

**REPRESENTOR REF. NOS:  
DMFA/04(1)-(5)**

**MATTERS ONE AND TWO**

**LIONEL BROWNE OF TELEVIEW  
194 ACTON LANE, LONDON W4 5DL**

**Prepared by Howard J Green FRICS**

**April 2013**

1. The London Borough of Ealing have responded to my original Representations by correcting some errors but also by making other alterations to the Shopping Frontage designations in this part of Acton Lane
2. These do not change my previous Representations. I remain of the opinion that it borders on the farcical to designate a Local Shopping Centre where only one convenience 'corner type' shop serving local residents exists.
3. However, I think the authority have made another error in their amended designations:-
  - Within EPM 4 and EPM 5 they now designate Nos. 177–183 (odd) Acton Lane as part of a Secondary Frontage between Berrymede and Saville Roads.
  - On the amended Proposals Map, however, Nos. 191–197 (odd) are coloured with the Secondary Frontage annotation.
  - By e-mail dated 18<sup>th</sup> April 2013 the authority confirmed that Nos.191–197 (odd) have been removed from the Secondary Frontage.
4. On that basis and the basis of the advice at para 12 of the Guidance Note that the Policy Map is not part of the Development Management or Development Sites Development Plan Documents I am assuming Nos. 191-197 (odd) Acton Lane are **not** designated as being within a Secondary Frontage.
5. My further comments regarding are:-
  - (a) I question how a discrete Local Shopping Centre can only have Secondary Frontages. There surely must be a Primary Frontage.
  - (b) However, I calculate that within the Secondary Frontage designations there are 18 no. units originally designed for retail use but Nos. 196–198 are a combined unit comprising Gill's Food and Wine Grocers. The other two units which could be described as A1 are Halina's Tailoring at No. 188 and what appears to be an intermittently open Antique shop at No.199 – which may be more of a wholesale use.
  - (c) Mr Fitzpatrick-Browne's premises at No. 194 are not in retail use. An application for a Certificate of Lawfulness in respect of the use of the premises for B1 purposes has been submitted to the council.
  - (d) On the basis that there are 18 no. retail units and four in A1 use that represents a 22% retail element. However, on the basis that Gill's is a single unit the retail representation is 17.5%.

- (e) These figures already fall below the 40% retail element of Secondary Frontage that Emerging Policy 4B states should be retained. However, the only 'true' retail use in this alleged Local Shopping Centre is the convenience store at Nos. 196-198 which represents an 11% retail element.
6. The proposed designation of this part of Acton Lane as a Local Shopping Centre is not sound. It is contrary to two Matters ie:-
- (a) **Matter 1: Overall Approach. Para 1.3.** I fail to see how the authority can justify the proposed designation as being “..robust, credible...” and having an “... up to date evidence base” when it is self evident from any site visit that this alleged 'Local Shopping Centre' is in terminal decline. It is too late to try and arrest any further changes.
- (b) **Matter 2: General Issues for Development Sites DPD.** The proposed Local Shopping Centre designation does not comply with the latter part of **Matter 2.4** when it poses the question:-

**“Is there a reasonable prospect of the safeguarded land being used for that purpose with the life of the Plan?”**

7. There is no prospect of this 'Local Shopping Centre' returning to a thriving retail centre.
8. This part of Acton Lane should not be designated as a Local Shopping Centre.

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