



10th July 2025

1. Introduction

- 1.1. This Written Statement has been prepared by Savills (UK) Limited on behalf of our client, Investra Capital in consideration of the forthcoming examination of the London Borough of Ealing ('LBE') Local Plan 2024 to 2039 (the 'Plan'), in the context of their land ownership at The Arcadia Centre, The Broadway, Ealing, W5 2ND ("the Site").
- 1.2. The Arcadia Centre forms part of the proposed site allocation '**Ealing 01EA Broadway Connection and Arcadia Shopping Centre**', within the Plan.
- 1.3. This Statement should be read in conjunction with the previous representations dated 8 February 2023 submitted to the Council in response to 'Ealing's Local Plan Initial Proposals (Regulation 18), November 30th 2022' and letter dated 2nd April 2024 submitted to the Council in response to 'Ealing's Local Plan Final Proposals (Regulation 19), 28th February 2024'.
- 1.4. Investra Capital is a bespoke real estate advisor who strives to make long-term improvements to the local surroundings in the areas in which they work, with emphasis placed on the well-being of the local community. Broadway Capital Investments Limited, the freeholder of the Site, as advised by Investra Capital, have united as business partners to fulfil the potential of the Site by taking a comprehensive approach to mixed-use development.
- 1.5. Fundamentally, our Client fully **supports the inclusion of the Arcadia shopping centre within the site allocation**. Our client supports the principle of re-development of the site for employment and mixed-uses suitable to the town centre as part of the Site Allocation 01EA (pp. 172 – 173).
- 1.6. This Statement has been drafted on behalf of Investra Capital with regard to **Matter 9 – Development Sites** and proposes modifications that are required to ensure the policies are justified, effective, and consistent with national policy.

2. The Site

- 2.1. The Arcadia Shopping Centre is a 3-level shopping centre housing a range of retail stores and restaurants. Constructed in 1987, the Site was originally designed to serve members of the public travelling via car and includes 68 car parking spaces at rooftop level. The Arcadia Shopping Centre has mostly been left structurally unaltered since then. It has been described by the Council as having '*little architectural merit*' in the previously adopted Arcadia Site Ealing Metropolitan Town Centre DPD (January 2012), thereby failing to reach its potential contribution to the wider function and vitality of Ealing Town Centre.

- 2.2. The Site is situated in a designated Metropolitan Town Centre and has a high PTAL rating ranging between 6a/6b, partially due to its proximity to Ealing Broadway Station with District, Central and Elizabeth Line services.
- 2.3. The adopted Ealing Local Plan (2013) sets out LBE's allocated sites, in which the Site and adjacent land is allocated for retail-led mixed-use development within Site Allocation EAL3 (The Arcadia Site). The adopted allocation of this Site has been included for reference in **Appendix 1**.
- 2.4. The Arcadia Shopping Centre currently forms part of this site allocation along with the neighbouring site, The Broadway Connection. The neighbouring site has recently been granted planning permission, dated 14 February 2024 (reference 223774FUL), for the partial demolition, refurbishment and development to provide between 2 and 21 storey office-led mixed use scheme with flexible retail, restaurant and café uses, a music venue and leisure uses at lower levels with a new area of landscaped public realm and pedestrian route and other associated works.
- 2.5. The Site is subject to the following key adopted (current) planning policy designations:
- Part of Site Allocation EAL3 The Arcadia Site;
 - Ealing Town Centre Conservation Area;
 - Ealing Metropolitan Centre; and
 - Primary Shopping Frontage.
- 2.6. The Site is subject to the following emerging planning policy designations:
- Site Allocation 01EA Broadway Connection and Arcadia Shopping Centre;
 - Ealing Metropolitan Town Centre; and
 - Primary Shopping Frontage.

Emerging Site Allocation 01EA – Broadway Connection and Arcadia Shopping Centre

- 2.7. Site Allocation 01EA ('the Allocation') of the Plan, outlines the proposed use for the site includes offices and mixed uses appropriate for a town centre location. The allocation identifies that the site lies within a town centre typology and is in principle suitable for a tall building, with a threshold height of 9 storeys. Further comments on this are provided below.

