

1.Matter One-Overall Approach

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I have to assume that the two DPDs take forward the policies of the London Plan but in the case of the DM DPD, by using the same format, structure, numbering and themes of the London Plan, all sense of the document actually being about the Borough of Ealing has been lost and therefore does not reflect local issues and objectives.

I have looked at similar documents for Richmond and Harrow (unfortunately the Hounslow one is yet to be completed) and neither of these boroughs follows the format and structure of the London Plan and both documents I find easy to understand. Personally I prefer longer documents that give more detail instead of the endless footnotes, appendices and SPDs of shorter versions of DM DPDs.

An index would have been helpful in the DM DPD
The chapter headings in the Ealing DM DPD are Places, People, Economy, Climate Change, Transport, and Living Places and Spaces.

The Harrow DMP pre-submission document has 12 chapters with far more informative headings like Character and Amenity (2) and Conservation and Heritage (3). There have been modifications including the use of boxes re policies for clarification and minor changes in wording however the overall format remains the same.

I have used the Harrow document to show that a DM DPD should give local information to illustrate a policy.

(Appendix 1) shows the Introduction to Conservation and Heritage that actually includes phrases such as- re Heritage Assets-

'They also represent a precious inheritance, to be passed-on for future generations to understand and enjoy'.

There are over 20 pages devoted to Heritage Assets. The chapter includes sections on Listed and Locally Listed buildings. The Ealing DM DPD Policy 7C-Heritage Local Policy barely fills two pages.

The Harrow document also contains a list of primary and secondary frontages and although these are alluded to in the Ealing DM DPD they are not actually listed in either EDM1, 2 or 3. The Harrow document even contains photos of protected views.

However I do realise that the housing needs of Harrow are different to those of Ealing but just because the priority in the Ealing Core strategy document is housing it is not necessary to reduce a chapter on Heritage to a few lines.

Richmond also has a DMP that has clear and comprehensive chapters-Sustainable Development, Open Land and Rivers, Shopping and Centres, Housing, Social Infrastructure Provision, Employment, Transport and Parking and Generic Policies.

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I am not sure how robust and up to date the evidence is, re both the sites and policies documents, because developers do not necessarily put forward an application that corresponds to either the sites or policies documents.

For example, there are two applications currently being considered that are connected to both documents. One is for the Arcadia Centre-part of EAL3-Arcadia, and the other for a hotel on part of Site EAL16-67-75 The Broadway.

I have attached my objection to the application for the Arcadia Centre and I have outlined why I think it contravenes various policies.(Appendix 1).I have not attached the various appendices connected to my objection.

The hotel application is being considered by the planning committee on May15th and the officer has recommended that the application be granted.
The site allocation is mixed use which I suppose might include a hotel.

To quote the site document

'Buildings along the Broadway should be of a height, grain, pattern and footprint commensurate with the Victorian parades at 85-97 and 43-57 The Broadway...facades should be finely detailed and use materials to respond to the character of these assets, and reflect their characteristic roof features—



This shows part of the parade, Lidl's and the hotel site.



The hotel site is to the left of the photo.

Appendix 2 shows the proposed 60 bedroom hotel that is neither finely detailed or reflects the characteristic roof features. And it does not have either coach parking or disabled parking.

Because both these applications do not abide by either site allocation or policies there must be a question mark about other development sites and the robustness of the whole Core Strategy.

I was not quite sure in which Matter and Issue to make a reference to 'Create Streets' written by the Policy Exchange.

It was published in January this year and therefore does contain up to date evidence.

Basically the report is critical of the London Plan's strong focus on putting more people in higher buildings in less space and that we are repeating the mistakes of the past.

These are a few quotes from the report

'Multi-storey developments are expensive to build and maintain. They lead to higher crime and are bad for residents' health and mental well being even when socio-economic conditions are identical. They are consistently and strongly unpopular with the public.'

Children go out less when they live in high-rises. Recent MORI research found that parents have strong preferences for private gardens as opposed to living in flats with communal gardens

The majority of British people wanted to live in house in streets. At least 89% of Britons want to live in a house in a street.'

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INTRODUCTION

3.1 Harrow benefits from a surprisingly diverse historic environment. From archaeological remains associated with the Romans and Saxons, the surviving village settlements and farm complexes of rural Middlesex, the estates of Harrow School and former country houses, to the garden suburbs, Art Deco flamboyance and Modernist buildings associated with the Borough's rapid development in the 1930s. These and many other heritage assets provide a point of reference in the cultural distinctiveness of the Borough and their conservation enables both residents and visitors to appreciate Harrow's history. They also represent a precious inheritance, to be passed-on for future generations to understand and enjoy.

