the Mayor's energy hierarchy. This involves the adoption of the highest standards of sustainable design and construction, prioritisation of decentralised energy and combined heat and power or combined 	

Development Theme	'Core' Objectives	'Non Core' Objectives
	<p>heating, cooling and power and a carbon dioxide emissions reduction target of at least 20% from on site renewable energy generation unless it can be demonstrated that such provision is not feasible. In addition, a minimum of Code Level 4 of the Code for Sustainable Homes and BREEAM 'Very Good' rating will be sought for all developments.</p> <ul style="list-style-type: none"> • Design of development must encourage waste minimisation and maximum waste recycling. • The development's impact on air quality must be assessed and should be consistent with the air quality objectives - there must be no unacceptable impact on air quality. • Combined Heat and Power (CHP) scheme / decentralised energy network (potentially in association with CHP within the South Acton Estate). • Development should incorporate measures to reduce the risk of flooding from all sources and in particular incorporate SUDS. 	

10.0 Sustainability Appraisal Overview

- 10.1 In accordance with Section 5 of the Planning and Compulsory Purchase Act 2004 and EU Directive 2001/42/DC, a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) are required for Development Plan Documents (DPDs), produced as part of the Local Development Framework (LDF). Whilst the requirement to undertake an SA and SEA are separate and distinct, it is possible to satisfy both through a single appraisal process.
- 10.2 In January 2006, the Council published a SA Scoping Report for use alongside the preparation of DPDs. The Scoping Report includes baseline information about Ealing and identifies key environmental and sustainability issues for the Borough. To provide a sound basis for analysis, the report also identified relevant plans and programmes along with key sustainability issues and problems. From these issues, objectives and indicators have been produced.
- 10.3 As required by the SEA Directive (Article 6(2)), the SA Scoping Report was referred to the four consultation bodies with environmental responsibilities namely, the Countryside Agency and English Nature (now both part of Natural England), English Heritage, and the Environment Agency, in January 2006. Comments were received in response to this consultation. These responses resulted in a number of changes to the SA framework for the DPDs.
- 10.4 Following on from this, the Council published their updated SA incorporating SEA: Full Technical Report in September 2010. This provided a sustainability commentary on the Development Strategy DPD, published for consultation in September 2010. It effectively represents an interim/progress report prior to completion of the full SA report at Submission stage of the Development Strategy (2011).
- 10.5 Under the Planning and Compulsory Purchase Act 2004, SA is also mandatory for all Supplementary Planning Documents (SPDs), which form part of the LDF. A Strategic Environmental Assessment is also required under European Directive 2001/42/EC 'on the assessment of certain plans and programmes on the environment'.

- 10.6 Due to changes introduced by the Planning Act 2008, however, local authorities no longer need to undertake SA for SPDs, where the policies within the SPD are linked to a LDF DPD that has already undergone SA.
- 10.7 As such, it is concluded that since this SPD is linked to a DPD that has already undergone SA, a full SA / SEA is therefore not required for the SPD.
- 10.8 Therefore although a full SA / SEA is not required for this SPD within the overall context of the Borough's sustainability agenda and in order to ensure the SPD aligns with the Council's sustainability objectives, it is considered useful to assess the SPD against key objectives contained within the SA.
- 10.9 The establishment of SA Objectives and criteria is central to the SA process. The SA framework, based on these objectives, provides a way in which sustainability effects can be described, analysed and compared.
- 10.10 The SA Scoping Report as outlined above identified environmental, social and economic objectives contained in other relevant plans, policies and programmes, and baseline information on environmental, social and economic characteristics of the Borough.
- 10.11 The Scoping Report also identified key sustainability issues affecting the borough and set out the framework for the SA including objectives, criteria and indicators.
- 10.12 These SA objectives have subsequently been developed by the Council in response to the key sustainability issues identified through the scoping process, and were subsequently refined following consultation. Through this process, the Council has formulated 19 SA objectives.
- 10.13 Conclusions have therefore been drawn in the matrix (Appendix 4) against each of the SA objectives with specific regard to the objectives and principles contained within this SPD.

11.0 Implementation and Delivery

- 11.1 This section provides further guidance in relation to the likely route of delivery for the development of the Site.
- 11.2 This SPD sets out a vision for the regeneration of the Site. It provides the framework to enable a high density, mixed-use development. The UDP and emerging LDF emphasises the regeneration of the Site for a mix of uses.
- 11.3 Accordingly, the Council is committed to securing the delivery of a suitable development scheme as soon as possible to meet identified demand as well as other urban regeneration benefits for the Town Centre.
- 11.4 Proposals within the Site should seek to contribute to the funding of the necessary infrastructure required to deliver comprehensive regeneration through entering into a development agreement with the Council and entering into a Section 106 agreement under the Town and Country Planning Act 1990 or other relevant powers such as the Community Infrastructure Levy should the Council progress with this in the future. This is discussed in more detail later in this section.

Phasing

- 11.5 The comprehensive redevelopment of the Site is one of the Council's highest priorities. It is possible that areas will come forward for redevelopment at different times and each within more than one phase.
- 11.6 As such, the Council will expect development and linkages to come forward in a phased and coherent fashion, which has cognisance of the vision and development objectives – particularly in relation to heritage assets - for the Site.
- 11.7 Continuous operation of the Town Centre is important and phasing strategies should take account of this.
- 11.8 The Council is aware that the comprehensive regeneration of the Site will require a number of relocations which may involve seeking planning permission(s) on land outside of the Site to deliver the Council's vision for the Site.
- 11.9 Proposals that include the Magistrate's Court should not compromise the development objectives of the Site.

Development Requirements

11.10 The comprehensive regeneration of the Site has the potential to deliver a significant level of new development, which will have a direct impact on transport, social, and public realm infrastructure of the area.

11.11 Based upon the level of development envisaged on the Site, a number of environmental and transport-related benefits and community uses will be required. In terms of transport-related benefits this could include cycling / pedestrian improvements, congestion relief measures, provision of short term on-street parking or loading facilities.

11.12 The Council will seek planning obligations in accordance with the Replacement London Plan (Policy 8.2), the UDP (Policy 1.10) and the Development Strategy DPD (Proposal 6.4). The Council has also produced a draft SPD 9: Planning Obligations and Legal Agreements which provides further guidance.

