Matter 1 – Overall Context (Preface, Chapter 1 and in general
Appendix 2 (July 2011 version)

Will French BSc, MCD, MBA, MRTPI,
Representor Ref 174
This Submission relates to Representation Number 395, 397, 396, 399, 707, 709, 710, 711

Introduction

These comments reflect my own Professional Views as a chartered Town Planner, and those of the Group which I represent – Save Ealing’s Centre. SEC is a voluntary alliance of 27 local residents associations and community groups which formed in 2007 in response to major changes confronting Ealing Metropolitan centre in order to provide a forum for the community to input their views. Between them the Groups that comprise the SEC alliance speak for over 12,500 members.

From the start, both I and Save Ealing Centre members generally have been strong advocates of the Local Development Framework. We have sought to engage as fully and constructively as possible in its preparation because we think that the LDF has a critically important role to play in place-shaping and in managing development in the Borough. It is therefore with a great deal of regret that as the Chair of SEC I find myself objecting to the Strategy in its entirety because I consider that when it is examined as a whole in terms of PPS12, and the August 2009 Guidance issued by the Planning Inspectorate, it can be found to be neither sound nor legally compliant. Our reasons for thinking this are set out in response to Questions 1, 2 and 7 below.

1. Whether the Key Issues, Spatial Vision and Spatial Objectives are sufficiently clear, locally distinctive and specific and thus effective.

PPS12 sets out tests of soundness which provide a good framework for responding to this question. It says that a sound core strategy should be Justified, Effective and Consistent with National Policy.

• To be ‘effective’ a DPD needs to be Deliverable in terms (inter alia) of the following tests:

  • Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?

Response. The simple answer to this is ‘No’. A number of issues are described in the Preface in the most general terms possible and without any statement of priorities. In effect, I consider that the draft spatial strategy seeks to address just two issues in any meaningful sense – those of providing new homes and regeneration. For only the first of these does it take a spatial approach (albeit an unjustified one) since policies relating to ‘regeneration’ are based on no appraisal of the economic geography of the borough or strategies for areas of multiple deprivation in the way for instance that instance the London Plan describes (Maps 1.2 and 1.3). They involve little more than the identification of areas that can be knocked down and rebuilt irrespective of what this means to the economic geography of the borough or the employment prospects of the community.
• Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?
  
  **Response.** There are very great cross-boundary issues relating amongst other matters to transport planning (Crossrail, HS2, London Orbital routes), retail (impact of Westfield), and a number of GLA Opportunity Sites on, or close to the Borough’s borders which are inadequately considered — either in terms of the opportunities they provide for regeneration in Ealing or the threats they might pose.

• Does the DPD contain clear objectives?
  
  **Response.** Except for the many new homes whose numbers are imposed by the Mayor no clear objectives for the Strategy are discernible. Objectives are of course referred to — in the Executive Summary, in the Sustainable Community Strategy, in Policy 1.1 — but it is not at all clear how these fit with one another, nor is it clear how they will be balanced against each other in the event that conflicts emerge between them.

• Are the objectives specific to the place; as opposed to being general and applicable to anywhere? Is there a direct relationship between the identified issues and the objectives?
  
  **Response.** One of the most disappointing aspects of the Strategy is that it lacks appreciation of the special qualities and diversity of the Borough. The only spatially relevant policy in the Spatial Vision for Ealing (Policy 1.1(b)) will entail the wholesale demolition and rebuilding of conservation areas but this is a fact that is not considered.

• Are the policies internally consistent?
  
  **Response.** It is inevitable that policies should sometimes conflict with one another, and it is not difficult to point to quite serious inconsistencies here. For example, while the key diagram highlights in red the Uxbridge Road corridor which Policy 1.1(b) explains is where new development will be primarily concentrated, Appendix 2 says that Hanwell, which lies in the centre of this corridor, ‘will not be a major focus for growth and investment’. No reason is offered for excepting Hanwell from Policy 1.1(b), but it is not at all clear anyway whether this exception would carry any weight at all as the purpose of Appendix 2 is not explained.

What is missing more generally is any view about how the inevitable conflicts within the strategy are to be addressed. Our concern is that the drive towards providing the numbers of new homes will in practice mean that other policies are overlooked or downplayed. Such an approach has already been apparent, for instance in the case of the Arcadia development which the Council strongly and wrongly supported despite the impacts there would have been on important heritage assets and the integrity of Haven Green. Had planning officers’ had their way and the arguments in favour of more residential development prevailed, this latter, one of Ealing’s most iconic assets, would now be a bus station.

• Have the infrastructure implications of the strategy/policies clearly been identified?
  
  **Response.** The Council has made a very good attempt to consider the infrastructure implications that will arise when so many new homes are crammed into an already densely developed area. What it has been unable to do is provide assurances that the necessary land and financial resources will be available to meet the infrastructure...
needs of the expanded population and the concern therefore is that the quality of like in Ealing for existing and new residents alike will be seriously impaired.

For all these reasons it is respectfully submitted that in the terms both of PPS12 and the PINS tests of soundness that the Strategy would be ineffective

According to the PINS’ Tests of Soundness, if is to be deemed ‘justified’ a DPD needs to be:

1. Founded on a robust and credible evidence base involving:
   - evidence of participation of the local community and others having a stake in the area.

Response. To many, the plan preparation process has felt throughout to have been designed to keep the local community as far away as possible. Evidence provided to the Inquiry by the Council that claims to demonstrate meaningful community inputs have occurred should be considered as little more than evidence that various boxes have been ticked in order for the Examination to proceed.

What has happened in fact is that the whole exercise has dragged wearingly on since 2006 with the occasional release of consultation documents that were poorly advertised and whose purpose and how to respond were ill-explained. (See eg EB1, EB2, EB3). It is true that occasional public meetings have been held but analysis of them, and in most cases even their outcomes, have not fed back to participants and nor were they passed on to the elected representatives (see eg Report to Cabinet July 2010). All this has led to an entirely avoidable bewilderment and fatigue amongst members of the community which has left them feeling excluded from the process.

By way of an example the key 2009 Consultation on the initial development strategy generated no more than 20 responses from individuals. This might lead to an impression that the community was not interested in participating. Such an impression would be quite wrong. There is widespread local concern about developments in Ealing and over recent years this has been amply demonstrated in many different ways, eg:
   - SEC, which is an alliance of 27 local groups and residents' associations, launched its Vision (see response to Q7 below for more detail) at a packed public meeting in Ealing Town Hall – both local and national level political representatives attended.
   - Over 2000 objections were received from local people to two major town centre planning applications for developments of the kind of scale the draft strategy envisages.
   - The very strong local support SEC enjoyed in successfully challenging the planning approval for the Arcadia development in central Ealing.
   - the 203 forms that individuals completed during a 2010 pre-election debate on Ealing’s future involving national and local candidates from all parties.

None of this is reflected in the Strategy now subject to this examination which has been prepared without any meaningful participation of the local community. There is no evidence that any of the policies in the document have been shaped to reflect community views. Preparation of the Strategy has followed neither the letter nor the spirit of the Council’s Statement of Community Involvement. For this reason in the terms both of PPS12 and the PINS tests of soundness the present Strategy cannot be found to be Sound.

- research/fact finding – the choices made in the plan are backed up by facts.
Response. As discussed elsewhere, there is little evidence that meaningful ‘choices’ have been made in the preparation of the strategy. Instead the document now being examined is indicative of a strong regeneration based ideology that is not well rooted in the facts, or the local context in which they would operate.

This is a pity because from the outset, Ealing had a considerable evidence base from which to draw in formulating its strategy. Unfortunately, and particularly during the crucial ‘issues and options’ stage (EB2) this lay unused.

Instead much of the evidence that purports to underpin the strategy seems to have been collated after the key elements of the strategy were first formulated, and much of it was only been published by the Council at the end of the Strategy formulation process which meant there has been no opportunity for the public to comment on it.

The inadequacy of the evidence base can be illustrated through the evidence provided on the Council’s Local Development Framework website relating to the Economy of Ealing – a subject on which the strategy focuses very heavily with its emphasis on regeneration. As part of the 2009 consultation (EB3) Background Paper 3 was published entitled Ealing’s Economy. This was a very thin paper and one that was quite insufficient to build the policies that first appeared at that time and, if the Strategy is approved, would now be entrenched in Ealing up to 2026. In is notable that the 2010 final proposals consultation contained no Background paper on the local economy. A separate piece of research that reviewed Employment Land in Ealing did appear after the start of the consultation, but the Council’s views about its findings and its role in the strategy remain unclear. In our view the evidence on which the Strategy has developed its economic agenda is wholly inadequate. Although the elements of the strategy have been operating for a number of years now, they offer very little encouragement that any ‘regeneration’ in the Borough has occurred.

The paucity of the published evidence makes it very hard to discern any of the assumptions that underlie the proposed Strategy. Only one assumption is made explicitly – the delivery of Crossrail on page 24. But many other assumptions, particularly those relating to the regeneration processes that form the basis for Chapter 2 remain totally unexplored. As an example, the introduction to Chapter 2 refers to the fact that Crossrail will ‘underpin physical, economic and social change in this corridor’ but it offers no views as to how.

For this reason too it is respectfully submitted that in the terms both of PPS12 and the PINS tests of soundness that the Strategy is not Sound.

- the most appropriate strategy when considered against reasonable alternatives

Response. It has been a disappointment that at no point in the process has there been a clear statement of the alternatives from which any of the key choices in the Strategy have been made. The problem perhaps can be traced back to the two initial ‘issues and options’ rounds of consultation (EB1 and EB2) which did not examine the key issues that the spatial strategy for the Borough would address and therefore – unsurprisingly perhaps – did not discuss what options there were for addressing them.

These were points that I raised in my response to the EB2 consultation (see Annex 1, section 3) but though my observations evidently fell on stony soil they remain relevant today.
Instead, and in contrast to the comprehensive remit that PPS12 requires of it, the Strategy has evolved to concentrate on addressing just two key issues in Ealing – those of regeneration and house building. LBE has never published or discussed alternatives for responding to either of these issues in preparing its strategy.

In contrast, SEC has proposed alternative strategies for addressing both of these issues in the form of presentations made within the Town Hall:

- Sir Peter Hall’s proposals in a 2008 lecture organised by Ealing Civic Society for alternative residential locations (Annex 2) and
- Nick Woolvern’s proposed alternative regenerations strategy presented both to LBE and the Ealing BID Co (Annex 3).

Neither of these alternatives has ever been referred to in the plan preparation process. Instead, the audit trail that the PINS tests of soundness says must demonstrate how preferred approaches have been arrived at and how a balance has been struck between the competing approaches, does not exist.

For this reason too it is respectfully submitted that in the terms both of PPS12 and the PINS tests of soundness that the Strategy is not Sound.

- **A Sound DPD should be consistent with national policy**

  **Response.** The Strategy is not consistent with national policy because it does not, in any meaningful way ‘set out a positive, proactive strategy for the conservation and enjoyment of the historic environment’ nor does it ‘consider the qualities and local distinctiveness of the historic environment and how these can contribute to the development of the spatial vision in the local development framework core strategy’ both of which PPS 5 requires that it should do.

