



**Save
Ealing's
Centre**

**5 Gordon Road
Ealing
London
W5 2AD**

Tel: 020 8997 0201

Email: willdfrench@btinternet.com

Planning Policy Team
Planning Policy
Regeneration and Property
4th Floor, Perceval House
14-16 Uxbridge Road
Ealing W5 2HL

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Dear Planning Policy Team

Ealing Cinema:
Response to Consultation by the London Borough of Ealing

Introductory comments

SEC warmly welcomes the Council efforts to secure the development of the derelict cinema which has been an eyesore at the heart of our town centre for far too long. SEC's immediate objective is that Ealing folk should once again be able to go to the cinema and they should be able to do so as soon as possible. We understand that this consultation constitutes an important step in the Council's plans to compulsorily purchase the land in order to get the development of a cinema underway.

We see that the site about which we have been consulted does not just cover the land owned by Empire Cinemas but that it extends to encompass a major part of the west side of Bond Street and has a prominent face onto Ealing Green. This makes the consultation site a highly strategic one, second only to the Arcadia in its potential impact on the town centre as a whole. So much so, that calling the consultation document 'Ealing Cinema' is likely to result in unfortunate confusion amongst the Ealing public about what is proposed. The ideas in the consultation document raise questions about much more than how best to restore a cinema to the town centre.

Legislation provides for compulsory acquisition when there is a compelling case in the public interest for taking private land into public ownership. Compulsory purchase must promote the economic, social or environmental well-being of an area, and it must involve a due process of consultation with the local community. In the light of planning policy, other objectives for Ealing town centre and the duty to safeguard Ealing's heritage, SEC is responding with this imperative in mind.

Ealing Cinema Site – Development Note

The Council's consultation document offers a good start in considering the enlarged site's potential. But first, our comments will consider the information contained in the 'Ealing Cinema Site – Development Note' that invited expressions of interest from prospective development partners as this document contains some points of planning relevance that are missing from the planning SPD consultation document.

For example, the sites in the two documents differ in some significant ways. The Development Note anticipates that development will include the row of locally listed shops on Bond Street north of the YMCA building, described as being in 'various ownership'. We note that, and do not understand why, these properties lie outside the area of the draft planning SPD. On the other hand, Flava's bar/restaurant building is included within the SPD but not the Development Note. These anomalies need rectifying and, more importantly, the rationale for including them in the two documents, and indeed, the delineation of the site as a whole, needs to be properly explained.

Under the heading 'Planning Policy', the Development Note states that the Planning Authority has long sought the comprehensive development of the site for a modern cinema. While the Council did indeed approve redevelopment of the site upon which the cinema stands, we were not previously aware of any plans to comprehensively develop the much larger area for which a developer is now being sought. The Development Note rightly says that the Ealing Metropolitan Town Centre Spatial Development Framework offers some ideas about a proposed cultural quarter for the area but the Spatial Development Framework was a consultant's report that has not been subject to public consultation and has not been formally adopted by the Council. The people of Ealing have had no opportunity to input their ideas into such a significant change in the town centre as both the National Planning Policy framework and the London Plan says they should be able to do.

Our initial view is that if it were done well and the right uses were provided, acquisition and redevelopment of some, but not all, of this site could be a catalyst in reversing Ealing town centre's long decline. Much will depend on getting the details right. With no opportunity to discuss the pros and cons of comprehensive redevelopment with the Council and with little information available about the kind of scheme that would be built on the site, it is very hard to know whether the proposals now being consulted on would be a good idea.

We are particularly unclear about the justification for including the land beyond Empire Cinemas. Neither the development note, nor the draft SPD, explains this. Our fear is that one outcome will be to increase the costs and complexity of the CPO process, and cause yet further delays in starting work on the cinema. Nothing must be allowed to get in the way of our main objective, for Ealing to have a cinema again.

