

Matter 11 - Public Services, Retail and Employment uses

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Representor Ref 174

This Submission relates to Representation Number 395, 397, 711

1. Does the Core Strategy provide an appropriate, effective and soundly based framework for the provision of a range of public facilities and services?
2. Is the proposed retail hierarchy soundly based, fully justified and consistent with national policy?

Response: While despite our best efforts, it remains consistent with the latest London Plan we believe that the retail hierarchy is not soundly based because it erroneously continues to describe Ealing Town Centre as a Metropolitan Centre.

Ealing's position in the highest tier of London's retail hierarchy dates back to the GLC days in the 1960's. There have been huge changes since those days and it is high time that its status should be formally reviewed. Continued classification as a metropolitan town centre is no longer supported by an adequate evidence base. The town centre faces long term structural challenges that can only be satisfactorily resolved by addressing the specific and separate issues of Ealing Broadway and West Ealing. The current classification inhibits the bringing forward of focused plans for addressing the differing requirements of Ealing Broadway and West Ealing.

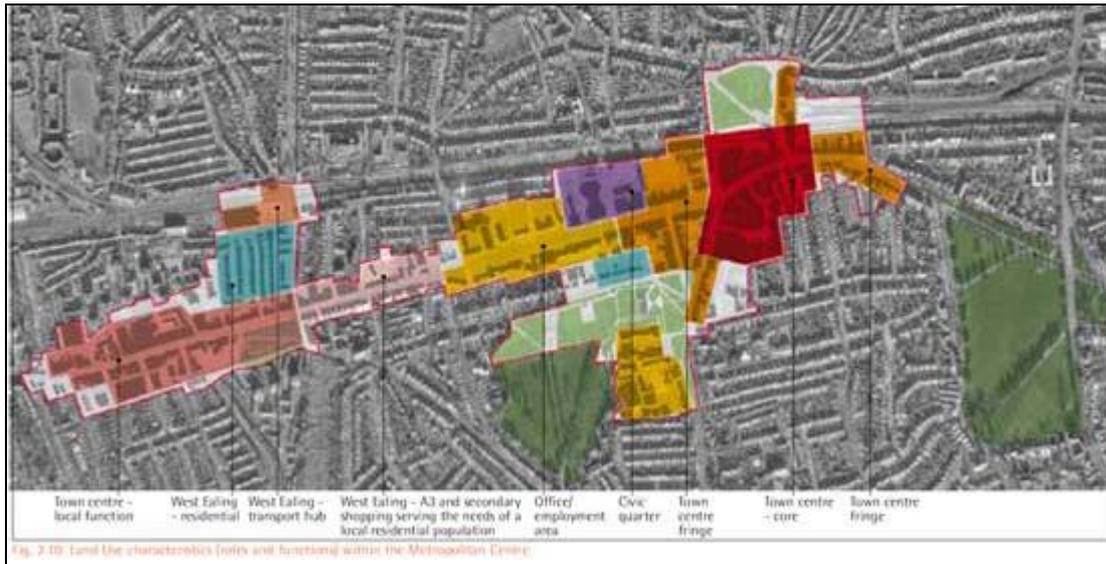
Ealing's status as a Metropolitan Centre raises two overarching issues, which carry significant planning implications. We consider these below.

(i) The Town Centre's Boundaries

The guidance note to the recently published PPS4 states in paragraph 6.13 that, *"LPAs should also identify an appropriate 'town centre boundary' within which it will seek to locate other main town centre uses."* It goes on *"it is important to ensure the town centre boundary is not drawn too widely."*

Ealing MTC has a linear footprint that stretches over more than two kilometres. This in turn subdivides into three zones. There is a retail cluster at each end linked by up to half a kilometre of office buildings and a further half kilometre of secondary commercial activities serving local residents along the Uxbridge Road.

The annotated map below from the Ealing Council commissioned Tibbalds report depicts the geography of the Town Centre. It illustrates how the one kilometre length of office and other commercial buildings along the Uxbridge Road effectively separates the two retail locations of Ealing Broadway, shaded red, and West Ealing, shaded dark pink, and results in their operation as two distinct retail centres.



In the minds of residents and visitors alike the two locations operate as discrete town centres. Shoppers in Ealing Broadway rarely access West Ealing during the same visit or vice versa. Until the recent decline of West Ealing this was well illustrated by the presence of two Marks and Spencers, two WH Smiths and two Mothercare stores, one in each centre.

