Matter 6 – Uxbridge Road/Crossrail Corridor

Issues and Options

1. Most of the proposals set out in this section refer to the Development Sites/Management DPDs in some form. The LDS shows that the aforementioned DPDs are not expected to be adopted until 2013. Are the Development Sites/Management DPDs sufficiently advanced to justify the proposed figures in the Housing Trajectory?

We consider that the Development Sites and Management Documents are not far enough advanced to justify the proposed figures in the housing trajectory. The Revised London Plan renders the Development Management Document out of date. Changes to policies, such as requiring local character to be taken into account, will influence the capacity of identified sites to be developed at the density proposed in the Development Sites document. The rationale for concentrating development in the Uxbridge Rd Corridor seems to be the completion of Crossrail. But this will not take place until 2018 at the earliest. The downturn in the economy may delay interest in redevelopment and therefore finance for its building will be delayed. Commuters most likely to purchase housing in the Corridor will be deterred by the congestion of existing rail services which is likely to increase until 2018. The London Plan requires annual monitoring of housing completions to achieve the annual target of 890 yet the proposals are concentrated in areas where development should not be encouraged until more public transport is available.

Development sites should be spread throughout the borough so that short journeys to work are encouraged rather than expensive commuting into the CPZ on overcrowded trains. This is a more sustainable land use pattern.

2. Policy 2.1(b) has no indication of what the improvements would entail (e.g. are there specific additional bus routes planned?), who will be responsible for funding/implementing them and when will they be implemented?

We do not think that increasing bus services will help relieve rail congestion in the Uxbridge Corridor until Crossrail is completed in 2018. Uxbridge Road is already congested so that buses are delayed. Relating bus services to stations requires adequate transfer provision. Improvements at West Ealing Station have not been achieved through recent residential redevelopment opportunities in the neighbourhood. Proposals for a bus station at Ealing Broadway Station involve building on Public Open Space which is Common Land that many residents regard as unacceptable.

3. Development and conservation are not mutually exclusive (policy 3.1(b)). Should growth be inspired by an understanding of the historic context as best practice in regeneration to be consistent with national policy?

Accommodation of 9000 extra housing units in the Uxbridge Rd/Crossrail corridor will involve a large amount of redevelopment that inevitably will impact on the conservation of both built and natural environments. Conservation can be an important stimulus to regeneration but this large number of dwelling, the social infrastructure needed and the proposed additional economic development would require major redevelopment which would impact on conservation areas and green spaces. It has already occurred in Southall with a new school built on MOL at Norwood Green and is proposed in the A40 Corridor with a new school proposed on Green Belt. Green spaces are protected by the London Plan and PPS/PPGs and would be by the DNPPF. But development should be limited by these and supported by Ealing’s UDP despite recent deviations on schools.

The Corridor should therefore be redrawn to exclude protected green space and an indication of where conservation areas are located.
In conservation areas (and their settings) policies should be clear that high buildings are inappropriate in Acton, Hanwell and Ealing Town Centre CAs. This does not exclude high density on negative sites but heights of buildings should reflect their surroundings. It is therefore misleading to impose such a high level of contribution to the borough target for housing from the Uxbridge Road Corridor. The figure of 9000 units should be reduced and an alternative strategy proposed for the next 7 years which lowers the requirements for so many homes in policies 2.2 and 2.4 after realistic calculations are made.

Built environment with heritage value should be identified and its scope for regeneration appreciated through reflecting its character in the redevelopment of its setting. Neither the Core Strategy nor the Development Management Strategy offers protection for the setting of conservation areas or other heritage assets as proposed in London Plan Policy 7.8 C-G; nor do DMS policies offer any special consideration to the impact of tall buildings on either heritage assets or Green Belt and MOL as proposed in Policy 7.7 E in the London Plan. Ealing Development Management Policy 7C (B) Heritage requires that ‘development within or adjacent to Conservation Areas must be guided by the relevant Conservation Area Appraisal.’ These Appraisals vary in detail but we have not identified one yet that deals with development adjacent to the conservation area. Appraisals can be given very little weight in planning decisions by Planning Committee which has recently allowed a new dental surgery in the back garden of a property despite it being contrary to the Management Plan.