3. Policy Context

- 3.1. The National Planning Policy Framework (NPPF) sets out how local plans and spatial development strategies are to be examined to assess whether they are 'sound'. Specifically, it requires plans to be '**positively prepared**' (to meet objectively assessed needs), '**justified**' (based on proportionate evidence), '**effective**' (deliverable over the plan period) and '**consistent with national policy**' (NPPF Paragraph 36).
- 3.2. The Planning Practice Guidance (PPG) provides further guidance on how Local Authorities should plan to meet objectively assessed housing need, using the standard methodology, and use financial viability evidence to ensure policy requirements strike an appropriate balance with the potential effects on scheme viability. More specifically, the PPG confirms in setting local policy an authority must use a viability assessment to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan (Ref ID: 10-002-20190509).

4. Detailed Response

- 4.1. The EiP Inspectors questions regarding Ealing Development Sites, specifically 01EA Broadway Connection and Arcadia Shopping Centre are set out below (in bold italics), with our responses provided below.

Ealing Development Sites

01EA Broadway Connection and Arcadia Shopping Centre

18. Is the proposed scope of uses justified, effective and consistent with national policy?

- 4.2. Mostly.
- 4.3. The Draft Site Allocation 01EA outlines the proposed uses that could come forward on the site as “*office and mixed-uses suitable to the town centre*”. We understand the policy is designed to be flexible to allow a broad range of uses that could come forward on site, this is supported in principle by our Client.
- 4.4. The uses appropriate to Ealing town centre, were discussed with the Council at the Landowner and Developer workshops held between December 2023 and March 2025, whereby it was agreed that a broad range of employment uses and types of residential (such as purpose built student accommodation and co-living) alongside traditional town centre uses such as retail would benefit the town centre, encourage the night time economy and assist in the delivery of a 20 minute neighbourhood.
- 4.5. The current office market is experiencing significant challenges, and as such, a flexible mix of employment-generating uses should be supported to ensure economic resilience and adaptability.
- 4.6. To ensure that the site allocation is effective and flexible enough to respond to evolving economic needs, we propose that the wording of the policy is amended from ‘*office and mixed-uses*’ to ‘*employment and mixed-uses*’. Referring to ‘employment’ rather than solely ‘office’ use allows for a broader range of employment-generating activities. This terminology better supports economic growth and productivity in accordance with NPPF paragraph 85.
- 4.7. As presently worded, the scope of uses are not effective or consistent with national policy.

19. Is the increased extent of the site allocation since the Regulation 18 stage justified?

- 4.8. Yes.
- 4.9. The adopted Ealing Local Plan (2013) sets out LBE’s allocated sites, in which the Site and adjacent land is allocated for retail-led mixed-use development within Site Allocation EAL3 (The Arcadia Site). The adopted allocation of this Site has been included for reference at **Appendix 1**. The Arcadia Shopping Centre currently forms part of this site allocation along with the neighbouring site, The Broadway Connection.
- 4.10. Within the Regulation 18 Draft Local Plan, the Arcadia Shopping Centre was effectively ‘carved out’ from the site allocation, with the emerging site allocation EA01 (The Broadway Connection)

being wrapped around The Broadway Connection, for a mix of appropriate town centre uses, between 2 and 21 storeys.

- 4.11. The Arcadia Centre presents an exciting and significant opportunity to make better use of a well-connected, low density previously developed site, which could make a significant contribution to meeting the LBE's targets for housing growth and employment. A mixed-use development on the site would have the potential to deliver a significant number of new homes and modernised retail commercial units which benefit the local community and better reflect the emerging character of the Town Centre.
- 4.12. The Arcadia Centre's strategic position close to the new Crossrail Station and within Ealing Town Centre, on the junction of The Broadway and Spring Bridge Road, presents opportunity to build on the established and permitted pattern of development and cluster of taller buildings along the rail line and within the town centre.
- 4.13. The Arcadia Centre, currently allocated within Site Allocation EAL3, was excluded in the Regulation 18 Draft Plan. However, the Site's reinclusion recognises the Site's strategic location within Ealing Town Centre, offering significant potential for intensification. Redevelopment of this well-connected, brownfield Site will support housing and employment growth in accordance with national and regional planning policies.
- 4.14. The increased extent of the site allocation since the Regulation 18 Plan is therefore justified.