11.13 Key obligations in the Replacement London Plan are:

- affordable Housing; and
- public transport improvements; followed by
- climate change, learning and skills, health facilities and services, childcare provisions, the provision of small shops.

11.14 The Council lists (draft SPD 9) matters that will potentially be covered by legal agreements as follows:

- Affordable homes – on-site and (rarely) off-site provision;
- Community facilities – on and off-site, e.g. schools capacity (financial contribution), library facilities, sports and community centres, healthcare facilities, childcare provision;
- Community and economic capacity, e.g. funding employment skills training, commitment to a Local Labour Scheme, building and fitting-out business start-up space, funding business support programmes, establishing a Community Development Trust on a new housing scheme;
- Environmental sustainability, e.g. on-site energy generation, Travel Plan, operation of a Car Club, waste and recycling initiatives;
- Building heritage, public realm and community safety, e.g. securing effective management of listed buildings, street

lighting renewal, footpath improvements, town centre improvements;

- Green space – play space, amenity space and nature conservation , e.g. implementing a nature conservation management plan, open space and play area improvements / provision, tree planting, enhancement of green corridors, creation/ maintenance of landscaped buffer zones;
- Site accessibility, e.g. funding bus service improvements and new bus routes, pedestrian and cyclist access/safety and signage improvements, increasing off-site junction capacity, building a new access route;
- Low car housing and city car club;
- Maintenance and management of on-site facilities, e.g. open space, play areas, community halls, roads and footways;
- Construction phasing, e.g. to ensure an appropriate mix of uses (especially if part of the development is justified as being ‘enabling’) or linked with access improvements.

11.15 The Draft SPD 9 provides formulae and thresholds for calculating the value of various planning obligations contributions.

11.16 For the Site the Council will consult on priorities for planning obligations both prior to and during the consideration of a planning application for a specific development (Draft SPD para 6.14). As a starting point, and drawing on the priorities for the Borough generally and Acton specifically in Appendix 5 of the Draft SPD 9, the following are suggested as priorities for the Council which may be secured as planning obligations:

- Restoration and management of historic buildings.
- Re-provision of the swimming pool.
- Provision of sports hall facility.
- A new community hub.
- Affordable housing.
- Local park improvements.
- Improved waste management facilities.
- Contributions to new primary school.
- Employment and skills training.

11.17 The Site falls outside the 1km radii of any proposed Crossrail stations so contributions towards Crossrail will not be required.

- 11.18 Planning obligations will be sought from developers bringing forward planning application(s) for the Site. Requirements will be the subject of negotiation as part of each individual planning application. When considering planning obligations in relation to individual planning applications the Council may take into account the wider objectives of the SPD, the unique combination of circumstances which provide local benefits and influence financial viability, including the delivery of a range of new and improved community facilities and public services and the conservation and re-use of historic buildings and assets.
- 11.19 Each application will be expected to comply with the objectives set out in this SPD.
- 11.20 Financial contributions will be required unless the development partner seeks prior Council approval to implement the works themselves.

Planning Application Requirements

- 11.21 It will be important to ensure that any planning application delivers the detailed schemes in a coordinated and comprehensive fashion. Whilst this SPD has been prepared in sufficient detail to allow detailed planning applications to come forward on individual sites these will need to demonstrate how any proposal responds to the vision and objectives and will be integrated into the development as a whole. Outline applications are unlikely to be acceptable given the significance of heritage value on the 'main' and library sites in particular.
- 11.22 The Council expects developers to undertake pre-application consultation in line with the Council's Statement of Community Involvement.
- 11.23 Planning applications for the Site will generally need to be accompanied by the following:
- Planning Statement.
 - Design and Access Statement.
 - Heritage Assessment.
 - Sustainability Statement (See SPG1 for Sustainability Checklist)
 - Environmental Impact Assessment (if required).
 - Transport Assessment
 - Green / Travel Plan.

- Retail Assessment (as appropriate).
- Remediation Statement (as appropriate).
- Air Quality Assessment.
- Energy Report.
- Archaeological Assessment.
- Noise & Vibration Assessment.
- Statement of Community Involvement.
- Sunlight and Daylight Assessment
- Tree Survey and Protection Measures (including street trees)
- Social Impact Statement (See SPD 2 Community Facilities)
- Flood Risk Assessment

Further Information

11.24 For further information please contact :

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Appendices

Appendix 1: PTAL Report for the Town Hall

PTAI Study Report File Details

Date 05/11/2010 09:34
Day of week M-F
Time period AM peak
Walk speed 4.8 kph
Walk file PLSQLTest
POI Name: 520311, 180043

Bus Services

Reliability factor for this mode is 2
Maximum walk time for this mode is 8 minutes
Maximum walk distance for this mode is 640.0 metres
Stop ACTON PARK THE VALE
Walk time to stop from POI is 7.07 minutes
Walk distance to stop from POI is 565.61 metres
Route 207 Direction OUT Frequency 9.0 giving AWT of 3.33 minutes
Route 607 Direction OUT Frequency 6.0 giving AWT of 5.0 minutes
Route 266 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes
Route 266 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes
Route 70 Direction OUT Frequency 6.0 giving AWT of 5.0 minutes
Stop ACTON LANE MEON ROAD
Walk time to stop from POI is 3.56 minutes
Walk distance to stop from POI is 284.65 metres
Route E3 Direction OUT Frequency 10.0 giving AWT of 3.0 minutes
Route E3 Direction BACK Frequency 10.0 giving AWT of 3.0 minutes
Route 440 Direction OUT Frequency 4.0 giving AWT of 7.5 minutes
Stop BOLLO BRIDGE RD ACTON LN
Walk time to stop from POI is 6.13 minutes
Walk distance to stop from POI is 490.77 metres
Route 440 Direction OUT Frequency 4.0 giving AWT of 7.5 minutes
Stop ACTON MARKET PLACE
Walk time to stop from POI is 6.2 minutes
Walk distance to stop from POI is 495.93 metres
Route 207 Direction OUT Frequency 9.0 giving AWT of 3.33 minutes
Route 607 Direction OUT Frequency 6.0 giving AWT of 5.0 minutes
Route E3 Direction OUT Frequency 10.0 giving AWT of 3.0 minutes
Route 427 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes
Route 440 Direction OUT Frequency 4.0 giving AWT of 7.5 minutes
Route 266 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes
Route 266 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes
Route 70 Direction OUT Frequency 6.0 giving AWT of 5.0 minutes
Stop ACTON BATHS
Walk time to stop from POI is 2.31 minutes
Walk distance to stop from POI is 184.61 metres
Route 266 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes
Stop ACTON TOWN HALL
Walk time to stop from POI is 0.45 minutes
Walk distance to stop from POI is 35.88 metres
Route 207 Direction OUT Frequency 9.0 giving AWT of 3.33 minutes
Route 607 Direction OUT Frequency 6.0 giving AWT of 5.0 minutes
Route 266 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes

Route 266 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes
Route 70 Direction OUT Frequency 6.0 giving AWT of 5.0 minutes
Stop ACTON CENTRAL STATION
Walk time to stop from POI is 4.14 minutes
Walk distance to stop from POI is 331.49 metres
Route 207 Direction OUT Frequency 9.0 giving AWT of 3.33 minutes
Route 607 Direction OUT Frequency 6.0 giving AWT of 5.0 minutes
Route 266 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes
Route 266 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes
Route 70 Direction OUT Frequency 6.0 giving AWT of 5.0 minutes
Stop HORN LANE MARKET PLACE
Walk time to stop from POI is 5.25 minutes
Walk distance to stop from POI is 420.04 metres
Route 427 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes
Route 70 Direction OUT Frequency 6.0 giving AWT of 5.0 minutes
Stop ACTON LIBRARY
Walk time to stop from POI is 1.03 minutes
Walk distance to stop from POI is 82.27 metres
Route E3 Direction OUT Frequency 10.0 giving AWT of 3.0 minutes
Route E3 Direction BACK Frequency 10.0 giving AWT of 3.0 minutes
Route 440 Direction OUT Frequency 4.0 giving AWT of 7.5 minutes
Stop ACTON STEYNE ROAD
Walk time to stop from POI is 7.51 minutes
Walk distance to stop from POI is 601 metres
Route 427 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes
Route 266 Direction OUT Frequency 7.5 giving AWT of 4.0 minutes
Route 266 Direction BACK Frequency 7.5 giving AWT of 4.0 minutes
Route 70 Direction OUT Frequency 6.0 giving AWT of 5.0 minutes
Stop SOUTHFIELD ROAD ACTON LANE
Walk time to stop from POI is 7.0 minutes
Walk distance to stop from POI is 559.98 metres
Route E3 Direction BACK Frequency 10.0 giving AWT of 3.0 minutes
Route E3 Direction OUT Frequency 10.0 giving AWT of 3.0 minutes

TATs for this mode

Route 207 Stop ACTON TOWN HALL TAT 5.78 minutes EDF 5.19
Route 607 Stop ACTON TOWN HALL TAT 7.45 minutes EDF 4.03
Route 266 Stop ACTON TOWN HALL TAT 6.45 minutes EDF 4.65
Route 70 Stop ACTON TOWN HALL TAT 7.45 minutes EDF 4.03
Route E3 Stop ACTON LIBRARY TAT 6.03 minutes EDF 4.98
Route 440 Stop ACTON LIBRARY TAT 10.53 minutes EDF 2.85
Route 427 Stop HORN LANE MARKET PLACE TAT 11.25 minutes EDF 2.67
Best EDF is 5.19
Half of all other EDFs is 11.6
AI for this mode is 16.79

Underground Services

Reliability factor for this mode is .75
Maximum walk time for this mode is 12 minutes
Maximum walk distance for this mode is 960.0 metres
** No stops found within buffer for this POI

Rail Services

Reliability factor for this mode is .75
Maximum walk time for this mode is 12 minutes
Maximum walk distance for this mode is 960.0 metres
Stop ACTON CENTRAL
Walk time to stop from POI is 7.0 minutes
Walk distance to stop from POI is 559.96 metres

Acton Town Hall and Surroundings I Supplementary Planning Document

Route RICHMOND to STRATFORD Direction T504-T750 Frequency 4.0 giving AWT of 7.5 minutes

TATs for this mode

Route RICHMOND to STRATFORD Stop ACTON CENTRAL TAT 15.25 minutes EDF 1.97

Best EDF is 1.97

Half of all other EDFs is 0.0

Appendix 2: Relevant Planning Policies

National Planning Policy Statements (PPS) / Planning Policy Guidance Notes (PPG)

- PPS1: Delivering Sustainable Development (February 2005)
- PPS3: Housing (November 2006)
- PPS4: Planning for Sustainable Economic Growth (December 2009)
- PPS5: Planning for the Historic Environment (2010)
- PPG13: Transport (March 2001)
- PPG17: Planning for Open Space, Sport and Recreation (July 2002)
- PPS22: Renewable Energy (August 2004)
- PPS23: Planning and Pollution Control (November 2004)
- PPG24: Planning and Noise (September 1994)

Regional Guidance

The London Plan (Consolidated with Alterations since 2004) (February 2008):

- Policy 2A.1 Sustainability criteria
- Policy 2A.2 The spatial strategy for development
- Policy 2A.8 Town centres
- Policy 3A.1 Increasing London's supply of housing
- Policy 3A.2 Borough housing targets
- Policy 3A.3 Maximising the potential of sites
- Policy 3A.5 Housing choice
- Policy 3A.6 Quality of new housing provision
- Policy 3A.8 Definition of affordable housing
- Policy 3A.10 Negotiating affordable housing in individual private residential and mixed-use schemes
- Policy 3A.11 Affordable housing standard
- Policy 3A.18 Protection and enhance of social infrastructure and community facilities
- Policy 3B.1 Developing London's economy