2. Whether the overall spatial strategy has a sound basis, having regard to the Borough’s context and needs, and the relationship with other strategies.

Responses to Question 1 apply in large part also to Question 2. But I make two further points.

First, the Borough’s needs are not and never have been clearly articulated. I have already inferred that the Plan perceives there to be just two overarching priorities – new homes and ‘regeneration’. Other needs such as addressing area of deprivation and social isolation, or tackling town centres under stress are largely ignored.

Second, with regard to Ealing’s context, Map1: ‘West London Growth corridors’ needs revising. Map 1 is no doubt designed to show the sub-region in which Ealing is located but is likely to mislead. Missing from or inadequately depicted on this map of the sub region are major developments in the West London area that both now and in the future will impact on Ealing’s economy. First and foremost these include Crossrail, the proposed HS2 line and its proposed Old Oak Common station, and the upgraded north-south London Overground line but in addition and barely registering are major regional destinations like Heathrow, Wembley and Westfield centre, while the Opportunity areas that fringe the Borough are asterisked, but their potential significance as explained in the London Plan is not acknowledged let alone examined for the role they have to play in the future of the Borough.

It is also notable that the map carries no attribution and as far as I am aware it does not appear in any GLA documents such as the London Plan or the West London sub
regional strategy, both of which contain key maps that would be relevant to Ealing. (and in fact the latter is included later on without any policy explanation as Map 11 in the DPD).

Map 1 is seriously mistaken in its suggestion that neighbouring boroughs have similar growth corridors in their strategies to those which Ealing favour. This can be seen in the key diagrams for Brent and Hounslow below:

Map 1 obviously needs to be amended by removing the two fingers of growth that are wrongly drawn as passing through Brent and Hounslow. This would leave just two fingers for Ealing – an apt description perhaps of the Strategy as a whole.

7. Does the Core Strategy provide an appropriate, effective, comprehensive and soundly based framework for ensuring the quality of places in the Borough, including the design of new development and protection of the built, cultural and natural heritage?

Response. The short answer is ‘No’.

Reasons are already given above, and more fully examined in Matter 2.8.
However at this point it will be worth referring to the ideas that SEC has sought to feed into the Strategy preparation process through the publication of its 2008 Vision for Ealing (Annex 4). The Vision provides a clear description of the sort of considerations that need to go into planning the town centre and one of its stated objectives was to ‘Provide a basis for ...inputs to the LDF'. There is no acknowledgement of the Vision's existence at any point in the Plan preparation process.

9. Is the CS entirely consistent with The London Plan 2011 and is there any potential conflict with the Draft National Planning Policy Framework?

Response. The Strategy does not comply with the London Plan which requires under Policy 7.8 G that it should contain policies for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings'.

Very similar provisions apply in the NPPF.
Planning Policy and Development Advice,
Perceval House,
14-16 Uxbridge Road,
London
W5 2HL

20 October 2007

Dear Ealing Planning

Response to LBE Issues and Options Consultation
Revised version of on-line submissions (ID Nos 463 and 464) which I wish to withdraw.

My comments, on behalf of my local residents organisation - Gordon Road and Surrounding Streets (GRASS) on the Issues and Options Consultation are as set out in detail below. In addition, I am assuming (please tell me if I am wrong) that you will continue to pay heed to the comments that I submitted last time around in which I proposed a spatial structure for Ealing which is something that appears to be missing from the current consultation document.

Please note that while the following comments clearly relate to a number of the sections of the issues and options paper, I am offering no specific comments on any individual section. As I explain, this is because I fear that neither the issues that are raised in the paper, nor the options made available to us are really very helpful in addressing the enormous land use questions that will arise in Ealing over the coming years and which really must form the basis for Ealing’s LDF. All the same, I would like very much to remain engaged in this process and look forward to hearing from you as things develop.

As I don’t entirely trust the newfangled form of responding to consultation via a website in Limehouse, I shall be submitting a paper based version of these comments to you over the weekend (October 20th, 21st). I hope that in whatever form you receive the comments in you will accept them as having been duly made.

Best wishes

Will French
On behalf of Gordon Road and Surrounding Streets (GRASS)
1. The Issues and Options Consultation Paper takes an insufficiently spatial view

The consultation seems to have missed many of the really significant issues that are affecting land use change in Ealing as the new planning system intends that it should. Unless this is rectified neither the Council nor the community will have a chance to explore the spatial implications of key development pressures and policies. There is no map of the borough anywhere in the document – only individual area plans that show sites. This is very worrying as it means the LDF’s role as the Borough’s spatial plan will be missed. If so Ealing Council will have no chance of performing the critical place-shaping role that Sir Michael Lyons in his Review of Local Government published this year, sees as being the primary purpose of Local Government.

On behalf of all its residents GRASS believes that the London Borough of Ealing must try to address the spatial implications of major land use issues with more ambition than it does in the present document.

2. The issues and Options Consultation Paper Does not take account of the real forces that are driving change in the Borough

GRASS believes that the Issues and Options paper should draw more strongly than it appears to do from the following:

a. Ealing’s evidence base.

There is a huge potential spatial planning evidence base for Ealing which seems not to be reflected in the consultation paper. The Council has commissioned studies on housing need and the health of its Town centres whose spatial implications are not examined. A massive amount of travel data has been collected as part of the West London Tram proposals, a 2006 Economic Regeneration Strategy contains much data and some valuable spatial analysis of the Borough. Other work has been done on assessing socio-economic issues and educational provision. The consultation document carries none of this.

b. The land use implications of higher level strategies - the London Plan.

The London Plan provides a strategic context for Ealing and the LDF should reflect this. The London Plan anticipates that there will be strong growth in London’s Western Wedge and it contains strategies relating to housing, employment, town centres and transport which all have strong spatial implications. Policy 5D.1 of the Plan sets out West London’s strategic priorities which the LDF should discuss and respond to. One of these policies which is growing increasingly necessary to examine given the pressures for more intensive development along the Uxbridge Road corridor, is the need to identify which areas are suitable for high buildings.

At an absolute minimum, the London Plan’s diagram of the West London sub-region (Map 5D.1) should appear in our document to provide a spatial context for the LDF (even if changes such as the abandonment of the WLT need to be reflected - now that the West London Tram has been dropped both by TfL and the Council, it has become an irrelevance to the LDF and there should be no further reference to it in any subsequent
DPDs. As it is, the references in the LDF to WLT makes the Issues and Options Paper look out of date and out of touch).

c. **Strategic developments in West London**

A number of major West London developments are already impacting on the Borough and their effects will become increasingly intense. These include Heathrow expansion, the White City development and Wembley. None of these are considered in the Issues and Options paper.

Perhaps most worrying is the absence of analysis of the land use implications of Crossrail – despite the fact it is in the London Plan, and despite the increasingly strong signals that the Government had been making about over the past year about a favourable outcome for it. Crossrail will have a profound impact on the spatial structure of the Borough. The fact that it had not yet received funding when the Issues and Options Paper was published was not a reason for the consultation paper not to have discussed what its land use implications were. It is apparent that the developers of the Arcadia site in Ealing Broadway have been thinking very hard for sometime on this issue and they seem to have been in close discussion with the Council about it. By failing to open out these discussion through the LDF process, the opportunity for front loading community input has been lost, and frustration amongst the community for the consequences is already growing. The consequences clearly include pressure for high rise redevelopment of sites around the stations. In the light of the Arcadia proposals, GRASS, whose members will live literally in the shadow of the development, urges that a proper debate on a policy that responds to these pressures must be now given very high priority.

d. **The Sustainable Community Strategy.**

The LDF should be providing a spatial context to the SCS – for absence of a coherent on the ground delivery mechanism to put substance to it, means that the SCS will remain no more than an idle aspiration. The SCS is considered in Table 2.3 of the Issues and Options paper but it contributes no spatial analysis whatever – and indeed it is hard to see any additional value added by this table.

3. **Key issues that the Issues and Options Paper ought to have raised but does not.**

As the spatial development plan for Ealing, GRASS was looking for the LDF to draw together threads from its analysis of the material above to spell out the issues and consider options for achieving optimal and more joined up development on the ground. Such an exercise would explore the following issues that are more complex and varied than the consultation document implies:

a. **Population growth and the consequent increase in housing provision.**

KEY QUESTIONS: The issues and options paper refers to the need for 915 new homes per year but where are we to accommodate these? What are the capacity limits? OPTIONS TO EXAMINE: Alternative location strategies.

b. **The pressure of inward investment and economic growth**

KEY QUESTIONS: How much investment. Where are the pressures? OPTIONS TO EXAMINE: Alternative spatial policy responses – where to accommodate? Where to manage or direct? Where to resist?

c. **Addressing deprivation and social isolation**
KEY QUESTIONS: Where are the problems? what spatial issues do they raise?
OPTIONS TO EXAMINE: Alternative spatial policy responses

d.  **Town centres under stress**
KEY QUESTIONS: What forces have caused the decline? What should be the role of each town centre?
OPTIONS TO EXAMINE: Alternative future roles for each centre

e.  **Transportation priorities including responding to the opportunities of Crossrail.**
KEY QUESTIONS: Where is demand greatest – now and in future? Journey to Work. Capacity questions
OPTIONS TO EXAMINE: Distinct transport strategies

f.  **Capacity limits to essential social infrastructure**
KEY QUESTIONS: Where is there spare capacity?
OPTIONS TO EXAMINE: Opportunities for new provision

g.  **High Buildings Policy**
KEY QUESTIONS: Which locations are suitable for high buildings?
OPTIONS TO EXAMINE: Alternative locations – some? or none?

h.  **Responding to climate change locally.**
KEY QUESTIONS: Can any spatial policies mitigate or adapt to Climate change?
OPTIONS TO EXAMINE: Alternative location strategies, density strategies, transport strategies, townscape implications

GRASS had been anticipating that the Issues and Options paper would describe the extent and the implications of each of these issues together with the spatial options (which may well conflict with one another) for addressing them.

GRASS acknowledges that resolving these issues will be extraordinarily difficult, but if the issues are not even examined here, they will not be examined anywhere. The consequence will be that we shall continue to waste serious quantities of time and resources pursuing unsound and unstrategic vanity schemes like the West London Tram, we shall find our major assets like our town centres continuing their decline and as a community we shall feel ourselves frustrated and increasingly alienated from decision making processes while, rightly or wrongly, we sense that Council officers are engaged with aggressive developers in closed door discussions on strategic schemes that will have a major impact on all our lives.

