



Quod

Ealing Local Plan Examination

Matters and Questions
Response

Matter 9 –
Development Sites

(Respondent Ref. 717)

JULY 2025

Q240297

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- 1 Regulation 19 Representations

1 Introduction

- 1.1 We are instructed by our client, Wickes Building Supplies Limited ('WBS'), to submit the enclosed response to Matter 9 (Development Sites) in respect of the examination of the Ealing Draft Local Plan, ahead of the hearing sessions that are due to commence between the 9th and 18th September 2025.
- 1.2 WBS is a key stakeholder in the Borough, with an existing Wickes branch at 89 South Ealing Road, Ealing, W5 4QS ('the Site'). This branch provides an important outlet for residents and local tradesmen and builders, particularly given the shortage of similar facilities in the Borough. The existing branch also generates important employment opportunities for the local community and acts as an important anchor for the defined South Ealing neighbourhood centre, where the Site is located.
- 1.3 This Statement follows representations submitted on behalf of WBS to the Regulation 19 consultation stage, and a review of the Council's response to these representations. A copy of the representations is provided at **Document 1** for ease of reference and should be read alongside this statement.

2 Matter 9: Development Sites

24EA – Wickes, South Ealing Road

Q46 Has the impact of the allocation on the Neighbourhood Centre been assessed? What evidence exists to determine whether the Design Requirements for this allocation should make adequate provision for the requirements of the existing business within the site?

2.1 The Site is proposed to be allocated under draft Allocation 24E (referred to as ‘Wickes, South Ealing Road’) for a residential-led mixed-use development.

2.2 The supporting text to this proposed allocation, when considering the design principles for the site, states that:

“A residential-led mixed use development is preferred, with an approach that responds to the varying residential/retail frontage along South Ealing Road, which may benefit from the inclusion of some small commercial units.”

2.3 It is evident that the Council’s aspirations for the Site are not clear. Indeed, we note that specific questions raised by the Inspectors relate to whether the development site should set out anticipated housing units and / or commercial floorspace to be delivered. Such information is not provided for the Site. The proposed wording simply refers to residential-led mixed use development as the “preferred” development and that the frontages along South Ealing Road “may” benefit from “small” commercial units. Such wording is vague and critically fails to acknowledge the active use of the Site – a large-format builders’ merchant/DIY and home improvements facility (Wickes) – that provides an important role in meeting some of the needs of the local area.

2.4 Such an approach is at odds with the assessment undertaken for the Site as part of the evidence base prepared by the Council. That evidence base underpins the emerging Local Plan (Site Selection Report of Regulation 19 Local Plan¹). This recognises that the Site is in active use but that this use could be re-provided as part of future redevelopment. However, this is not reflected in the proposed wording of the draft allocation.

2.5 Instead, retention of the existing use is not explicitly identified within the proposed wording as a requirement of any future development proposals. Instead, reference is made to small commercial units that may be provided. This failure to identify the active use of the Site, and the important role that it serves, represents a significant shortfall in the Council’s approach to the Site’s allocation. Under the current ‘loose’ wording of the emerging Local Plan there is no requirement to provide any retail / commercial floorspace as part of the proposals. This is despite the Site falling within a defined South Ealing Neighbourhood Centre, where other policies contained in the Local Plan fully support retail and related uses in such locations.

¹ Appendix E ‘Results’

2.6 Consequently, there is a clear risk that that the existing DIY store, occupied by Wickes, which provides an anchor role for the defined Neighbourhood Centre within the defined primary frontage, will be lost.

2.7 In specifically responding to our representations to the Regulation 19 Local Plan² raising these concerns, the Council suggests that:

“...allocating a specific retail use could constrain proposals for this site. The proposed 'mixed use' is flexible enough to allow the retention of the builders merchant should that be part of any proposal for the site.”

