

Matter 11 - Public Services, Retail and Employment uses Issues and questions

1. Does the Core Strategy provide an appropriate, effective and soundly based framework for the provision of a range of public facilities and services?

Retail is not the only key requirement of PPS4. Town centre uses should also include Leisure, Offices, Arts and Tourism. The CS should identify 5 years' supply of sites for these main town centre uses. Unless sites are reserved for these purposes they will be lost to housing and/or retail. Town Centres will become retail/housing estates and local employment in offices will be replaced by local residents having to undertake expensive and overcrowded travel to jobs in Central London (CAZ). Land for Arts and Leisure uses will become increasingly expensive and eventually will have to be accommodated on the periphery which is an environmentally less sustainable solution. (This process has already happened in Ealing Town Centre where Victorian baths were replaced by a site in the Brent River Park at Greenford. This left the Metropolitan Centre without a public swimming pool.) Policy 2.5 a) promises sports and leisure facilities in Ealing Town Centre but the sites mentioned have no proposals for public facilities. In our view, private gyms and clubs provided as part of residential developments are insufficient in this respect.

We consider that there should be policy commitment in the CS to arts and cultural facilities as well as public leisure provision for the Metropolitan Centre and other town centres as appropriate.

Acton Town Centre has a fine Victorian/Edwardian Town Hall with a swimming pool that is to be redeveloped on a site in the face of opposition from local community organisations who oppose loss of community facilities (currently provided in the Priory Centre which is due to be redeveloped for a primary school which is not in the CS) in the redeveloped complex. Regenerating Acton Town Centre is dealt with under policy 2.2. Points a-e do not deal with public facilities **and f) should be inserted 'To enhance existing community facilities in the Acton Town Hall complex, conserve the public hall, provide sustainable swimming facilities and adequate library space'.**

Southall Town Centre at present has a deficiency of public facilities although some are provided on religious and school sites. There is scope for new public provision in the part of the former gasworks site which will be incorporated into the town centre when eventually constructed. Our main concern is pressure for built facilities on the very limited amount of open space until the highly polluted land is reclaimed adequately and more land becomes available.

We consider that a new Policy 2.8 i) should be added stating 'to protect and enhance the existing open space in and near the town centre and ensure adequate provision in the new neighbourhood to be constructed on reclaimed land.'

2. Is the proposed retail hierarchy soundly based, fully justified and consistent with national policy?

Policy 1.1d) deals with ensuring 'the viability and vitality of the borough's town centres in accordance with the established shopping hierarchy.' As previously stated, national policy in PPS4 requires the provision of more than just retail use. The hierarchy is illustrated in Map 5 (in which "Pitzhanger" should read "Pitshanger Lane"). There appears to be no vision for Neighbourhood and Local Centres [only a descriptive para. on page 18 (2011) and there is no Delivery policy].

Policies for the Neighbourhood Centres are grouped in the Corridor chapters e.g. Policy 3.7a) relates to East Acton, Park Royal, Perivale and Northolt because they are in the A40 corridor. But there appears to be no Delivery Policy and it is therefore unclear how retail will be promoted. Policies in the UDP do provide protected frontages in order to maintain retail continuity in such centres. The four centres are

very different but they share the problems of empty shops with those in the Uxbridge Road Corridor. There is a limit to the number of betting shops, takeaways, wine or coffee bars and charity shops that can use the surplus resulting from the weekly shop being done in supermarkets with free parking.

We consider that more positive action is needed: Policy is spread over separate chapters and there is a lack of explanation of both the hierarchy and how centres are to be promoted.

Ealing's shops may suffer from loss of local expenditure and therefore finance for investment as a result of concentration of development in Town Centres along the Crossrail/Uxbridge Rd Corridor. This will place other shopping centres near stations outside the borough within a shorter journey time after 2018. Improving radial public transport accessibility and capacity may encourage some firms to locate in Ealing; on the other hand if the journey to the West End is significantly reduced Ealing residents may be encouraged to shop in the West End (as is already occurring with Westfield at which is easily accessible by tube and bus). Further expansion of Brent Cross with its free parking and range of popular stores will increase competition and the potential for regeneration from retail schemes in Ealing will be reduced. Increases in on-line and catalogue shopping will also restrict retail sales.

