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**WRITTEN  
REPRESENTATIONS  
TOWARDS THE  
EXAMINATION IN  
PUBLIC**

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In respect of

**THE LONDON BOROUGH  
OF EALING  
DEVELOPMENT SITES  
AND DEVELOPMENT  
MANAGEMENT  
DEVELOPMENT PLAN  
DOCUMENTS**

On behalf of

**MAYOR'S OFFICE FOR  
POLICING & CRIME  
/METROPOLITAN  
POLICE SERVICE**

CgMs Ref: JR/JNS/6359

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## **Introduction**

1.1 This statement has been prepared by CgMs on behalf of the Mayor's Office for Policing and Crime and the Metropolitan Police Service (MOPAC/MPS) who wish to make further representations in respect of the Ealing's Development Sites DPD concerning Site EAL8 – Ealing Police Station, 49-69 Uxbridge Road.

1.2 There are a number of related questions as outlined in the Draft Schedule of Matters and Issues including:

Question 2.1 – would the scale, type and distribution of the allocated sites conform to London Plan policies and be consistent with the Development / Core Strategies?

Question 2.3 – is the amount of land allocated for housing sufficient to meet the needs of the borough over the short, medium and long term?

Question 2.4 – are the location and scale of the retail, employment, mixed use allocations clearly justified?

Question 2.5 – Are the allocations deliverable and viable?

Question 3.5 – An overarching issue for Ealing is whether the development sites would revitalise Ealing Metropolitan Centre, including defining and reinforcing its character, as envisaged by the Core Strategy.

Question 3.7 EAL8 – Are the allocated uses justified / too restrictive / viable?

## **Which part of the document is unsound?**

1.3 Within the Development Sites DPD, Site EAL8: 49-69 Uxbridge Road (Ealing Police Station) is identified as being suitable for an office-led (B1a) redevelopment, including ancillary commercial uses at ground floor. Whilst

MOPAC/MPS support the allocation of this site for redevelopment, it is recommended that the site is allocated for both office and residential use. In its current form, we considered that the draft designation relating to site EAL8 Ealing Vale Police Station is unsound in that it is not consistent with National Policy as it does not allow for the possible redevelopment for housing to contribute towards housing targets.

### **Planning Policy Position**

- 1.4 The policy position below sets out the justification for including housing (in addition to office) as possible redevelopment options. The National Planning Policy Framework (NPPF) promotes the development of town centres. It states that planning policies should allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. Balanced with this is the need for housing.
- 1.5 Within Policy 51 it is stated "*local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty home strategies... They should normally approve planning applications for change to residential use and any associated development from commercial buildings where there is an identified need for additional housing in that area, provided there are not strong economic reasons why such development would be inappropriate*".
- 1.6 A further material consideration is the latest changes to the Town and Country Planning (General Permitted Development) (Amendment) (England) Order. The key changes come into force on 30 May 2013 and remove the need for planning permission on specific types of development providing the stated criteria are met. This includes permitting a change of use from offices to residential use until 30 May 2016 provided the building is in office use on 30 May 2013, or if vacant, last used as offices.
- 1.7 In January the Government invited councils to submit applications to exempt "nationally significant areas of economic activity" from the above changes. The London Borough of Ealing applied for exemptions for their designed employment

locations including Ealing Town Centre and Office Corridor as part of a joint West London Alliance submission. The Government have announced that following careful consideration of all applications for exemption, there are areas in 17 local authorities in England consisting of individual buildings, roads or zones that are exempt from new rights to convert offices to homes. They are in the City of London and the London boroughs of Camden, Islington, Hackney, Tower Hamlets, Southwark, Lambeth, Wandsworth, Westminster, Newham, and Kensington and Chelsea. Other areas are in the borough councils of Vale of the White Horse, Stevenage, Ashford (Kent), the district councils of Sevenoaks and East Hampshire, and Manchester City Council. No areas in London Borough of Ealing has not been made exempt.