Policy 3B.2 Office demand and supply

Policy 3B.3 Mixed use development

Policy 3C.2 Matching development to transport capacity

Policy 3C.3 Sustainable transport in London

Policy 3C.17 Tackling congestion and reducing traffic

Policy 3C.21 Improving conditions for walking

Policy 3C.22 Improving conditions for cycling

Policy 3C.23 Parking strategy

Policy 3C.24 Parking in town centres

Policy 3D.1 Supporting town centres

Policy 3D.2 Town centre development

Policy 4A.3 Sustainable design and construction

Policy 4A.4 Energy assessment

Policy 4A.7 Renewable energy

Policy 4A.14 Sustainable drainage

Policy 4A.19 Improving air quality

Policy 4A. 20 Reducing noise and soundscapes

Policy 4B.1 Design principles for a compact city

Policy 4B.2 Promoting world-class architecture and design

Policy 4B.3 Enhancing the quality of the public realm

Policy 4B.4 London's buildings: retrofitting

Policy 4B.5 Creating an inclusive environment

Policy 4B.8 Respect local context and communities

Policy 4B.11 London's built heritage

Policy 4B.12 Heritage conservation

Policy 4B.15 Archaeology

Policy 6A.4 Priorities in planning obligations

Policy 6A.5 Planning obligations

Consultation Draft Replacement London Plan (October 2009)

The London Plan SPG: Accessible London (April 2004)

The London Plan SPG: Housing (November 2005)

The London Plan SPG: Sustainable Design and Construction (May 2006)

Best Practice Guidance: Wheelchair Accessible Housing (September 2007)

The London Plan SPG: Providing for Children and Young People's Play and Informal Recreation (March 2008)

The London Plan: Interim Housing Supplementary Guidance (April 2010)

The London Plan Housing SPG EiP Draft (August 2010)

London Housing Design Guide: Interim Edition (August 2010)

Local Guidance

Ealing Unitary Development Plan (2004)

Strategy

1.10 – Legal Agreements

Environmental Resource and Waste

2.1 - Environmental and Other Sustainability Impacts

2.6 - Air Pollution and Quality

2.7 - Contaminated land

2.9 - Energy

2.10 - Waste Minimisation and Management

Urban Design

4.1 - Design of Developments

4.2 - Mixed Use

4.3 - Inclusive Design – Access for All

4.4 - Community Safety

4.5 – Landscaping, Tree Protection and Planting

4.7 - Locally Listed Buildings, Buildings with Façade Value and Incidental Features

4.8 - Conservation Areas

4.11 - Noise and Vibration

4.12 - Light Pollution

Housing

5.2 - Affordable Housing

5.3 - Lifetime Homes and Wheelchair Housing

5.4 - Range of Dwelling Sizes and Types

5.5 - Residential Design

5.6 - Small Dwellings and Flats

Shopping and Town Centres

7.1 - Promoting and Enhancing a Network of Centres and Promoting Key Sites

7.2 - New Shopping Development and the Sequential Test

Transport

9.1 – Development, Access and Parking

9.5 – Walking and Streetscape

9.6 – Cycling

9.7 - Accessible Transport

9.8 - Low Car Housing and City Car Clubs

9.9 – Highways and Traffic Management

Sites and Areas

10.12 - Conservation Areas (3 - Acton Town Centre)

10.13 - Archaeological Interest Areas

10.17 – Zones for Parking Standards

10.20 – Road Hierarchy

Ealing Supplementary Planning Guidance/Documents (SPG/SPD)

SPG 1: Sustainability Checklist

SPG 2: Water, Drainage and Flooding (draft)

SPG 3: Air Quality (draft)

SPG 4: Refuse and Recycling

SPG 5: Urban Design Statements

SPG 6: Plot Ratio

SPG 7: Accessible Ealing

SPG 8: Safer Ealing

SPG 9: Trees

SPG 10: Noise and Vibration

SPG 12: Greening your Home (draft)

SPG 13: Garden Space

SPG 14: Indoor Living Space

SPG 17: Baby Care Facilities

SPG 18: Places for Eating, Drinking and Entertainment

SPG 20: Transport Assessments

SPG 21: Green Travel Plans

SPG TC: Town Centres (Acton, Ealing, Greenford, Hanwell, Southall)

SPD 1: Affordable Housing

SPD 2: Community Facilities SPD 3: Low Car Housing in Controlled Parking Zones

SPD 7: Car Clubs

DSPG 9: Planning Obligations (draft)

Acton Town Centre Conservation Area Appraisal (April 2009)

Acton Town Centre Conservation Area Management Plan (April 2009)

Appendix 3: Historical Building Analysis

The buildings and sites that make up the overall Town Hall site are here described in historical sequence:

The Salisbury Road Car Park

1. The car park is the site of "Berrymead Priory". The earliest house on the site may have been built in the 16th century and there is documentary evidence of it being acquired by Sir John Trevor in 1661. In 1705 the house is described as "handsome, low, and regular, with fine gardens". The building was transformed in the early nineteenth century and by the time of its listing in 1973 it was described as a "castellated Gothic building". The site acquired historical significance by virtue of its association with Lady Wortley Montague, who lived in the former house in the eighteenth century.
2. Berrymead was bought by Ealing Council in 1977. In 1984, with the approval of the Department of the Environment, it was demolished. Although the Council were encouraged to allow archaeological study of the site, to explore possible evidence of a 13th century manor house on the site, no excavation records exist. It is possible that the rubble from the demolition of the house was used to level the site.
3. Although no physical evidence remains of Berrymead Priory it is within an Archaeological Interest Area. The implications for the future development of the site are noted below.

The Priory Centre

4. The Priory Centre is a community centre based in former school buildings. The buildings have a complex history which begins in 1882 with the opening of a school for 360 boys and 300 girls. Temporary buildings for technical education were added by Middlesex County Council at the rear of the site, and removed in 1894. Initially infants shared the girls' accommodation until the construction of an extension in 1896. This included a large central hall, with seating for 600. The hall was used for public assemblies in addition to its use by the school.
5. In the inter-war and post-war periods the school went through numerous reorganisations as a secondary school. In 1974, after the establishment of the London Borough of Ealing it became a first school, sharing the buildings with a youth centre. It closed as a

school in 1979 and part of the front range of buildings was demolished. The southern part of the site was disposed of for housing.