4. The Options offered in the consultation Paper do not provide real choices.

The choices that arose from such an exercise would be more meaningful than the three option themes presented in the document now being consulted on. These three themes are just too simple to be very helpful in considering alternative futures for the Borough. Everyone understands that there is enormous pressure for change to the fabric of the area and everyone wants to protect the best of Ealing’s heritage, so what choices are really offered? Different strategic combinations should be devised to address the issues identified above. The question that GRASS would like to discuss is what combination of these choices is best? By asking this question the LDF can create meaningful alternative visions of the future to choose from and it can lay down the basis for a coherent policy framework that would attract public support.
5. The Issues and Options Paper is not the right document to be consulting on individual sites

And it should only be when there is some clarity about the broader spatial options that it will become realistic to consider the potential of individual sites. PPS 12 suggests that site allocations should be a separate document from the Core Strategy, and this looks quite right. GRASS is very uneasy that a very major part of the current consultation is a consultation on individual sites. This can only distract respondents from grappling with the big issues as they will concentrate on the individual sites that most affect them. They will lose sight of the woods in favour of the trees, and the opportunity that the current exercise provides to establish a clear strategic vision for the Borough will be lost.

As it is it is quite misleading for the Council to be consulting on some of the most critical sites such as the Arcadia and Dickens Yard. The Council has already embarked on separate planning exercises for these sites and the options made for them are far advanced from what is implied in this document. Many members of the public will be mislead into believing that they have an opportunity to influence the future of these sites when the only meaningful way they will be able to do so is through response to a planning application.
A VISION FOR EALING
Strengths, Weaknesses, Opportunities, Threats

Professor Sir Peter Hall
Ealing Civic Society
17 June 2008

Ealing 2008: A SWOT analysis

• Strengths: Strong centre; Good residential quality
  Still the Queen of the Suburbs
• Weaknesses: Weakening retail; densification pressures
• Opportunities: Improved linkages, especially Crossrail
• Threats: Increased development pressures

Ealing: The Classical 19th-Century Railway Suburb

• Based on station
• Shops, services at core
• Dendritic streets – “tree pattern”
• Thus, easy access
• High-ish densities (family size!)
• Houses: 50/ha.
• Population: 150/ha?

19th-Century West London: The great estates

19th-Century Ealing: Railways + Charles Jones

19th-Century Ealing
Walk to (from) rail

Ealing: Sustainable Development Model?
- Ideal urban form
- Compact
- Walkable
- Public Transport based
- Mixed use: shopping, services in core
- Permeable street pattern

Urban Task Force Principles: Linked Neighbourhoods

UTF: Mixed Use

Ealing in the 21st Century: London Plan 2004
- Key transport hub (Crossrail, Tram, New Heathrow service)
- Therefore, densification?
- But: how?
- “Metropolitan centre”
- Conservation areas – surround centre

London Plan: “Compact City” Matrix
Suburbs: How dense?

Source: Rudlin and Falk, Building the 21st century Home

Lessons from Land Use

- Public Transport needs minimum density:
- Bus: 25 dw/ha
- LRT: 60 dw/ha
- Exceed recent densities
- Big gain from 30-35 dw/ha
- Plus “pyramids” up to 60 dw/ha round rail stations
- Urban Task Force
- Traditional – Stockholm, 1952!
- Or Edwardian suburbs!

London Plan: Centres

Llewelyn Davies 1997: Ped-Sheds and Interface Zones

- Ped-Sheds: 10-minute walk (800m) from train stations
- 4 big town centre case studies: Bromley, Hackney (Mare St), Walthamstow, Hounslow
- +6 others: West Norwood, Wealdstone, Erith, Chadwell Heath, Willesden Green, Raynes Park
- Conclusion: Ped-shed capacity for extra homes:
  - Existing UDPs: 52,000
  - Tighter parking: 77,000
  - No off-street parking: 106,000

Llewelyn Davies 1997: Walthamstow Ped-Shed

Conservation Areas: Ealing Bdy North
Conservation Areas: Ealing Bdy South

Ealing: The Problem – and the Solution

- Interface Zones – Not large, because of Conservation Areas
- So: densify Conservation Areas?
- But: only through conversions
- Car parking problem: environmental standards
- So: better to divert demand elsewhere!
- E.g. Chiswick Park/Acton Town
- E.g. Park Royal Triangle

Crossrail and the London Plan

Crossrail and Orbirail

New Suburban Centres?
Back to the Railway Map...

New Interchanges: Shepherds Bush
New Centres:
1. Chiswick Park/Acton Town?

New Centres:
2. Park Royal Triangle?

Intensifying North Acton
- Victoria Heights:
- Frogmore: £50m
- 255 apartments
- Rialto/Fairview:
  - 398 apartments, 50% affordable
  - Two hotels
  - 34,000 sq m commercial
- Community facilities

Central Ealing: Master Plan Needed!

Tibbalds Report
2.5.3 Centre Ranking
100 (2006)
“The town centre is ranked well below other Metropolitan Centres. For example Kingston (16th), Croydon (27th), Bromley (30th), Romford (54th) and Sutton (80th) are all ranked significantly higher than the town centre based on the scale and the quality of their retail offer. It is realistic to assume that the town centre can and should achieve a ranking in ‘the top 50-75’ centres.”
Tibbalds Report

- A “Master Plan”, but:
- Doesn’t consider scale of challenge – especially from White City
- So: Doesn’t quantify “absorptive capacity” of Ealing Broadway
- And: accepts existing components as given!
- And: no consideration of station!
- Conclusion: “Shouldn’t start from here at all”

Leaf and Dickens Yard

Leaf Development 116,174 sqm
Haven Bridge 116,433 sqm

Leaf vs. Haven Bridge

- Achieve similar density to existing Leaf Development
- Introduce a more human scale
- Respect the conservation area
- Lessen impact of shadows

Leaf Development
Haven Bridge
Final Questions

• Need to start at the beginning
• What kind of place should Ealing be?
• Density?
• Transport?
• Services?
• Balancing change and continuity
• Need to accommodate pressures in new ways/new places
• We did it right once, long ago…
• We can do it again!
Putting local enterprise at the heart of regeneration in Ealing

Summary
- Attracting major inward investment to Ealing during the Credit crunch is unlikely until Crossrail is imminent.
- Ealing needs a strategy to cover the intervening years before Crossrail opens
- There are many strategies to regenerate that don't require large capital investment.
- The two keys are:
  - Finding means of attracting customers into Ealing's businesses and shops
  - Making Ealing's income work harder within the borough, i.e. increasing local employment, using local suppliers
- These are strategies closely related to the Green agenda for less carbon intensive living

Building on Ealing's advantages
- Strong local community that only spends 35% of its income locally
- Ealing is highly entrepreneurial, with a large number of small businesses
- Large number and range of experts in the local community
- Ealing is cosmopolitan with many external linkages
- The strength of community campaigning and cohesion to mobilise education and support for local development strategies

Attracting spending into Ealing does not have to be capital intensive
- Plug key gaps in the Ealing's retail offering
- Encourage and establish further niche retail e.g.:
  - Educational toys
  - expanding Farmer's market into a W London Borough Market...
  - Catering to the aging demographic profile
  - Sports and running goods shops
- Create "Market Halls" from disused large shops to encourage small retailers
- Extended shop hours to capture the commuters
- Loyalty card scheme
- Affordable, sustainable, rents strategy

Regeneration does not have to be capital intensive
- Procurement policies to encourage local suppliers and local employment
- "Business angel" trusts to invest and support local businesses
- Insulation spaces for start-ups
- Business networking to encourage support between business, local government and major employers
- Concessionary rates for CPZ's for local employers with robust "green travel plans"
- Voluntary organisation encourage local initiatives such as handy-men / home helps
- Tracing and approaching owners of empty property
- Increasing emphasis on family housing and increased usage of the existing housing stock
- Active support for local combined heat and power / solar power schemes

Conclusions and next steps
- Ealing must do something other than rely on Crossrail and mega-redevelopments
- Ealing is well placed to exploit and benefit from alternative strategies
- These approaches have benefits to local retailers, businesses and residents
- They all need to be engaged to gain further ideas and to implement a strategy
- SEC and the Council need to co-operate on the approach
A Vision for Ealing
Broadway Town Centre

Save Ealing's Centre

November 2008

Price: £1
Save Ealing's Centre Alliance

SEC is a voluntary alliance of 26 Residents' Associations drawn together, as local stakeholders, in response to the proposed developments within the centre of Ealing. Our focus is to promote the revitalisation of Ealing Town Centre and its development as the focal point for the Borough and for the community as a whole, in a manner that meets the needs of our future generations. Our constituency numbers over 12,500 residents from:

- Ascott Avenue Residents' Association
- Brentham Society
- Chiswick Protection Group
- Ealing Civic Society
- EPTUG
- The Five Roads Forum
- Grange Grove Residents' Association
- Hanger Hill East Residents' Association
- Hanwell Village Green Conservation Area Residents' Association
- Neighbours' Paper
- Pitshanger Community Association
- Warwick Road Residents' Association
- Woodfield Gardens and Regency Close Residents' Association
- Boston Manor Residents' Association
- Central Ealing Residents' Association
- Creffield Area Residents' Association
- Ealing Fields Residents' Association
- Ealing Arts & Leisure
- Friends of the Earth
- Gunnersbury Avenue Residents' Association
- Gordon Road & Surrounding Streets Residents' Association
- Kingsdown Residents' Association
- Residents' Association Madeley and Westbury Roads
- The Park Community Group
- Walpole Residents' Association
- West Ealing Neighbours

Web site: http://www.saveealingscentre.com/

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Patrick Chapman MA, FIBC
Richard Chilton BA, MBCS, CITP
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Eric Leach
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Janet Sacks MA

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Corinne Templer, SEC Treasurer
20 Mattock Lane
London W5 5BH.
Save Ealing’s Centre (SEC)

A Vision for Ealing Broadway Town Centre

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November 2008
Introduction

As an alliance of Ealing-based residents’ associations and community groups, Save Ealing’s Centre’s (SEC) agrees with the Council’s statement above and here sets out its Vision of how to achieve it.

Our objective is to promote the revitalisation and overall improvement of Ealing as a town centre that can better serve the needs and aspirations of the whole community, i.e. that is lively, safe, attractive, full of people with a wide range of things to do throughout the day and into the evening.

Revitalisation of Ealing’s centre should:
- Preserve and enhance the historic character of the town.
- Rationalise the road network – particularly north to south.
- Look at redevelopment of the town centre as a whole.
- Create a mixed environment with emphasis on Arts, Culture, Entertainment and Leisure.
- Produce a family place where people of all generations come for a variety of purposes.
- Be safe for pedestrians and cyclists and with no ‘crime hot spot’ areas.

Our Vision defines the overall principles and themes that SEC believes should guide future development in Ealing and takes a holistic approach by looking at the six central development sites together, as one “opportunity” to revitalise the town centre. The six sites include Dickens Yard, Arcadia Centre, Ealing Broadway Station, Cinema site (opposite the Town Hall), Lamerton’s and the Ealing Broadway Centre.

The purpose of SEC’s Vision is to:
- Provide a coherent vision for Ealing from the perspective of residents and the local community which can be used to modify, complement, and qualify the ideas of planners and developers.
- Give SEC a clear set of principles to take to the Council - both to members and Officers.
- Provide a basis for responding to new development proposals and to Tibbalds and other inputs to the LDF.
- Explain to the wider public what SEC is about, thereby offering the themes around which SEC will attract the broader support of the Ealing Borough community.
- Provide a basis for SEC to develop and evaluate more detailed strategies, scenarios - eg on integrated interchanges or town centre layouts - and other development options.
Executive Summary

SEC believes that the following seven elements need to be considered and included in plans for the redevelopment of the town centre to ensure it is diverse in terms of its mix and distribution of uses:

**Built Environment**
- Buildings to be no more than 2 to 8 storeys high, depending on the site location.
- The existing townscape, historic character, key views and landmark elements to be protected.
- All new building to be attractively designed and of a scale that complements Ealing’s ‘look’.

