

## MATTER 2: GENERAL ISSUES FOR DEVELOPMENT SITES DPD

Representor: DS 55  
Will French, For Save Ealing's Centre (SEC)

---

***Matter 2.4: Are the location and scale of the retail, employment, mixed use allocations clearly justified? Is 'mixed use' a clear enough term to guide development? Is there a reasonable prospect of the safeguarded land being used for that purpose within the life of the Plan?***

1. Unlike the earlier 2010 consultation document the present Sites document carries no indication of expected land use allocations. This has the advantage of retaining flexibility for the development of the Metropolitan Town Centre, with which SEC is primarily concerned, but it is entirely unhelpful in developing the kind of strategic response to change which both the London Plan (Policy 2.15) and Mary Portas proposed.
2. In preparing their LDFs, Policy 4.7 of the London Plan calls upon Boroughs to
  - a. identify future levels of retail and other commercial floorspace need in light of integrated strategic and local assessments
  - b. undertake regular town centre health checks to inform strategic and local policy and implementation.
3. SEC has long expressed its concern about the accuracy of the Council's projections of retail floorspace demand in the Metropolitan Centre. Events in recent years have reinforced our concern and we are afraid that the Sites Document will be unsound as a result.
4. The Council's projections of demand for existing, let alone additional, retail floorspace in both Central and West Ealing have become increasingly out of date. The latest evidence in the Examination Library is EB33 – Roger Tym's Joint West London Retail Needs Study Update which uses data from 2009 and before – ie before the full extent of the economic slowdown and the decline in consumer spending had become apparent. Despite key reports, for instance that undertaken by Mary Portas on the Health of High Streets which point to a very much less rosy picture than the Tym, there has been no consideration of the implications of changing patterns of spending for the Metropolitan Town Centre.
5. A similar problem exists with relation to the demand for employment floorspace – the most study of which was Tym's somewhat partial and incomplete 2010 report (EB26) which again was based on data from previous years when optimism about the economy was very different to what it is today.
6. Information published in the Council's AMR is also becoming increasingly dated. The Town Centre Vacancies table 3.7.6 on page 94 only goes up to 2009 and seems to relate to surveys etc. conducted in the Council year ending 31st March 2009 - some time before the Core Strategy was prepared.
7. SEC and others highlighted the problems of out of date information and the need for more up to date detail projections in the Core Strategy Examination. Our concern was that over-ambitious targets were increasing building densities in a way that would be damaging to the character and the heritage of the Town Centre. In responding to our

concerns that its projections were out of date, the Council said it would be updating their projections, but we are not aware work on this has commenced.

8. In summary therefore, we continue to believe that the Council's retail projections are out of date and threaten to harm to the viability, character and heritage of Ealing Metropolitan Centre. For the Core Strategy to be considered sound, more up-to-date projections of retail demand are required urgently in Ealing. These inter alia must take account of changes in:
  - Economic growth rates
  - Disposable Income
  - Consumer Debt
  - Increase in Internet Trading
  - Changing consumer behaviour with retail (especially middle & up market) concentrating into larger centres
  - The impact of the opening of the Westfield Centre. (Westfield has drawn trade from the east of the borough and Uxbridge from those who live to the west of the River Brent and it is surprising that no impact analysis has been undertaken of it.