We also see that the Development Note suggests the comprehensive development scheme on the site should provide for some 30-40,000 ft² of multiplex cinema floorspace and 40-50,000 ft² of A1-A5 commercial floorspace and some residential over. But these suggested uses do not appear in the draft SPD, and they pay no reference to the objective of establishing the 'Cultural Quarter' that the Tibbalds consultants recommend. As we explain below, and as Tibbalds suggest, we think the overriding priority for the larger site must be to secure a much wider range of leisure and cultural activities that help attract new visitors into

the town centre. The Development Note seems to point to a quite different outcome of expansion of retail and residential.

Comments on the Draft SPD

Moving from the Development Note to the draft SPD, we see this aims to establish a 'concept and vision' for the site and lists 10 design principles to deliver them. While welcoming some of these, SEC's initial reaction is that others are unjustified or too vague. More detail is needed to guide the development partners the Council seeks, and to show Ealing's many local stakeholders that a CPO will lead to a development that will benefit the town centre as a whole. Particular points are these:

- While they are described in the Development Note as an important element in the Council's planning strategy, the Tibbalds recommendations are not mentioned in the planning brief. This omission could lead to disagreement and confusion later on and it should be rectified.
- The Brief should be more explicit about the intended uses of the site. These should be reserved overwhelmingly for leisure and culture as Tibbalds seems to anticipate. There must be a multi screen cinema, but there are opportunities for many other activities of which there is a well-documented dearth in Ealing. The brief makes no reference to the LDF Core Strategy's requirement for there to be a comprehensive range of cultural, heritage, social, sport and leisure facilities in the town centre. If these are not to be provided in the 'cultural quarter' where will they be provided.
- It is not stated how much development the Council thinks the site can accommodate and what building heights it envisages. We would expect that the existing planning permission for redeveloping the cinema should guide overall plot ratios and heights. The justification for positioning the higher elements of the development on the south side is unclear, given the proximity of Grade I listed Pitzhanger Manor.
- Good pedestrian routes are always desirable, but we do not feel they are a high priority in this part of Ealing where the street network already provides adequate permeability. The case for a new public space in the heart of the site is not well explained. It might work successfully as an outdoor performance area, but otherwise, given the site constraints and other uses the land might be put to, its justification is unclear.
- The draft SPD should refer to the Conservation Area Appraisal and Management plans for both the Ealing Town Centre and Ealing Green Conservation Areas and what they imply for the redevelopment of the site. These are key planning documents that reflect the statutory duty of the Council to protect and enhance national heritage assets. Also missing, are references to locally listed buildings within the site, which play a very important role in establishing the character of the town centre. What are the intentions for these important buildings, bearing in mind the proposals to comprehensively redevelop the site? There will be considerable alarm about any suggestions for demolishing the row of shops north of the YMCA building.
- We do not understand why the cinema 'box' should be located in the centre of the site. Our view it should be where it already has planning consent, immediately behind the locally listed preserved facade, which should be a key component of a new scheme. The

SPD should explain that the facade was designed by John Stanley Beard in a classical idiom as a reaction against the art deco designs of the Odeon cinemas of the day and even in its existing sorry state it is locally listed and plays a unique role in establishing Ealing's identity.

- Opportunities for including the surviving arch from the Walpole Picture Theatre now stranded on the side of a Mattock Lane house also need consideration.
- We would like to see more consideration given to prospects for the locally listed YMCA building. It is well suited to social or community uses and its protected facade should be retained.

Concluding Comments – Engaging with the Ealing Community

Finally, and very importantly, we would like some idea how the Council intends to take these proposals forward. Compulsory purchase procedures require the acquiring authority to put in place a clear strategic framework for the site and one that is founded on an appropriate evidence base and has been subjected to consultation processes. We note a shortlist of three preferred developers has been drawn up, all of whom were asked to submit their outline thinking including sketch designs, and information on envisaged uses and areas. The next step should be to make these available for the public to comment on, as happened for example in the case of Dickens Yard.

Save Ealing's Centre would like to engage formally in this process. We would also like it recognised that the emerging Ealing Centre Neighbourhood Forum is the appropriate body to input stakeholder ideas into the scheme as it develops.

Best wishes



Will French
Save Ealing's Centre