6. Following the closure of the school the buildings were converted for use as a community centre: the Priory Centre. Major rebuilding of the hall and the rear parts of the building took place in the 1980's after a fire. The hall roof was carefully restored using laminated timbers to match the original structural form.
7. The Centre currently houses 37 different activities and is the base for 4 organisations. The main hall is used for conferences, wedding receptions and birthday parties. There is also a dance studio, a drama studio, exhibition room and cafeteria. There are two outside play areas used by the playgroup and nursery which occupy parts of the building. The Centre is of particular significance for a number of ethnic communities in Ealing. It provides space and resources in a relaxed and secure environment and although the Centre is owned and managed by Ealing Council they do so with a light touch.
8. The building has a single entrance, so in principle control and security can be maintained from a single point. However the circulation in the building is awkward, and there are numerous secondary doors to the outside. The building is in need of external repair. Wholesale internal refurbishment would be required in order for it to meet modern expectations of servicing, accessibility, finishes, appearance and style.

The Library

9. The Acton Public Library was opened in 1900. It was designed to face High Street, with a three-storey cluster of blocks containing the entrance, offices etc., and a large single hall space behind. This was the main library space, a brick building with buttresses, a high roof, and dormers, a little like a village hall.
10. The construction of the Library was partly funded by John Passmore Edwards, and it was one of fifty public buildings which he sponsored in London and the south-east between 1889 and 1904. The architect was Maurice B. Adams (1849-1933). Adams lived in the nearby suburb of Bedford Park, where he designed the Parish Hall. He was an active designer of houses and cottages (at Port Sunlight for instance), a gifted architectural draughtsman and a writer of books and articles on architectural topics.

11. The appearance of the Library was radically changed in the 1960s with the addition of a first floor above the original library space. There have been significant changes internally but many of the finishes and details remain in the entrance block, and its exterior on the High Street is largely intact.

Acton Public Baths

12. The Acton Public Swimming Baths were opened in 1904 to the design of D.J.Ebbetts, the Borough Surveyor of Acton Urban District Council. The original building provided two pools (32m x 9.1m and 22.9x9.1) each with a diving stage and water chute. The large pool could be covered over for use as a concert and dance hall. There were sets of "lassar" baths: individual sauna-like compartments each containing a shower and foot bath. There was also a laundry and an engine room which generated electricity for both the Baths and the Library.
13. The building was refurbished in 1989-90 and radical changes were made to the end elevations of the blocks on Salisbury Street. The two original pools are still in operation, but the subsidiary spaces have now been adapted for use as a dance studio and fitness centre. The central pavilion block has offices on the first floor but there are access difficulties from the second floor and it is currently unused.
14. The building lacks many of the features that are currently expected in a leisure centre: changing facilities are inadequate, accessibility is poor, the pools themselves do not match current standards, there is only a limited provision of fitness and training equipment, and there is hardly any café or social space.

County Magistrates' Court, Winchester Street

15. The Magistrates Court was built in 1907 and designed by the Middlesex County Architect H.T.Wakelam. It is of red brick, with stone details and has steeply-pitched Welsh slate roofs. There is a central courtroom facing Winchester Street, higher than the subsidiary parts of the building. The courtroom's prominence is further emphasised by a stone entablature above rusticated brick pilasters, with round-headed windows in each bay. The façade on Salisbury Street is also given its own expression, and here a shorter entablature is surmounted by a pediment in which the arms of Middlesex are carved.

16. By using facades on both streets the architect has been able to incorporate the required number of separate entrances (a feature of court buildings) while maintaining a framework of symmetrical classical design. Although the building was commissioned by a different entity from the Acton Urban District Council, the choice of location suggests that a consensus was developing that the immediate area should become a civic complex for Acton.

Acton Town Hall

17. Acton became an Urban District of Middlesex under the Local Government Act of 1894. Its offices were originally in the High Street, at the foot of Acton Hill, in a building of "Italianate Gothic" style. An architectural competition for new offices was organised in 1903 but no building work was commissioned. With a change of Council a new competition was organised in 1907, for which Richard Norman Shaw was the assessor. The winners were Raffles and Grindley and they worked with D.J.Ebbetts, the Borough Engineer and Surveyor, on the execution of the design. The building was opened in 1910.
18. The building provided offices, a Council Chamber, and a caretaker's flat. It is on three storeys, a U-shape in plan with an entrance placed symmetrically on Winchester Road. The Council Chamber turns the corner of the composition into Salisbury Street and has its own symmetrical expression, with a grand Serlian window on the axis of the original seating arrangement.
19. The building is largely unchanged externally and much of the original detailing and decoration remains. It is now entirely occupied by offices for the London Borough of Ealing: the caretaker's flat and the Council Chamber are used as offices and training spaces.

The King's Rooms

20. The King's Rooms building opened in 1926 to provide additional facilities in conjunction with the Swimming Baths, for example to provide access and refreshment spaces for the main pool when it was boarded over and used for events. It included a grand first floor entertaining room, with windows overlooking the main pool. The building has three storeys with an entrance on the High Street. It was designed by William Leicester (1872-1951), the Chief Architectural Assistant to W.G.Cross, the Borough Surveyor of the Borough of Acton.

21. The façade of the building is unchanged, and the decoration of the first floor entertaining room and the stair is largely intact. However much of the interior is now subdivided and used as offices and interview rooms. The second floor is unused, following fire damage.

The Town Hall Extension

22. The possibility of a future extension to the Town Hall was envisaged as early as 1909 and discussions for the project began in 1933. The Borough Surveyor, W.G. Cross and his chief architectural assistant William Leicester were responsible for the project, but the Council consulted the architect Robert Atkinson at the early stages of the design. The Extension was opened in 1939.
23. The building provided further office accommodation, a large committee room and a splendid Assembly Hall with stage and balcony. It has its own entrance on the High Street, and a grand ceremonial stair leading to the first floor Assembly Hall. The ground and first floors also link to the central corridor of the original Town Hall building. This makes for simplicity in plan for the extended building, but it also means that the main foyer of the Extension is a few steps down from pavement level.
24. The exterior of the building is intact and the finishes and details of the main public spaces are virtually intact. The Assembly Hall is under-used at the moment, but the office space is in use.