3.2 The historic environment of the Borough comprises:

- 28 conservation areas
- over 300 statutory listed buildings
- 4 historic parks and gardens
- 9 scheduled ancient monuments
- over 700 locally listed buildings
- 2 locally listed parks and gardens
- 9 archaeological priority areas

3.3 The Borough's conservation areas are shown on the Harrow adopted Policies Map and further information about the history, special interest and management of these areas has been produced by the Council in a series of conservation area supplementary planning documents, including character appraisals and management strategies. Similarly, the historic parks and gardens are shown on the Harrow adopted Policies Map and nationally registered ones can also be found on the English Heritage list which identifies them. More information about locally historic parks and gardens can be found via the conservation pages of the Council's website.

3.4 The statutory register of buildings of outstanding historical or architectural interest is maintained by English Heritage and includes a summary identification of the building and the justification for listing with each entry. The Council maintains a compendium list of all buildings within the Borough that appear on the statutory register as well as a separate register of buildings which are considered to be of local historic or architectural interest. These can be downloaded via the conservation pages of the Council's website.

3.5 The extent of scheduled ancient monuments and archaeological priority areas are shown on the Harrow adopted Policies Map. The Greater London Sites and Monuments Record, maintained by English Heritage, provides a computerised record of information regarding London's archaeological and historic fabric.

3.6 English Heritage's Heritage at Risk register provides details of designated heritage assets, namely listed buildings, scheduled ancient monuments, registered parks and gardens and conservation areas, that are vulnerable to decay and neglect, together with classification by priority and condition. The register is updated annually.

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3.7 Taken together, these sources form the current historic environment record for the Borough. Further information for individual heritage assets may also exist from other specific sources, such as previous planning applications, applications for grant funding, etc. Additions to the historic environment record for the Borough may be made, from time to time, and will be made publicly available via the conservation pages of the Council's website.

3.8 The National Planning Policy Framework (2012) integrates the protection and enhancement of the historic environment within the meaning of sustainable development and seeks the conservation of heritage assets as one of the Framework's twelve core planning principles. To this end it requires local planning authorities to set out a positive framework for the conservation and enjoyment of the historic environment. National guidance on best practice in conservation is contained within the *Historic Environment Planning Practice Guide (2010)*⁽¹⁵⁾. Harrow's Core Strategy provides a spatial strategy for accommodating the Borough's development needs without compromising the integrity of heritage assets. The following policies allow individual proposals to be managed in relation to the significance of the heritage asset(s) affected and the degree of any impact both positive and negative, which extends to the consideration of enabling development where necessary. Supplementary planning documents, character appraisals, management strategies and other non-statutory documents complete the positive framework for the conservation, management, adaptation and investment in Harrow's historic environment.

ALL HERITAGE ASSETS

Policy 7

Heritage Assets

- A. When assessing proposals affecting heritage assets, priority will be afforded to the conservation of the assets affected and their setting as appropriate to the significance of the assets. Proposals that secure the preservation, conservation or enhancement of a heritage asset and its setting, or which secure opportunities for sustainable enjoyment of the historic environment, will be approved. Proposals that would harm, or lead to the loss of, the significance of heritage assets will be refused.
- B. Applications for proposals affecting heritage assets will be required to:
 - a. demonstrate an understanding of the heritage asset including its significance and the contribution of their setting to that significance;
 - b. explain how the significance of the heritage asset has informed the proposal; and
 - c. show at an appropriate level of detail on the drawings, or in other material, how the proposal relates to the heritage assets affected.

Where relevant, the application should also explain how any harm to or loss of heritage assets or its setting is considered to be justified, including the consideration to alternative schemes.

- C. The impact of proposals affecting heritage assets will be assessed having regard to:

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- a. emerging or adopted supplementary planning documents, including character appraisals and management plans or other relevant documents;
 - b. relevant issues of design and character including proportion, scale, height, massing, bulk, alignment, materials, historic fabric, use, features, location, relationship with adjacent assets, setting, layout, plan form and landscaping;
 - c. the preference to be afforded to proposals that both conserve and sustain heritage assets and their setting;
 - d. any sustainable economic benefits;
 - e. the need to mitigate climate change and to ensure that heritage assets are resilient to the effects of climate change; and
 - f. the desirability of increasing understanding, interpretation and public access of heritage assets.
- D. The Council will use planning conditions and planning obligations where necessary to ensure the preservation, conservation or enhancement of heritage assets and their setting, and to secure the exploitation of opportunities for the sustainable enjoyment and increased understanding of the historic environment.