2.8 However, the Council does go on to suggest that the first design principle be amended as follows (amended wording in bold and underlined):

*“A residential-led mixed use development is preferred, with an approach that responds to the varying residential/retail frontages along South Ealing Road, which may be benefit from the inclusion of some ~~small-commercial units~~ **provision at ground level.**”*

2.9 The proposed removal of ‘small’ from the supporting text is welcomed. However, the revised wording still fails to ensure that retail uses will be provided despite the Site’s location within a defined Neighbourhood Centre. Indeed, there continues to be reference to “may” be beneficial to inclusive commercial provision at ground floor. The wording does not require commercial floorspace to be provided at ground floor, despite the Site’s ‘in centre’ location, nor does it recognise the important local DIY facility that is currently provided within the centre.

2.10 The approach adopted by the Council is in directly conflict with draft Policy E4 which looks to maintain and strengthen facilities in Southern Ealing. Specifically, the draft Policy states:

“The strong local character and facilities of Southern Ealing and Ealing Common will be maintained and strengthened by:

*(i) **Reinforcing neighbourhood centres** at Northfields and South Ealing.*

*(ii) Character-led growth and improvements of local social infrastructure, **shopping**, and facilities.*

(iii) Improvements to existing active travel and green infrastructure networks” (our emphasis)

2.11 The supporting text to this draft Policy (paragraph 4.2.50) also acknowledges that “strong local facilities” make South Ealing one of the more inclusive parts of the Borough.

2.12 The proposed wording now being suggested by the Council for the Site will not ensure that retail / commercial floorspace will be provided. Nor does it support the principle of maintaining and strengthening the neighbourhood centre. This includes retaining the existing DIY store operated by Wickes. Under the proposed revised wording, there will continue to be no requirement to provide any retail floorspace as part of a residential-led scheme. As such, there

² Correspondence dated 10th April 2024

is a distinct possibility this proposed allocation will result in the loss of an important anchor retail use within a defined Neighbourhood Centre – contrary to other policies within the emerging Local Plan, and the London Plan.

- 2.13 This position has been reached despite no assessment being undertaken by the Council to understand the implications of the loss of the existing or any retail use on the wider vitality and viability Neighbourhood Centre. This represents a significant gap in the Council's evidence base and means that the Local Plan in relation to the loss of retailing at the Site – as potentially proposed – is not justified. It is therefore unsound in this regard.
- 2.14 The potential loss of the existing Wickes has also been acknowledged by other representations submitted during the Regulation 19 consultation stage³. This includes concern regarding the loss of important retail services provision, such as the existing Wickes, and other similar outlets (including Travis Perkins on Popes Lane in Ealing) which is also proposed to be redeveloped for residential uses under Draft Allocation 25EA of the emerging Local Plan.
- 2.15 In raising these concerns, it is highlighted that there is no rationale for the loss of such facilities, and it is questioned how the allocations fit within the 20-minute Neighbourhood Framework being promoted by the Council⁴. In short, the Council has simply not considered or assessed the impact of the allocation on the Neighbourhood Centre.
- 2.16 To help support growth within the borough, the Council has committed to the promotion of the 20-minute neighbourhood. This model encourages local neighbourhoods to accommodate facilities that residents need locally and aims to make them available within a 20-minute round trip that is accessible through sustainable modes of travel such as walking and cycling. The existing Wickes not only provides jobs for the local community, but also provides local access to building materials, DIY and home improvements goods, and associated advice, helping London to build. The proposed loss of existing, viable operators within the Borough will have adverse implications on meeting the needs of the local community, including residents and local tradesmen alike.
- 2.17 The loss of important local provision will also be at odds with the objectives of Ealing's 20-minute neighbourhood model.
- 2.18 In considering the potential loss of Wickes (and Travis Perkins) this follows a previous loss of Wickes at Boston Road in Hanwell District Centre, which was redeveloped for residential purposes under the current Development Plan⁵. This resulted in the loss of an anchor tenant and an overall net loss of retail floorspace in this location.
- 2.19 Whilst it is acknowledged that there is a need to meet housing needs, this should not be at the expense of not meeting other needs, particularly where a Site is located within a defined centre. The NPPF (at Paragraph 11) is clear that all local plans should meet the needs of all uses. Critically, the NPPF does not give a preference to housing over the need of other uses.