The Architectural and Historical Significance of the Acton Civic Buildings

22. Each of the buildings described above – the school, the library, the swimming baths, the town hall, The King's Rooms and the town hall extension – provides a good example of changing approaches to public architecture in the period from 1880 to 1939. However they acquire greater significance by virtue of their grouping. Over a fifty year period and in a step-by-step manner a civic centre developed to serve the Borough of Acton. Summary assessments of the architectural and historical significance of the buildings on the site are outlined below, but it should be stressed that the individual assessments are to be seen in the larger context of the Acton civic complex as a whole.

Summary Assessments of Architectural Significance

The Priory Centre

23. The school in which the Priory Centre is now accommodated was designed and built for economy. The circulation spaces and subsidiary spaces are very modest and utilitarian, and the classrooms are large, with lofty ceilings supported by timber trusses, in order to accommodate the maximum number of pupils in well-ventilated and daylit spaces. The construction is of London stocks, with red brick dressings and painted stone cills and lintels. Sculptural and decorative elaboration is restricted to the centre bay in the form of two red brick niches, and a decorated spandrel over the main axial arch. The style is familiar from London School Board projects of the same period, but it is modestly expressed and perhaps points up the difference in ambition (and expenditure) between the metropolitan programme and the efforts of a suburban School Board.

The Passmore Edwards Library:

24. The Passmore Edwards Library is architecturally much more ambitious. It is a fine example of the fusion of arts and crafts and classical elements, common in public buildings of the period. This allowed a degree of formality and axial planning, and a good deal of freedom in the arrangements of sub-blocks of the building and choice of decoration. The arts and crafts elements are in the spirit of Philip Webb while the classical elements are free interpretations of the popular Jacobean style. A third distinctive

element is added, namely the fine sculptural ensemble that decorate the two projecting wings on the High Street. The striped brick and stone facades introduce the motif which was adopted by later architects of the Acton civic complex, and which served to bring disparate buildings together into an informal unity.

25. The Passmore Edwards Library is Listed Grade II and the text of the Listing makes the following assessment of the building's significance:

"One of the most picturesque library designs, with an unusually large amount of well-executed decorative arcing (sic), by the most prolific designer of public libraries. ... This library forms an important civic group with the adjoining town hall. The interior and side elevations are of lesser interest: what is really important about this building is the exceptionally sculptural façade."

The Public Baths

22. The public baths adopted a simplified version of the idiom used in the design of the Library. There is more brick, and less stone, and the external decoration is much more modest. It is a much larger building than the Library, and there is less opportunity for picturesque massing. The organising principle is a simple symmetry, with the gable ends of the two pools expressed either side of a central pavilion. Scale, symmetry and relatively simple detailing allow the building to express civic confidence. However the entrance of the building is on a minor suburban street, so the expression is muted. It presents blank brickwork to the more important Acton Lane, and it has no presence at all on the High Street.
23. The public baths are locally listed.
24. The chimney of the public baths is listed (Grade II). The listing describes the chimney as "unusually handsome" and makes the observation that in 1902 Maurice Adams (the architect of the Passmore Edwards Library in Acton) had designed a similar chimney for the public baths in Wells Way, South London.

The Magistrates Court

22. The Magistrates' Court uses the same range of materials and stylistic elements as the other buildings in the civic complex: red brick, slate roofs, stone details, with classical entablatures and window motifs. These similarities are an important aspect of the

civic complex: the coherence of the buildings is not just a historical fact but can be easily seen and appreciated by the person in the street. The Magistrates' Court is smaller than the other buildings in the complex, but it is carefully composed and richly detailed. This concentration of architectural effect is appealing and gives the building considerable charm.

23. Although the building is not listed, it does however form part of the nearby Conservation Area. Along with its architectural attractiveness and its significance within the civic complex, means that it should be considered as a heritage asset. The re-use of the building is encouraged, and any proposals for modifications need to carefully respect the existing materials and detailing.

The Town Hall

22. The Town Hall is an exercise in the neo-Baroque style which, by the early years of the twentieth century, was supplanting the arts and crafts idiom. The red brick and stone dressings of the Library remain the key visual elements and they are composed into three layers: stone at the ground floor, brick at middle level and striped brick and stone at the second floor. A strongly detailed cornice is terminated at the north and south ends by broken pediments. There are segmental pediments over windows, prominent keystones and rustication, all characteristic elements of the neo-Baroque style. Internally the most significant space is the Council Chamber. It is square in plan with columned niches on each side. There was wood panelling, a strongly decorated ceiling and elaborate suspended light fittings.
23. The Town Hall (together with the Town Hall extension) is listed Grade II, and the relevant key points of the Listing assessment are shown below, in the entry for the Town Hall Extension.

The King's Rooms

22. The King's Rooms aimed to remedy the lack of ceremonial and circulation space for the Baths, and to provide a way in to the Baths from the High Street. It is striped brick and stone once more, but the exuberance of the neo-Baroque town hall has been replaced by a more formal neo-Georgian style.
23. The King's Rooms are locally listed.

The Town Hall Extension

22. The final addition to the complex, the Town Hall Extension, is a very striking example of how modern and classical elements could be combined by architects in the late nineteen thirties. The basic three-part façade design of the main Town Hall elevation is continued in a slightly simplified form, and the cornice is continued exactly. In fact the junction between the original Town Hall and the extension is not at all obvious on Winchester Street, a tribute to the architectural good manners that were observed. The continuous wrapping of the façade is modulated in two places. Firstly a diagonal plane is set forward from the main façade at the junction of the High Street and Winchester Street. This is surmounted, above the cornice, by a massive stone panel on which the date of construction is recorded. This is all in a broadly classical idiom, but the second modulation is quite different, an abstract composition in stone at the High Street entrance to the Assembly Room. Above this, in three massive stages, is a stone clock tower, again expressed abstractly and with only modest decoration.
23. The decoration of the stair hall which leads to the Assembly Room is intact. Stone, decorated and stained glass, metal and timber are all used to give a modern interpretation of monumentality: a combination of fine materials, space and light.
24. The Town Hall Extension forms part of the overall listing of the Town Hall. The key passage in the Listing assessment is as follows:

"... Robert Atkinson was one of the leading private architects from the late 1930s to specialise in public commissions, and the main entrance shows his influence and use of good materials in a simple Scandinavian-inspired fashion. A harmonious juxtaposition of Edwardian and 1930s styles, both of good quality and demonstrative of civic architecture across the first half of the twentieth century."