Reasoned Justification

3.9 Heritage assets are buildings, monuments, sites, places, areas and landscapes that have a degree of significance meriting consideration in planning decisions because of their heritage interest⁽¹⁶⁾. Significance is defined in the National Planning Policy Framework (2012) as the value of a heritage asset to the present and future generations because of its heritage interest, and includes the asset's setting as well as its physical presence. Further information on significance is available in the English Heritage publication *Conservation Principles and Policies for the Sustainable Management of the Historic Environment* (2008).

3.10 Collectively and individually heritage assets are a unique, irreplaceable resource to be sustained for the present and future generations to understand and enjoy. They fall into two broad categories: those that are formally designated under statutory provisions and referred to as 'designated' assets; and those that are identified by the Council and referred to as 'non-designated' assets. For the avoidance of doubt, this policy applies to proposals affecting designated and non-designated heritage assets, as well as the setting of these assets⁽¹⁷⁾. The significance of a heritage asset will be informed by its designation and, where relevant, its grade. However this should not be interpreted as meaning that lower grade and non-designated heritage assets do not matter. The Council is committed to the conservation, preservation and enhancement of all heritage assets in the Borough.

3.11 Consistent with the National Planning Policy Framework (2012), the Council will attach great weight to the conservation of heritage assets having regard to the significance of the asset and whether the proposal would lead to substantial or less than substantial harm. Many aspects of the historic environment, such as listed buildings and conservation areas, are 'living' places and need to be sustained through development, adaptation and active use. Public access to other aspects of the historic environment, such as archaeology or historic parks and gardens, can support tourism, education and the wellbeing of residents. The Council therefore recognises that change

¹⁶ See National Planning Policy Framework (2012) Annex 2: *Glossary*.

¹⁷ Which might include development outside the boundary of the heritage assets affected.

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Appendix 1 (7 pages)
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Steve Austin
Planning Officer
Ealing Council

April 17th 2013

Re Planning Application P/2013/1127
1-8 The Broadway W5-Internal and External alterations.

Dear Steve Austin

Firstly I would like to say that although the consultation date start was on April 4th all the documents relating to this application were not available on the web site until April 17th.

I am objecting to the above application on numerous grounds and they are as follows-

Retail needs

I believe the application contravenes Policy 2.5 of the LDF Core Strategy.
Regenerate Ealing Town Centre

2.5 (b) *Ealing Broadway- a high quality retail destination.*

(c) *To strengthen and extend the retail core of the town centre leading to an increase in the quantum, quality and diversity of the existing retail/leisure offer and sustain the the town centre's position in the retail hierarchy.*

The footnote to this page of the Core Strategy is the Retail Needs Study of 2010

LB Ealing Comparison goods

9.19 *'But Ealing has suffered a decline of turnover since the opening of Westfield Shopping Centre.....if there is a continuing threat to Ealing's market share this may put at risk its competitive position in the longer term.*

'There is a lack of high quality fashion outlets and a poor department store offer'.

The Core Strategy differentiates between Ealing Broadway as being a high quality retail destination and West Ealing a destination for value goods and a wide range of eating places

I would not argue with the retail statement of the applicant in that the Arcadia shopping centre has a poor layout and that the units are too small (ix) .However the two anchor stores proposed of Morrison's (there is already a large Morrison's in Acton and a newly opened one in W.Ealing) and TK Maxx (x) will not be high quality retail units and will not add quality and diversity to the existing retail offer in the Metropolitan Centre.

Opposite the site we already have Marks and Spencer with its food section. There is a Sainsbury's Local within a few yards of the Arcadia Centre and a Tesco supermarket with the Broadway Centre that is also opposite the site.

Within the Arcadia site there are shops that can provide goods that cannot currently be found within other areas of the Metropolitan Centre-Mothercare, Blacks, Robert Dyas and Cargo. Cargo, for a brief time, contained a franchise called Butlers but because very few people knew it was there it moved out. However, in Brighton where there are distinctive areas to shop, Cargo, Tiger (there is a branch of Tiger in the Broadway Centre) and Butlers are right next door to each other and are thriving. The block also contains a Blacks.



