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

**Response:** As far as we can understand, Ealing’s housing targets have largely been arrived at after desk-top exchanges with the GLA during the preparation of the SHLAA. As a result the figures in the housing trajectory are unreliable guesses that have never been subject to the rigours of testing by the preparation of site briefs or of public consultation.

An early example of how the Council’s expected housing trajectory has come unstuck can be seen in the Arcadia site in central Ealing. This was expected to yield around 600 new homes but is now destined to yield far fewer and at a far delayed point in the future following the outcome of the Public Inquiry in December 2009.

Considerable uncertainty must therefore surround any estimates of the number of new homes that can be provided along the Uxbridge Road Corridor. Many of the sites on this corridor are in sensitive locations such as Conservation Areas or affecting the settings of listed buildings, or perhaps because they will affect places people cherish and secure the support of locally elected politicians to retain.

Adoption of the strategy on the basis of the estimates in the Development Sites DPD would carry significant risks for the way that new proposals are dealt with in Ealing generally. While the outcome of the Arcadia Inquiry was very welcome, we are concerned that the Council may feel itself under pressure to increase densities on other sites even further than they are indicated at present in the Development sites DPD in order to make up for the shortfall from the Arcadia site as well as any similar schemes that run into problems. The imprecise guidance in the draft strategy for deciding how to balance competing objectives such as the number of new homes to be provided against the importance of safeguarding Ealing’s heritage may well result in the latter being sacrificed in the very short term interests of the former.

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

**Response:** SEC has the same concerns. A few years ago Ealing was engulfed in controversy over plans that the Council backed strongly to construct a tram along the Uxbridge Road (Annex 1). We were told that there would be gridlock in West London by 2011 if the tram was not constructed. The scheme was eventually dropped in the face of
very strong local opposition, and the Council and TfL pledged themselves instead to upgrading bus routes in Ealing. This was the last that the public has heard of these improvements, but they are necessary now and will be even more so with the completion of Crossrail when Ealing Broadway in particular is expected to become a major interchange. Plans need to be set in place now particularly to:

- provide integrated interchange facilities at Ealing Broadway station
- rationalise the bus network to improve bus access to other Crossrail Stations
- reduce long term bus parking on Haven Green.

These objectives and options for achieving them need to be stated in the core strategy.

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

Response: Yes, indeed.

It is not explained why this Policy is not also stated in Chapter 2 where the planned developments are far more intense and where the large majority of the Borough’s conservation areas are situated.

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

Response: As a voluntary body of 27 local groups and residents associations set up to respond to change in Ealing town centre, Policy 2.5 is of fundamental importance to Save Ealing’s Centre. As we have indicated in successive rounds of consultation we have been very anxious to work with the Council on the preparation of strategies and proposals relating to the town centre. We have gone to much effort to prepare and publish our own Vision for Ealing (Annex 2) which sets out the overall principles and themes that we believed should guide future development in Ealing town centre. Our stated intention was to provide proposals for Ealing from the perspective of residents and the local community that would be an agenda for discussion to feed into the preparation of the LDF and other DPDs. We launched our Vision in January 2009 in the Town Hall (Annex 3) at a packed meeting that attracted local and national representatives. Officers from the Regeneration Department were invited, but it is not known whether they attended.

In the face of all these initiatives, SEC has been very dismayed about the policies set out in Policy 2.5 which reflect very little of the time consuming work that SEC put into drawing up and publishing its Vision. There is a strong sense of exclusion from the Strategy formulation process. The concern is not that the SEC view did not prevail when all the matters were taken into consideration, but that our objectives and priorities have remained been unrecorded and unrepresented as the Strategy has evolved. This is
contrary to the provisions of the Council's SCI as well as the Government's Localism agenda.

For reasons that are explained quite fully in our Vision, and again in my evidence to the Arcadia Inquiry (Annex 4), we think that trying to fit so many new homes into the town centre is excessive because it will undermine the role of the centre as the commercial and civil heart of the Borough. We fear that the reliance on tall buildings to meet the large number of new homes required will do much harm to the character of the Town Centre Conservation Area and the CAs that adjoin it. We consider the determination to proceed with an expansionist retail strategy in response to competition from Westfield is unsound, and undeliverable, especially when the recent drift down market of the centre and the closure of many stores is considered. We are unclear about the intentions of the work done by Tibbalds which is described as forming part of the evidence base of this consultation, but has not been adopted by the Council. We sense inconsistencies in the Council's ambitions in 2.5 (d) to retain business development, and its actions in approving earlier this year the redevelopment of the Westel House office building for residential and Hotel purposes (Annex 5). We also agree with the Inspector that Policies 2.5 (e) and (g) are essentially wish lists that are not underpinned by a clear strategy for the town centre which is something that we have long called for and which our Vision was designed to feed into.
IT WILL BE

CHAOS

THE TRAM: FIRST GLIMPSE OF DETAILS RECEIVED A COLD RECEPTION

NOW is the time to look at the future of the proposed tram route.
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
- Brentam 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
- 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/

SEC’s Vision statement has been prepared with contributions from the member organisations of Save Ealing’s Centre. Particular acknowledgements are due to:

- Patrick Chapman MA, FIBC
- Richard Chilton BA, MBCS, CITP
- Will French MRTPI, MBA, MCD
- James Guest FCA, MBA
- John Hummerston RIBA, Dipl Arch
- Dr Robert Gurd MA, DPhil
- Eric Leach
- Tony Miller BA, FIPD
- Ann Pavett MA
- Janet Sacks MA

This booklet has been funded by contributions from the member organisations and individuals. All donations to help us in our work would be gratefully received, and should be sent to:

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

A Vision for Ealing Broadway Town Centre

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Conclusion

November 2008
Introduction

**From Ealing Council’s website:**

We believe that the borough’s town centres should be truly central to our lives and the focal point of our communities - thriving places where we enjoy living, working and shopping. Places that can instill a shared sense of local pride and attract business and jobs.

We aim to:
- build on the range and quality of shops
- enhance the character of our town centres
- alleviate congestion and make it easier for people to get around

We also want to generate business and employment opportunities and realise the borough’s potential as a leisure and cultural destination

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 19th and early 20th 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.¹ This fine suburban grain and scale has been broken in the later 20th 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.²

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 inter alia

- a tall buildings policy which respects the historic scale of the town
- specific guidance on densities consistent with the status of Ealing Broadway as an Urban rather than a Metropolitan Centre
- recommendations on style and design suitable for the area.

¹ Ealing Town Centre Conservation Area Character Appraisal, December 2007, para 4.1
² ibid, para 5.2.1
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>
</tr>
</thead>
<tbody>
<tr>
<td>Building height</td>
<td>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.</td>
<td>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</td>
</tr>
<tr>
<td>Building density</td>
<td>Keep the current medium density profile of the Ealing Broadway area: plot ratio 2:1 max residential 70 – 260 u/ha</td>
<td>To reflect the provisions of UDP SPG 6 (Plot ratios) and the London plan Table 3A.2 (Density matrix) appropriate for an urban centre</td>
</tr>
<tr>
<td>Architectural style</td>
<td>Accept high quality contemporary styles if they remain sympathetic in context of neighbouring buildings, particularly in choice of materials and finishes (brick and stone)</td>
<td>To provide a harmonious look to the centre of Ealing and protect existing character of conservation area</td>
</tr>
</tbody>
</table>
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 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 and in the proposed Ealing Alcohol Strategy 2008-2010.) 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).

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\(^1\) 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 locations\(^1\)
- 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 retailing\(^2\)
- 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 outlets\(^3\)
- 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.

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\(^1\) Government report on town centre retail – *Policy Evaluation of the Effectiveness of PPG6, ODPM, January 2004, paragraphs 35 & 36*

\(^2\) Town Centres Survey 2003-4, TfL Surface Transport, July 2004, prepared by Accent Marketing & Research

\(^3\) 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 that 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.\(^1\) 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.

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\(^1\) 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.