³ Including from Respondent ID 485 and 284

⁴ www.ealing.gov.uk/download/downloads/id/20140/a_vision_for_ealing.pdf

⁵ Site Allocation HAN3 'Wickes' in the current Development Sites Development Plan Document (December 2013)

- 2.20 The loss of the existing DIY retail use within the Borough will have adverse implications on meeting the needs of the local community. In addition, it will also result in the loss of an anchor retailer, which will have adverse impacts on maintaining the long-term vitality and viability of South Ealing neighbourhood centre. No justification has been provided by the Council to understand the implications of the loss of retail floorspace in this Neighbourhood Centre location.
- 2.21 Against this background, whilst the amended wording put forward by the Council is acknowledged, we do not believe that the proposed wording goes far enough to ensure retail / commercial uses are protected and an important outlet retained. We maintain that the suggested revised wording outlined in our previous representations remains appropriate.

3 Summary

- 3.1 The existing Wickes at South Ealing Road is a successful branch and one that WBS wants to continue to trade from and continue to act as an anchor for the Neighbourhood Centre.
- 3.2 The facility provides an important outlet for residents and local tradesmen and builders, particularly given the shortage of similar facilities in the Borough – in line with the objectives of Ealing’s 20-minute Neighbourhood Framework. The existing branch also generates important employment opportunities for the local community.
- 3.3 Local planning policy recognises the role builders’ merchants play and the implications of their loss on the local economy – particularly where there is no alternative provision.
- 3.4 Within this context, and the important role the existing use plays for the wider vitality and viability of the neighbourhood centre, the existing use should be retained as part of any future redevelopment of the Site. This needs to be reflected in the wording of the allocation.
- 3.5 This is particularly important in the absence of any evidence to understand the implications of the loss of retailing or the Wickes on the wider vitality and viability of the Neighbourhood Centre or on meeting the Council’s own 20-minute Neighbourhood Framework objectives.
- 3.6 In the absence of any evidence published by the Council to understand the likely effects of losing Wickes in this location on the wider South Ealing Neighbourhood, and there currently is no guarantee that any retailing will be provided as part of the proposed allocation – based on the proposed wording put forward by the Council. Given this, we strongly believe that the proposed allocation should be deleted. Currently, the proposed allocation is not justified and positively prepared being contrary to other policies within the emerging Local Plan, and both the adopted London Plan and NPPF, which seek to focus retail uses in defined centres, and strengthen and maintain their role and retail function. This would not be achieved by proposed allocation.
- 3.7 However, if it is the Inspectors’ view that the allocation should be included within the Local Plan it is essential that the proposed wording is amended to ensure that the existing retail use is retained. In this respect, the proposed wording should be revised, as follows.

PROPOSED USE

“Residential led, mixed use development, that incorporates the retention of the existing retail use”

DESIGN PRINCIPLES

“A residential-led mixed use development is preferred, with an approach that responds to the varying residential/retail frontages along South Ealing Road, which must include some small commercial units provision at ground level to retain active frontages within this Neighbourhood Centre, including the retention of the existing retail use.”



Document 1

Regulation 19 Representations

Our ref: EW/AFx/Q240297
Your ref: -
Email: adrian.fox@quod.com
Date: 10th April 2024



Local Plan Submission Draft Consultation
Ealing Council
Strategic Planning Team
Ealing Town Hall
New Broadway
Ealing
W5 2BY

By email

Dear Sir / Madam,

Ealing's Local Plan: Submission Draft (Regulation 19) Comments submitted on behalf of Wickes Building Supplies Limited

We are instructed by our client, Wickes Building Supplies Limited ('WBS'), to submit the enclosed representations to the consultation on the Regulation 19 Version of the Ealing Local Plan.