20. How will the site allocation affect the town centre and is this evidenced and justified?

- 4.15. Ealing Town Centre is currently undergoing a period of significant change, catalysed by the delivery of Crossrail, which has driven the redevelopment and optimisation of nearby brownfield sites to create high-quality, high-density mixed-use developments in a highly accessible and sustainable location. There has been a substantial direction of growth and density along the Uxbridge Road Corridor, from Ealing Broadway down to West Ealing with notable developments including CP House, Dickens Yard, Perceval House, 55 West and Ealing Filmworks. These developments have created an established context for higher-density development in this part of the borough.
- 4.16. This is a theme very much present within the Local Plan that continues to emphasise the need for growth within Ealing Metropolitan Town Centre with Policy E2 outlining that development within the Town Centre will focus on '*delivering strategic office, commercial, retail and residential growth [...] **optimising growth around Ealing Broadway***'.
- 4.17. Policy E2 Part G highlights the importance of '*Strengthening the local character and distinct offer of West Ealing [...] while realising the potential of identified Development Sites to improve the quality of built environment and deliver new houses and jobs*'.
- 4.18. The proposed site allocation will support the redevelopment and optimisation of a brownfield site by facilitating the delivery of high-quality, high-density mixed-use development in a highly accessible and sustainable location.
- 4.19. This approach aligns with key planning objectives to make efficient use of underutilised land within the urban area, particularly in a town centre location well-served by public transport and existing services and infrastructure. The Site's town centre location and connection to public transport enhances its suitability for intensification, promoting sustainable travel patterns and reducing the need for car dependency.

- 4.20. The principle of the site allocation is both justified and essential for delivering the town centre's growth aspirations, improving the urban environment, and meeting housing and employment needs.

21. Does the supplementary planning document (2012) for the site remain relevant, and if so, are the allocation's Design Principles consistent with it?

- 4.21. No.
- 4.22. The document 'Statement of Planning Principles Arcadia Site Ealing Metropolitan Town Centre (January 2012)' is **no longer relevant**. Primarily, the guidance has been overtaken for a large part of the site allocation by the 2024 planning permission and by more up to date policy in the NPPF and London Plan.
- 4.23. For example, the document states at page 25 that development of around 6 storeys in height could, if carefully designed, support the existing pattern of development and character. This is inconsistent with the 2021 London Plan and NPPF seeking to drive substantial growth in sustainable locations and is significantly out of step with the substantial 21 storey building approved as part of the 2024 planning permission.
- 4.24. We consider that this Supplementary Planning Document should be **deleted**. If any new site specific guidance is considered necessary, this should be informed by the 20 minute neighbourhood principles the Council is developing, the London Plan, NPPF and relevant on site and surrounding development context.

22. Is the maximum storey height specified in the Plan, correct?

- 4.25. No, we do not consider the maximum storey height specified in the Plan is correct.
- 4.26. The Reg 19 site allocation stated:
- "The site is in principle suitable for a tall building. The threshold height for a tall building is 21 storeys (73.5m)."*
- 4.27. This wording is the same as when the site allocation only covered part of the site at Reg 18. Notwithstanding that, our Reg 19 representation supported the wording as it essentially meant that a single 21 storey building is appropriate for the site. This is to be expected given planning permission exists for this. As the threshold height for a tall building is also 21 storeys, it would, as worded at Reg 19, allow for a range of building heights to be considered *up to* this limit and would not engage the tall buildings policy providing the other buildings across the site were lower than 21 storeys.
- 4.28. We would therefore **support** the text used in the **Reg 19 version** of the site allocation.
- 4.29. However, the Council's main modifications proposes to amend the 'tall building' text of the policy as follows:
- The site is in principle suitable for a tall building **with an appropriate height up to 21 storeys (73.5 metres)**. The threshold height for a tall building is ~~21 storeys (73.5 metres)~~ **9 storeys (31.5 metres)**.*
- 4.30. We object to this revised wording.