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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>Building height</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>Building density</td>
<td>Reflect the medium density profile within the Ealing Broadway area.</td>
<td>To avoid dominating the local area.</td>
</tr>
<tr>
<td>Architectural style</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>Size of flats</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>Range of sizes</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>Affordable housing</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>Play space</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>Nursery</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>Parking</td>
<td>To be provided on-site or in adjacent blocks at the rate of 43% of the number of flats.</td>
<td>The “natural” 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>Car clubs</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>Amenity space</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>Private</th>
<th>Child yield</th>
</tr>
</thead>
<tbody>
<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>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Affordable</th>
<th>Child yield</th>
</tr>
</thead>
<tbody>
<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.” \(^1\) 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.\(^2\) 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
\(^2\) Metropolitan Police Estate: Asset Management Plan: November 2007
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.
A Better Way for Ealing
The SEC VISION

The Context:
Comprehensive Redevelopment

What use is a Vision?
- Strategic thinking about change - not a blueprint
- Establish the **principles and themes** that development in Ealing must address?
- The best places succeed on many dimensions
  - they meet the needs of many different stakeholders
  - they address economic and financial realities
  - different agencies work together to create them
  - they involve local people in the process of change
  - they contain quality buildings and spaces that fit together well
  - they are allowed to evolve incrementally

If you don’t know where you want to go it doesn’t matter which road to take.

What’s Ealing for?
A Metropolitan centre?
- like Kingston, Harrow, Croydon
- Catchment areas cover several boroughs
- Department stores & multiple retailers

Or a Major Town Centre?
- like Richmond, Putney Camden
- Borough-wide catchment.
- mix of comparison and convenience stores.

Ealing and West Ealing

The SEC VISION: Retail
- Ealing can’t compete with Westfield …
- … it must complement it.
- So reinvent Ealing as a Town Centre for Ealing people
- More shops to meet the needs of local residents
- Varied units with small and medium sized shops to minimize overheads.
The SEC VISION: Arts, Culture, Entertainment & Leisure
- Find other ways to attract visitors from inside & outside the Borough
- A new cinema complex
- Quality arts, leisure and conference centre
- Facilities for young people
- Eg indoor sports

The SEC VISION: Commercial
- Exploit good access by providing new office space
- Selectively refurbish older blocks and allow some change to residential uses
- Encourage start up businesses by providing small and medium sized units
- New quality or boutique hotel linked to arts and conference facilities

The SEC VISION: Residential
- The town centre’s first purpose must be for civic, business, cultural and leisure activity
- But some new homes would add new vitality
- New homes must come with essential infrastructure ...
- … and they must be designed to meet the needs of the local community

The SEC VISION: Community facilities
- New health, education and public open space must match increases in population
- A centrally sited police station
- The town hall can be a centre for community activities

The SEC VISION: The Built Environment
- New buildings to be in keeping in design, scale and materials with the look of the existing
- Buildings should be between 2 and 8 storeys high – depending on the site
- Protect the existing townscape, historic character, key views and landmarks

The SEC VISION: Transport and Movement
- Rationalise the road network
- Improve routes for pedestrians, cyclists and motor vehicles
- Better access to public car-parking
- A fully integrated public transport interchange …
... an integrated interchange

... if it can be done in Hammersmith, why not Ealing?

A Better Way for Ealing
The SEC VISION
Public Inquiry into the called in planning application for:

Demolition of existing buildings and erection of 7 buildings Block A North - 2/6/7 storeys, A South - 1/2/4/6/8 storey with basement, B 2/5/7/8 storey, C - 3/5/11 storey, D - 2/3/9/10/11/12 storey, E 2/3/9/10/11/12 storey and F 19/25/26 storeys containing approximately 17,279 square metres of retail shops (Use Class A1), 1,363 square metres of cafes/restaurants (A3), 490 square metres of offices (B1(a)), 1,861 square metres of leisure facilities (D2) and 567 residential units, provision of 2 basement floors containing 352 car parking spaces (of which 230 are for the residential element including 16 spaces for the car club and 60 disabled spaces and 122 are for the retail and commercial uses including 7 disabled spaces), parking for 631 cycles (567 for the residential use and 64 for the retail and commercial uses), servicing area and plant and equipment with vehicular access off Springbridge Road, pedestrian accesses off Springbridge Road, Haven Green and The Broadway, landscaping, formation of areas of public realm, amenity space for the residential uses and ancillary works

at:

Arcadia Centre (all), 9 - 29 (consecutive) and 36 - 42 (consecutive) The Broadway 1 - 10 (consecutive) Central Chambers 1 - 4 (consecutive) Haven Place Flower Haven Springbridge Road, land over the Railway between Springbridge Road and Central Chambers and car park adjacent to Haven Green. EALING

Proof of Evidence

The Planning and Policy Framework

WILL FRENCH

BA, MCD, MBA, MRTP

on behalf of

SAVE EALING CENTRE (SEC)

Planning Inspectorate reference : APP/A5270/V/09/2097739

Introduction

1.1 My name is Will French. I live in Ealing, and have done so for the past 15 years. My home is less than 100m from the Arcadia site and will be overshadowed by the development. I pass through Haven Green almost on a daily basis either on my way to work or to use the facilities of the town centre.

1.2 I am the chairman of Save Ealing’s Centre, (SEC) a voluntary non-political alliance of 26 residents’ associations and community groups, from Hanwell to Acton who between them speak for over 12,500 members of the Ealing community. The SEC alliance was established in 2007 to provide an organised voice for the local Ealing community in response to a series of development proposals within Ealing Town centre, particularly this one.

1.3 SEC’s mission is to promote the revitalisation and overall improvement of Ealing as a town centre that can better serve the needs and aspirations of the entire community that lives or works in the London Borough of Ealing. Ealing is our town centre and we have a major stake in its future. It is us, the local residents, who will have to live directly with the harm caused by this proposal. That is why, in our view, our voice should matter.

1.4 I am also a town planner by profession with a first degree in Social sciences and masters degrees in Civic Design and Business Administration. I have around 35 years of experience in a variety of planning fields including working for Local Authorities, Government Departments, the Commercial sector and the Royal Town Planning Institute in this country and overseas.

1.5 I do not claim to speak as a planning ‘expert’ on the matters surrounding the issues that arise from the current proposals. Instead, my evidence is presented on the basis of my own knowledge and understanding of general planning principles that I believe to underlie them.

2 Objective and Scope of the Evidence

2.1 The Secretary of State wishes to know whether the development proposals ‘are appropriate in their context and take the opportunities available for improving the character and quality of the area and the way it functions.’

2.2 What yardsticks should be applied to make such an assessment? This evidence proposes that answering this question requires a 3 step process.

(i) First it is necessary to establish the context of the development in terms of its site and location. What elements define the character and quality of the area? What opportunities exist for improving the way that it functions? And where elements and opportunities appear to conflict with one another, how are we to prioritise between them?

(ii) Second it is necessary to examine the national, regional and local planning policies that govern the area and the important characteristics that have been identified. Section 38(6) of the Planning and
Compulsory Purchase Act requires that proposals be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

(iii) Third it is necessary to consider other ‘material considerations’ and the weight they should be given in setting aside established planning policies.

2.3 The premise that underlies my evidence is that in deciding to support the Arcadia proposals, the Council has set aside statutory planning considerations and judged the merits of the scheme on non-planning grounds.

2.4 My evidence provides an overall context to SEC’s concern about the proposals and the way the process has been used to support them. In doing so it raises many general issues that SEC’s later witnesses will elaborate on a topic-by-topic basis in greater detail.

3 The Site and its Locational Context

3.1 First it is important to consider the site in the round, and to consider how different elements of this development might interrelate with one another.

3.2 The Arcadia site lies in the very heart of Ealing Town Centre. While Ealing is described in the London Plan as a ‘Metropolitan Centre’, such a description is not sufficient to depict what kind of place Ealing is or to understand how it works.

3.3 Ealing Town Centre is a linear centre extending a mile and a half along the Uxbridge Road from Ealing Common to West Ealing. In reality, the metropolitan centre constitutes two separate commercial cores – Ealing and West Ealing. Until quite recently the prosperity of the two centres were conspicuously diverging with the once more prosperous West Ealing losing major retailers like Marks and Spencer to the expanding and more accessible retail core in central Ealing. But recently this latter has begun to decline quite ominously too, finding it increasingly difficult to compete with nearby expanding centres that have exploited their greater accessibility to the national road network and with more space than Ealing to expand. Opening of the Westfield centre in White City in 2008 precipitated a major decline in the number and the quality of shops in Ealing, and this has raised some very serious questions about Ealing’s longer term purpose and identity.