**Transport and Movement**
- Rationalisation of the road network – particularly north to south.
- Improved travel routes for pedestrians, cyclists and motor vehicles
- A fully integrated public transport interchange at Ealing Broadway station.
- Better access to public car parking to reduce town centre traffic.

**Arts, Culture, Entertainment and Leisure**
- A high quality, flexible multi purpose arts, leisure and conference centre.
- A professional Management Board to run programmes to attract residents from in and outside the borough. A cinema complex showing general release and art house films.
- Indoor sports facilities.

**Retail**
- Reinvention of Ealing as a town rather than a metropolitan centre, to ensure that its shopping facilities meet the needs of its local catchment area.
- Shopping which is complementary not competitive to Westfield, with a mix of small independent traders in shops and permanent indoor/outdoor market stalls.
- A variety of units with sufficient small to medium shop sizes to keep overheads to a minimum.

**Commercial**
- New office space to exploit improved transport access in the centre
- Selected refurbishment of older blocks with some changes to residential use
- Provision for local small and medium-sized start-up businesses and professionals.
- New quality or “boutique” hotel development linked to the arts and conference facilities.

**Residential**
- Ealing centre to be mainly for civic, cultural and leisure facilities rather than residential.
- Medium density residential only where adequate infrastructure can be provided.
- New homes to be planned to meet the emerging needs of the existing local community.

**Community**
- Adequate health services, education and public open space to allow for any increase in housing.
- A centrally sited police station with easy access 24 hours a day.
- The Town Hall to return to being the centre of civic community/arts activities.
1. SEC Vision - Built Environment

BACKGROUND

The special architectural and historical interest of Ealing’s town centre is derived from the development of the centre as a commercial focus for the Borough in the late 19\textsuperscript{th} and early 20\textsuperscript{th} centuries, following the arrival of the railway in the 1850s. A particular feature of the streetscape is the relationship between the Edwardian/Victorian buildings and open spaces in the centre of the town, in particular the common land at Haven Green, Ealing Green and Ealing Common.

Virtually all Ealing’s historic centre is covered by the Town Centre Conservation Area. Except to the west, it is surrounded by other CAs that influenced its historical development and still provide its immediate setting, and because of this and the main railway line to the north, there is a strong boundary which marks its natural limit and restricts any spread.

The main shopping area which lies along the curve of The Mall and The Broadway is characterised by several frontages which are locally listed as being of special interest, with a tight and compact rhythm punctuated by the prominent gables of the late Victorian/Edwardian three and four storey buildings, as noted by the Council’s Conservation Appraisal.\footnote{Ealing Town Centre Conservation Area Character Appraisal, December 2007, para 4.1}

This fine suburban grain and scale has been broken in the later 20\textsuperscript{th} century by a number of poor quality buildings, both on the central part of the main east-west axis and by blocks such as Villiers House. These disfigure the town centre because they failed to relate to their surroundings and did not use materials traditionally employed in Ealing, where the prevalent architectural language of the centre remains red and stock brick.\footnote{ibid, para 5.2.1}

Commercial buildings further along Uxbridge Road outside the conservation area are largely in a different vernacular and are visually separate from the historic centre. They are frequently of poor design and character out of keeping with its style, and give a poor impression of the town when approached from the west. They also mark a clear division between Ealing Broadway and West Ealing, marking the latter as an individual centre in its own right.

AIMS

One of Ealing’s attractions is the character of its built environment. The main objective should be to encourage changes which exploit this special character and identity. It should recognise central Ealing as being a suburban town with an essentially human scale, instead of shoehorning it into the artificial construct of a Metropolitan Centre which conflicts with its physical and historic character.

This requires a master plan which will govern all redevelopment proposals, and fit them into the strategic objectives elsewhere in this vision statement. The plan should recognise the Management Plan for the conservation area, and contain \textit{inter alia}

\begin{itemize}
  \item a tall buildings policy which respects the historic scale of the town
  \item specific guidance on densities consistent with the status of Ealing Broadway as an Urban rather than a Metropolitan Centre
  \item recommendations on style and design suitable for the area.
\end{itemize}
PROPOSALS

We believe that future developments in the centre should:

1. Preserve and enhance the existing townscape and historic character of the town and its conservation area, and respect its scale and open spaces.
2. Replace buildings and other elements that currently have a negative impact upon the centre, in particular unsympathetic modern additions.
3. Preserve key views and landmark elements of the townscape. New builds close to significant existing buildings or façades should complement them and contribute to their historic interest.
4. Be attractively designed in their own right and of a scale, proportion and massing that respects the Victorian/Edwardian structure of Ealing.
5. Provide public realm that is welcoming not intimidating to the visitor at any time of day and night.
6. Ensure groups of new buildings give a distinctive character to the area and become recognisable landmarks that help orientation.
7. Make communal green space with attractive views available for relaxation.

The table below sets out some specific recommended criteria.

Table 1

<table>
<thead>
<tr>
<th>Policy Area</th>
<th>Standard</th>
<th>Rationale</th>
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| **Building height**| Maxima within conservation area, depending on the site, listed buildings proximity etc.  
Max storeys on frontages:  
Shopping road 3 -4;  
Public open space 4 – 6;  
Internal blocks 6 – 10. | To maintain the character of the conservation area; to avoid new buildings over dominating the local area; to prevent canyon effect in shopping areas; to ensure high residential standards |
| **Building density** | Keep the current medium density profile of the Ealing Broadway area:  
plot ratio 2:1 max residential 70 – 260 u/ha | To reflect the provisions of UDP SPG 6 (Plot ratios) and the London plan Table 3A.2 (Density matrix) appropriate for an urban centre |
| **Architectural style** | Accept high quality contemporary styles if they remain sympathetic in context of neighbouring buildings, particularly in choice of materials and finishes (brick and stone) | To provide a harmonious look to the centre of Ealing and protect existing character of conservation area |
2. SEC Vision – Transport & Movement

BACKGROUND

There are several problems with the current transport arrangements for Ealing Broadway.

1. Walking and Cycling

- There are many points of conflicts between vehicle, cyclist and pedestrian movement, i.e. where cars and buses cross the path of cyclists and pedestrians.
- The only pedestrianised areas are within Ealing Broadway Centre and Arcadia.
- The footways are of varying widths being too narrow in many places. This is often exacerbated by street traders and hawkers.
- There are few cycle routes separate from busy roads.

2. Public Transport

- The station is a terminus for two underground lines, and a stopping place for up to eight trains per hour on the Paddington line, which is heavily utilised. Entrance and exit to the station is overcrowded and dangerous at peak times, with no step-free access to platforms or booking hall from street level. The station will need to be reconstructed to meet the needs of Crossrail.
- The only drop-off and pick-up facility for passengers from Ealing Broadway station is an inadequate one, either across two roads or in between bus stops.
- The taxis outside Ealing Broadway station can’t be reached without crossing one or two roads.
- There are no ‘legal’ pick-up and drop-off points for mini-cabs.
- The bus stops are not concentrated outside the station and are spread out over Haven Green, The Broadway and The Mall. There is no bus station even though it is a terminus for nine routes that run daily.

3. Access roads and parking

- The main access roads into Ealing are very congested at peak times. Short of driving through one or two extra dual carriageways, there is limited scope for easily improving the situation.
- There is heavy traffic within the town at many times of the day. Some of this is caused by the one way system on the east and west sides of Haven Green, which causes traffic to circumnavigate the centre of Ealing.
- Traffic heading to and from the town centre car parks has to traverse at least part of the town centre, with the exception of that from the south heading for the Ealing Broadway Centre car park.
- There is no suitable off-road parking for delivery vehicles, apart from within Ealing Broadway Centre.
FUTURE DEMANDS

A significant number of extra flats in the centre of Ealing would increase the number of pedestrians in the area, both using local facilities and public transport. These new residents would also own a significant number of cars that they would want to use for getting in and out of Ealing, at least for those journeys that are not convenient by public transport.

New elements that would generate extra delivery traffic and pedestrians include new shops, offices, cultural facilities, community facilities and flats. They would also generate extra demand for public transport. More up-market facilities, in particular, would also generate extra cars trying to reach the centre of Ealing.

AIMS

The key aims are:

1. to improve significantly the ease of walking and cycling about the centre of Ealing, and to reduce the number of vehicles in the centre to produce a more pleasant environment

2. to create an integrated transport interchange for easier use of public transport

3. to improve traffic flow and use of car parks.

PROPOSALS

1. Walking and Cycling

Pedestrian bridges
The biggest barrier to pedestrian movement in the town centre is the heavy traffic volume along The Broadway. While this would be reduced if Springbridge Road is made two-way (as below), one option would be to provide a wide footbridge from the Arcadia site across to the Ealing Broadway Centre.

Another link from the north over the rail tracks would reduce congestion at the pedestrian crossing at the junction of The Broadway and The Mall. This could be provided by a footbridge from Haven Green over the railway direct to the Arcadia site.

Pedestrian link across Springbridge Road
The east-west pedestrian route between Dickens Yard and Arcadia should be improved by an enlarged Springbridge Mews and a pedestrian crossing of Springbridge Road.

Further pedestrianisation of the Town Centre
The permeability of all major redevelopment sites should be improved by the provision of pedestrian through routes. Where walkways adjoin traffic routes, frontages should be set back to enable the pavements to be widened.

Other opportunities should be taken to pedestrianise roads. Some further “pedestrian friendly” areas may be possible with the redirection of town centre traffic to car parks. If either High Street or Bond Street were made two-way then the other could be restricted to pedestrian, cycle and delivery vehicles only.
2. Transport Interchange

Bus Station
The best solution would be to build a full bus station over the London Underground tracks and platforms of Ealing Broadway station. To make this work there would have to be a new bus road entrance and exit to the station. This might be from The Mall, probably at the point where Carmelita House now stands, from Haven Green where the old District Line station entrance stands, or from Madeley Road. The canopy over the District Line tracks should be removed during construction and reinstalled afterwards.

Ealing Broadway Station
Rail plans must allow for Network Rail’s projected expansion of the Great Western main line and the fifth track to meet the need for additional rail capacity between Ealing Broadway and West Ealing, including alternative arrangements for the Greenford branch line.

Taxis, mini-cabs and drop-off facilities at Ealing Broadway station
The main facilities should be provided at the back of the station and linked to the proposed “over the underground lines” car park.

3. Traffic flows and parking

Traffic flows
Improvements are needed to ease access for traffic from the north. There are two options for this. The first is to make the western side of Haven Green and Springbridge Road two-way. This would require the widening of this road, the railway bridge and its junctions with Castlebar Road and New Broadway.