Concerns that Ealing Metropolitan Town Centre does not operate as single integrated town centre have been raised repeatedly. We quote some examples from Council and Council commissioned reports:

- *“Ealing town centre is unusual in that it is divided into two distinct and very different areas, namely Ealing Broadway and West Ealing, separated by a range of other key town centre uses (predominately offices) along the Uxbridge Road. As a result, the eastern (Ealing Broadway) and western (West Ealing) ends of the Uxbridge Road are characterised by their own distinct commercial offer, catchments and built form.”* (Tibbalds Report, Ealing Metropolitan Centre Spatial Development Strategy, 2008, paragraph 2.5.1)
- *“In terms of overall comparison goods offer this provision **falls significantly behind all other London Metropolitan Centres and a number of ‘Major Centres’, including Camden Town, Walthamstow, Kensington High Street, Lewisham, Streatham and Wimbledon in terms of its total floorspace.** Ealing is not therefore performing its role in the context of London’s network of centres.”* (Tibbalds Report, Ealing Metropolitan Centre Spatial Development Strategy, 2008, paragraph 2.5.4)
- *“Over time West Ealing has evolved as a more value-led shopping destination, underpinned by its food and convenience offer, ...”* (Tibbalds Report, Ealing Metropolitan Centre Spatial Development Strategy, 2008 paragraph 2.5.5)
- *“Consultation undertaken for the strategy and analysis undertaken by CB Hillier Parker revealed that West Ealing has a clear role as a **distinct neighbourhood centre**, with a strong convenience and discount durable goods offer, as well as a strong trade draw for textiles and furnishings, carpets and furniture, and domestic electrical appliances.”* West Ealing Neighbourhood Regeneration Survey,

London Borough of Ealing & Groundwork West London, April 2001, paragraph 8.2).

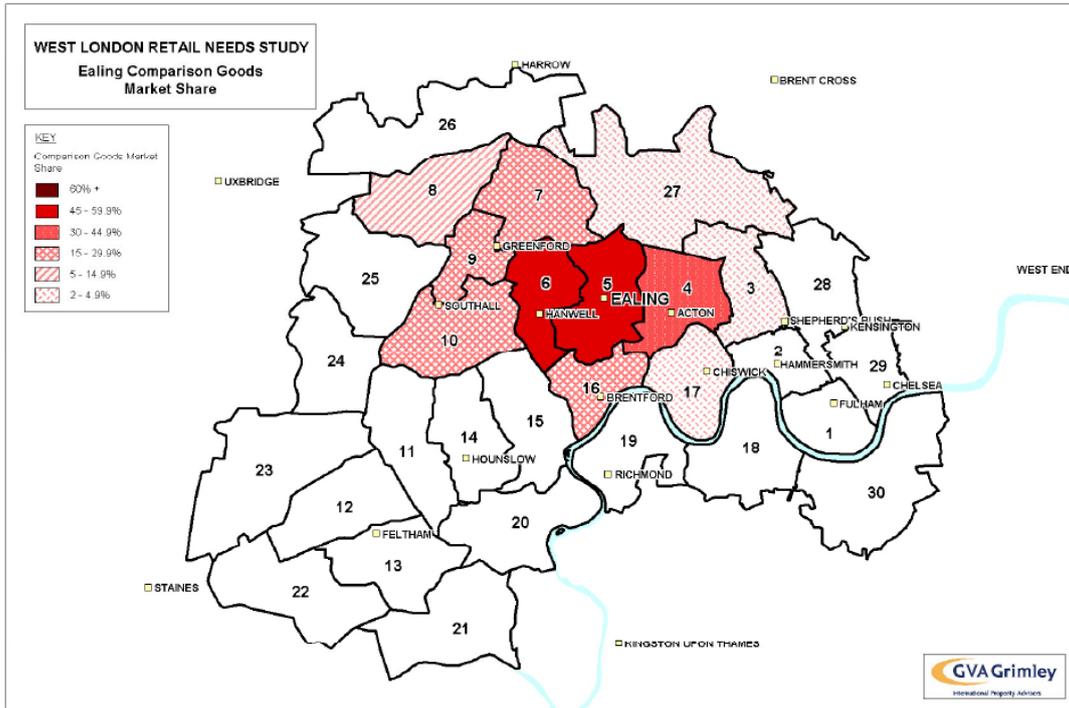
- *“There is an issue as to whether the Metropolitan centre functions as one centre or as two distinct centres namely Ealing Broadway and West Ealing which are its constituent parts.”* (Shopping and Town Centres, London Borough of Ealing, September 2005, page 15).
- *“Review assumptions about Ealing’s position in London’s retail hierarchy in light of the opening and impact of Westfield Shopping Centre. Further work is required to establish the case and the preferred approach.”* (Ealing LDF Core Strategy Review – Integrating LB Ealing’s Regeneration Ambitions, Shared Intelligence, April 2009, paragraph 5.12).
- *“Consider the evidence for the continued designation of Ealing as a metropolitan town centre and the realism of aspirations for further retail growth.”* (Ealing LDF Core Strategy Review – Integrating LB Ealing’s Regeneration Ambitions, Shared Intelligence, April 2009, paragraph 5.22).