3.4 There are no realistic opportunities to extend the town centre’s boundaries. Victorian and Edwardian residential developments tightly constrain it to the north and south. The overwhelming majority of these were built as individual houses, but a good number have long been converted into flats. Most of these residential areas have been designated as Conservation Areas. East and West of the metropolitan centre are two large areas of open space in the form of Ealing Common and the two Hanwell cemeteries and these provide equally permanent barriers to a further physical extension of the centre.
3.5 At the crossroads of the two classified roads that pass through Ealing town centre the Arcadia site is located at the very heart of the metropolitan centre. The A4020 runs east to west along the southern boundary of the site and the north and south bound carriageways of the B455 flank the site to the west and east. Standing opposite Ealing Broadway station the site provides the first view of the town to visitors arriving by rail or by one of the two underground lines that terminate here. Its location ensures that the perimeter routes around the site can be very busy and congested. 27,000 vehicles a day are reputed to run along this stretch of the Uxbridge Road. At peak times the station can become dangerously overcrowded.

3.6 Neighbouring uses are extremely diverse. The station to the east is a transport interchange due to be redeveloped as part of the Crossrail project. Both sides of the Uxbridge Road on the south form the most important stretch of the town centre’s primary retail frontage and provides the location for a number (although a declining number) of multiple retailers. The western frontage of the site is Springbridge Road. One-way with northbound traffic, Springbridge Road will provide the only vehicle access into the Arcadia site, but it already gives access to the Grade II* Church of Christ the Saviour and the adjoining Christchurch Primary School which would directly face the new development. Beyond is the 482 space Springbridge Road public car park, a public asset that is seriously underused. On the north boundary is Haven Green, the most intensively used public open space in the Borough. Once seen as a jewel at the heart of Ealing, the quality of this space has become eroded through the intensive encroachment of bus stands and general traffic congestion.

3.7 The Arcadia site itself is developed with buildings of various ages most between 2 and 3 storeys high. Befitting its central location, the site is in economically productive use, with a rich mix of A1, A2, A3, A4 and A5 town centre uses at ground floor level and fairly typical town centre B1 offices and D1 uses above. These latter, and indeed many of the ground floor retail uses away from the primary frontage, appear to be occupied by small businesses supplying local services to other businesses and the surrounding community. The site also provides the home to the Ealing Jazz and Blues club which has an important history as the birthplace of British Blues and the place where legendary bands like the Rolling Stones and the Who started out. Sadly long closed, the site provides a reminder of a type of town centre use Ealing now lacks. Running diagonally across the site is a publicly owned footpath. Small 19th century terrace homes front this footpath and look onto the rather ill-conceived 1980s Arcadia retail development which since opening has struggled to compete for footfall.

3.8 The above description highlights just the most important features of the site and its location. But it is sufficient, perhaps to suggest the extreme planning complexity of the area and the infinite variety of ways that it impacts on the lives of all those who live and work in the town centre – or indeed those who just travel through it on their daily commute further afield. It also hints at some of the deficiencies of the area as a prelude to considering what
opportunities there might be for improving its character and quality and the way that it functions.

3.9 Complexity of this level requires that a major development of the scale of that proposed at the Arcadia site is designed and planned with care and precision to ensure as PPS 1 (CD) puts it, that ‘the design principles in relation to the site and its wider context, including the layout, height and massing, scale, open space, visual appearance and landscaping, are appropriate in their context and take the opportunities available for improving the character and quality of the area and the way it functions.’ As this evidence will argue, I do not consider that this has been the case.

4 The Planning Policy Base

4.1 PPS 1 explains that national policies and regional and local development plans (regional spatial strategies and local development frameworks) provide the framework for planning for sustainable development and for that development to be managed effectively. This section looks at these different policy documents and highlights some of the ways the current development conflicts with them.

National Planning Policies

4.2 National Policies are set out in the Government’s Planning Policy Statements and Planning Policy Guidance notes. They provide guidance on planning policy and the operation of the planning system and are relevant to decisions on individual planning applications and on appeals. A number of PPSs and PPGs are relevant to this development but the following in particular need highlighting here:

4.3 PPS1 Sets out the Government’s Objectives for the Planning System. Para 8 describes our plan-led system and explains: ‘the certainty and predictability it aims to provide, is central to planning and plays the key role in integrating sustainable development objectives.’… ‘Plans should be drawn up with community involvement and present a shared vision and strategy of how the area should develop to achieve more sustainable patterns of development … More effective community involvement is a key element of the Government’s planning reforms. This is best achieved where there is early engagement of all the stakeholders in the process of plan making and bringing forward development proposals.’

4.4 PPS12 (CD) establishes the Government’s Objectives for Local Spatial Planning. It talks about local authorities’ ‘place shaping’ role and explains the advantages of spatial planning to Councils. It then sets out the process for preparing a Local Development Framework. The LDF should include a core strategy which, inter alia, involves frontloaded community participation as prescribed in the Council’s Statement of Community Involvement, identify strategic issues and examine alternatives for responding to them. Area action plans should be used when there is a need to provide the planning
framework for areas where significant change or conservation is needed. All this should be done in accordance with the programme published in the Local Development Scheme.

4.5 It is important to note, in the context of PPS1 and PPS12, that after the early adoption of its Statement of Community Involvement (CD), there has been a continual slippage in the production of Ealing’s LDF. Responses to an initial ‘issues and options’ consultation in 2006 (CD) were not reported on, and neither was the exercise which repeated it in 2007 (CD). This means there has been no examination of the options, for example, for providing the large number of additional homes that the London Plan says Ealing needs. The Local Development Scheme (CD) suggests no plans for an Ealing Action Area Plan, despite the pressures for change that the town centre has been subject to for many years. Instead, it the Planning Authority appears content to let individual developers identify sites, including those for major housing developments, on an ad hoc basis without affording the community much of a voice in discussing changes that will have a major bearing on Ealing’s strategic future.

4.6 PPS 6 (CD) sets out Government policies for town centres. It explains that (emphasis added):

*The planning system has a key role in facilitating and promoting sustainable and inclusive patterns of development, including the creation of vital and viable town centres*. ‘Local planning authorities... should set out a spatial vision and strategy for the network and hierarchy of centres,’

4.7 National Government guidance stresses the importance of protecting and enhancing the role of town centres and the significance of these centres to local communities. It also highlights the value of such centres in promoting sustainable development by concentrating uses that are major trip generators in areas of high transport accessibility. As will be shown below, the Local Planning Authority has been slow to set out its vision for town centres in the Borough generally, and in Ealing in particular. The delay means that approval of the Arcadia development will take away options for the use of this central site for any purpose more in accordance with such a vision when it emerges.

4.8 PPS 6 stresses the importance of mixed use developments in town centres - Paras 2.21-2 state (emphasis added):

*Subject to other planning considerations*, residential or office development should be encouraged as appropriate uses above ground floor retail, leisure or other facilities within centres...A diversity of uses in centres makes an important contribution to their vitality and viability. Different but complementary uses, during the day and in the evening, can reinforce each other, making town centres more attractive to local residents, shoppers and visitors. Local planning authorities should encourage diversification of uses in the town centre as a whole, and ensure that tourism, leisure and cultural activities, which appeal to a wide range of age and social groups, are dispersed throughout the centre.”
4.9 Implicit in this guidance, and also a matter of common sense, is that a mix of uses in a town centre should be properly balanced. The uses should be proportionate to one another. In this case, we are concerned that through the over-provision of housing on the Arcadia site opportunities for locating other major trip generating uses in Central Ealing such as employment uses, or arts, leisure, culture and entertainment activities will be lost permanently.

4.10 The Supplement to PPS6 (CD) - Planning for Town Centres: Guidance on Design and Implementation tools is also relevant. Paras 3.2 and 3.3 say (emphasis added):

‘The most important planning tools at the local level will be the relevant local development documents. In particular, local planning authorities should make effective use of the core strategy and area action plan development plan documents (where the latter are needed), to establish an effective spatial planning framework within which to reach robust decisions on planning applications… The types of issues which should be considered for inclusion in relevant local development documents include: identifying the capacity of each centre to accommodate growth, as set out in the relevant development plan document, and make provision for its accommodation; providing a comprehensive plan for an area of renewal or development’.