The other option is to divert northbound traffic from Springbridge Road to Longfield Avenue and Longfield Road. Longfield Road would be extended southwards to join up with a new road running along the railway tracks to the car park. The short part of Longfield Avenue north of the railway tracks would be closed and provided as replacement parking for Berkeley Court. The direction of traffic in Springbridge Road would be made southbound.

Public car parking and access roads
The aim would be to discourage cars from traversing the centre of Ealing by arranging access to the car parks as follows:-

- Vehicles from the south would use the Ealing Broadway Centre car park. The car park and access roads would remain as they are today.
- Vehicles from the west and north would use the Springbridge Road car park. This would be enlarged and the access arrangements changed as described above.
- Vehicles from the east would use a new car park over the underground lines, along with new access roads.
**Springbridge Road car park**

This could be extended westward over/beside the railway lines, as an alternative to providing public car parking on the Dickens Yard site. A new road would run to the car park either above the tracks or above the side of the cutting.

**New car park beside the underground lines**

This would be on the eastern edge of Ealing Broadway station. The main access to it could be from a new road which would run to a junction at the Webbs site on the North Circular Road. The road would run along the Webbs site and then on the northern side of the cutting by the District Line tracks.

This new car park would make use of the expanded width of the North Circular Road following the replacement of its bridges over the railway lines. It would remove some traffic from the town centre. The new access roads would also be used to provide “rear” access for any developments over Ealing Broadway station.

**Off-road parking for delivery vehicles**

All new developments should include off-road delivery facilities. New developments should also provide facilities for off-road deliveries to adjacent premises.
3. SEC Vision - Culture

BACKGROUND

1. Introduction: the town centre in 2008
As the administrative and cultural centre of the borough, Ealing is a large town with good communication links to most of its outlying parts. The attractions it offers to its residents and those of neighbouring areas are however limited. At present the centre offers shopping, some restaurants and occasional art exhibitions in Pitzhanger Manor Gallery. In the evening there is a plethora of licensed drinking venues and clubs which notably attract the young. Other evening entertainments include pubs, a cinema (now undergoing refurbishment), or Ealing’s highly-respected amateur theatre, the Questors.

The town also hosts the Ealing & West London College, Ealing Studios and part of Thames Valley University, but these institutions’ programmes of cultural activities for the general public are somewhat restricted.

The Council has initiated the summer Comedy and Jazz festivals and other summer events in Walpole Park which have been immensely successful, suggesting that there is a hunger for a wider range of cultural activity. Nevertheless, over the last decade Ealing Broadway has failed to develop in a way that will improve the quality of life of Ealing residents, or to encourage people from beyond the Borough’s boundaries to visit and spend their money here.

2. The future
Arts, culture and leisure are essential ingredients if the town centre is to be revitalised. Ealing Broadway lacks any current focus for such social activity. It is shunned in the evenings by many local residents of all ages who do not enjoy the prevalent alcohol and drug-fuelled atmosphere. It offers one cinema, one amateur theatre, some restaurants, cafes and many pubs and clubs. Simply adding thousands more residents and some additional shops will not increase its attraction as a vibrant hub.

Two major residential developments in the heart of Ealing Broadway are currently planned. Together with other possible smaller proposals and the recent construction of a number of flats along the Uxbridge Road, they will have a major impact on our town centre. However, if questions of social cohesion through a rounded policy for culture, leisure and sport are not addressed, the impact could be problematic.

Ealing has been highlighted in a GLA study\(^1\) as being one of ten London crime “hotspots”. The main reason for this is the predominant provision of alcohol in the numerous pubs and clubs, plus other drugs, leading to the street crime. (See also the later Ealing Council report\(^2\) and in the proposed Ealing Alcohol Strategy 2008-2010.\(^3\)) The GLA document recommends, as one of the ways of resolving this problem, “encouraging the diversification of the evening and late-night economies so that they are not so dominated by young people and by alcohol and other drugs.....There are plenty of avenues to explore” such as “shops, cafes, galleries, libraries museums and other cultural venues” (our emphasis).

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\(^3\) Ealing Drug and Alcohol Action Team report to Safer Ealing Partnership Executive Board, June 2008.
The study goes on: “In much of Europe [there] was a completely different state of affairs…City centres were lively, attractive places, full of people and with a wide range of things to do throughout the day and into the evening. They did not become empty and threatening after dark, as concerted efforts had been made to keep them alive by promoting restaurants, bars, theatres, cinemas and other cultural facilities. The idea of ‘cultural and entertainment led urban regeneration’ had been first advocated in Europe in the late 1970s and was put into practice at that time in such cities as Rome.”

AIMS
SEC supports Ealing Council’s statement that “we … want to realise the borough’s potential as a leisure and cultural destination.” We believe this is essential if the town is to regain a position as an attraction in the wider region, and as a counter to the draw of competing shopping centres. There is potential to involve a great many people in activities in the town centre. This should be achieved by its becoming an interesting venue for pursuits for all, from sport to music, arts, dance, and day/evening classes, particularly involving young people who currently find little positive to do in the centre. We also aim to change the negative attitude many people have to the current evening/night-time life in Ealing.

PROPOSALS
SEC proposes turning Ealing’s town centre into an exciting place with activities that will attract young and old from around the borough and surrounding areas. A major element of this would be an Arts & Leisure centre. Such a Centre should be an integral part of a town plan so that all elements of development combined will enhance our community.

1. **Cultural strategy**
For the cultural regeneration of Ealing, SEC suggests the following:

- A Concert/Conference Hall - an adaptable multi-purpose performance space that can be used for music, dance and literary events, featuring Ealing’s own talent as well as professional performances by national and international artists. The Hall would be flexible and let out for conferences/meetings on a commercial basis.
- Studios for dance, recording and practising music, painting and crafts, IT related skills, photography and film, etc.
- Flexible rooms for teaching courses (written and spoken literature, TEFL, life skills, etc.) that could also be let as meeting rooms.
- Cinema, including a screen for art-house films.
- Indoor sports centre and outdoor sports area
- Spaces for hire and a wide-ranging programme of day and evening courses to involve all sections of society, but especially young people and the disadvantaged.

A full-time, professional arts administration team would create and manage the centre as well as involving local arts and educational establishments in an integrated programme.

There is an urgent need to engage young people in more meaningful activities – and young people themselves say this. The Council recently (2008) ran a survey among young people through its Connexions youth service called “How I would spend £1m in Ealing”. The results of the survey should be included in a cultural plan for the town centre.
2. Use of facilities

Cultural and leisure activities should be developed using existing facilities in Ealing as well as new build. There are rooms in the Town Hall that could be adapted for music and other activities where light is not a significant factor. However, art studios, where good natural light is needed, may have to be purpose built.

Multi-purpose use of facilities is important. Our proposed Concert/Conference Hall is the best example of multi-use, since it is envisaged that it will not only be used for music events, dance and drama, but double up as a conference centre. The Hall, with catering facilities attached, could also be used for weddings or business events/parties. By being flexible in this way, it should be able to fund itself.

3. Sites

Whether we have one or more buildings is not critical. The Tibbalds report identifies the need for a cultural quarter, east of the Questors theatre in the area of the cinema and the land south. An arts and leisure centre could be built there, linking naturally with the Ealing College, Ealing Studios and TVU, all of which could be encouraged to develop public cultural activities. However, re-building the Empire cinema is already underway and may be completed before any decisions are arrived at by the Council.

The Town Hall building has enormous potential for internal restructuring, but it may not be possible to house all the Centre’s facilities there. Dickens Yard could provide space for a building to be constructed behind the Town Hall linking with the fire station and stables, which could be adapted for craft studios. A youth centre might be put into an enlarged ‘Community Hall’ building. Finally, the Arcadia site would be a good position for a Concert Hall/Conference centre.

3. Funding

The opportunity exists to identify an arts and leisure project which will need to be specifically funded and for which specific money can be raised from developers, other businesses and from grants. We feel that this is the best approach because the pool of S.106 monies would not produce the requisite amount.

The new facilities should strive to be self supporting but they may well qualify for funding, especially if there is strong provision for the young and for the disadvantaged.

Charging for facilities can vary according to the user group, with special, affordable prices for registered member groups – as is operated at the Priory Centre, Acton and Ealing Library. But charges must be affordable to young people and the less wealthy.

4. Conclusion

Introducing several thousand more residents into the heart of Ealing without planning carefully for a more worthwhile area of culture, entertainment and sport in the centre would exacerbate the social problem the town centre already has. Efforts have been made over many years to persuade Councils to take this social problem seriously. Now our scarce, available land is about to be developed. Crossrail will make Ealing Broadway even more accessible. Housing and retail developments must go hand in hand with a culture and leisure programme if our town is to be successfully revitalised.

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1 Ealing Metropolitan Centre Spatial Development Framework s.7.4.2. Tibbalds Planning & Urban Design, 2008.
4. SEC Vision – Retail

BACKGROUND

The national context
Any plan for the centre of Ealing must take into account the national trends affecting retail in general. The factors to be considered include:

- the trend for destination retail to concentrate into larger and fewer locations¹
- the expectation by shoppers that any shopping centre they take the time to travel to should have a large number of competing, non-food, retailers (the adjacencies argument)
- the importance of car-borne shoppers to mid-to-up market non-food suburban retailing²
- the opportunity for commuter households, many of which are dual income, to shop near where they work, and/or on their way home, rather than close to where they live.
- the growth of on-line retailing
- predictions by leading accountancy consultancies that the recent rates of growth in retail sales will not return and that many national chain retailers may need to vacate between a quarter and a third of their outlets³, an accelerating deterioration in retail activity, with many retailers including the John Lewis group now (October 2008) reporting week-on-week reductions of between 10% and 20% for many of their Greater London and Home Counties stores.

The current economic climate will accelerate the national downturn in retail as a result of these trends, and is likely to precipitate an even greater concentration into larger centres. Chain retailers will attempt to limit their premises costs by closing outlets in the smaller shopping locations where there is a low footfall.

The challenge to retail in Ealing’s town centre

The present position in Ealing is characterised by significant withdrawal by national retailers, many of whom cite increasing competition from other shopping locations, e.g. White City, Wembley and Brent Cross. This has resulted in more vacant shop units and a move to down market tenants by landlords.

Despite the closures over the last two to three years and the evident oversupply of retail floorspace, the Council has backed proposals to increase available space further, and in particular to target “aspirational” or up-market niche retailers. In our view this is perverse, because of the following facts.

- Council projections for growth in retail demand, which are being used to justify this expansion, are wildly unrealistic. There only is a finite amount of retail expenditure in West London. Just adding floorspace in Ealing is unlikely to attract additional consumer spending, especially when the much larger and more attractive shopping destinations already available have been joined by White City, which will dwarf any expansion in Ealing.

¹ Government report on town centre retail –Policy Evaluation of the Effectiveness of PPG6, ODPM, January 2004, paragraphs 35 & 36
³ BBC Radio ‘File on 4’ July 2008
There is over-reliance on the additional retail expenditure which might be generated by the residents of proposed but as yet unapproved town centre housing developments, whose residents will probably work, and therefore do much of their non-food shopping, outside Ealing.