Key issues of historical significance

22. The sequence of buildings in the civic complex shows the expanding role of local government as Acton developed in the late nineteenth and early twentieth centuries:
- 1865: Acton Local Board: The Acton Lane School
- 1894: Acton Urban District Council: the Library and the Town Hall
- 1921: Municipal Borough of Acton: the King's Rooms and the Town Hall Extension

23. The reorganisation of local government in 1965 brought together the Boroughs of Ealing, Acton and Southall into a new entity. The London Borough of Ealing centred its administration, Council chamber and meeting rooms around the existing Town Hall in the centre of Ealing, and consolidated this with the construction of a new civic centre. The civic complex in Acton, like many others in London, lost its symbolic and political status, and its offices became branch departments of functions centred at Ealing. Its current importance is therefore twofold. It remains a vivid physical reminder of Acton's municipal past, and, equally importantly, it provides a physical marker for Acton's continuing sense of identity as a London neighbourhood.

Appendix 4: Sustainability Appraisal Objectives Matrix

No.	Objective	Type	SPD Impact on SA Objectives	Assessment
1.	Actively support inclusive access to essential health, community and local services	Social	The SPD objectives will deliver enhanced and modern public leisure facilities together with civic and community space and a new library. All sectors of the community will have access to these facilities.	++
2.	Promote community involvement, voluntary and partnership working	Social	The SPD objectives will deliver enhanced community space available for community groups and partnerships to use.	++
3.	Preserve and enhance the local historic environment and cultural heritage	Environmental /Social	The SPD fully considers heritage policies contained within both national and local guidance. SPD objectives ensure that the historic and cultural environment will be preserved and enhanced and historical elements utilised to ensure viable and appropriate uses are delivered.	++
4.	Reduce crime, fear of crime and antisocial behaviour	Social	The SPD seeks to deliver improved community facilities and civic space thereby improving community cohesion.	+
5.	Minimise detrimental noise impacts	Environmental	The SPD will deliver a range of improved community and leisure facilities, together with residential development. These may increase car movements and create noise impacts. However, sustainable forms of travel are encouraged in order to minimise this impact.	-
6.	Improve access to well	Social	The SPD promotes the delivery of residential accommodation on	++

	designed, affordable, inclusive and appropriately located housing		the Priory Centre site and in the Town Hall which could include affordable subject to viability. This affordable housing would be delivered in a suitable town centre location.	
7.	Reduce health inequalities and promote healthy living	Social	The SPD seeks to deliver a modern leisure facility which will be accessible to all sectors of the community.	++
8.	Protect and enhance the network of open space	Environmental	The SPD seeks to redevelop a key town centre site and as such does not impact on the open space network of the Borough.	No impact
9.	Protect and enhance the natural environment and biodiversity	Environmental	The SPD seeks to redevelop a key town centre site and as such does not impact on the Borough's natural environment.	No impact
10.	Improve air quality	Environmental	The SPD will deliver a range of improved community and leisure facilities, together with residential development. These may increase car movements and impact air quality. However, sustainable forms of travel are encouraged.	-
11.	Reduce contributions to and vulnerability to climate change	Environmental	The SPD seeks to re-use existing buildings and limits the amount of new build. Opportunities exist to include renewable energy and carbon saving technology within the development including a district wide heating system.	+
12.	Improve water quality, conserve water resources, and minimise the impact of flooding	Environmental	The SPD includes opportunities to conserve water resources through renewable technology within the proposed development. Overall, the objectives of the SPD are not expected to impact on flooding.	No impact