4.11 Despite the complexity of the issues they raise, no spatial planning framework has been adopted by the Council for the town centre or this major site within it, and there has been no meaningful engagement with the community as Para 3.5 of the supplement says that there should be.

The London Plan (CD)

4.12 Although the GLA has indicated that for strategic reasons it is not objecting to the development (CD), the London Plan carries a series of policies relevant to this site which these proposals do not adhere to. A number of these will be discussed in other submissions to the Inquiry, but those that are key to the overall approach of this development are listed below to highlight the extent of divergence between the policies in the Plan and the proposal.

4.13 **Policy 3A.7 large residential developments** states that:

‘Boroughs should prepare planning frameworks for all large residential sites of 5 hectares or more, or that are capable of accommodating more than 500 dwellings. The planning frameworks should be prepared in consultation with local communities and other key stakeholders’.

4.14 **Policy 4B.8 Respect local context and communities** states that:

‘The Mayor will and boroughs should work with local communities to recognise and manage local distinctiveness ensuring proposed developments preserve or enhance local social, physical, cultural, historical, environmental and economic characteristics.’

4.15 **Policy 3C.4 Land for transport** states that:
‘the Mayor will and boroughs and other strategic partners should ensure the provision of sufficient land and appropriately located sites for the development of an expanded transport function to serve the economic, social and environmental needs of London, including: .... taking account of proposals for passenger transport (including buses, trams, Underground, trains, river transport, coaches, taxis and minicabs), interchange and freight transport improvements which require additional land by identifying sites for these purposes within their DPDs’

4.16 The London Plan is clear that planning frameworks should be drawn up in conjunction with local communities for major developments likely to materially change the character of an area. This has not happened in this case.

4.17 In addition, as the site stands immediately opposite Ealing Broadway station which is due to be redeveloped to accommodate Crossrail, and one that is located on a site that has long been proposed for a new bus station, there should be a plan to accommodate the needs of these transport facilities. No such plan exists.

4.18 Policy 3D.1 Supporting town centres states that:

‘the Mayor will and boroughs should enhance access to goods and services and strengthen the wider role of town centres, including DPD policies to: encourage retail, leisure and other related uses in town centres and discourage them outside the town centres … support a wide role for town centres as locations for leisure and cultural activities, as well as business and housing and their key role in developing a sense of place and identity for sustainable local communities … require the location of appropriate health, education and other public and community services in town centres.

4.19 Para 3.261 of the Plan seeks to ‘reinvigorate town centres and widen their role as accessible and diverse community centres’, while Para 3.268 explains that:

‘The vitality and viability of town centres will be enhanced by a wider range of uses. Leisure uses contribute to London’s evening economy and ensure that town centres remain lively beyond shopping hours. So too does more and higher density housing. This can lever in resources for comprehensive town centre renewal as part of mixed use redevelopment and expansion. ... Town centres should also provide a range of civic services and social facilities such as accessible public lavatories, affordable childcare facilities and shopmobility schemes. ... High quality, well designed development and regeneration will help support and re-establish town centres as attractive places and as distinctive centres of the community’s life, which will in turn underpin their competitive offer as business locations.’

4.20 Like PPS3, the London Plan, (and SEC) welcome additional housing in town centres like Ealing, but it sees residential uses as part of a far richer mix of commercial and employment uses and the full range of facilities required by
the community that lives around it. Such facilities should include arts, leisure sport and entertainment facilities. This major development in perhaps the most accessible site in Ealing, does not aspire to do this.

4.21 Each one of the policies in the London Plan that are referred to above potentially have a great bearing on an assessment of the appropriateness of the development to its context and the opportunities available for improving the character and quality of the area and the way it functions. I note in passing that none of the policies is referred to in the 17th December 2008 Committee Report (CD).

The UDP (CD)

4.22 The majority of policies in the UDP – and all those that appear relevant to this proposal - were saved in a letter from the Government Office for London dated 27 September 2007 (CD). This suggests that they were considered by GoL to be up to date at that time. The thorough planning processes that lead to its adoption by the Council mean that the UDP provides the most authoritative guidance as to ‘the opportunities available for improving the character and quality of the area and the way it functions’

4.23 The UDP clearly never anticipated a development of the magnitude of the one proposed. Examination of the Plan confirms the extent to which the present scheme fails to meet its provisions, for example in relation to building heights in Conservation Areas, (Table 4B), on residential outlook and privacy (Table 5C) or Provision of playspace (Table 3.F)

4.24 Other evidence to the Inquiry will highlight the discrepancies in some detail, further, but to illustrate the disparity between the UDP and the current proposals it is perhaps easiest to examine the proposals for Site 63 which are set out in Volume 2.

‘Site 63 Mixed use redevelopment comprising retail, residential, offices and cinema (alternative location to site EB1 and/or EB4). Site also needs to be considered option site for development of "bus station and interchange with Ealing Broadway Station". Development to provide good pedestrian access. Scheme to have Broadway frontage to retain "street". Development to consider integration with West London Transit. Development to link with redevelopment of Station (EB5) and improved interchange facilities for all modes of transport and strategic rail options. Development to improve Haven Green open space and trees and ensure no significant overshadowing.’

4.25 The current proposals disregard most of these principles. There are no offices to speak of and no cinema. There has been no apparent consideration of the use of the site as a bus station interchange and no link with the station and its interchange facilities. Later evidence will show that the development will cause serious harm to Haven Green and its trees and will result in significant overshadowing. It is surprising therefore that the officer’s report to the 17th December Planning Committee offers no satisfactory reasons for setting aside these principles in a way that appears to be contrary to our plan-led system of development control.
Supplementary Planning Guidance

4.26 Also highly relevant to the site are Ealing’s SPGs. Three in particular are listed below in determining what development is appropriate in this location. The explanation on the Council’s website of the purpose of its SPGs and how they were prepared makes it clear they should be treated as ‘material consideration’ when considering the merits of this development.

‘The council has produced supplementary planning guidance (SPG) and supplementary planning documents (SPD) that supplement the adopted 2004 plan for the environment, (Ealing's UDP). They relate to topics, areas, and sites. These have been approved for use in considering planning applications. All have been through a full public participation process.’

4.27 Ealing Town Centre Strategy 2002 – 2012 (CD) describes the Council’s strategy for the improvement of Ealing Town Centre as a whole. Amongst policies that seek to ‘improve the character and quality of the area and the way it functions.’ are the following

- **Building Design:** ‘Phased and integrated 10 year development programme, controlled by an agreed urban design strategy and site planning briefs.’
- **Traffic:** ‘Assess in detail the pros and cons of Making Haven Green (west) two-way to enable access from the north to Springbridge Road car park - so cars going to the car park do not have to travel through the town centre and restricting capacity for general traffic on Station Broadway to enable greater priority for pedestrians and buses.’
- **Growing as a Quality Centre:** Encourage a wide mix of uses – shops, offices, leisure, education, arts, cultural and residential – set within attractive public spaces to enable the centre to be the real ‘heart’ of the community.

4.28 The proposals for the Arcadia Site overlook policies of this sort in the SPG, but the Report to the 17th December Planning Committee offers no reasons why.

4.29 Site 63 – the Arcadia site. (CD). The site brief for the Arcadia site is sets out as Supplementary Planning Guidance a very clear set of principles for its development. The SPG puts the site’s overall capacity at 53,700 m², (about twice the density at present) and with the following preferred uses:

‘Mixed use redevelopment comprising Town Centre uses, retail, leisure (include some residential), offices, cinema (alternative location to site 58 and/or 60), transport/interchange (option site for bus station and interchange with Ealing Broadway Station), public realm’

4.30 Design principles are listed in this SPG to include items that are manifestly not reflected in the current scheme – for example

‘Perimeter block development, Create new town square, Development to address the park - two storey maximum, Interchange opportunities if connected to the Broadway Station,'
mixed use opportunity with possible community use included, depth of site enables opportunity to broaden the ‘high street activity zone’

4.31 And removing any room for misunderstanding, the SPG concludes:

‘the final scheme will need to meet all relevant policies’

4.32 SPG 6: Plot Ratios (CD) sets out concisely the Council policies with regard to plot ratios. It states (emphases added):

‘in town centre developments that have a high public transport accessibility … ratios should not normally exceed 1.5:1, but ratios up to 2:1 might be acceptable. Where the Council has identified appropriate sites that are highly accessible (i.e. in the larger town centres with large building footprints and buildings of 4-6 stories), it may be possible for developments to achieve a plot ratio of 3:1.