Analyses of the retail demographics of the town centre catchment area are inadequate and verging on the non-existent, when compared for example to those of Hillingdon Council. The realities are that, contrary to the type of retail that is projected, Ealing’s ageing population means declining demand for the high street fashion chains which mainly cater for 20-45 year olds. Areas of high localised wealth are limited when compared to Richmond and other mid-to-up market locations, and this reduces the catchment area for mid-to-up market retail.

Road congestion in Ealing and poor access to the town centre by car discourage the consumer groups which are being targeted. The constraints of the Hanwell Viaduct, the A4, Argyll Road, and the North Circular create an effective boundary to the vehicle catchment area. Car access is especially difficult from the North of the railway line because of the Town Centre one way system. This is exacerbated by limited shopper car parking in the town centre, a fraction of that in Uxbridge, Kingston or White City. Ironically, improved rail connections and tube interchanges may make it easier for those resident within the central area to shop elsewhere, rather than attracting more people in.

The move down market by many landlords in their lettings policies. The more down market retailers there are, the less attractive the Town Centre becomes to mid-to-up market retailers and shoppers. Fewer mid-to-up market shoppers (footfall) means fewer quality restaurants and other service businesses, which adds to the downward spiral in attractiveness. At the same time, rental levels for retail space are being kept high.

There is an inconsistency between the design and scale of present proposed town centre developments and the built environments of those suburban locations which foster successful mid/up market retail, e.g. Chiswick, Richmond and Wimbledon Village. There is an unsupported assertion that Ealing’s present retail units are of the “wrong” size, though this does not appear to cause problems to areas such as Richmond or Chiswick. At the same time, aspirations to attract a department and/or anchor store(s) are inconsistent with existing plans and with the catchment Ealing offers.

Finally there is a risk that many years of wholesale redevelopment in the town centre will drive away even more shoppers, possibly permanently, and result in the failure of small town centre retail and service businesses.

**OPTIONS**

The choice for Ealing is between

- the Council’s expansionist “regeneration” strategy, which is high risk and likely to fail for the reasons above, and

- a modest contraction in town centre retail capacity, or at least no net expansion. This would aim to more closely match retail capacity to the spend of the local catchment area, with an offer which differentiates Ealing from major competitors such as White City. This is the low risk choice, is more likely to succeed and could integrate well with other revitalisation strategies.
PROPOSALS

Preferred option
SEC’s preferred option is for no expansion in Ealing Town Centre’s retail floorspace. The proximity and scale of the new White City Shopping Centre means that any increase would be both high risk and likely to exacerbate the growing number of vacant units in the town centre. We believe that Ealing’s future retail offer should be based on the demographics of its local catchment area. We should recognise the limitations of the natural geographical zone in which the town is placed and the competitive pressures from surrounding retail centres. Ealing Town Centre should NOT attempt to compete with a similar offer to that available at larger centres such as White City.

Improved links could ease the problems of transport from parts of the Borough as mentioned above, and SEC’s Vision for transport aims to do both this and to improve access to the town centre car parks. However Ealing should NOT adopt an expansionist policy based on achieving increased penetration of the comparison goods market outside the area bounded by: Hanwell Viaduct, the A4, Argyll Road, and the North Circular.¹

Components and contribution to revitalisation
The elements of a sustainable policy for retail development in the Ealing Broadway area which will play a part in the revitalisation of the centre are we believe as follow:

- Ealing’s retail should be based around an offer which emphasises local independents, accommodating those national chains which are compatible with this.

- Ealing’s retail offer should include a market (ideally covered) which would enable a number of smaller and independent retailers to establish a retail presence without high premises costs. A market would reintroduce many of the products, haberdashery for example, which have been lost from the town centre following the exit of the Department Stores (see examples of market stalls at ‘The Pavilions’ in Uxbridge and, in a more tourist orientated version, at Greenwich).

- An indoor market could be complemented by an outdoor one which could be used by a weekly farmers market and the occasional continental food fairs.

- Possible locations for the markets could be the Lamerton site for the indoor market, with the outdoor one on or alongside Ealing Green.

Challenges to achieving preferred option (What must go right)
Successful implementation of a viable retail policy for Ealing town centre requires a number of decisions to be made and steps to be taken. These include:

- Abandoning the aspiration to remain a ‘Metropolitan Centre’, which is being used by the Council’s Regeneration Team and developers to justify unsustainable expansionist proposals.

- The preparation of realistic projections of retail expenditure by the residents of the catchment area, based on a detailed demographic analysis, and an assessment of their disposable income and travel patterns including commuting.

¹ See map at fig 2.12, Ealing Metropolitan Centre Spatial Development Framework, Tibbalds Planning and Urban Design, 2008
• A realistic assessment of current and future footfall and pedestrian flows within the town centre and their impact on the continued viability of the existing shopping locations, let alone the proposed new and peripheral retail developments.

• Acknowledgment that the quantum of additional shopper car parking proposed for the Dickens Yard and Arcadia sites will be insufficient to support a retail revival.

• The need to develop a master plan for shopper car parking which both caters for the maximum number of car movements which can reasonably be accommodated on the approach roads to the town centre and which also locates additional car parking at the main access points to the town centre, in order to minimise the number of car movements in the heart of the town.

• Resolving the inconsistency between the aspiration to re-establish mid-to-up market retail in the town centre and the move to down market retail tenants (Primark etc.) by landlords in response to the departure of mid-market retailers.

• Recognition of the detrimental consequences for retail of the continued over emphasis on a night time vertical drinking economy targeted at 18 to 30 year olds. Restaurants are an increasingly integral element of a successful shopping location. Licensing decisions, with their resulting public behaviour problems, means that it is no longer attractive to operate restaurants catering for customers over 35 years old in the evening in the town centre. Without evening trade restaurants cannot afford to operate in the day time. The result is that Ealing lacks the very restaurants which are needed to complement a successful mid-market to up-market shopping revival.

• Committing to a low rise built environment which reflects the town centre’s Victorian and Edwardian heritage and which would favour a move up market to mid market retail.

• Resolution of the issues associated with the station and transport interchange, so that it is easy for the residents of the catchment area to visit, shop and spend time and money on the retail and leisure attractions in the town centre.

• Rent levels and business rates need to be contained so that it is economic for quality and independent retailers to trade in the town centre.
5. SEC Vision – Commercial

BACKGROUND

For the purposes of this section, by “Commercial” we mean
- Large free standing office blocks, probably let to more than one tenant
- Smaller offices/serviced space, often above street level retail and leisure activities
- Workshops, including starter units for small businesses
- Hotels and other premises occupied or let for gain.

1. Location

Commercial office activity in the centre of Ealing is mainly concentrated in larger buildings to the west of the town centre along the Uxbridge Road, known as the “office corridor”.

A number of smaller, often professional, offices are located above the shops in the Victorian and Edwardian buildings along The Broadway and The Mall, and on the upper floors of The Broadway Shopping Centre. There are a very small number of workshops remaining in the town centre. None are thought to cater for starter businesses.

There are presently no hotels in the centre of Ealing, though permission has been given for a 165-bed commercial/budget hotel at 22-24 Uxbridge Road.

2. Accessibility

Much of the office area is outside the accepted distance for a “ped shed” - the walkable catchment area of 400m or five minutes from a station - with Westel House being exactly 800m between Ealing Broadway and West Ealing, a 10 minute walk along busy traffic routes. This and the east-west nature of Ealing’s major rail, tube and bus routes mean that staff in offices outside the central corridor are more likely to commute to work by car. This will be especially true of those who do not live on accessible public transport routes. This is reflected by the proportionately large number of large private car parking spaces in the metropolitan town centre: 1,411 private compared to 1,718 public. However because of the number of buses on the Uxbridge Road, the area is rated with a PTAL of between 4 & 6.

Accessibility will also be a critical factor for prospective tenants. Crossrail plus easy taxi access at Ealing Broadway should prove an attractive feature of new office accommodation in the future. This is despite its not being particularly accessible by road for those who live, or are based, outside the immediate area, with rush hour congestion on the Uxbridge Road, Argyll Road and Northfield Avenue detracting from the attractiveness of this location.

3. Occupancy and demand

A significant amount of office space in central Ealing remains unlet, partly because many blocks are seen as out-of-date and in need of refurbishment or complete redevelopment (such as Villiers House). At the same time, confidence in the outlook for occupier demand in the whole of the Greater London area, as measured by the RICS in Q2 2008, reached the lowest level in the survey’s history, even before the latest economic downturn.

Southall Traffic Congestion and Parking Provision Specialist Scrutiny Panel, 25th Sept 2006, Item 6, Table 1.
GVA Grimley have reviewed demand for office space in Ealing Town Centre and forecast that there will be a need for a net additional 2,000 to 4,000 sq.m by 2011 and 25,000 to 40,000 by 2016. They also observe that at the end of 2005 approximately 31,700 sq.m of office space was either under construction or had secured planning permissions. This suggests that there will be little immediate demand for office space over that which has already been approved. Such development as does take place is more likely to be nearer Ealing Broadway station and its transport links. This could result in continued vacancies in the Uxbridge Road.

Demand forecasts for hotel beds in the economic sub-region show that there will be a high need for more quality hotels in Ealing and its immediate neighbours (Brent and Hounslow), totalling 6,000 net new beds by 2026 (over 80% more). This would be a natural consequence of increases in office and leisure space, as well as improved transport links.

AIMS

The SEC believes policy for commercial activity in the centre of Ealing should be to

1. improve the opportunities for more office employment in total
2. exploit the increased accessibility of the town centre created by Crossrail, through high quality mixed-use development
3. encourage the redevelopment/refurbishment of out-of-date accommodation, without significantly increasing the total quantum of space; where appropriate, consider the conversion of less accessible units to residential accommodation
4. discourage commuting by car and restrict commercial car parking
5. ensure adequate, cheap space is available for smaller businesses, start-ups and studio type use
6. encourage the building of new quality or “boutique” hotel space within the centre, probably linked to new an arts and conference facility.

PROPOSALS

The existence of a number of redevelopment sites in the town centre offers the opportunity for new commercial space within easy walking distance of Ealing Broadway station. Such redevelopment should respect the scale and grain of the present predominantly Victorian and Edwardian buildings, including but not limited to those frontages which are recognized as having particular value.

Development locations suitable for office space include:

- Villiers House (UDP site 64). A significant, well-designed building of up to 30m (8 storeys over a new bus/rail/underground interchange) should replace the present empty 9-storey 36,000 sq ft (3,340 sqm) block with up to 4,500 sqm total. This would allow a landmark building in conjunction with the station development for Crossrail, with retail space as well as improved links to the Arcadia centre.
- Alternatively, this site, Arcadia or Dickens Yard could provide space for a significant hotel with function rooms for local business and community use.
- 51 & 53 The Mall (UDP site 54). Space for smaller offices, with some residential/community uses. Space north of The Mall could also provide some redeveloped office accommodation.