- 4.31. The Site is within area E14 of the Ealing's Tall Building Strategy (TBS) (September 2024) whereby the tall building threshold defined at page 9, states 9 storeys, whereas the previous draft of this document (dated November 2022) identified a tall threshold of 21 storeys. It is unclear why this significant adjustment has been made and it is not explained in the TBS.
- 4.32. Again, as covered in our Tall Buildings hearing statement, the **threshold level** of what **triggers** the tall building policy analysis under London Plan D9 C, and what is a suitable height for buildings on a site allocation, are two very different matters.
- 4.33. Indeed, criterion F of the draft policy D9 Local Variation states that tall buildings **above** the thresholds established at criterion E should be located on development sites defined in the plan. Inherently therefore, the tallest buildings, exceeding the thresholds in table DMP1, will be expected to come forward on the site allocations.
- 4.34. The TBS includes Zone D (essentially Ealing Town Centre) within the wider neighbourhood area of E14. As the TBS states, E14 covers a wide area with a large variety of building heights. Naturally, the tallest existing/ permitted buildings (21m) are located towards the town centre and the western extent of the area as it moves towards West Ealing, but the area also includes many lower buildings in more traditional residential street patterns – largely 2 storey terraced housing. The TBS therefore gives a range of 9- 21 storeys for E14.
- 4.35. The threshold height for the whole area is then set by table DMP1 at the lowest end of this scale at 9 storeys. This is therefore somewhat simplistic, and in our view, artificially low. It would be more accurate to show a higher threshold height for the town centre.
- 4.36. Notwithstanding this threshold trigger, the purpose of the **site allocation** is to provide guidance on heights **above** any threshold level.
- 4.37. The site allocation at 01EA appears to have taken the lowest end of what the tall buildings study defines as a tall building for area E14 and then applied this to the site allocation. This essentially takes the baseline information of what a tall building should be defined as (as a minimum) and then stops there. It does not positively plan for growth and assess the location's suitability for taller buildings nor does it assess heights and capacity in the evidence base.
- 4.38. For instance, the TBS and TBS Appendix does not assess the 01EA site allocation and therefore does not assess its capacity. It is not assessed as part of Ealing Cluster A or B. The proposed restriction in the main modification is therefore not based on evidence and will have the direct effect of limiting the development of this highly sustainable site to an unjustified low level that is not commensurate with either the established and permitted pattern of development in the area or the scale of growth required to satisfy the purpose of the site allocation.
- 4.39. The main modification wording will (perhaps inadvertently) only allow for only one tall building at 21 storeys and then all other tall buildings will be limited to below 9 storeys as a result of the policy D3 Local Variation.
- 4.40. This is all explained in the recent Waitrose appeal decision¹ as follows:
- Para 26: *"In particular, I am not at all convinced that, in the emerging context of the appeal site, an upper limit of 13 storeys upon, as set out in the allocation in the new Local Plan, can realistically be said to optimise site capacity."* NB the appeal was approved for a 20 storey development across a series of tall buildings.

¹ Appeal Decision APP/A5270/W/23/3347877

- Para 27: *“If the intention is that the **tallest buildings in Ealing should be in the vicinity of Ealing Broadway Station**, then if the hierarchy is to be maintained, the maximum permissible heights around Ealing Broadway Station, **will need to increase to reflect what has been permitted in West Ealing.**”* I.e Ealing Broadway will need to make allowance for buildings of **20 storeys plus**.
- In that context, the sites in West Ealing provide:
 - 20 storeys on Waitrose
 - 16 storeys on 42 Hastings Road (approved by the LPA against the site allocation of 13 storeys
 - 20 storeys at 55 West
 - 16 storeys at Green Man Estate
- Para 30. *“In particular, the changing context of the appeal site, and the approach the Council has taken to other tall buildings in the Borough, against the background of the London Plan, suggest very strongly to me that the approach to the appeal site, and indeed the approach to other sites expected to house tall buildings, in the new Local Plan, is very unlikely to remain intact in any event.”*
- Para 39. *“On top of that, the building **would add to the spine of taller development that is growing along the line of the railway**. This description drew some comment too but again, it is a situation reflected in the TBS, and its approach to what it terms ‘Appropriate Locations’. Unsurprisingly perhaps, this is because one of the key suitability criteria is ready access to public transport. I would add that there is historical precedent for this type of growth. Map regression analysis shows that this part of West Ealing originally grew along the line of the railway and Uxbridge Road. What is taking place now, is an echo of that, with the addition of another layer of taller buildings.”*
- 40. *“I appreciate, of course, that there are streets of attractive, traditional, two-storey terraced housing north and south of the railway. There would obviously be a stark contrast between these dwellings, and the proposal, in terms of scale, massing and height. However, for the reasons set out, **the contrast is not arbitrary; there are good reasons why development should be more intensive along the railway, and near to the station**. Moreover, contrast is not invariably negative.”*