Please note that the London Plan indicates that there may be some sites where a plot ratio nearer to 5:1 can be achieved. It is not envisaged that any such sites will available within Ealing, as these ratios are normally only expected in Central London sites.

4.33 The total floorspace of the proposed development, including service corridors and retained buildings is 106167m². While there is some disagreement in the size of the site overall, the report to the 17th December Planning Committee (CD) (which takes a generous measurement) calculates the plot ratio of the development as 5.89:1.

Status of the LDF and other Plans

4.34 In contrast to its adopted UDP and SPGs, it is necessary to observe that work on the Ealing LDF has not advanced to a stage where it can be given much weight in assessing these proposals. There have been just two ‘issues and options’ consultations in 2006 and 2007, but neither has been followed up as described in the Council’s Statement of Community Involvement.

4.35 In addition, the Borough commissioned Francis Tibbalds and Partners to start again by preparing a completely new master plan for the Town Centre. Tibbalds’ Terms of reference were not made public, but it is understood that they excluded consideration of the major developments being discussed relating both to the appeal site and to the adjacent Council owned site at Dickens Yard. In contrast to the public consultation exercise that accompanied the preparation of the Supplementary Planning Guidance described above, the study was undertaken with just token public consultation. The Tibbalds report (CD) was eventually published in May 2008, but it has never been adopted by the Council which carries this disclaimer on its website:

‘the proposals in the report are those of the authors and should not be treated as being those of Ealing Council itself.’

4.36 Generally then, while the Tibbalds study report gathered plenty of useful background material about the current situation in Ealing, its
recommendations cannot be treated as material in considering the case for the current application.

The Policy context: Summary

4.37 In short, contrary to the approach required by section 38(6) of the 2004 Act, by resolving to approve the proposed development, the Council has disregarded numerous National Planning policies, London plan policies and policies it has adopted in its own UDP and SPGs. The scheme seems to have been assessed instead against other policies which are premature, or into which the Ealing community has been afforded no adequate opportunity to make a meaningful input.

4.38 The 17th December report to the Planning Committee demonstrates this. It recommends the scheme on very general grounds with remarkably few references to specific UDP or SPG policies.

5 Other Material Considerations

5.1 If the overall policy context does not support the case for a development of the scale of the Arcadia what other material considerations might the Secretary of State take into consideration in assessing whether these proposals are ‘appropriate in their context and take the opportunities available for improving the character and quality of the area and the way it functions.’?

Regeneration

5.2 The overall conclusion of the Report to the 17th December Planning Committee (CD) states (page 7) that the main considerations in favour of the development are its ‘regeneration benefits’.

‘On balance it is considered that the scheme would deliver a number of significant regeneration benefits to Ealing Town Centre which would outweigh all other material considerations. These would include new retail, commercial and leisure uses, a significant amount of new residential development, including some affordable housing, new areas of public realm and significant S106 contributions to enable other regeneration schemes to come forward, in particular the new bus interchange facility opposite Ealing Broadway Station. (emphasis added)

5.3 Determination of the proposals on the basis on these grounds expressly conflicts with the provisions of Section 38(6) of the Planning and Compulsory Purchase Act (CD). No regeneration policies exist that justify overriding adopted planning policies, and no regeneration strategies have been cited in the Committee report to explain justify why planning policies should not apply.

5.4 While Ealing’s fortunes have indisputably dipped in recent years, no case has ever been made for setting aside planning policies in pursuit of regeneration. The Borough has not sought to designate the Town Centre as a regeneration area in any DPD and it has not been identified as such in the London Plan. To
the contrary the London Plan expects Ealing to benefit from the investment opportunities that will inevitably arise from the construction of Crossrail.

5.5 And when they are examined in detail, the regeneration benefits that the Committee report speaks about are unconvincing. In particular:

- James Guest’s evidence to the Inquiry will demonstrate that far from regenerating the town centre, loss of the existing retail units and the replacement with significant additional floorspace are more likely to undermine its fortunes further.

- The new commercial uses equate to just 490m² of office floor space (B1) which represents a significant net loss of B1 floor space compared to what exists now. A significant number of small office premises will be demolished, permanently denying the town centre of both the relatively cheap stock of flexible premises for small businesses that they provide and the important economic functions that they serve.

- New leisure uses equate to just 1861m² (D2). The Council appears uncertain what this is for. The Committee report explains only that ‘the proposal incorporates a 1660sqm D1 Use Class leisure centre that would be located on the first floor level of Building E. Limited detail of this use has been provided with the application’. (page 117)

- The planning application for ‘the new bus interchange facility opposite Ealing Broadway Station’ was in fact refused by the same planning committee that expressed its support for the Arcadia development. Reasons for the refusal were ‘The scheme needs to be looked at in more detail. The committee was concerned about ‘the loss of trees and the design of the bus/taxi driver facilities, with consequent impact on the appearance of Haven Green, the impact on the transport network not demonstrated, and issues with loading bays and drop off points.’ (CD)’ It is worth stating that these concerns closely mirror some of the criticisms that Save Ealing’s Centre has of the Arcadia scheme as a whole

- A total of £8,080,725 Section 106 contributions are proposed for a variety of on and off site items. Some of these moneys may indeed help fund some rather modest improvements to the area such as the £50,000 contribution to public art that will be enjoyed by the wider community; but these can hardly be described as ‘regeneration’. The very large majority of Section 106 payments will be paid just to implement the scheme, either to do works that are directly required, (eg ‘to contain the impact of development on the road network’) or otherwise to help the Council to accommodate the new demands that will be placed on it as a result of the development (new education provision).

- Regeneration benefits that might arise from the provision of new housing in the scheme are examined in the paragraphs below.

Housing

5.6 The report to the planning committee implies that some of the most significant regeneration benefits from the development are those that would arise from the provision of new housing in the town centre. PPS 3 and London Plan
policies are invoked to justify the provision of 567 new homes in the metropolitan centre.

5.7 There can be no question that, like the rest of the country, Ealing needs more homes. But close examination of what is proposed in this scheme makes it clear that the quantum of housing in this location relates to no national, regional or local planning policies and that the outcomes would be unsatisfactory both for incoming residents as well as for the wider Ealing community.

5.8 First it is necessary to look at the strategic approach to delivering housing provision in Ealing. While PPS3 – para 11 (CD) states that:

“Local Planning Authorities should take a strategic lead role in their local area, ensuring that Local Development Documents provide a high quality framework for planning for housing delivery…as well as early engagement with local communities, stakeholders and infrastructure providers.”,

5.9 It has already been shown that Ealing’s LDF has become delayed and that there is no evidence that strategic thinking has taken place as to new housing location. Instead, a de facto opportunistic policy has emerged whereby, without thought for the capacity of the centre to accommodate it, the Borough is choosing to meet a large part of Ealing’s housing need by cramming as much as it can into the Metropolitan centre. This unstrategic and opportunistic approach is well illustrated on the Arcadia site itself where, according to the Council’s Annual Monitoring Review, the capacity for new homes increased without any explanation or justification from 220 to 710 in the year between 2006 (CD) and 2007 (CD).

5.10 The design of buildings is, of course, always important in planning. But the more housing is provided on a site, and the bigger the buildings required, the more significant becomes their potential impact with what surrounds them. PPG 3 states at paragraph 16 that new housing should be “well integrated with, and complements, the neighbouring buildings and the local area more generally in terms of scale, density, layout and access” and that it ‘creates, or enhances, a distinctive character that relates well to the surroundings and supports a sense of local pride and civic identity’”. Civic Society evidence to this inquiry and the strength of local opposition to this development demonstrates that these conditions have not been met.

5.11 While it may be acceptable to develop some parts of this site more intensively than it is developed at present, para 49 of PPG 3 makes it clear that:

“Successful intensification need not mean high rise development or low quality accommodation with inappropriate space. Similarly, in Conservation Areas and other local areas of special character where, if proper attention is paid to achieving good design, new development opportunities can be taken without adverse impacts on their character and appearance.”