**Specific support for CAs should be included in the Core Strategy as proposed in matter 1)**

We therefore consider that Policy 1.1h should be divided into 2 parts:

1) To protect and enhance the borough’s heritage assets including ancient monuments, nationally and locally listed buildings, historic landscapes and gardens, and their settings, ensuring that new development takes account of the local character of different parts of the borough.

2) To ensure excellence in sustainable urban design, high quality architecture and …’ Reference to natural heritage could be included under 1.1 i) after ‘green space’.

We wish to know where the heritage assets will be recorded with easy access for residents and developers so that they are not overlooked in the so-called ‘balance’ of policies 2.1c) and 3.1 b).

In addition to open space and conservation objections ECS regards this Corridor strategy as unsound because:

1) a band of 1 km on either side of the Uxbridge Rd that does not take into account the street pattern may involve considerably more than 12 minutes’ walk. Techniques used for Map 12, the PTAL maps from the London Plan would be appropriate although clarity would be improved for a larger map on A3.

2) existing public transport is at capacity for journeys to work especially at the morning rush hour when it coincides with journeys to school.

3) Acton Town centre has only distant access to the proposed Crossrail mainline station.

4) The corridor is roughly drawn to include areas that are more than 1 km from the Uxbridge Road.

5) A 12 minute walk from each station would be a more realistic approach.

6) We challenge the idea that Uxbridge Rd can accommodate more bus traffic and adequate crossing points for pedestrians and cyclists without bringing the town centres to a halt. Priority given to Uxbridge Rd traffic in Ealing makes it difficult for pedestrians to cross and improvements are needed e.g. at The Broadway/High Street crossing and in West Ealing.

**Policy 2.1 d)** proposes the improvement of cycling in the Corridor by developing 4 cycle hubs for Southall, Hanwell, Ealing and Acton. In Ealing the key initiative is funding covered cycle racks using Public Open Space at Haven Green. Cycling is dangerous where the road is shared with parked and moving vehicles and
resources should be concentrated on providing safer routes. Painting narrow lanes on existing road space is not
enough and cycling in wet weather in a mixed mode environment is unpleasant. Cycle racks are important but
safe cycle routes should also be provided.

**We propose an alternative strategy** that the simplistic and over-wide Uxbridge Rd corridor be replaced by
other areas for regeneration through identifying:

a) areas within 12 minutes’ walk from proposed Crossrail stations so that long term transport and infrastructure
needs can be planned;
b) sites where regeneration that may come forward in the next 7 years so that their transport and infrastructure
needs are already identified.

4. **Policy 2.4 supporting text refers to the need for further studies, did these not inform the CS; when and in what format will the studies be undertaken?**

The Sites Development Document shows a site for development at Acton Main Line

The 2 sites at Acton Main Line Station (Acton 07 & 08) provide very little information about interchange
facilities. The station is located on the bridge which would have to be widened to accommodate stationary
buses. We objected to the housing proposals in the DSDPD on the adjacent site because they made no
reference to bus facilities. Also environmental conditions are poor because the nearby aggregate freight depot
causes noise and dust for adjoining houses.

5. **Policy 2.5 (e) and (g) provide a wish list of changes/development to occur over the lifetime of the plan. There is no indication of how/when such features will be provided, and whether they will be justified and effective.**

We support regenerating Ealing Town centre and the first and last bullet points of this wish list, provided the
settings of historic assets are taken into account. Construction of the first phase of high rise flats in the Dickens
Yard development W5 shows the problems building near listed buildings.

**We propose 2.5 e) first bullet point should be reworded ‘Preserve or enhance historic buildings, frontages and their settings that contribute ….’**

The Uxbridge Road office corridor boulevard was originally a landscape corridor and some rebuilding has
included adequate planting although the latest development makes a minimal contribution. The landscaping
should have adequate space for trees to grow to maturity without being pollarded. A minimum width for
this boulevard should be specified on redevelopment.