We consider that the proposed retail floorspace projections for the Metropolitan Centre are too optimistic and there should be a reduction in the total with a consequent amendment in the Development sites DPD. Furthermore, initiatives for regenerating less favoured locations to reduce the number of empty shops, such as that used by the Council in Bond Street, Ealing, and by the Pitshanger Lane Association in W5, should be included in the CS. Local schemes improvements including parking and rear serving initiatives should be promoted to encourage the retention of local shops in the least favoured locations and smaller centres. This could be a consequential addition to the Delivery Policy 1.2.

3. Is the strategy and policies for the economy and the provision of employment land soundly based, effective, deliverable and appropriate for this Borough, supported by a robust and credible evidence base, and consistent with national policy?

The DNPPF encourages sustainable economic development as does PPS4 which is rather general. The Revised London Plan is more specific where policy 4.1c) supports and promotes Outer London as an attractive location for national government, as well as business, giving access to the highly skilled London workforce, relatively affordable work space and the competitive advantage of the wider London Economy. Policy 4.1g) promotes London as a suitable location for European and other international businesses. This is particularly relevant to this borough with access to Heathrow via Heathrow Connect and the Piccadilly line. The good car access along Great West Road has proved more attractive to such businesses in the past so that new offices have attracted London businesses away from this borough.

The Mayor proposes both industry and warehousing should be managed rigorously to ensure a sufficient stock of land and premises to meet future needs (policy 4.4). Ealing is classified in Map 4.1 as part of an area where limited release should occur. Three Strategic Industrial Locations (SILs) are identified as important stock for future needs (Policy 2.17) and policy 2.7 lists comprehensive action for their regeneration. Policy 4.4 B covers LDF preparation and the need for both SILs in this corridor, locally significant industrial sites and other industrial sites to be planned and managed in local circumstances.

Policy 3.2 in the Ealing CS safeguards land along the A40 in Northolt/Greenford and Perivale SILS by encouraging sustainable commercial development and improvement to access and amenity but there are no schemes in the Infrastructure Delivery Schedule to improve access

from the A40. This is a particular problem where access to industrial sites impacts on residential areas.

Accordingly, we Propose that in Policy 3.2 reference to improvements to access should be removed from a) and added as a new clause c) along the lines of ‘Improvements to access will be explored to enhance the environment for local residents’.

b) Towpaths provide for recreational cycling at the expense of recreational walking but do not provide the best access to employment. One of the Mayor’s superhighways for cycles terminates at the borough boundary but no cycleway along the A40 is included in the CS despite the green corridor being available. Safe and healthy cycle routes should be provided along Western Avenue away from polluting traffic with access from residential areas to assist sustainable and cheaper journeys to work-

Park Royal Policy 3.3 provides a) and b) on promoting business and industry; c) d) e) relate to transport with no specific proposal to improve access for workers or HGVs. More orbital transport is essential to improve N-S access. The reference to the proposed Piccadilly/Central Line interchange station at Park Royal regrettably appears to be redundant since the developer of the land has recently sought planning consent from LB Brent for its omission from the latest revised scheme (still undetermined at the time of writing).

In summary we believe that Policies should make clear:

- 1) How the Green Enterprise District, centres of excellence and managed affordable workspace will be financed.**
- 2) How the internal access for HGVs will be improved.**
- 3) Options for improving orbital transport should be explored (Policy 4.4 c) mentions improving links from Ealing Broadway to N London but not to Park Royal).**
- 4) The provision of a cycle route along the line of the Western Avenue across borough boundaries with access from residential areas where land is available through green corridor designation or redevelopment.**

The management of locally significant and other industrial sites is ignored. These sites should be analysed according to a local evidence base. Policy 4.4B a-i in the London Plan provides useful criteria for managing local sites. We are concerned that releasing such land for housing based on the lack of demand for out of date premises during a downturn in the economy would lose valuable local employment land which, if premises were renovated or renewed, could provide local jobs and services. This is genuine sustainable economic development. The London Plan criteria could be applied when planning applications are received but it is important that those sites with the best access, amenity and relationship with other uses are retained. Policy 1.1c promotes business and enterprise by securing the stock of employment land encouraging regeneration and renewal protecting our position as one of London’s premier locations but does not say how.

