

## MATTER 3: SITE SPECIFIC ISSUES FOR DEVELOPMENT SITES DPD

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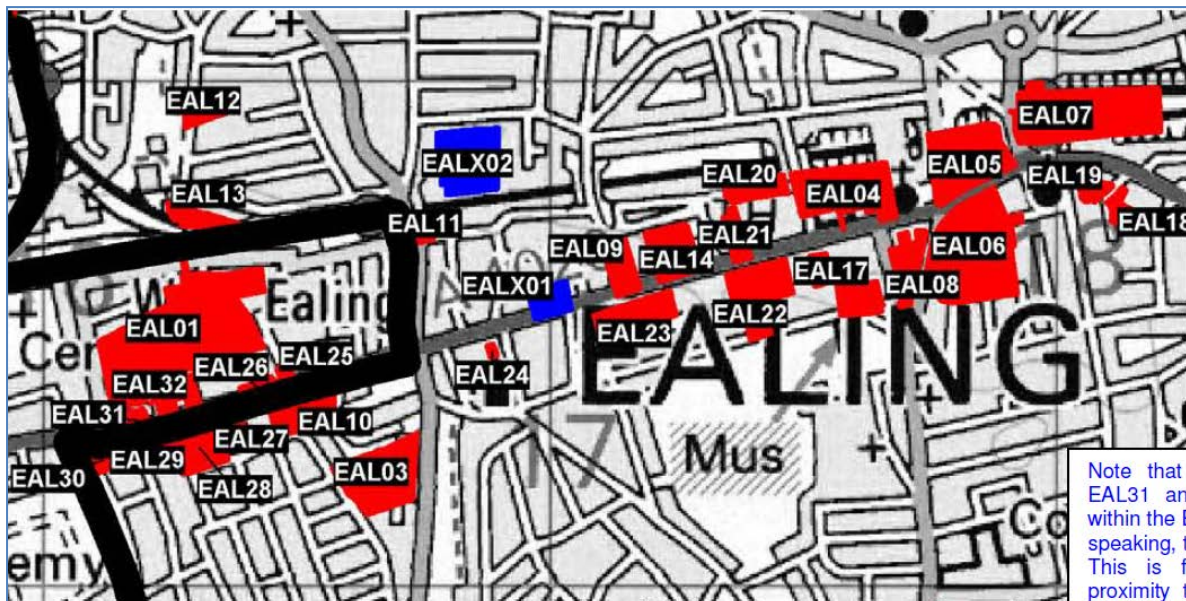
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**Matter 3.5: Area 2 Ealing: An overarching issue for Ealing is whether the development sites would revitalise Ealing Metropolitan Centre, including defining and reinforcing its character, as envisaged by the CS.**

1. The Core Strategy identifies Ealing Town Centre as one of the locations within the Borough that will face the greatest change. Major land uses are to be intensified and there is a particularly ambitious home building programme. In the next 14 years the CS expects the town centre to add:
  - 2,580 new homes, (5,000+ pop)
  - 90,000m<sup>2</sup> new office space - up 50%
  - Up to 50,000m<sup>2</sup> new shopping space - up 50%

But despite repeated requests by SEC and others (see our response to Matter 1) the Sites document adds no further thinking to the Core Strategy's aim of revitalising Ealing Town Centre through its wholesale redevelopment.

2. A map showing the extent of redevelopment envisaged does not appear in the present Sites document but the 2010 Consultation document below gives an idea what is envisaged. It includes most of the major commercial sites in the town centre.



3. SEC believes redevelopment on such a scale ought not be contemplated in a policy vacuum. Required are a Vision, strategy, goals and priorities that underpin planning decisions for individual sites by pulling together higher level questions surrounding the future role of the Town Centre, its economy, its land uses, the built environment and its heritage, transport, and social infrastructure. As the NPPF puts it, the Local Plan must address 'the spatial implications of economic, social and environmental change'. The Local Plan does not do this, and the outcome will be development that is unsustainable because the individual elements will not work together.