Similarly, the reports commissioned from Experian by the GLA shows that it regards Ealing Broadway and West Ealing as separate retail centres. The March 2009 report titled: ‘Consumer Expenditure and Comparison Goods Retail Floorspace Need in London’ only referred to Ealing Broadway. And although spreadsheets in the December 2009 ‘GLA Town Centre Health Check Analysis Report’ contained the note: *“Ealing uses combined Experian data for Ealing Broadway and West Ealing”*, the fact that one of the UK’s leading retail research organisations regards Ealing Broadway and West Ealing as separate town centres is compelling evidence that supports SEC’s case.

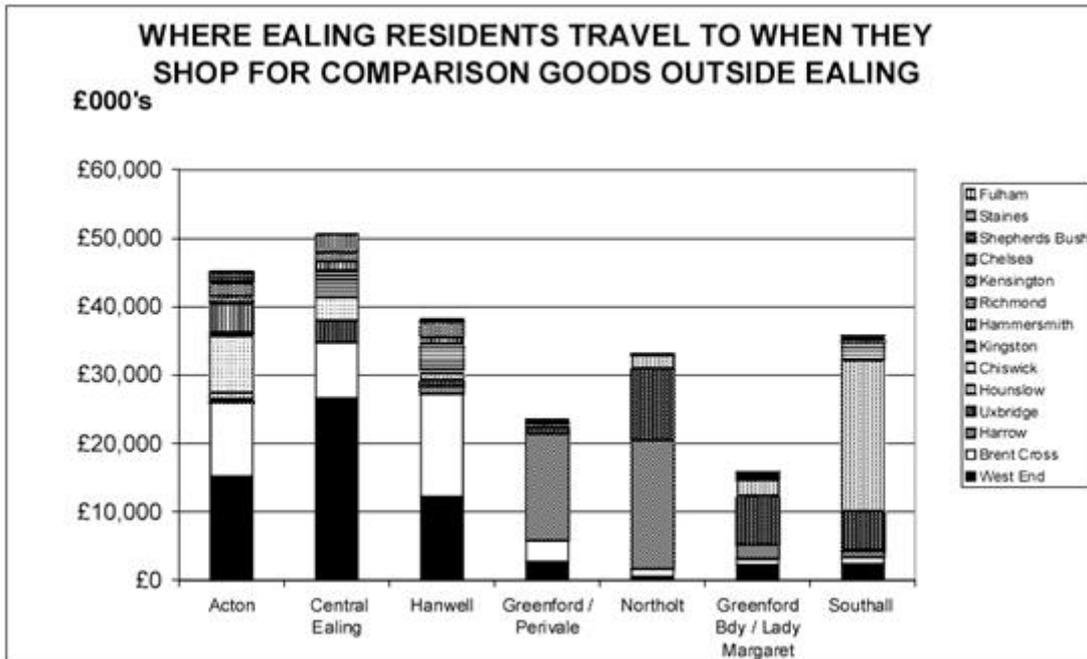
Considerable independent evidence questions thus Ealing’s operation as a metropolitan town centre. Ealing lacks the compact boundaries of successful centres such as Kingston, Uxbridge and Richmond. The boundaries of Ealing Metropolitan Town Centre are too widely drawn and do not comply with the expectation set out in PPS4 noted above.

(ii) Operation

Ealing lacks the multi-borough catchment area of other metropolitan town centres. Research commissioned by Ealing Council, and summarised on the following map, shows that Ealing MTC fails to attract shoppers from outside the Borough, and even fails to attract a significant proportion of the residents of the western half of the Borough.



Council research has identified the following shopping patterns of the residents of different parts of the borough. This reveals a tendency for residents to shop at the town centre most accessible to them by car. Congestion on the Uxbridge Road reduces Ealing’s attractiveness for those living west of Hanwell, who favour Uxbridge, Harrow and Hounslow.



Ealing Council’s projections of retail need are anyway out-of date and were prepared prior to the opening of Westfield White City. They included a number of optimistic

assumptions which inflated predictions of future growth. Correcting for these assumptions reveals negative retail growth in Ealing Broadway.