3rd bullet point should explain ‘pedestrian orientated circuit’.

5th bullet point reference to ‘landmark buildings in gateway locations’ should be deleted because it could be
used as a justification for tall buildings in the wrong place. EH and the London Plan advise identifying where
tall buildings are suitable. This could be done on a site-by-site basis in the DSDPD

2.5g) should include a much needed leisure centre and an arts centre which could be accommodated in the
Town hall. If a new health centre is sought by the NHS to replace the overcapacity Mattock Lane clinic it
should be accommodated in the Dickens Yard development where it could be accessed from communal car
parks and by public transport.

2.5c) We fully support proposals to increase in Ealing town centre the quality and diversity of retail and
provision of leisure uses not associated with drinking, clubs or gambling which are adequately catered for.
Retail customers are already being attracted away to Westfield with its good public transport connections, to
Tuesday 8 November, 10.30/14.00

Brent Cross with its good car access while in the long term Crossrail will increase accessibility to Oxford Street shops. Increase use of internet and catalogue shopping will also reduce local footfall. Extending the retail core and the quantum of retail with more new shopping schemes could leave the tradition shop premises without A1 uses as there is a limit to the demand for cafes, restaurants and charity shops. Extended the quantum of retail should be carefully controlled to avoid empty shops and the loss of sites for other town centre uses.

Many traditional shop premises in the Town Centre Conservation Area are protected facades and their character can only be maintained where leases are taken up and the street scene is attractive to shoppers. Façade and street management is coordinated in Bond Street and this should be extended to the remainder of the Metropolitan Centre and other town centres. West Ealing provides mainly value and convenience retail and there is no longer scope for a shopping development.

**ECS objects to any commitment to further increase in retail floorspace in the Ealing Town Centre at the expense of leisure and essential social infrastructure. After the economic recovery retail patterns may change and be replaced by other town centre uses. Existing shops need to be supported through Development Management policies and street improvement projects.**

2.5 d) Much of the existing property over shops is reallocated in the development schedule for housing. We consider that a mix of businesses makes for a lively street environment with flexibility for small businesses on upper storeys and would make a more effective support for heritage assets because the Middlesex business centre is demoted to an employment Site.

**We object to use of existing properties over shops being used only for housing rather than offices or tutorial establishments but careful control of business frontages at an upper level is required to avoid loss of amenity.**

6. Policy 2.9 provides for the ongoing discussions regarding the Middlesex Business Centre (the Great Western Strategic Industrial location having been removed in the proposed change) which will inform the comprehensive regeneration of the Havelock area. It is not clear how this will be coordinated – a separate DPD or SPD – the timing and whether it would be effective in the lifetime of the CS.

We note that map 2.7 in the London Plan shows a SIL in Southall identifying it as a Preferred Industrial Location. We are unsure which industrial land this covers because Middlesex Business Centre has been demoted to an employment site and the Former Southall gas works site to a Town centre and residential area. But we have concerns about a high density redevelopment for the Havelock Area close to the industry with limited local park facilities along the canal. Policy 2.0 b) promotes the overall quality of Southall’s existing green space but it actually needs more space.

**ECS would like to see a policy of retention of green spaces in the Havelock area including Glade Lane. This former stadium site which is proposed for mixed uses in an SOS should be returned to MOL.**

7. What is the current situation at Green Man Lane (explanatory text to policy 2.6), is the text still justified.

No views.

8. Is footnote 63 comprehensive and effective? Why are maps 2 and 3 of the Atlas of Proposed Changes to the Adopted Proposals Map 2004 not relevant?

Maps 1-3 are relevant to Southall Town Centre and King Street neighbourhood centre. Regeneration Policy 2.8 ignores the three separate elements that will be called Southall Town Centre and neighbourhood centre if redevelopment is carried out at the gas works site. The vehicle access proposed at present to South Rd would
not be an easy link and will form a barrier between the two parts of the town centre: traffic is likely to use the Hayes by-pass. It is likely that King Street will act as a part of the town centre until the new centre is in situ.