Cargo et al in Brighton

The retail statement implies (xiii) that it is likely that the retailers (other than TK Maxx) will withdraw from Ealing anyway or relocate elsewhere in the town centre. However there is currently nowhere for them to relocate to within the town centre and the units at Dickens Yard might not be suitable (they are relatively small) or not available until 2016 or later.

This will mean that contrary to the London Plan and Local policies that encourage people to use public transport, people will have to drive elsewhere to find similar goods.

There is also the question of the change of use and relocation of a fast food takeaway into a primary retail frontage.

Policy 4B Retail of the Development Management DPD

A A1 Retail uses should constitute 100% of the designated Primary Frontage at street level.

This is a Primary Frontage.

Policy 4C Main Town Centre Uses

Local Policy

C

Fast Food outlets-Are not permitted within a ten minute walk (which will normally equate to a 400m radius of existing schools.)

I realise that there is already a MacDonalD's on the site but this is a chance to implement a laudable policy. The nearest school is probably less than 50 metres from the site.

Also by moving MacDonalD's into a prominent and major A1 unit there will be a loss of retail on one of the most important central sites.

It will be more difficult to implement policy 4C C at a later date if a precedent is set now by allowing MacDonalD's to be positioned even nearer to Christ the Saviour School.

Also by positioning a fast food takeaway on this highly visible corner site with its relatively narrow pavement used by many pedestrians it will make the area even more congested and littered with detritus than it already is.



Arcadia

Although the design of the frontage will be changed in the proposed application the entrance into the SW corner unit will be in the same position.

I would also like to point out that the Shopmobilty scheme is currently situated within the Arcadia Shopping Centre but no mention of this is contained within the application. It took a considerable number of years to set the scheme up and it was only launched a couple of years ago despite the fact that such schemes are mentioned in the UDP of 2004 7.1-J4 *'The Council recognises the important role of providing Shopmobility schemes integrated within shopping centres.'*

There seems to be no plan for such a scheme in the Dickens Yard development or anywhere else for that matter.

In conclusion re retail I would dispute the applicant's statement (xvi) that the proposal will have a positive impact on Ealing's overall vitality and viability. Ealing does not need a major new foodstore retailer or a repositioned fast food outlet, what Ealing needs, as a Metropolitan centre, is high quality retail preferably in the form of a department store. Ironically this was previously the site of a department store-Sayers and later Bentalls. The latter moved into the Broadway Centre and then the Bentalls Broadway Centre site was finally replaced by Primark who outbid Debenhams for the site.

Heritage Statement and Design

In the Heritage statement from the applicant it states that

.....'with the exterior mimicking the red brick, slate roofed Ealing vernacular'

The Broadway Centre is also red brick and has actually worn very well. Its main problem is the size of the units now needed, not the actual design. The design uses traditional materials suited to the Conservation Area in which it stands, it is not mimicry. The Broadway Centre is also Locally Listed.



The Broadway centre south side.

The London Plan 7.31 states that

'Heritage Assets such as conservation areas make a significant contribution to local character and should be protected from inappropriate development that is not sympathetic in terms of scale, materials, details and form.'

NPPE, as quoted in the applicants Heritage statement-

'It sustains or enhances the significance of a heritage asset and the contribution of its setting.'

'It is an appropriate design for its context and makes a positive contribution to the appearance, character, quality and local distinctiveness of the historic environment.'

Not only is the Arcadia Site in a Conservation Area it is opposite the Listed building of Christ the Saviour which unfortunately is already dominated by the marketing suite for Dickens Yard (this eyesore could be in situ for another five years).

I believe the application contravenes these policies and the proposed design neither improves the setting of the listed Church or the Conservation Area as a whole.

7.5.2 Heritage statement-'The tacky clock tower' is now to be replaced by a tacky clock (Appendix A) and we are to be presented with double height slightly framed glazing that is completely unsuitable for the Conservation Area (Appendix B). However the applicant draws our attention to a photo of Ealing Broadway in 1907 (Appendix C) and mentions 'Note the two storey display shopfronts'. This is an absolutely ridiculous comparison. The 1907 windows are relatively small with intricate framework.

Tk Maxx, although an excellent store, is not noted for its window displays and does not require enormous windows.

In Brighton Tk Maxx is carefully renovating a corner building of a similar vintage to Sayers .The windows are of a similar design to those of the windows in the 1907 photo of Ealing.



What will be the new TK Maxx in Brighton

Why the rather beautiful building of Bentalls (1960 photo) was pulled down one will never know. Many department stores of a similar design still remain in many town centres today.