Vacancy levels for retail premises are significant and rising in Ealing. Ealing Council's Annual Monitoring Report, which was published on 7th January 2010, identifies a 16 per cent vacancy rate for the latest year, which is up from 10 per cent in the previous year. It should be noted that the 16 percent vacancy rate is significantly above the 10.2 percent reported in Table A4.2 of the GLA 2009 London Town Centre Health Check Analysis Report.

Strategies for responding to Ealing's relative decline are required at both the Londonwide level and the local level. They need to reflect a realistic understanding about what kind of places Ealing and West Ealing have become. We recognise that the London Plan did not acknowledge our arguments, but this does not mean it is right - nor that the trends we have identified are likely to reverse in the future.

However, for now the LDF should reflect Ealing and West Ealing for what they are now and will be in the future. This means the two centres should be treated as separate centres for Local Planning purposes with different needs and priorities.

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

Response: The strategy and policies for the economy appear primarily to relate to the imperative of regeneration, but just what this means in practice, who and what is being targeted and why is left entirely unclear. The two main pieces of background evidence published with the key Strategy are the 2009 Background Paper 2 Ealing's Economy – a very basic summary and Roger Tym's Employment Land Review published in 2010. The former document offers no evidence base from which policies can be seen to have emerged. Tym's study is much more interesting, but its status is unclear, and there has been little public discussion as to its findings. It is difficult to see how this has fed into Strategy's strong regeneration agenda.

Tym's comments on the underperformance of the office sector in Ealing and his view that this is likely to have been a consequence of a planning policy vacuum in this area which has encouraged investors to concentrate on the potential residential opportunities in Ealing Town Centre. SEC has always stated that a successful town centre needs to contain a good mix of uses, particularly those that strengthen the centre as a place people come do business in. We therefore support the recommendation at Para 10.9 and then from 10.29 of the importance of retaining the existing office space in the Borough and of encouraging new office development. We would endorse Ealing Town Centre as a primary location for new office development. It is after all a highly attractive place with very good transport accessibility. However as we have explained our response to the consultation on the 4 Arcadia options, we think that that the central Arcadia site may be better suited to this purpose as opposed to the more distant office corridor which is less convenient for commuters using Ealing Broadway Station, already contains a large number of vacancies, and may be better suited to other uses including perhaps education, hotels and residential. We await now a view from the Council on this question and how they intend to take it further.

We think Tym's report does not make reference to the potential in the Borough for higher education and training uses which appears to offer new opportunities for

investment and employment. Perhaps this is a consequence of Tym's focus on B space employment, even though it accounts for less than 50% jobs in Ealing. Ealing seems to have a locational advantage in education and training which it could exploit. Tym's report shows a higher proportion of people working in education and R&D in Ealing than in West London generally. TVU is located here and we understand that the University has sought over the years to expand in the Borough, although it has not always been encouraged by the response to its approaches. Thanks to its location and its rich population mix, Ealing is also a popular location for short term training in everything from language skills to professional activities. It seems to us there is a strong case for the LDF to consider promoting education and training industries and it is disappointing this does not feature in the Study. Again these are ideas that need to be developed further.

We are concerned about Tym's recommendations (eg at Para 10.10) of the need to manage the decline in manufacturing uses in Ealing. While we can accept there may be a general decline in the demand for sites in large industrial areas like Park Royal, the Ealing community has become increasingly concerned with the accelerating loss of small units scattered throughout the Borough that provide accommodation for numerous small businesses. Many of the documents that are being consulted on at present – particularly the Strategy and the Sites documents – appear designed to encourage this process by promoting residential uses on them. It is important to stress the contribution that small units like these can play in supplying valuable services to the local community and as business incubators. SEC therefore suggests that in principle these units should be identified, protected and promoted for the benefits that they provide to the local community.

We question Tym's championing of the need to promote warehousing and distribution uses in the Borough (eg at Para 10.14 and 10.23). As Tym says, the best locations for such uses are those with good access to the national road network, and in London this is close to the M25. Park Royal in particular is no longer such a good location for warehousing and there is no reason to protect warehouse sites here. Distribution uses are not generally large employers, they add little value to the local economy and as Tym acknowledges, they tend not to make intensive use of the sites that they occupy. In addition, Park Royal's two main points of access from the national road network – the A40 and the A406 - tend to be heavily congested and we see no reason to exacerbate things by encouraging additional distribution uses which are traffic generating by definition. Instead, and as Sir Peter Hall has argued, there is at least a case for considering the viability of utilising some of these sites for more intensive residential developments.