5.12 Evidence to the Inquiry by the Conservation Area Panels will show this would not be the case here.
5.13 Our greatest concern is the sheer quantity of the residential component and the density of residential occupation that it entails. Other evidence to the inquiry will describe how unacceptable are the impacts of this degree of over development – in visual terms, on the local transport network, on the capacity of social infrastructure and on environmental quality. Policies in the UDP and in the London plan clearly understand how difficult it is to accommodate development densities of the level proposed, and it is surprising these issues have not been more carefully taken into account when the assessments of the merits of this proposal have been made.

5.14 Table 5A in the UDP contemplates 80-120 flats per hectare in high density sites, and even then it cautions that

“In certain locations in the Borough, the density may be restricted by site constraints, or by the character of the area. Such locations include Conservation Areas…”.

5.15 The GLA (CD) calculates that in this Conservation area the density would be 405 flats per hectare.

5.16 The London Plan also encourages high residential densities in high PTAL locations, but the GLA (CD) saw the proposed residential densities on this site to be excessive:

‘the density of the scheme would significantly exceed the upper limit (405 units or 1100 habitable rooms per hectare) of the indicative range provided in the London Plan for a metropolitan town centre location with a high level of public transport accessibility’.

5.17 I consider that even this view misrepresents London Plan policy where the highest densities (albeit below those at the Arcadia) are deemed appropriate to dedicated residential developments ‘typically buildings of four to six storeys, located within 800 metres walking distance of a International, Metropolitan or Major town centre’. Not development like the Arcadia which is right at the heart of a centre – places where Policies in 3D of the plan apply and where mixed uses are required.

5.18 The excessive residential densities are also well illustrated by the extent to which the development would exceeds both the GLA and the Council’s policies on plot ratios Section 4 has shown the extent to which the development, with a plot ratio estimated at 5.89:1, departs from SPG but the development also breaches London Plan Guidance.

In highly accessible areas within central London and some Opportunity Areas, especially in the Thames Gateway area, ratios nearer to 5:1 can be achieved. The ability for plot ratios to be maximised at any site or area will depend on local context, including built form, character, plot sizes and existing or potential public transport, utilities and social infrastructure capacity.

5.19 Ealing, of course is not in Central London, nor is it an Opportunity Area, nor is it in the Thames Gateway. As other evidence to the Inquiry will confirm, it is on the other hand in the heart of a Conservation Area, surrounded by mainly 2 to
4 storey buildings and in a part of the world where social infrastructure capacity is already very limited.

5.20 It is well documented that with 79 units of affordable housing - 14% by unit and 18% by habitable room, the affordable housing provision site is significantly below London Plan and UDP policies. It is understood that the GLA has commissioned an independent study of the viability of the development and the case for such a low provision, which accepts that the costs of rafting over the railway would make any greater provision of affordable housing unviable.

5.21 The low proportion of affordable units proposed for the site mirrors the provision of affordable housing in the borough as a whole. The Council’s 2008 Annual Monitoring Report (CD) shows that while the housing trajectory in Ealing is ahead of its targets, the provision of affordable units is lagging quite seriously behind requirements at just 21% of planning permissions granted. With Ealing’s 2005 Housing Needs Study (CD) showing the need for affordable housing to be 7 times the level of estimated new dwellings in the Borough, this might appear to be an area that merits more priority than has been shown in this instance.

5.22 If so, other options could be assessed including the one that is the most obvious - compliance with the Council’s adopted SPG. The SPG puts the capacity of the site as 220 units. UDP policy requires new residential developments in Ealing to include 50% affordable units. Application of this policy suggests a less ambitious development that did not raft over the railway could yield 110 affordable units - 31 more than the current proposals. While there may be other reasons why a development of this kind would not be acceptable it would at least better satisfy the Government’s affordable housing objectives than this scheme does.

5.23 Important spatial design issues arise from the mix of housing proposed. The development proposed would provide for 51 of 55 socially rented units on the site having 3 or more bedrooms – accommodation that is clearly designed for families. But this is not a good location for providing affordable family housing. Instead it seems more appropriate to provide small units of 1 or 2 bedrooms for key workers. The Council’s Director of Housing appeared to echo this view in a 4th December 2007 report to Cabinet (CD) which states that Ealing town centre.

‘is not an area that could easily support family homes due to a lack of suitable amenities. In this instance smaller homes would be more complimentary encouraging young couples into the housing market’.

5.24 The practice of not concentrating family housing in town centres is borne out by all levels of planning policy. For instance PPS3 Para 17 states that:

‘Particularly where family housing is proposed, it will be important to ensure that the needs of children are taken into account and that there is good provision of recreational areas, including private gardens, play areas and informal play space. These should be well-designed, safe, secure and stimulating areas with safe pedestrian access.’
5.25 Similarly, UDP Policy 5.5 demands that new residential development provides adequate play space for children and the justificatory text explains:

‘Adequate space for children to play is required in all residential development. The authority will normally expect developers to provide separate play space for any development with 10 or more child bed-spaces, to at least a standard of 3 square metres of fully equipped play-space per child bed-space.’

5.26 The developer expects there will be 126 children on this scheme and so if this policy is applied 378m\(^2\) of playspace ought to be provided. But here, as far as can be determined from the plans there is no provision for any equipped child play spaces at all

5.27 Nor is the question of overlooking and residential privacy adequately addressed. Table 5C of the UDP states that “Roof terraces and balconies will not be permitted where they overlook neighbouring habitable rooms or garden space”. About half of those in the proposal do just this, but elsewhere in the Borough the LPA quite rightly applies this policy very strictly.

5.28 The above concerns further illustrate the need for a proper planning framework for the site and the wider area drawn up in line with National and Regional Planning Policy. If it is not properly addressed then serious harm will be done to ‘the character and quality of the area and the way it functions.’

Wider development proposals in Ealing

5.29 Fig 1 below from the Tibbalds report (CD) shows all the sites that are currently ‘in play’ in central Ealing. When areas of open space are excluded, it is apparent that a very large proportion of Ealing’s buildings are under active consideration for redevelopment – and the plans that have so far been revealed for these sites show the intention is to replace them with some very large developments indeed. The enormous scale of the Arcadia development, and its position as the very centrepiece of this bigger jigsaw demand it be viewed in the light of what of it would mean for the centre as a whole.
5.30 As described above, neither the Tibbalds report nor any other plan has been adopted by the Council for the town centre as a whole. In consequence, many questions surround the cumulative implications of these developments and these include:

- Will the redevelopment address the long documented problems about Ealing the road network?
- What thought has been given to how the individual parts will fit together
- What will the town centre be like as a whole when all the work is done?
- Is the capacity of essential social infrastructure and other facilities needed to support a healthy community sufficient to cope with the new demands that will be placed on them?
- How are so many huge developments to be managed to minimise disruption to the centre?

Other evidence to this Inquiry on the built environment, transport and social infrastructure look at the implications of these questions in more detail.

5.31 Until some substantial progress has been made on such a plan, the present proposals must be treated as premature. The Government is clear that it is entirely justifiable to take this view in circumstances where a DPD is being prepared or is under review, but has not yet been adopted. ODPM’s 2005 publication – ‘The Planning System: General Principles’ (CD) explains that these circumstances arise when a proposed development is so substantial, or where the cumulative effect would be so significant, that granting permission could prejudice the DPD by predetermining decisions about the scale, location or phasing of new development which are being addressed in the policy in the DPD. This is exactly the situation that would pertain in Ealing.
5.32 Besides, the developers acknowledge in their planning application that they do not intend to commence development for three years, and so deferral of permission, even should it eventually prove to accord with an Action Area Plan that was correctly drawn up, would not cause the developer undue inconvenience. On the other hand if, as SEC contends, the preparation of the Action Plan drawn up and adopted after due process, did lead to the realisation that the development would lead to conflict with matters of a material planning nature it is wholly proper that consent for this scheme should not be granted at this point in time.

5.33 It is not just the harm that would be done to this site that has to be considered by a premature decision on it. Approval of the development at a stage when local plan-making is still at a formative stage would enable other developers of sites that Tibbalds have identified as ‘Opportunity Site’ to claim a precedent for them to set aside UDP and other correctly established policies. This will further erode the town centre’s character and undermine Ealing’s future prospects.