4. Such a spatial planning approach has been a fundamental tenet of the planning system at least since 2004. The NPPF for example requires local planning to *'seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued'*. Thinking of this kind is not evident in Ealing.
5. While the scale of what is contemplated in Ealing Town Centre, is one reason why an over-arching planning framework is required, wider changes have begun to exert themselves, many in quite a negative way, and they too need a planning response. It is worth considering briefly some of them here.
6. Until about 10 years ago Ealing was considered a successful Metropolitan Town Centre - one in fact that was in danger of 'overheating'. Since that time, there has been a loss of major retailers, including many familiar high street names and the last two of Ealing's Department stores. In their place discount and charity stores have expanded together with vacant premises.
7. During this time, Ealing's last two cinemas have closed, one now provides new housing and office space but for the past 3 years the other has been just a vacant site with a multi-storey relic at the front of it - a nagging reminder of Ealing's happier days.
8. Additional competition from the giant Westfield shopping centre a few miles to the east in Shepherd's Bush has had a significant part to play, but as Mary Portas has described in her report on the health of Britain's High Streets, there are wider changes in shopping behaviour and in the economy as a whole are occurring. Portas encourages the formation of Town Teams that include the surrounding community as a way to manage change in our High Streets. Unfortunately, there is no clear policy response to these kinds of issues – at least none that is reflected in the planning documents that are the subject to this Examination.
9. Crossrail is another major driver of change in our Town Centre. This major infrastructure project will significantly enhance Ealing's accessibility to Heathrow airport, Central London and Docklands and Ealing Broadway Station's role as a major transport interchange will grow beyond its important role now. Most unfortunately, even at this late stage in the scheme's design, Crossrail has not revealed predicted passenger numbers, but SEC's understanding is that the redeveloped station is being designed to provide a 70% growth in capacity.
10. How will Crossrail impact on the Town Centre and the way that it works. Reports like GVA's Crossrail Property Impact Study (Annex 1) suggest there will be new investor interest in the Metropolitan Centre, and major property companies including Land Securities and British Land are establishing themselves here. However, the documents that make up the Local Plan are frustratingly silent about what the Planning Authority thinks.
11. Some of likely scenarios and the questions they raise include:
  - Increased pressures for site redevelopment in which developers will understandably wish to maximise the size of their development. To what extent will the Council wish to go along with this and to what extent will it aim to protect key heritage assets? The sites document offers very little guidance.
  - Greatly increased pressures on the local transport network – buses, kiss and ride, cycle parking. How and where is this to be accommodated?

- Increased demand by UK and foreign businesses for bed space – both hotels and flats. To what extent is it desirable to meet this demand and how will it impact on provision of affordable housing for local people?
  - Improved accessibility will change the local economy but in ways that have not been clearly identified. Easier access to Central London might cause more custom to be diverted away from Ealing as it already has to Westfield. On the other hand Ealing will be accessible to more customers so what can be done to attract them?
12. In summary then, national, regional and local forces are coming together in a way that will make Ealing a very different place by the end of the plan period to what it is now.
13. The great changes confronting the Metropolitan Centre need managing to reflect and build upon the things that make Ealing special. Not the least of these is Ealing's historic and cultural heritage which are assets of much more than merely local importance. This was acknowledged in 2009 by the then Secretary of State when she called in the Arcadia planning application, and by her successor when he accepted the findings of the Inspector at the Arcadia Inquiry (Annex 2) and withdrew the planning consent the planning authority had granted.
14. Considering the scale of redevelopment the Council is anticipating, the Council should have undertaken an assessment of the local character and context of the town centre to provide a framework for planning individual sites.
15. This is a major topic area that the two Neighbourhood Forums have started to grapple with and now is not the place for me to anticipate their conclusions. Nevertheless, in his evidence to the Arcadia Inquiry, Ealing resident Sir Peter Hall, sought to put his finger on what he felt made Ealing unique (Annex 3). It is worth contemplating his comments which are made with great clarity:

*'A key feature of Ealing Broadway is the scale of the conservation areas that surround the central commercial area, stretching generally for about one mile or more in all directions, which characterise Victorian and Edwardian Ealing and support its well-known claim to be the "Queen of the Suburbs". Of course, Ealing is not absolutely unique in this respect. Other London suburbs, built at the same time around train stations, have some of the same qualities. But Ealing is arguably unique in the scale and coherence of these suburban areas, and in the limited degree to which they have been altered over a century and more since they were built.'*

16. So it is unfortunate that the proposals in the sites document have been drawn up with little regard for Ealing's unique and special characteristics. The approach has not been in line with the NPPF which requires planning to *'have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment'*. I look at some of the implications of this oversight in the consideration below of individual sites.
17. Finally however, under Matter 3.5, I should note that the CS acknowledged the need to prepare an overall Town Centre strategy. Page 34 notes that two studies in 2008 and 2010, by the Council's consultants Tibbalds *'will help guide and inform the development of the town centre over the plan period and the council intends to use it as the basis of a separate supplementary planning document that will be adopted in due course'*. Although the two Neighbourhood Forums are trying to put together their versions of such documents and despite the many major sites that are before this Examination, the Council seems to have made no start in preparing its own SPD.

18. The Council dismissed concerns I expressed in SEC's response to the 2012 Sites consultation about the absence of a town centre strategy. It said (see eg its response to our representation on EAL3) that the two Tibbalds studies served the purpose. It is important to say that after an initial public meeting in 2007, the outcome of which was never reported, there has been no communication with the community about the two reports and no consultation on them. The status of the reports is anyway uncertain. Not only does the CS say that they will form an input into some future SPD, but they have never been adopted by the Council - a fact that is emphasised on the website where the reports appear. As I say in my comments on the Cinema Site (EAL6), the Council tends to use the reports selectively, rather than as a starting point that an area based strategy should provide.

### ***Matter 3.7: Additional site specific matters***

#### **EAL2. Ealing Broadway Crossrail Station:**

19. Crossrail will have a massive impact on the Metropolitan Town Centre as a whole, and the Haven Green area in particular. Haven Green is an important Heritage asset at the heart of the town centre. It is very ancient Common Land, the heart of the eponymous Conservation Area and it is lined on 3 sides by locally listed buildings. Any plans to redevelop the station or the adjoining eyesore that is Villiers House should consider these Heritage Assets from the outset. They should not be left to the afterthought of a planning application as the Council suggests in its response to our submission.
20. Even though work on the station may start next year, SEC has Crossrail has not released the plans or even the assumptions behind them. However we have been told that the new station will be designed to increase passenger numbers of the station, which is already seriously overcrowded by 70%. The Sites document should consider what the implications will be of the increased numbers and how best they can be managed. SEC shares the concerns of the Friends of Haven Green that without proper planning, the only way to cope with the additional numbers will be by further encroachments onto Haven Green. Serious encroachment has already occurred through the formation of a bus layby, construction of an electricity substation and new cycle hub and installation of hundreds of additional cycle stands and FoHG is challenging the legality of these. SEC fears the Council has been far too passive in its dealings with Crossrail in setting out requirements. For example, new cycle stands should be provided within the curtilage of the new station and not on Haven Green. Even now it is not too late to secure improvements through this sites document.