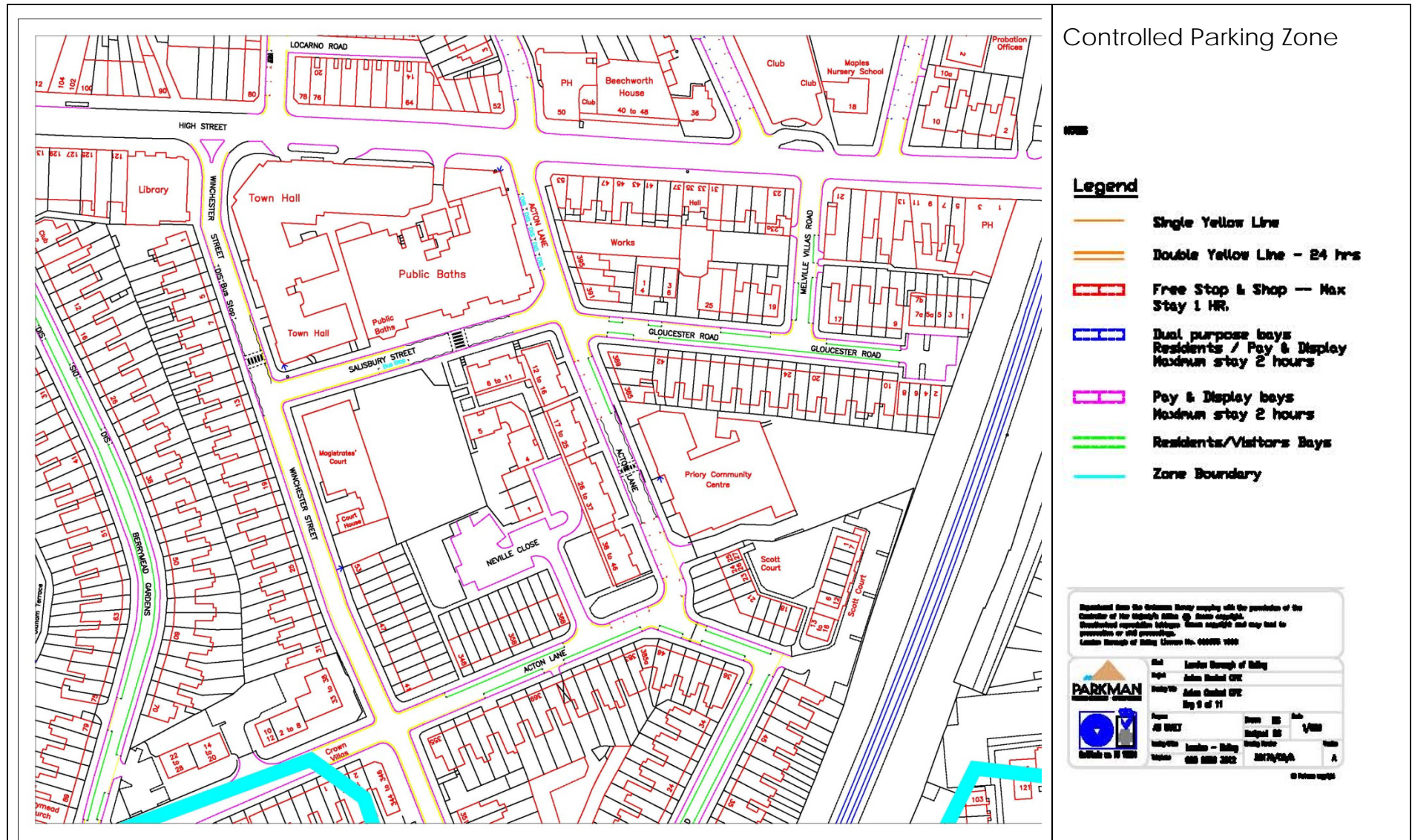
13.	Enhance existing buildings and facilities, and encourage the reuse / remediation of vacant land and under-utilised buildings	Environmental	The SPD promotes the re-use of a range of existing buildings (e.g. town hall, town hall extension, library etc) and the intensification of an appropriate town centre site.	++
14.	Reduce waste generation and increase waste recycling	Environmental	The SPD includes opportunities to promote recycling within the new community and civic facilities, together within the proposed residential use.	+
15.	Reduce vehicular dependency and promote the use of sustainable modes of transport	Environmental	The SPD will deliver a range of improved community and leisure facilities, together with residential development. These may increase car movements, however, sustainable forms of travel to the Site are encouraged.	+
16.	Promote local employment opportunities, training and skills attainment	Economic	The SPD seeks to re-provide and improve community and civic uses which provide local employment opportunities and training. The development will also deliver new employment opportunities throughout the construction process and through the delivery of new uses such as restaurants and bars.	++
17.	Support sustainable economic growth	Economic	The SPD seeks to re-provide and improve permanent employment generating uses on the Site.	++
18.	Improve opportunities for education and training	Social/ Economic	The SPD objectives will deliver opportunities for education and training through the provision of a new library together with civic and community space.	++
19.	Promote cultural and community identity	Social	The SPD objectives seek to deliver a new heart for community uses within Acton together with opportunities for community groups to	++

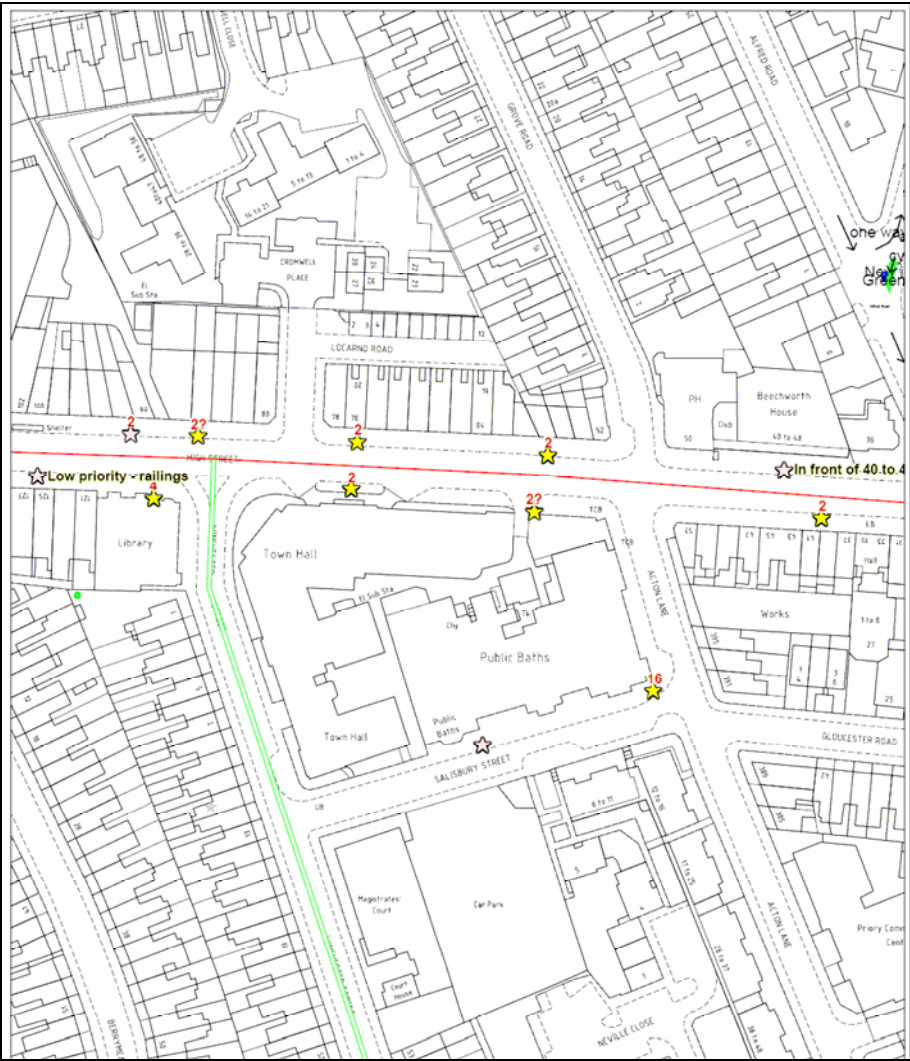
			utilise the community spaces and leisure facilities.	
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Assessment Criteria Key:

++	Major Positive
+	Minor Positive
	No Impact
-	Minor Negative
--	Major Negative
?	Uncertain

Appendix 5: Controlled Parking Zone and Existing and Proposed Cycle Parking Maps





 Proposed cycle stands

 Existing cycle stands

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