WBS is a key stakeholder in the Borough, with an existing Wickes branch at 89 South Ealing Road, Ealing, W5 4QS ('the Site'). This existing branch provides an important outlet for residents and local tradesmen and builders, particularly given the shortage of similar facilities in the Borough. The existing branch also generates important employment opportunities for the local community.

It is against this background that the representations have been submitted.

Representations can be made until the 10th April 2024, and on the basis that this letter has been submitted within this timescale, we trust that our comments will be taken into account.

1 Context

The Site extends to 0.66 hectares and comprises the existing Wickes branch and adjacent car park. WBS has been trading from the Site since 2003. The lease expires in June 2031 however WBS have a strong desire to continue trading from this location given its strong performance and the important role it plays in the local area.

Indeed, the Site is strategically located being within the defined Neighbourhood Centre of South Ealing in an easily accessible location.

A Site Location Plan identifying the location of the Site can be found at **Document 1**.

The current adopted Local Plan identifies the Site as forming part of the defined primary shopping frontage (referred to as. 89 – 95 odd South Ealing Road).

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Policy 4B ('Retail') of the current Local Plan identifies that retail uses should constitute 100% of the designated primary frontage at street level. This policy states that development in any designated frontage should not result in a net loss of active frontage and should increase the active frontage where appropriate.

The Site also falls within the defined South Ealing Neighbourhood Centre, where retail and related uses are supported.

2 Draft Spatial Policy E4

Within the Regulation 19 Local Plan, the Site continues to be identified as forming part of the defined South Ealing Neighbourhood Centre. Draft Spatial Policy E4 ('Southern Ealing and Ealing Common') outlines that the strong local character and facilities will be maintained and strengthened by reinforcing neighbouring centres at Northfields and South Ealing.

The Council's aspiration to strengthen and reinforce the existing neighbourhood centres is supported by WBS. Indeed, such an approach is consistent with both the National Planning Policy Framework and the London Plan.

3 Site Allocation 24EA

The Site is allocated under draft Allocation 24EA (Wickes, South Ealing Road) for a residential-led mixed-use development, with an indicative timeframe for delivery of between 2028/29 and 2032/33. However, as previously highlighted WBS has an existing lease until June 2031 and are looking to extend this. Consequently, the delivery of the Site for alternative uses, particularly in the suggested timetable, is unlikely.

The supporting text to this allocation, when considering design principles for the site, goes on to state that:

"A residential-led mixed use development is preferred, with an approach that responds to the varying residential/retail frontage along South Ealing Road, which may benefit from the inclusion of some small commercial units."

Whilst recognition that commercial units should be provided is welcome, the proposed design principles considers that this will only be 'small' units. Such an approach is at odds with the assessment undertaken for the Site as part of the evidence base underpinning the emerging Local Plan (Site Selection Report of Regulation 19 Local Plan¹), which recognised that the Site is in active use but that this use could be re-provided as part of the development. However, this suggestion is

¹ Appendix E 'Results'



not reflected in the proposed wording of the draft allocation. Instead, large commercial units are not recognised as part of the design principles identified for the Site.

Consequently, the proposed allocation, as currently drafted, will see the loss of the existing builder's merchant. The existing Wickes provides an important role not only in terms as an anchor retail unit for the Neighbourhood Centre within the defined primary frontage, but also in meeting the needs of local tradesmen.

WBS and other similar builders' merchants provide an essential service to the construction industry especially within London and its surrounding hinterland. WBS branches are situated in populated centres (such as the Site) where there are concentrations of tradesmen and serious DIY enthusiasts such as industrial / commercial estates.