The Save Ealing Centre Vision

5.34 Finally, in this part of the proof, it is necessary to return to the Secretary of State’s interest in learning about the opportunities available for improving the character and quality of the area and the way it functions. As has been argued at some length above, many people in the community believe they have ideas to contribute to answering this question. Without the opportunities that the Council’s Statement of Community Involvement had promised would be given to input into local plan-making, the Save Ealing Centre Alliance decided to suggest its ideas about these opportunities by drawing up its own Vision for Ealing Town Centre (SEC1.1). SEC’s vision reflects on the development pressures that face the Town Centre and sets out its ideas for how Ealing should develop and what the major planning policies might be. It seeks to draw together the threads raised in the paragraphs above and presents the community’s agenda for Ealing.

5.35 SEC’s Vision is very strongly concerned with identifying opportunities for enhancing the area and the way that it functions and they cover the following important planning matters:

Retail development
- Reinvent Ealing as a Town Centre for Ealing people
- More shops to meet the needs of local residents
- Varied units with small and medium shop sizes to minimize overheads

Arts, Culture, Entertainment & Leisure
- Find other ways to attract visitors from inside & outside the Borough
- A new cinema complex
- Quality arts, leisure and conference centre
- Facilities for young people eg Indoor sports

Commercial
- Exploit the town centre’s public transport by providing new office space
• Selectively refurbish older blocks and allow some change to residential
• Encourage start up businesses by providing small or medium sized units
• New quality or boutique hotel linked to arts and conference facilities

Residential
• The town centre’s first purpose must be for civic, business, cultural and leisure activity
• But some new homes would add new vitality
• New homes must come with essential infrastructure
• They must be designed to meet the needs of the local community

Community Facilities
• health, education and public open space to match population increases in
• A centrally sited police station
• The town hall can be a centre for community activities

The Built Environment
• New buildings to be in keeping in design, scale and materials with the look of the existing
• Buildings should be between 2 and 8 storeys high – depending on the site
• Protect the existing townscape, historic character, key views and landmarks

Transport and Movement
• Rationalise the road network
• Improve routes for pedestrians, cyclists and motor vehicles
• Better access to public car-parking
• A fully integrated public transport interchange at Ealing Broadway station

5.36 The SEC Vision was published in January 2009 and was presented to a meeting of around 250 member of the public in the Town Hall that included Councillors and National Politicians. The presentation excited an interested debate, and Councillors from all three major parties affirmed the value of the Vision to the debate over Ealing’s future, and congratulated the alliance for having taken the initiative in its preparation.

5.37 Reflecting its authorship, this Vision is of necessity a partial one. But given the strong support within the community for the SEC alliance, it merits consideration with regard to the current planning application. The SEC Vision statement, and the slide presentation at its January launch (SEC1.2) are submitted to the Inquiry as key items of SEC’s evidence. The Inspector is therefore respectfully requested to consider them as important items of evidence when he drafts his report to the Secretary of State.

6 Summary and Conclusion

6.1 The Arcadia development will be massive. It occupies a site that is the very lynchpin of our town centre. For better or worse it will permanently transform the centre and a far wider area beyond.
6.2 The scheme is an opportunistic one that has not been drawn up within the framework of any national, regional and local planning policies. This evidence shows that, to the contrary it has simply ignored them.

6.3 The regeneration benefits that the Council claims justify setting aside these policies are at best minimal.

6.4 As other SEC evidence will emphasise, the scheme represents a development that is far too big for the site, and completely out of keeping with the character of the area. It also very permanently removes options for improving the way that the town centre functions as a whole. So, if it is built, the scheme will cause significant problems both to the existing Ealing community and to incoming residents.

6.5 Save Ealing’s Centre understands that Ealing needs to change, but as this evidence has argued, the town centre and the way that it functions needs to be viewed as a whole. And this needs to be done through the eyes of all Ealing’s stakeholders - those who live, work, visit or own property in it or provide services to it.

6.6 The way to do this is through the preparation of an Action Area Plan for the town centre. At least until work on this has got meaningfully underway on this plan, a scheme like the Arcadia should not proceed. It just will not be possible to assess, as the Secretary of State wants to do, the extent to which the proposals, ‘are appropriate in their context and take the opportunities available for improving the character and quality of the area and the way it functions.’

6.7 For these reasons, and on behalf of all the 26 local groups and residents associations that constitute the SEC alliance, I respectfully request the Inspector to recommend to the Secretary of State that consent for the development should not be granted.
References

Save Ealing’s Centre Evidence

SEC 1.1 A Vision for Ealing
SEC 1.2 A Better Way for Ealing - The SEC VISION

Presentation on the launch on the SEC Vision

Core Documents

CD Planning Policy Statement 1: Delivering Sustainable Development
CD Planning Policy Statement 12: Local Spatial Planning
CD London Borough of Ealing Statement of Community Involvement
CD London Borough of Ealing Issues and options’ consultation 2006
CD London Borough of Ealing Issues and options’ consultation 2007
CD London Borough of Ealing The Local Development Scheme
CD Planning Policy Statement 6: Planning for Town Centres
CD PPS 6 Planning for Town Centres Supplement: Guidance on Design and Implementation tools
CD The London Plan
CD London Borough of Ealing 17th December 2008 Committee Report
CD London Borough of Ealing Unitary Development Plan
CD London Borough of Ealing Ealing Town Centre Strategy 2002 –12. SPG
CD London Borough of Ealing Site 63 – the Arcadia site. SPG
CD London Borough of Ealing SPG 6: Plot Ratios
CD Francis Tibbalds & Partners Ealing Metropolitan Centre Spatial Development Framework
CD Planning and Compulsory Purchase Act. 2004
CD London Borough of Ealing 17th December 2008 Committee Report Minutes
CD Planning Policy Statement 3: Housing
CD London Borough of Ealing Annual Monitoring Review 2006
CD GLA Planning Report PDU/1668/03, Arcadia redevelopment, 21 January 2009
CD London Borough of Ealing Housing Needs Study 2005
CD London Borough of Ealing Director of Housing Report to Cabinet 4th December 2007
CD ODPM 2005 The Planning System: General Principles
Comments on Planning application PP/2010/4585:
32-38 Uxbridge Road Westel House,

The Land Use Question

The first issue to consider with this proposal is whether such a major employment use should be lost to the town centre. Established and emerging policy says that it should not be. It would conflict with policies 1.6, 6.1 and 6.3 of the adopted UDP, which protect and promote Ealing's employment uses generally and office uses in particular, and with the Town Centre SPG which provides that on this site (Site 65) 'the Council will promote high density office redevelopment'. It would also conflict with the evidence base of the emerging LDF in the form of the recently completed Roger Tym review of employment land. Tym is very concerned about the decline of the office sector in Ealing and thinks that if employment uses on the site are lost there is a danger the town centre will lose the critical mass of office uses that it needs to continue to attract commercial investment. Having paid Tym to come up with such advice it would seem perverse and a waste of money to ignore it.

The Montagu Evans statement accompanying the application challenges Tym’s view and claims that Ealing has an oversupplied office market and a decreasing tenant demand. The statement argues that there should be a significant reduction in both prime and secondary office supply not only in Ealing but in West London as a whole. This may well be a concern, but the correct way to address it is strategically, through a review of the town centre as a whole.

Such an exercise should start from Tym's study as well as the Tibbalds report which asks 'What kind of centre does Ealing need?' Tibbalds try to answer the question by offering four scenarios for the future. Two of these contemplate retention of office use on the Office Corridor and so preclude the uses proposed in this application and two envisage mixed use developments that would allow them. Tibbalds examine the implications of each scenario and find each has its own benefits and shortcomings. They therefore advise the Council to set out its views in an Ealing Town Centre Supplementary Planning Document. SEC and many others have called for such a document for many years. There are so many forces of change operating on Ealing that it is no longer good enough to allow individual landowners to determine the future of the town centre - a place that the whole borough has a major stake in. The absence of such a plan in Ealing has contributed to its long decline. The contrast with successful town centres which tend to have a strong vision that shapes the way they change and grow is very apparent.