Release of land is managed through two Special Opportunity Sites but the future of the Southall site seems uncertain and more a detailed study is needed of any problems with existing sites. Identifying sites for short or medium term release or mixed use is likely to increase land values beyond the scope of industrial use so that firms move away to out of London sites, thus increasing traffic on major roads to the areas they serve and removing local employment opportunities.

It is important in view of the DNPPF approach to office policy in excluding sequential tests that the LDF should be more specific about protection of industrial and warehousing sites in order to protect sustainable economic land use from sporadic office development. According to the Outer London Commission a minimum quantum of floorspace is needed for a successful office location.

We consider that the paragraph on page 21 of the CP on phased release of industrial land should be a policy under 1.2c) that protects all the essential sites on which office development is restricted to units needed to support the main use.

In the Ealing Strategy, 14 hectares of employment/industrial land is to be released for housing. (para 15 relating to Employment Land Review Sept 2011) We query the basis on which this is estimated. The Tymes Employment Land sites assessments recommends the retention of most of the industrial sites but because chapter 5 lacks areas and site detail it is not possible to relate them to total area. Adequate information is needed to help identify essential sites from those listed in tables 10.4 and 10.5 in the UDP vol. 2.

We regard policies on employment land as inadequate for a borough that has important industrial sites especially as they are spread through the CS. Therefore we consider that:

- 1) employment/industrial policy outside Park Royal should be more specific; and**
- 2) The future of 'locally significant sites and the other industrial sites' should not be left to the viability of the current occupiers but to the suitability of that particular site for employment or industry.**

The London Office Review published by the GLA in 2009 showed a projected addition to office floorspace stock in Ealing of 107,000 sq m between 2011-31 which may involve some change from office to housing provided overall capacity is sustained to meet long-term office needs. The Outer London Commission recommended that "there should be focus on the most competitive locations for future growth in the office based sector [and] attention should be given to the extent of ICT infrastructure in Outer London and the scope for new business support services for home or near home working. Outer London should be promoted as a cost-effective place for the public sector to do business."

Core Policy 1.1a) envisages 94,500 sq m of new office floorspace of which up to 90,000 sq m is proposed for Ealing Town Centre. The Sites Development Schedule identifies 17,000 sq m in the Southern Gateway, Park Royal, 5500 sq m in Southall and 5259 sq m in Hanwell. A range of other sites were regarded as suitable but these are not quantified. We appreciate that much of this projected office floorspace will not be built in the short term due to current lack of demand; but in the meantime office floorspace is being granted planning permission for redevelopment or conversion for hotel and residential use so that there could be a net decline in the total office floor space in the Office Corridor in Ealing (sites between Perceval House and the Lido Junction). This is inconsistent with Policy 1.1a).

Ealing Town Centre has improved as a suitable office location with the Heathrow Connect service improved access to Heathrow. But until Crossrail is finished the CAZ is more attractive because of high accessibility and the range of expertise and supporting businesses. Outer Metropolitan Region Office Centres are also more attractive to new office development where car parking standards are more liberal and workers have access to a wider range of housing at a wider range of prices. Ealing is still at a disadvantage as an office location since it benefits from neither. We would like to see its advantages enhanced to provide an adequate core of local office jobs which the Outer London Commission identifies as essential to a town centre if it is to benefit from sustained long term interest in leases. Ensuring that there is a quantum of office space that enables local expertise and support services to prosper will help to regenerate Ealing Broadway centre in a more balanced fashion with a wider range of job opportunities.

We therefore wish the proposed office floorspace areas for Ealing Town Centre, Hanwell, Southall and the Southern Gateway of Park Royal to be clarified with survey information identifying the existing floorspace on the site and the capacity for new development based on appropriate planning

policies. In particular, we consider that the office market in central Ealing could be made more attractive with:

- 1) more flexible parking under controlled conditions;**
- 2) improvements to orbital public transport that are more specific so that developers can invest in economic development greater certainty; and**
- 3) a more attractive landscaped environment with ground floor leisure and recreation facilities.**