- 1.8 Policy 3.3 of the London Plan further recognises the importance of increasing the housing supply across London. Part E states that boroughs should identify and seek to enable development capacity to be brought forward to meet the targets and in particular the potential to realise brownfield housing capacity through the spatial structure it provides. Table 3.1 confirms Ealing's annual average housing provision monitoring target at 890 net additional dwellings per year over the London Plan period.
- 1.9 London Plan policy 3.4 states that while taking into account the local context and character, development should optimise housing output. Development proposals which compromise this policy should be resisted. Policy 4.2 relating to offices states in section A (d) that the mayor will and boroughs and other stakeholders should seek increases in the current stock where there is authoritative, strategic and local evidence of sustained demand for office-based activities.
- 1.10 Ealing Core Strategy reaffirms the aims and targets outlined in the London Plan. The spatial vision for Ealing is set out in Policy 1.1 of the Core Strategy and highlights that by 2026, 14,000 new homes are planned in the Borough.
- 1.11 The Core Strategy (Policy 2.1) shows the site to be within the wider Uxbridge Road/ Crossrail corridor. The policy outlines how the Council will realise the potential of the Uxbridge Road/Crossrail Corridor and states that by 2026, the development of over 9,000 extra housing units (74% of the borough's total net increase in housing development) will be sought. Ealing is identified with Southall

as having the greatest potential. In addition, Policy 2.5 aims to revitalise Ealing Town Centre through the provision of (inter alia) 2,580 additional mixed tenure homes.

1.12 The site is currently located within the Ealing Town centre – a metropolitan centre. Core Strategy Policy CS13 requires employment space to be located within the CAZ or town centres. It does not state that all development in the CAZ or town centres must be employment generating nor does it preclude residential development in the CAZ or town centres.

1.13 The existing police station comprises a sui-generis use in planning terms. Policing is defined within the London Plan and Core Strategy as community service. In line with the MOPAC/MPS' Estate Strategy, the police station will only be released provided that the existing community service provision has been re-provided on sites elsewhere in the Borough or neighbouring areas. As such there would be no loss of policing. The Council have agreed this point in their response to the initial representation submitted (Ref. DS6(3)).

1.14 As the police station does not comprise a Class 'B' use there is no planning policy requirement to provide replacement employment floorspace in this location and there would be no loss in the overall provision of employment space should the site be redeveloped for housing. Therefore we recommend that alternative uses for the site should be widened from solely office uses to include housing.

1.15 The release of the site for a residential led redevelopment as part of the proposed allocation would be entirely consistent with the NPPF, London Plan and adopted Development (Core) Strategy.

### **Practical considerations**

1.16 The surrounding area encompasses a variety of land uses including residential, office, hotel and retail uses. In the response to the initial representations made by MOPAC/MPS, the Council state that "the constrained nature of the site and existing office uses make the police station unsuitable for residential development".

- 1.17 Whilst Uxbridge Road comprises a range of uses Mattock Lane which adjoins the site to the south is entirely residential. The site is also ideally suited for residential use.

### ***Redevelopment of the Wider Area***

- 1.18 There have been a number of recent planning permissions for large redevelopment scheme within the office corridor area. These are outlined below.

#### *22-24 Uxbridge Road*

- 1.19 Planning permission (LPA ref. P/2007/3971) was granted on 7<sup>th</sup> February 2008 at 22024 Uxbridge Road (opposite to the site), for demolition of building and erection of part 6,7 and 8 storey building with mezzanine floor to form 165 bed hotel with ancillary restaurant/bar and 3,815 sq m of B1 office accommodation. This included 40 parking spaces.

#### *79-89 Uxbridge Road*

- 1.20 Planning permission (LPA Ref. P/2007/1119) was granted for the demolition of the existing buildings, and the construction of part 6, 7 and 8 storey B1(A) office building 14,763 sq. m with part basement and roof top plant and equipment; and 12 car parking spaces (including 5 disabled) to rear with revised access off Uxbridge Road, 58 cycle parking spaces and landscaping.

#### *26-20 Uxbridge Road*

- 1.21 Opposite the site planning permission (LPA Ref. P/2000/3186) was granted on 13<sup>th</sup> November 2002 for erection of seven storey office building (9393 sq m floorspace)

#### *Dickens Yard*

- 1.22 Planning permission was granted (LPA Ref. P/2008/0156) on 23<sup>rd</sup> November 2009 at nearby land at Dickens Yard and the Church of Christ the Saviour and 2-12 New Broadway for demolition of a number of buildings and construction of 7 new buildings ranging from 2-12 storeys to provide maximum of 698 residential units; 9,040 sq m retail (Use Class A1/A3), 139 sq m office (Use Class B1), 920 sq m Health Spa (Use Class D2) and 325sq m community use (Use Class D1).
- 1.23 This permission was accompanied by a Listed Building Consent (LPA Ref. P/2008/0158) and Conservation Area Consent (LPA Ref. P/2008/0157) on 18<sup>th</sup> November 2008.
- 1.24 The Planning Committee Report identifies that although the scheme failed to meet all adopted residential standards, in the context of the urban location, it was considered that the accommodation would provide an acceptable living environment. This report emphasises the regeneration benefits of the scheme as its primary reason for recommending approval.