4.41. Given that the West Ealing Waitrose site was surrounded to the north and south by largely two storey terraced housing and that 20 storeys on the Waitrose site was considered acceptable, it would be somewhat perverse to suggest a site in Ealing town centre – also along the railway spine and close to a main railway station with the Crossrail station, where even greater height and density should be focussed, should be limited in the way the proposed main modification suggests. I.e., one 21 storey building (which already has planning permission) and all other buildings up to 9 storeys.

4.42. If the site allocation is to be effective, to meet the requirements of Policy D3 and GG2 of the London Plan and be seen in the correct context outlined by the Inspector on the Waitrose appeal, the 01EA site allocation would need to:

- Accommodate a positive level of support for tall buildings;
- Reflect the TBS which considered is one of the most suitable locations in the whole Borough for tall buildings; and

- Demonstrate how these heights form part of a hierarchy rising from West Ealing to the town centre;

The current main modification wording does not achieve that.

- 4.43. The TBS outlines that town centres are suitable to accommodate tall building development for a number of reasons, including the opportunity to contribute to often rich townscape characters, where compact, high density forms of development are appropriate. Town centres also represent a critical mass of services and amenities, including shops, public spaces, jobs and public transport infrastructure. As outlined above, accommodating tall buildings on the Site, will provide housing and employment opportunities in an accessible town centre location, making efficient use of brownfield land and reducing pressure on urban sprawl in other, less well-supported locations.
- 4.44. The Arcadia Centre's strategic position near the new Crossrail Station and within Ealing Town Centre, on the junction of The Broadway and Spring Bridge Road, presents a clear opportunity to deliver larger scale buildings, contributing towards the emerging cluster of taller buildings. The Site is part of the most suitable area in the Borough to accommodate building height based on the findings of the TBS.
- 4.45. Due to the changing context around the Arcadia Centre, there is a great opportunity to deliver new buildings of greater architectural quality in lieu of the current building, which itself offers no townscape or architectural benefit.
- 4.46. We would request that the wording of the Reg 19 site allocation relating to height is used so that a comprehensive masterplan of the site can be developed through a design led approach as required by the London Plan. This also relies upon changes to D9 Local Variation.
- 4.47. Alternatively, given the lack of evidence to support only one 21 storey building on site, the need to optimise this highly sustainable site and the emerging context around it, the wording could be amended to:

The site is in principle suitable for a tall buildings up to ~~with an appropriate height up to 21 storeys (73.5 metres).~~ The threshold height for a tall building is 21 storeys (73.5 metres) 9 storeys (31.5 metres).

- 4.48. This would allow for the site optimisation and for a comprehensive, design led approach to be taken to a planning application.
- 4.49. At present, the heights specified in the allocation are not justified making the policy ineffective.

23. Do the Design Principles appropriately address movement around and through the site?

- 4.50. Yes.
- 4.51. The design principles currently states, '*carefully consider the movement hierarchy for the site, integrating servicing internally where possible and avoiding blank frontages. Ensure the pedestrian network is attractive and well-integrated with 'desire lines' between Ealing Broadway Station and the rest of the town centre. Improve routes around the site, lining these with active frontage and set back the building line where necessary to address pinch points.*'

- 4.52. The Design Principles acknowledge the importance of movement through and around the Site, with a focus on establishing a clear movement hierarchy, integrating servicing functions internally where feasible, and promoting active frontages. The emphasis on enhancing pedestrian connectivity, particularly along key desire lines between Ealing Broadway Station and the wider town centre and addressing pinch points through strategic building setbacks is supported.
- 4.53. We consider the design principles should remain flexible to enable development at design stage. This will ensure that the policy is effective.