However by illustrating what the streetscape was like in 1907 the applicant has shown that another solution would be possible. It would not have to be a pastiche but with a clever use of traditional materials and smaller windows the site could be developed with a design more in keeping with the Conservation Area.

The LDF SPD for the site does not mention that there are a few Edwardian/Victorian buildings of note in The Broadway

'Particularly noticeable are nos 15-16 and No 14. The latter in particular is a little gem...No 9 is also interesting with its curved aspect on its west side.'

Ealing Town Centre Conservation Area. Character Appraisal.



The shops illustrated are in The Broadway (North side) and are part of the original Victorian/Edwardian fabric. The PoundKingdom signage has now gone and Jessops is now closed, soon to be a Harris and Hoole (another loss of retail) Tesco's answer to Costa and Starbucks-an 'artisan' coffee shop.

I do not think the proposed facades are appropriate and they are certainly not 'an appropriate contemporary interpretation of craftsmanship and decoration of local heritage.'(7.5.3.Heritage Statement).

There are already acres of plate glass in the Broadway Centre and there will be in Dickens Yard and so it is important that the windows are smaller and reflect the designs of the Edwardian/Victorian period.

I find little craftsmanship contained within the design, especially compared with the Broadway Centre, and the overall impression is of something built in the 70s at the Elephant & Castle that has subsequently been pulled down.

The refurbished site (a rather vague interpretation of the word refurbish) will not provide a high quality frontage that includes a well detailed, contemporary-styled corner in a key town centre.

Re heritage assets and design, I believe this application contravenes policies as stated in
The NPPF, The London Plan, UDP 4.1

In Conclusion

I would ask the Council to reject the application and ask the developers to produce a plan both for the site and its uses more in keeping with a Metropolitan Town Centre in a Conservation Area.

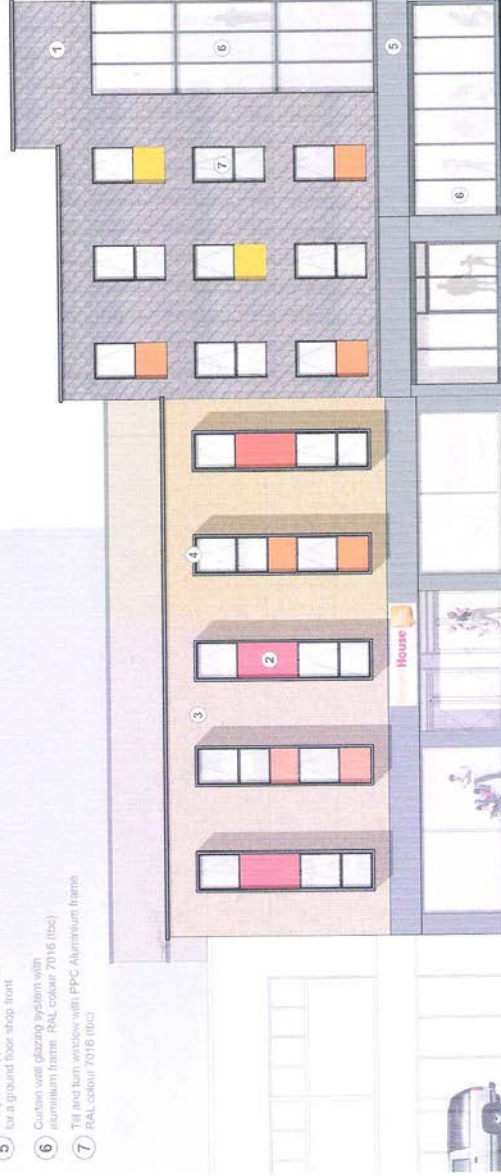
Yours sincerely

Susan New

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KEY

- ① Tessi Oud Rhomboid Copper shingle cladding system
- ② Silverstone colours/glass composite cladding panel
- ③ London yellow stock brick
- ④ 500mm projecting vertical windows with copper shingle cladding to side elevations, Aluminium frame RAL colour 7016 (fbc)
- ⑤ A separate application will be submitted at a later stage for a ground floor shop front
- ⑥ Curtain wall glazing system with aluminium frame RAL colour 7016 (fbc)
- ⑦ Tilt and turn window with PPC Aluminium frame RAL colour 7016 (fbc)



PROPOSED HOTEL 67-75 BROADWAY, WEST EALING
P747-016-Rev B BROADWAY ELEVATION
SCALE 1:100 @ A3

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