2 Greater London Authority - Hotel Demand Study 2005. Grant Thornton and The Leisure and Tourism Organisation
Arcadia (UDP site 63). Some office space (1,500 – 2,000 sqm) over redeveloped retail units facing The Broadway/Springbridge Road (up to six storeys). Administrative office space linked to an arts/conference centre would also be needed (or alternatively on Dickens Yard).

Dickens Yard (UDP site 58) Existing buildings (stable block) should be reserved for small studio units for uses such as arts/small workshops/low cost offices.

Other town centre locations (Broadway Centre, Lamertons and cinema sites) should also continue to provide for smaller office units and allow for a small hotel.

The Uxbridge Road office corridor redevelopment should continue to cater for the larger business occupier, but with little or no net increase in total commercial space, after allowing for some conversion to residential and provision for community use. Such development should be combined with the provision of small retail facilities to serve the offices (such as restaurants) and increased nearby housing.
6. SEC Vision – Residential

BACKGROUND

With the coming of the railways, Ealing grew up as a dormitory town for London. This has been one of its main roles ever since. Its key attraction is that it is easy to get to most of central London using public transport and it is also easy to get to Heathrow. This attractiveness will further increase once Crossrail has been completed.

There are a number of things people aim for when choosing their home. The main ones are probably
- the match between their needs/wishes and what the accommodation provides in terms of size, number of rooms etc
- the attractiveness of the property and the area in which it is situated
- for families with young children, to be within the catchment areas for certain schools
- the location of the property with respect to the main places to which its occupants want to travel. This generally means the shorter the travel time, the better.

The prices fetched by particular types/locations of homes then vary according to the supply/demand balance within each category. Over recent years there have been varying but substantial rises in the prices fetched by all categories of residential property. This has partly been caused by an increase in the number of households coupled with a low rate of home building. This has meant that home building can be highly profitable. Current prices would suggest that a major factor for demand is proximity to Ealing Broadway station.

There are a several issues with this wish to locate close to the station.
- It could displace other buildings that could be put closer to the station to reduce travel times, such as office blocks.
- It could change the nature of the town from a civic and cultural centre to something more akin to a housing estate.
- It could crowd out other things that would ideally be put in the centre of a town, such as leisure, community, event and conference facilities.
- There isn’t enough available land to fit in other things that should be fairly close to homes, such as primary schools and open space.
- The centre of Ealing is rather noisy and may require homes to have closed windows and forced ventilation.
- Too high a concentration of homes may produce crowding issues that make the area less attractive. There can also be social and environmental problems, especially if the buildings are too tall.
- Unlike commercial properties, once substantial residential areas have been built they are generally there for at least several generations.
OPTIONS

There are a number of possible alternatives. The obvious ones are listed below.

1. Maximum residential
This would be to pack out the centre of Ealing with as many new homes as could be fitted in.

This strategy would have a good chance of commercial success for developers. It would also provide large receipts for Ealing Council. It should make a large contribution to London’s housing needs, but would also create significant knock-on problems from a big addition to the population in this area. These include the pressure on infrastructure and especially the difficulty in providing appropriate facilities for children.

2. Substantial sympathetic residential
This would be a scaled down version of the previous option, something like the Haven Green Court courtyard style on new development sites. Flats would be larger than the current average size in the centre of Ealing. This would fill a gap in the market that is creating a significant premium for the few flats of this size. It would be a move away from current “rabbit hutch” standard that has been common in Britain. The architectural style would also be sympathetic to the rest of the centre of Ealing.

This strategy should have a reasonable chance of commercial success, although the current premium for flats of this size would reduce if extra flats saturated this segment of the market.

3. Homes above commercial property
This is nearer to the “home above the shop” approach. “Commercial” could be anything from retail to office, community or leisure facilities at ground and perhaps first floor levels. The homes could reflect aspects of the courtyard scale and style.

The success of this strategy would largely be dependent on the economics of the “commercial” aspects. If they were viable in their own right, then the overall situation would be similar to the “substantial sympathetic residential” one. There is also a longer term consideration for this scheme. The commercial parts would be physically locked down by the residential above. They couldn’t be demolished if they were a commercial failure, although they could be turned over to other uses.

4. Sheltered Housing
With an ageing population, there is an increasing need for sheltered accommodation (although lifetime homes standards could lessen this increase). The centre of Ealing is an appropriate location for these, as the residents make less use of cars. Shops and other facilities are within easy walking distance, and any carers can come by public transport. The external style of such housing could follow the courtyard model, although some of the internal arrangements would be different. There is also the opportunity to mix sheltered accommodation in amongst other flats and to open up facilities such as laundries and perhaps common rooms to all residents. This could help create a much greater sense of community.

The viability of this scheme would be influenced by the split between private and publicly funded parts, and whether there is enough demand for all the space that could be made available.
5. No residential at all
This would reserve the centre of Ealing for commercial and leisure uses. This could be any mixture of shops, offices, hotel, event/conference centre, cultural, community and some sports. All these would then be readily accessible to others within the borough and beyond, within the limits of public transport. The style and scale of these uses would be a “best fit” with the current surrounding architecture.

This viability of this strategy would depend on the strength of (profitable) demand for any aspect that was built. This would in turn be influenced by any improvements in transport that would enable greater numbers of people to reach the location. The economics of additional retail look marginal, and the position on community and cultural is less clear. This suggests that offices and leisure would be the most likely candidates.

AIMS

SEC’s preferred option is to see the heart of Ealing town centre used for the civic, cultural and leisure facilities that would be expected to be found there, rather than being turned into a major housing estate. At the same time, we accept that that there could be some residential above other uses and that there could be residential intensive developments a little further from the station. Essentially, this could include any of the previously listed options apart from “maximum residential” and “no residential”.

PROPOSALS

1. Locations
The suggested locations for residential developments are set out in the table below.

Table 6.1

<table>
<thead>
<tr>
<th>Site</th>
<th>Proposal</th>
<th>Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ealing Broadway station</td>
<td>No residential</td>
<td>Reserve for transport, civic, offices and some retail</td>
</tr>
<tr>
<td>Dickens Yard</td>
<td>Mainly residential, after giving priority to cultural and civic</td>
<td>Fairly large site, a little too far from the station for some uses</td>
</tr>
<tr>
<td>Arcadia</td>
<td>Some residential above other uses</td>
<td>To make better use of the location, as other uses may only be 2-4 storeys high</td>
</tr>
<tr>
<td>Cinema</td>
<td>Possible residential above re-developed cinema</td>
<td>To make better use of the location, as the new cinema may only be 3 storeys high</td>
</tr>
<tr>
<td>Office corridor</td>
<td>Partial conversion of the offices along Uxbridge Road to residential use</td>
<td>The offices are too far from the station to be convenient for commuters, and so could lie empty or attract disproportionate car traffic.</td>
</tr>
</tbody>
</table>
2. Planning guidelines for residential

Whichever of the options is pursued, there are a number of planning guidelines that could be introduced to limit the adverse effects that residential could cause in terms of visual effect, traffic, amenity space, play space, schooling, sustainability etc. These have been listed below.

Table 6.2

<table>
<thead>
<tr>
<th>Area</th>
<th>Standard</th>
<th>Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Building height</strong></td>
<td>No more than a total of 5 storeys for any development facing Haven Green.</td>
<td>To maintain the current character of this conservation area.</td>
</tr>
<tr>
<td></td>
<td>No more than a total of 6 to 8 storeys elsewhere (4 storeys on main street frontages), with no part of the building to be visually intrusive.</td>
<td>To avoid new buildings over dominating the local area and the conservation areas.</td>
</tr>
<tr>
<td><strong>Building density</strong></td>
<td>Reflect the medium density profile within the Ealing Broadway area.</td>
<td>To avoid dominating the local area.</td>
</tr>
<tr>
<td><strong>Architectural style</strong></td>
<td>To pick up on the style and materials of neighbouring buildings.</td>
<td>To provide a harmonious look to the centre of Ealing.</td>
</tr>
<tr>
<td><strong>Size of flats</strong></td>
<td>Minimum internal area of 65 m² for one bedroom, 80 m² for 2 bedroom and 100 m² for 3 bedroom.</td>
<td>To ensure that the flats are large enough to be comfortable permanent homes, and less likely to be Monday to Friday homes for those doing a weekly commute.</td>
</tr>
<tr>
<td><strong>Range of sizes</strong></td>
<td>A mix of from 1 to 3 or more bedrooms, with relatively few 1 bedroom flats.</td>
<td>To encourage a wide age range of residents and to enable people to move within a development as their needs change.</td>
</tr>
<tr>
<td><strong>Affordable housing</strong></td>
<td>The on-site and local facilities to be scaled to cater for the expected mix of residents.</td>
<td>Affordable housing (except for the elderly) attracts a higher proportion of children, with associated need for play space, nursery schools etc.</td>
</tr>
<tr>
<td><strong>Play space</strong></td>
<td>10m² per child to be provided within each development for every child of pre-school and primary school age.</td>
<td>To provide adequate safe play areas for all the younger children who live in the developments. As each is expected to be fairly large, on-site provision is appropriate.</td>
</tr>
<tr>
<td><strong>Nursery</strong></td>
<td>On-site nursery for every development with &gt;60 pre-school children.</td>
<td>To ensure that suitable, convenient nurseries are available to all who want to use them.</td>
</tr>
<tr>
<td><strong>Parking</strong></td>
<td>To be provided on-site or in adjacent blocks at the rate of 43% of the number of flats.</td>
<td>The &quot;natural&quot; level for such town centre developments. Artificially constraining parking could make flats less desirable and/or have knock-on effects in surrounding streets.</td>
</tr>
<tr>
<td><strong>Car clubs</strong></td>
<td>To be provided in every development of over 150 flats.</td>
<td>To help encourage a lower level of car ownership.</td>
</tr>
<tr>
<td><strong>Amenity space</strong></td>
<td>“All residents” amenity space to be provided within each development at the rate of 10 m² per flat.</td>
<td>To ensure adequate amenity space is available to residents.</td>
</tr>
<tr>
<td>Area</td>
<td>Standard</td>
<td>Rationale</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>---------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Roof areas</td>
<td>At least 90% of roof areas (except for “all residents” amenity space and play areas) to be available for rain water collection and solar power.</td>
<td>To maximise the sustainability of the development. (This will restrict private roof terraces.)</td>
</tr>
<tr>
<td>Orientation of flats</td>
<td>All flats to be at least twin aspect, with the majority having external walls so that one has direct sunlight and one is shaded.</td>
<td>To improve sustainability by reducing the need for heating and air-conditioning.</td>
</tr>
<tr>
<td>Natural light</td>
<td>The natural light in all habitable rooms to exceed minimum levels by at least 20%. All kitchens in two and more bedroom flats to have windows.</td>
<td>To ensure that flats are a pleasant place in which to live.</td>
</tr>
<tr>
<td>Water usage</td>
<td>To have rain water collection and grey water re-use schemes.</td>
<td>To improve sustainability is respect of water usage.</td>
</tr>
<tr>
<td>On-site power</td>
<td>To provide at least 20% of heating from ground source heat pumps.</td>
<td>To improve sustainability in respect of energy usage.</td>
</tr>
<tr>
<td>Service points</td>
<td>Adequate off street drop off points, contractor parking spaces and refuse collection space to be provided.</td>
<td>To ensure practical provision that does not obstruct people outside the development.</td>
</tr>
<tr>
<td>Deliveries</td>
<td>Adequate facilities to be provided to enable resident unattended deliveries, including for bulky and perishable items.</td>
<td>To assist online shopping (including food shopping), so there is less need to use private cars.</td>
</tr>
<tr>
<td>Local shopping</td>
<td>Developments of more than 20 homes to have convenience shopping within 5 minutes walk. On-site convenience shopping for developments of over 250 homes.</td>
<td>To ensure that day to day shopping is only a short walk away.</td>
</tr>
</tbody>
</table>

Appendix 1 - LBE’s formula for the number of children per flat

<table>
<thead>
<tr>
<th></th>
<th>Child yield</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Private</strong></td>
<td></td>
</tr>
<tr>
<td>1 Bed</td>
<td>0.049</td>
</tr>
<tr>
<td>2 Bed</td>
<td>0.236</td>
</tr>
<tr>
<td>3 Bed</td>
<td>0.532</td>
</tr>
<tr>
<td><strong>Affordable</strong></td>
<td></td>
</tr>
<tr>
<td>1 Bed</td>
<td>0.038</td>
</tr>
<tr>
<td>2 Bed</td>
<td>0.77</td>
</tr>
<tr>
<td>3 Bed</td>
<td>0.95</td>
</tr>
</tbody>
</table>

Studio flats and those allocated to the elderly are assumed not to have any children.

