

3.Matter 3-  
Site specific issues for Development Sites

Area 1-Acton 3.3/3.4 (ACT2 & 3)

Core Strategy 2.2./2.3

Regenerate Acton Town Centre/ South Acton

*(c) To improve the public domain, including the market square at The Mount, King Street, High Street and Churchfield Road and ensure that design has proper regard to the conservation area and listed building designations throughout the town centre.*

*(d)To make improved public transport, pedestrian and cycling and urban realm enhancements*

*including improvement of pedestrian and cycle access to and from South Acton Estate and the retention of existing levels of town centre parking in Acton.*

Basically I think there should be a more holistic approach to the regeneration of Acton Town centre and South Acton. In 2009 the Council underwent a Regeneration Programme for Shop Improvements for Acton Town Centre with very laudable goals (Appendix A) and so far there is little evidence of anything being achieved especially along the High Street.



The Acton Town Centre Conservation Area Management Plan (2009) also outlined the main problems. (Appendix B).There was also a Vision for Acton produced in 2002.

In my submission re ACT 2 (65-70) I think I made a reasoned argument why the proposed development was not suitable for the site and like many of the sites proposed in town centres there was an emphasis on it being a gateway and the possibility of residential units. The Market Square has been 'improved' at least twice in the past ten years.

My approach would be the Jane Jacobs approach in that before any development occurs in a town centre that there is a move to utilise all the space above shops (there are many empty floors above shops in Acton) and that there should be smaller 'in fill' developments. I have seen only one of the latter in Hanwell (Conservation Area) and it worked very well except that it was never quite finished according to the plan.



The fascia board was never put up and the owner decided to plaster the window with advertising.

There has been a lot of improvement in the shopping area along Churchfield Road near the restored Acton Central station and the frontages there could be used to illustrate what can be achieved.

This area is also in the Conservation Area and near ACT3 –THE Oaks Shopping Centre.

I did not comment on this site as there was an ongoing application for development on this site. However the 2011 application has been withdrawn and there is a current one pending-PP/2013/3154-part of which is for an 11 storey block on a former burial ground.

Does it abide to the site design principles?

*'Successfully integration will depend on an innovative and creative layout that responds to size and structure of existing blocks within the town centre to avoid a monolithic and incongruous development.'*

I think that Acton Town Centre could be revitalised if more flats above shops (London Plan 2.72' *there is scope to bring redundant offices or under used space above shops into more active uses ,especially housing'*.) were occupied and more emphasis was placed on improving the townscape especially the shopfronts.

Large scale development is unnecessary.

Personally I think the whole of Acton could be revitalised if a radical new approach to South Acton was instigated. Various ideas have been mooted over the years but since there have been vast improvements to the London Overground it is even more important now that there should be easy access to South Acton Station from the High Street and Acton Town Station.

Access is dependent on a completely different layout to the South Acton Estate. I did comment briefly on the estate at the time of the Core Strategy consultation but since then the Policy Exchange has produced a document-Create Streets (January 2013 and more quotes in Matter 5) that reiterates improvement ideas concerning council estates and high rising living that were first mooted in the early 70s by Oscar Newman i.e. tower blocks are not suitable for families and that the same density could be achieved using low rise.

If the Create Streets ideas were applied to South Acton there would be a series of streets not blocks and therefore the streets could be integrated into the town centre. The number of habitable rooms would remain the same.

Core Strategy 2.2 (d) mentions only cycling and pedestrian access to South Acton but I have never understood why there cannot be a bus that links various parts of Acton to the Overground-South Acton & Acton Central. In East London there are bus routes with smaller buses that can go down narrower streets. Originally the Core Strategy mentioned the West London Orbital, an underground line linking the NW to the SW, but this was cancelled by the Mayor in favour of the Overground.

Matter 3.Area 2-Ealing

3.5

Core Strategy 2.5.Regenerate Ealing Town centre

Sections (a) to (e)

I don't think the development sites proposed will revitalise Ealing Metropolitan Centre (not including W.Ealing) as there is too much emphasis on providing additional homes and office space. In fact there are only really 3 sites that should be included in the Central Area -EAL3-Arcadia, EAL5-Lamertons and EAL6-The Cinema Site. It is unlikely that the site -EAL4-Ealing Broadway Centre will have any major changes made to it within the time scale of the Core Strategy.

If one looks at the AMR report for 2011-2012-Ealing Metropolitan Town Centre re 'the programme of projects was established for Central Ealing, the aims being to improve the vitality of the town centre to make it a better place to live, work, visit and shop' all that seems to have happened, as usual, is new paving and the odd new shopfront.

However what it fails to mention is that numerous shopfronts have also been put in that don't abide by Shopfront Guidance, none of the Dickens Yard retail units have opened and we still don't have a cinema.