As it happens, SEC has considered the role of the office corridor in our Vision Statement. We want to retain a solid employment base in the town centre, but we think locations closer to Ealing Broadway Station including the Arcadia site may be better suited to office uses because of their easier accessibility to the station. Other uses including perhaps higher education and some residential accommodation might then be more appropriate in the office corridor which is a significant walk for commuters from Ealing Broadway Interchange. If – and only if - this were
the case, the principle of the change of use could be envisaged. Our thinking appears to reflect the thinking in the Town Centre SPG which states for site 63 there to be a ‘possible opportunity to convert some of the space to residential/mixed use if other offices are developed close to the Ealing Broadway Station hub’ (our emphasis). So any such change in approach requires the Council to make progress with its town centre SPD as Tibbalds propose. This is why we say that the Council must commit itself to such a document. The continuing delay means options for the future will be lost. If the wrong decision is taken on this proposal it may prove another big nail in the Town Centre’s coffin.

For the moment Ealing looks like Alice in Wonderland who had no idea where she was going and asked the Cheshire Cat for advice:

"Would you tell me, please, which way I ought to go from here?"
"That depends a great deal on where you want to get to," said the Cat.
"I don’t much care where—" said Alice.
"Then it doesn’t matter which way you go," said the Cat.
"---So long as I get somewhere," Alice added as an explanation.
"Oh you’re sure to do that," said the Cat, "if you only walk long enough."

It is time now Ealing decided where it is going. If not it will of course eventually end up somewhere -just like Alice. But who knows where, what damage will have resulted in the meantime and what the cost will be in opportunities foregone?

The Hotel
A number of other hotels are proposed or under construction in Ealing town centre and there is a real danger of going from almost a complete absence of hotel space to having a surplus. We have insufficient information to know if this is likely to be a concern but it is important it should not be, and we would expect there to be reassurance from the Council on this point. Save Ealing Centre can, however, see that there is a gap the market for a 3 or 4 star hotel suitable for visiting or seconded professionals. In this case the proposed hotel could increase the attractiveness of the remaining commercial properties in the Office Corridor.

Height of the proposed development
Westel House is already an oversized development for which there is no justification in terms of national or regional planning policies or in guidance on tall buildings provided by CABE and English Heritage. Its prominence is already an unattractive eyesore when it is viewed from every direction. The additional height of this tower will add to the harm caused to from a number of conservation areas, raising the same concerns that were discussed at length at the Arcadia public inquiry. Both the Inspector at the Inquiry and the Secretary of State who considered his report agreed with SEC that these views were important and they should be consideration for the Council in opposing this application.

There is no planning case for increasing the height of any development on this site further. It is not in context with the prevailing heights in the town centre and to permit this development would establish a worrying precedent for other development proposals in Ealing that would change its character and turn Ealing into something that looked similar to Croydon.

A particular concern is the likelihood of additional overshadowing that will be caused by the additional height beyond that which adjoining residents now face. The applicants suggest the slimmer profile of Building A will reduce the extent of overshadowing on some properties, but, although it is difficult to assess the this because the shadowing diagrams are inexplicably truncated, we think that it is inevitable the additional height will cause overshadowing of new homes that have previously not been affected. We see no justification for this. Also, the proposed affordable housing component is directly to the north of the new tower block which means that its occupants will live in permanent shadow which should not be acceptable.
Privacy
The extra height will lead to further loss of privacy for local residents whose enjoyment of their gardens will be impaired by the knowledge that they are being spied upon from the public observation platform. The Council operates strong policies through the UDP to protect the privacy of adjoining occupants and we would urge them to be are applied here.

Density of the proposed development
The proposed density of the residential development is excessive and, in line with the policies in the London Plan and its replacement, the application should be opposed for this reason. The applicant’s Planning Statement at Para 7.41 claims the density for the development lies within the density range for this location set out in the London Plan. However it bases its calculations on the whole application site and so includes all of the land on which the separate hotel development with its 111 bedrooms plus reception and conference facilities would stand. We estimate the Hotel would comprise around one third of the overall site area, leaving the site of the residential development at around 0.3ha, giving a residential density of around 1273.3 hr/ha - well in excess of the maximum levels specified in Table 3.2 of the replacement London Plan, where developments that are outside the indicated range are to be resisted.

Infrastructure provision
No community infrastructure is proposed. As we have commented on many previous occasions we are concerned that the cumulative impacts of this and other high density residential development along ‘the Uxbridge Road’ corridor will have on the quality of life and access to essential services both for existing residents and the occupants of the new developments. Construction of new homes is underway nearby at Dickens Yard and Green Man Lane. These two developments alone will deliver some 3,000 new Ealing centre residents – and, except for some new places at CoE primary schools which are inappropriate for the majority of the population which is not CoE, there will be no new infrastructure provided to meet the needs of the new residents. Local community schools already have insufficient spaces to cater for local demand, health and police services struggle to meet current needs and any capacity that used to exist for our open spaces to provide recreational space has long been used up. It is not just S106 monies that are needed to address these concerns but sites for new services to be provided. As far as we are aware, there is no programme for acquiring such sites. The Council’s comments in the LDF consultation suggested that developments would not be permitted if there was no infrastructure in place to support them, and we think this situation applies in this instance.

Phasing of the development
We are concerned about comments in the proposal that the 3 blocks could be built to quite different timescales. This could lead to the affordable residential building being built some years after the market residential one, and for the hotel being built some years after that. Parts of what seemed like a package of developments may never be built, even though approval may only have been given on the balance of overall advantage. There could be a particular problem with the children’s play area which abuts the hotel which could clearly not be constructed if this was being used by the occupants of the new residential units.

Inconsistencies in the planning application
There are several inconsistencies between the many documents in the planning application. Some are just historical, e.g. variously claiming that Westel House was built as an office block or as a telephone exchange (clearly not true). Others include the number of cycle racks in the development and the age range for the children’s play space. Council officers will need to check just which figures are the definitive ones and make these figures clear in any approval.

Access and Car parking provision
SEC believes it will not be acceptable for the buildings to be serviced from the existing small entrance about 100 metres down Craven Road off the Uxbridge Road. Craven Road is a local...
access road and is already fully parked. Removing the existing parking bays as the Design and Access Statement proposes will mean a loss to existing occupants and business users of parking opportunities. It should therefore only be countenanced through a significant S106 payment.

The design of the proposed multi-functional set down / pick up lay-by on Craven Road north of the junction with the A4020 Uxbridge Road needs to be carefully considered to ensure that it does not cause conflicts with or endanger pedestrians walking along the road.

We are unclear about how the numbers of parking spaces proposed have been arrived at and how it would be allocated between users. The size of the proposed parking spaces is not clear either, nor is the space for manoeuvring. The spaces in the south west corner look particularly tight. Council officers need to ensure that the space meets at least the minimum standards.

The problems appear to stem from a wish to limit the underground parking to a single floor. This may be insufficient. There is a clear alternative which is to provide 2 floors of underground parking which would not affect the external appearance of the development.

Other design issues
There are a few other design issues of concern.

- Whilst the flats are generally of an acceptable size, even the largest 3 bedroom/6 person flats appear to have just one communal room. This is a combined lounge/dining room/kitchen. This will cause overcrowding and tension among the occupants. We believe this doesn’t conform to the Mayor’s latest standards.
- It is not clear whether the play area is for those up to the age of 5 or up to the age of 11. On-site play facilities need to be provided for those up to the age of 11, as there are no other local ones available.
- The use of a Combined Heat and Power (CHP) plant will provide some carbon reduction in the short term. However, it is inherently dependant on the burning of carbon fuels. Much better and long term carbon reductions could be obtained if a Ground Source Heat Pump (GSHP) was incorporated into the design. The Arcadia planning application (P/2007/4246 & 4248) showed how this could be done, getting 90% of its heat this way as well as using the system in reverse for its air-conditioning output.

Planning conditions
If this planning application is approved, we would expect to see a number of planning conditions to mitigate the identified problems in the proposals.

- A clear phasing plan which sets out when the individual elements will be completed.
- Close liaison is established with local residents over demolition and construction arrangements to minimise local nuisance.
- Children’s play area(s) and facilities should be provided on site for children up to age 11.
- No flats can be sold or let until the children’s play area(s) are complete and in permanent use. (This deals with some of the order of build problems and also with a common sequencing failure in developments.)
- All flats with 3 bedrooms should have at least 2 communal rooms.
- The development should incorporate a Ground Source Heat Pump capable of supplying at least 70% of the heating requirement of the site.

Yours sincerely

Will French
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