*Westel House, 32-38 Uxbridge Road*

- 1.25 Planning permission was granted in 2010 for the redevelopment (following demolition of Westel House) to provide a mixed-use development of three buildings (Block A - up to 21 storeys: 117sqm of flexible floor space (Use class A1/A3) to ground floor; first to nineteenth comprising 96 residential units and twentieth floor viewing platform; Block B - 9 storeys comprising of affordable residential units; Block C - 9 storeys plus plant comprising hotel (floorspace of 4,634 sqm) and ancillary facilities (Use class C1)) to provide a total of 129 residential units); including new landscaped public realm, children's playspace, basement car parking, cycle parking at basement level and vehicular access off Craven Road via a combined access. Alterations to west side of Craven Road to create one emergency access. Removal of two existing vehicular accesses on Uxbridge Road frontage. Provision of 10 surface parking spaces in connection with approved residential development to the north (LPA Ref. PP/2010/4585).
- 1.26 The above schemes demonstrate that this area is highly mixed and is subject to extensive redevelopment for both office and residential led mixed use scheme.



The release of the site for a residential development as part of the proposed allocation would be entirely appropriate in this location.

- 1.27 The site is excellently served by public transport and this connectivity will be significantly enhanced by the completion of Crossrail which will bring with it both increased capacity and shorter journey times. It has a PTAL rating of 6 and is therefore highly accessible.

***Response to Council's response to initial representations***

- 1.28 In the response to the initial representations made by MOPAC/MPS (Rep DS6 (2)), the Council state that "*Development Strategy DPD Policy 1.2(b) identifies the need to provide up to 90,000 sq m gross additional office floorspace in Ealing over the plan period to support the economic development of the borough and that the Employment Review recommends that Ealing town centre retain a critical mass of office floorspace that meets modern occupier requirements*". Similar comments are made in response to Rep DS6 (5).
- 1.29 Whilst this policy is acknowledged, it is considered that Core Strategy policies 2.1 and 2.5 also promote Ealing Town Centre for housing and no evidence has been put forward by the Council as to why employment-led development is preferential to a housing led or mixed use development scheme.
- 1.30 In addition, the Council state in response to DS6 (2) that "*introducing residential in between two existing office development and a theatre would not provide an acceptable level of amenity for residential units and would sterilise the potential of the site to the immediate east of the Police Station to maximise the level of office provision*". Similar comments are made in response to DS6 (5).
- 1.31 It is evident from the numerous redevelopment schemes which have recently been granted consent that the area comprises a mix of uses in close proximity to one and another and that in the context of the urban location, residential standards are more flexible and can suitable residential accommodation can still be achieved.

1.32 Within responses DS6 (4), DS6 (6), DS6 (7) and DS6 (8) the Council also refer to Policy 2.5 of the Development Strategy which seeks to define and reinforce the roles of different parts of the town centre. Whilst Policy 2.5b identifies Uxbridge Road between Ealing Broadway and West Ealing as the high quality head offices and ancillary functions area, it does not state that all other types of development are unsuitable.

1.33 In fact, Policy 2.5a states that *"to regenerate Ealing Town Centre and develop a vibrant and diverse range of new homes, shops, offices, sport and leisure and other public facilities leading to the provision of 2,580 additional mixed tenure homes up to 90,000 sq metres increased office space providing up to 6,500 potential office jobs, and up to 50,000 sqm of gross retail floor space. Development sites will be specified in the Development Sites policy document and will include:*

- *Dickens Yard;*
- *Arcadia;*
- *Lamertons;*
- *Ealing Broadway Shopping Centre; and,*
- *The office quarter along the Uxbridge Road (between Ealing Broadway and West Ealing)." Own emphasis*

1.34 It is therefore clear that residential development in the office quarter along the Uxbridge Road where site EAL8 is actually promoted by Policy 2.5a.

#### **How could the document be made sound?**

1.35 It has been demonstrated above that the release of the site for a residential led redevelopment as part of the proposed allocation would be entirely consistent

with the NPPF, London Plan and adopted Development (Core) Strategy and would be appropriate for the area given the high accessibility and mixed use nature.

1.36 The site allocation for site EAL8: 49-69 Uxbridge Road (Ealing Police Station) should be amended to refer to both residential and office development.

1.37 The following wording is preferred and would reflect the overarching policies with regard to site EAL8:

*"Office or residential-led mixed-use redevelopment, potentially including ancillary commercial uses at the lower levels".*

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