For example, a development of 25 two-bedroom private flats would on average have about six children. One with 25 two-bedroom affordable flats would on average have about 19 children.
7. SEC Vision – Community

BACKGROUND

Introduction
Community can mean slightly different things to different people. It suggests joint ownership, and a place providing social and other services to a neighbourhood. However, neighbourhoods can be of different sizes for different purposes. The town centre of Ealing serves the community at several different levels; the local government facility of Perceval House and the Town Hall covers the whole of Ealing borough neighbourhood (ie all 23 Wards and 300,000 people), while other services reach different areas. These include

- police
- healthcare
- education
- parks/open space
- sport
- information and advice
- meeting rooms of varying sizes for use by community groups and private events
- crèche and playgroup services
- and for the increasing elderly population, drop-in cafes and organised lunch clubs.

It only takes a cursory review to realise just how impoverished central Ealing is in respect of services to its immediate community, and how far provision falls short of Ealing’s UDP. This states policy as: “To encourage the provision of community facilities to meet the wide-ranging needs of people living, working, studying in and visiting the borough; and to ensure that these facilities are located where they reduce the need to travel and enhance town centres.” However the central area is relatively small, with limited space for additional provision. Any significant increase in the resident population will inevitably place even greater strain on available facilities.

Specific services

1. Public Safety
The present Police Station in central Ealing (in the Uxbridge Road) is recognised by the police as well as the public as not fit for purpose, with no custody cells and a highly unsatisfactory front counter. It presently houses several Safer Neighbourhood Teams, most of whose territories are outside Ealing centre, and who should be based in or near their own wards. Though the Borough Commander has stated that it is the intention to find more suitable premises, up until now no suitable alternative has been found near the town centre.

2. Healthcare
The present GP provision in Ealing centre is at capacity, with no space for expansion. As quoted by Tibbalds, the Primary Health Care Trust (PCT) considers that any significant increase in the resident population would probably require a new practice, for which specific space would be needed.

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1 Ealing Unitary Development Plan 2004, Policy 1.8
3. **Education**

There are no open entry state primary or secondary schools in the centre of Ealing. There is only one infant and one junior school within 800m (1/2 mile) of The Broadway, and both are Church of England controlled with limited access. Even with existing population trends, new provision will be needed in the near future. ¹ There is no obvious location within reasonable distance of the centre for any new building.

Similarly, Tibbalds notes that all the secondary schools within 1,500m of the centre are over-subscribed, despite the area having a relatively low percentage of secondary age children. An increase in the relevant population in the town centre to anything like the average of the rest of the borough “will become even more of an issue”. ²

4. **Parks/open spaces**

The centre of Ealing has been identified in the UDP³ as an area of “moderate deficiency” in the provision of local public community and open space. Although Haven Green and Walpole Park are well established and well used, Haven Green in particular is coming under increasing pressure with encroachment of bus stands and public utilities.

5. **Sport**

There are no public sporting facilities within a ten-minute walk of the centre of Ealing. Again as noted by Tibbalds, “there is a distinct lack of informal space for older children to play”, with the nearest sports centre (Elthorne) over 800m away. There are three private gyms in the area (one with a small swimming pool), and a members’ squash club.

6. **Information/Advice**

The Central Library has recently been refurbished and re-purposed as much more of a study centre than it was previously. Some people have suggested that there appear to be fewer books than previously and space that could have been used for displaying books is now a café. However the library is much brighter and welcoming than it was previously. There is no Citizens Advice Bureau or similar service in central Ealing.

7. **Affordable space for family and community events**

Space for private functions is limited. The Town Hall facilities are both busy and expensive, and in generally poor condition. The central Ealing churches do offer halls for community use, but these spaces may not always be suitable or appropriate for people with differing faiths – or no faith at all - and may have restrictions on the nature of usage.

8. **Crèche/playgroup/child minding facilities**

The 2001 census tells us that there were 3,642 children aged four or less in the wards of Ealing Broadway, Cleveland, Hanger Hill, Ealing Common and Walpole. Whilst only a proportion of these live within the immediate centre, any significant new housing would create a demand for appropriate facilities which do not exist at present.

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¹ Tibbalds, *op cit*, s.2.5.17
² Tibbalds, *op cit, I* s.2.5.17
³ 2004 Unitary Development Plan s. 3.4 and Map sheet 3 – District Park Deficiency
9. Community facilities for elderly people
The 2001 census found 8,180 residents of 65 years of age or over in the wards of Ealing Broadway, Cleveland, Hanger Hill, Ealing Common and Walpole. However, other than the Polish Centre in Windsor Road there are no publicly available drop-in cafes or lunch clubs for the elderly in the centre of Ealing.

AIMS
Wherever residents live in the borough they have legitimate expectations to have ready access to a range of local community services – which are typically available in other communities across the country. The community services to be provided in central Ealing should be tailored to match immediate local needs as well as the requirements of the wider borough. Any plans which will lead to greater demand, particularly building substantial numbers of flats, must be matched by dedicated space to accommodate the required facilities.

PROPOSALS

1. Public Safety
As a centre aspiring to attract visitors from a wide regional catchment area, Ealing needs a fully functioning Police Station convenient to the main public areas, with proper counter service and all main public support functions. This could probably best be provided in purpose-built premises in Dickens Yard, close to the Town Hall/Perceval House and accessible to the main areas of the centre in a “civic quarter”. The Safer Neighbourhood Teams serving the wards bordering on the middle should be based there, but the objective of locating teams within their own wards should be followed wherever possible.

Consideration should be given to space within the civic quarter for a new magistrates’ court.

2. Healthcare
In order to cater for any significant increase in the resident population, specific space would need to be reserved for a new GP practice. The PCT and public bodies such as LINk must be fully involved in consultation about the level of service required before approval is given for large-scale residential redevelopment.

3. Education
The absence of adequate public schooling facilities in the centre must be a major factor when considering any possible new housing which would increase education demand. Sites for a new primary school within reasonable distance of The Broadway must be identified before any specific applications for new housing are agreed. Appropriate plans to cope with a rise in the number of secondary school pupils must also be made in advance.
4. **Parks/Open Spaces**
   In line with existing UDP policy, we believe
   - public open spaces in the central area of Ealing must be protected and restored; any development of adjoining land should preserve or enhance its open character
   - new space should be provided for arts, cultural and entertainment uses.

5. **Sport**
   Public facilities must be provided in the centre of Ealing for sports activities like badminton, bowling, tennis, table tennis, 5-a-side football, riding on a BMX circuit, or basketball.

6. **Information/Advice**
   The Council should ensure that funding is provided for the establishment of advisory services such as a Citizens Advice Bureau to meet the needs of the local residents and the wider surrounding area. This could be based in a refurbished Town Hall. Funding should not only come from S.106 money, but if necessary from an on-going levy on any private property company managing new housing in the centre.

7. **Crèche/playgroup/child minding facilities**
   Following the model utilised in Grand Union Village, a Day Nursery should be planned in to any decent sized new residential development in the centre.

8. **Community facilities for elderly people**
   New developments in the centre of Ealing should make provision for suitable space for drop-in centres or lunch clubs for the elderly.

9. **Central Ealing Community Centre**
   The needs described in 6, 7 and 8 above could be met by building and managing a Central Ealing Community Centre. This would sit very comfortably in the proposed civic quarter.
Conclusion

SEC’s Vision is that in 2020 Ealing will be a major town centre that:

- **has an overall integrity of design and function.**
  
  - Re-building the centre must work to an overall plan that allocates sites for their best uses and connects these to other sites in Ealing and the rest of the Borough.

- **will have become a major leisure and cultural destination.** Business, leisure and cultural facilities will complement quality retail to provide economic prosperity.
  
  - The Town Centre will be a dynamic, interesting venue with a wide variety of arts, leisure and sporting activities, attracting the young and old from near and far.
  
  - With residents having manifold reasons to come and spend time and money on a multiplicity of pursuits, commercial enterprises and social providers will benefit from “spin offs” into retail, leisure and business activities.

- **maintains and enhances its unique and distinctive historic character.**
  
  - Our landmark buildings – the Church of Christ the Saviour, and Ealing Town Hall and its green spaces – Ealing Green, Haven Green, Walpole Park (with Pitzhanger Manor) and Ealing Common - will be Ealing’s defining elements.
  
  - The height, style, mass, spacing and quality of new developments will be in harmony with the surrounding townscape, particularly in the use of traditional materials such as brick and stone.

- **is renowned as a beacon for sustainable development.**
  
  - The town centre will exploit its excellent public transport to minimise the need for travel. With main uses clustered around its new transport interchange, people will be able to achieve many things in just one journey.
  
  - Buildings will maximise “green” energy.

- **is easier to access by all modes of transport.**
  
  - A fully re-developed Ealing Broadway station will have a step-free transport interchange for trains, underground, buses, taxis and car drop-offs.
  
  - The interchange will have the capacity to handle the ever larger numbers of people who will use it. Road access into the town centre will be concentrated on main roads. Existing routes will be rationalised to make use of underutilised space and to reduce congestion.

- **is more pleasant to move around, particularly on foot, or by bicycle.**
  
  - High permeability with foot path and cycle paths linking key destinations will encourage non-vehicle movement around the Town Centre.

- **And above all, has fulfilled its role as the focal point for the Borough’s residents.**
  
  - No longer seeking to compete on unequal terms with larger metropolitan centres, Ealing will have rediscovered its role as the centre of the local Ealing community.
  
  - Maximising the variety of facilities to bring residents back into the heart of the town and to build a community feeling, Ealing will be a place to meet and eat, a place to shop and do business, a place to enjoy sport, arts, parks and learning.