They provide access to building materials, helping London to build. Despite this role, there continues to be a worrying trend that the number of construction retailers are being lost to residential, office and other uses throughout London. This is being proposed in Ealing. Indeed, in addition to the proposed allocation of the Site for residential-led development, the emerging Local Plan (under Site Allocation 25EA) seeks to redevelop the existing Travis Perkins on Popes Lane in Ealing for residential development. The loss of these existing building merchants will have adverse impacts on this sector and the ability for tradesmen to access building materials.

Whilst it is acknowledged that there is a need to meet housing needs, this should not be at the expense of not meeting wider needs. The NPPF (at Paragraph 11) is clear that all local plans should meet the needs of all uses. Critically, the NPPF does not give a preference to housing over the need of other uses.

The proposed loss of existing, viable builders' merchants within the Borough will have adverse implications on meeting the needs of the local community, including local tradesmen. In addition, the loss of an anchor retailer will have adverse impact on maintaining the long-term vitality and viability of South Ealing neighbourhood centre – contrary to the London Plan and other policies within the emerging Local Plan.

WBS is committed to continue to trade from the Site and continue to serve the needs of the local community. The potential loss of this facility in this location will have adverse effects on the continued vitality and viability, which is identified by the Council's evidence base ('Town centre health check' (July 2022)) as an 'average performing town centre'. The loss of an anchor use will adversely impact on the centre's performance.

The continued loss of builder's merchants will also have adverse implications on choice for residents and tradesmen.



Against this background, as currently drafted in reviewing the requirements of the NPPF (paragraph 35) we strongly believe that the Local Plan is unsound for the following reasons:

- **Not positively prepared** – the Local Plan fails to provide a strategy to meet the area's needs. Future needs should not be focused only housing needs. The loss of the existing use on the Site, along with the loss of similar facilities elsewhere in the Borough (as proposed by the emerging Local Plan) and throughout London will mean that local needs are not being met.
- **Not justified** – the potential for the existing use to be retaining on site is not considered. All reasonable alternatives have not been assessed and the current approach does not provide an appropriate strategy.
- **Inconsistent with nation policy** – the approach fails to seek to meet all needs in the Borough, contrary to the requirements of the NPPF.

Against this background, it is essential that the proposed allocation specifically identifies the need to retain the existing use on site – as was recognised by Council in identifying the site as having potential for redevelopment (Site Selection Report of Regulation 19 Local Plan). This is particularly important to achieve the wider objectives of the Local Plan, including the strengthening of existing centres and meeting all needs, and given that the Site forms part of the defined primary frontage where active uses must be maintained.

In this context the following suggested revisions are put forward to the draft allocation for the Site (revised text in bold and underlined and replaced text struck through):

PROPOSED USE

Residential led, mixed use development, that incorporates the retention of existing builders' merchant

DESIGN PRINCIPLES

A residential-led mixed use development is preferred, with an approach that responds to the varying residential/retail frontages along South Ealing Road, and retains the existing builders' merchant to retain active frontage at ground floor ~~which may benefit from the inclusion of some small commercial units.~~

These proposed changes will ensure that the important existing use is retained, which acts as an anchor for the neighbourhood centre.

4 Summary



The existing Wickes at South Ealing Road is a successful branch and one that WBS want to continue to trade from acting as an anchor for the Neighbourhood Centre and providing an important role in meeting existing and future need. Any allocation that does not seek to retain the existing builders' merchant is unsound.

It is important that local planning policy recognises the important role builders' merchants play and the implications of their loss. Within this context, and the important role the existing use plays for the wider vitality and viability of the neighbourhood centre, the existing use should be retained as part of any future redevelopment of the Site. This is in line with the policies within the London Plan as well as the NPPF which encourages local planning authorities to seek out opportunities for redevelopment and to not hinder development opportunities.

We trust that that these representations will be given consideration by the Council and are helpful in progressing the Local Plan. In the meantime, please do not hesitate to contact us if there are any queries.

Yours faithfully,

Adrian Fox
Associate Director

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