5. Modifications

- 5.1. We consider the proposed uses should be amended to “employment and mixed uses” to provide flexibility to encourage regeneration that provides a range of new employment opportunities and the delivery of a range of town centre use including different types of residential such as purpose built student accommodation, co-living, hotel to meet need.
- 5.2. While the site allocation sets out a framework for the Site, these objectives and those of the London Plan and NPPF cannot be fully realised without allowing for optimisation of height and density.
- 5.3. As a brownfield Site in a highly sustainable location, the delivery of enhanced permeability, active frontages, high-quality public realm, and sustainable transport connections depends on development that can viably support such improvements. Taller buildings and greater density are essential to optimising the site. The tall building threshold should be amended to 21 storeys for this site as per the Reg 19 text. We have provided alternative wording for the site allocation.
- 5.4. If more clarity is required, then capacity testing would need to be undertaken for the site given this is not provided for by the TBS and should be subject to further public consultation. This is important given that most sites in the Borough have permission for buildings far exceeding the assumptions in the TBS, suggesting it is taking an overly cautious approach.
- 5.5. As it stands, there is no justification for restricting this large site allocation to only one tall building of 21m and other buildings at 9 storeys.

6. Conclusions

- 6.1. For the reasons explained above, it is considered that further modifications to Site Allocation 01EA are required to ensure that the Plan has been positively prepared, justified, effective and consistent with national policy and in general conformity with the London Plan.
- 6.2. For these reasons the site allocation for 01EA (and indeed other site allocations noted by the Waitrose appeal decision) need amending and so at this stage cannot be considered sound.

Appendix 1: EAL3 Arcadia The Broadway/ Springbridge Road/ Haven Green Ealing W5

EAL3 Arcadia

The Broadway / Springbridge Road / Haven Green Ealing W5



Site Area: 1.78ha

Ownership: Private, some Council

Current Use: Retail, commercial, surface level car park

Development Strategy Policies: 1.2(h), 2.5, particularly 2.5(a), 2.5(b), 2.5(c) and 2.5(e)

Setting: Central

PTAL: 6

Planning Designations:

Metropolitan Town Centre
Ealing Town Centre Conservation Area and setting of Haven Green Conservation Area
Setting of Grade II* Listed Parish Church of Christ the Saviour and Grade II Listed Natwest Bank, Green Corridor

Relevant Planning Applications: P/2007/4246 and P/2007/4248 (refused November 2009); P/2013/1129

Allocation: Mixed use development appropriate to the town centre, including additional retail, commercial, leisure/entertainment and residential. Specific guidance will be set out in the Arcadia Site Supplementary Planning Document.

Justification: The existing buildings on the site are insufficient to accommodate the scale, range or quality of retail offer required to support the vitality and viability of the town centre, and their comparatively low intensity of development underutilises a key town centre site adjacent to the station. Individually or together the buildings have little architectural merit, such that the nature, form and scale of development is not considered to make a positive contribution to the Conservation Area or the townscape.

Indicative Delivery Timetable: 2016-2021

Site Context: The site occupies a key location in the town centre,

immediately adjacent to Ealing Broadway Station. The site as a whole forms a large impermeable block, divided on the east-west axis by the railway cutting, of low density retail and commercial units dominated by the Arcadia Shopping Centre on the southwest corner of the site. The limited architectural merit of the Arcadia Centre, opened in 1986, has a negative impact on the character of the town centre and the majority of its units do not meet modern retail standards.

South of the railway line, the remainder of the site consists of low-rise buildings of various typologies and eras organised along the perimeter of the site. Although the southern portion of the site is within the Ealing Town Centre Conservation Area, the existing buildings are not considered to contribute to the special architectural and historic interest of the Conservation Area, based as this is on the development of the town centre as a commercial focus for the borough in the later 19th and 20th centuries.