#### **EAL3. Arcadia Site:**

21. As we have related in Matter 1, significant history surrounds the Arcadia site, and the Inspector will no doubt assess both our comments and those of the Council in the light of that history. Our concern about the comments in this Sites document, as well as the more detailed Draft SPD, is that they have been prepared with no reference to the findings of the 3 week public Inquiry where arguments relating for example to Ealing's significant heritage assets and local character were considered in much greater detail than either of these documents do. If the conclusions of both the SoS and his Inspector are not evaluated, the important lessons learned after so much time and money was spent on them will inevitably be lost.
22. Though it is not one of the documents before this examination we should say that the Draft Arcadia SPD is still a draft and has not been adopted by the Council. SEC

commented on the draft by setting out 8 development principles for the site. (Annex 4) We consider these a clear and reasonable response, but they remain ignored by the Sites document, and have not been considered by elected members. As indicated in a recent article in the Estates Gazette, speculation remains about a high building (Annex 5). We do not think therefore that the Draft SPD provides a justification for indicating that a high building overlooking Haven Green is appropriate as the Council maintains in response to representations on the proposals in the Sites document.

23. In responding to our representation on the sites document the Council says the impact of development on Haven Green can only be considered as part of the planning application. Such a position must be unhelpful to the relevant landowners who must be considering the future of the site, as well as the local community which fought so hard at the public inquiry to safeguard amenity of the Green for future generations. It is also not supported by the NPPF which enjoins local plans to contain a clear strategy for enhancing the natural, built and historic environment. As an historic area of Common Land that forms the heart of a Conservation Area, and one lined with locally listed buildings, Haven Green has more than its share of Heritage assets - designated and non-designated - that must be considered at the outset. This was one of the lessons from the 2009 public inquiry.

#### **EAL4. Ealing Broadway Shopping Centre.**

24. The Council responded to our representation on the Ealing Broadway Centre by referring to a review of local heritage assets. SEC has not been invited to contribute to this review, and we are concerned that, contrary to the spirit of the NPPF, the London Plan and the Council's SCI, we shall have no chance to input into it until officers have decided the fate of this key town centre development.
25. It is important therefore to be aware of some of the history of the Ealing Broadway Centre which lies at the heart of the Ealing Town Centre Conservation Area. The Centre was built following community led opposition in the 1970s to previous plans by the Council to the demolition of the town centre. Those plans were rejected after a long public inquiry and the present centre designed by the Building Design Partnership has won civic awards, and is locally listed (Annex 6). The property has recently been acquired by British Land, which presumably has an eye on its development potential in the light, perhaps of the coming of Crossrail. The Local Plan generally, and this Sites document in particular needs to consider what view the Council will take about its status and the constraints that its location and history both put on it. This will be important both for the local community which worked closely on the existing development, and for British Land which no doubt even now is running its slide rule over possible options.

#### **EAL5. Lamerton Site.**

26. LBE's response to our representation expressed uncertainty which of the indicated development principles we were questioning. Though we see it does not appear now, it was indicated during the 2011 CS Examination that this site could yield 200 new homes – a figure that was also used in the 2010 consultation on initial proposals. If this target still applies, it would be impossible to accommodate so many new homes within the fabric of the existing buildings and this means demolition of these buildings within the Conservation Area will be required. If this is the case, the site proposal needs to say what constraints are to redeveloping the site. If redevelopment is no longer envisaged this needs to be clearly stated and a new, and indicative target for the new homes that are to be provided is required.

## **EAL6. Cinema.**

27. As explained under Matter 1, the proposals for the Cinema site as set out in the draft SPD came as a surprise and were not drawn up with any sort of frontloaded local engagement. It is unclear exactly what planning approach is envisaged, as there are some quite significant differences between the draft SPD and the Invitation to tender (Annex 7) prepared and sent to developers that were drawn up at the same time. SEC has commented in detail on both documents (Annex 8) but have had no response from the Council.
28. Neither of these documents, nor the Sites document reflects adequately the significance of the listed buildings and the locally listed facades that surround the site, and what the implications are for its redevelopment. And none of the three documents make clear a requirement for the site to become the 'Cultural Quarter' which Tibbalds proposes. We have stressed elsewhere in our statement the need for more leisure and cultural activities Ealing. If it is not provided for on this site, the Local Plan must indicate where else it will go.