Most of the locally listed Edwardian shopping parades (in the Conservation Areas) still have a mish mash of frontages despite the fact that some of them have been recently put in. This is despite numerous objections to shopfront applications and examples given of where best practice is achieved in other boroughs like Westminster and Richmond.

Virtually every idea put forward to revitalise the town centre by Council officers in the Ealing Metropolitan Area is small scale and frequently unsuccessful. The most recent example was a pop up market outside the Town Hall on a Saturday where, on a weekend the footfall is negligible, other than weddings, and some of the stalls fell in the road. Not a great success.

Great emphasis is put on the Summer Comedy and Jazz festival but that only lasts for a couple of weeks and Pitzhanger Manor and Gallery is not exactly buzzing with cultural activities.

Ealing cannot compete with Westfield and so there should be a drastic change in approach to retail and the emphasis should be put on regenerating Ealing's heritage- both built and cultural- by providing facilities other than just shops so people will be encouraged to visit the Town Centre.

In this respect there are only 3 sites available for this purpose but judging by the application for part of the Arcadia site we seem to be going down the budget retail route i.e.TK Maxx, Morrison's and a McDonalds not unlike the Broadway Centre.

I would like to point out that I thought it was rather pedantic of the planning dept. just to dismiss my comments re EAL3 just because I used the SPD on the site as a guide.

I think the ideas I presented for the Lamertons site (EAL5.DS58-32-36) and the Cinema site (DS58-32-36) are quite achievable but they were not accepted.

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Rep.no.DS 58  
Matter Three  
Area 2 Ealing

### 3.6

Personally I think there should be a more holistic approach to W.Ealing. There have been a few recent 'fill in' developments-the flats above Cudi, the flats above Iceland, 9 units next to the Grosvenor Clinic and Aviation Court. Slightly earlier ones (UDP sites) are the flats above Wilkinson's (former M&S building) and Lido House (a former cinema). Unfortunately all these developments have included white or cream render, with the odd bit of grey or black paint, and have not used the brick vernacular. The use of white render in such a polluted area has meant that after about three years the white render goes grey and the developments appear grubby and unmaintained.

There are numerous empty flats above the shops that could be converted into 1 or 2 bedroom flats and this would mean a possibility of having much needed larger units being built in other developments.

There are also two Locally Listed parades in W.Ealing that could provide a more vibrant and interesting focus if they were improved.



I doubt if the infrastructure can cope with new development but I will leave that matter to local residents' groups who will have up to date figures.

Matter Three-Area 2-Ealing

3.7 EAL3

Do the design principles take sufficient account of non-designated heritage assets?  
Demolition?

AMR 2011-2012re the Arcadia site

*... The Council has been closely working with the administrators and interested developers to encourage a comprehensive scheme to come forward for the whole site. The site has a new owner, Benson Elliott, but no planning application or detailed proposal has been submitted yet. The Council published the Draft Arcadia site SPD Document for consultation in July/August 2012.'*

I would like to point out that I used the Executive summary in the SPD to base my comments on EAL3 which I thought was quite a suitable document on which to base my comments. The Council said there was no Executive Summary but the document is in the Evidence Base BS25. I have therefore attached my original comment ( Appendix1)-as it mentions non-designated heritage assets that appear in the Conservation Area Appraisal.

I would also point out that the Council does not hold in high regard Locally Listed buildings judging by what has been allowed to happen to Locally Listed buildings and parades. The Broadway Centre does not appear on any Council maps as Locally Listed.

*The SPD 'establishes a concept and a vision for the Arcadia Site that includes .comprehensive redevelopment'*

However we seem to be going down the piecemeal approach and there is an application due for consideration (consultation date end 20/4) for 1-8 The Broadway the Arcadia Centre.

I have attached a section of the objection letter I submitted because it deals with Heritage Assets and what could be termed non designated heritage assets.  
(Appendix 2)

I am afraid both appendices are quite lengthy.

Matter 3 Area 6  
3.14-01S8

I have pasted this from a Matter 5 issue as it concerns St Bernard's Hospital and what might happen on the site. However I have learnt recently of various other aspects connected to the site and I have added them as a post script

'So in answering various Matters and Issues I am using the example of Site 01S8 (St.Bernard's Hospital) as an example. The applications for various developments on this site were recently passed by the Planning Committee but it is due to go before the Mayor for consideration. Both the Core Strategy and the Draft DM DPD were quoted in the documentation. The applications that I am going to comment on are P/2012/5040 & PP/2012/4008. I did not comment on the application before the Committee meeting because there is just too much documentation to peruse.

The site document (01S8) states that-'The revised layout of the site and any new building will be expected to be high quality'.

However the GLA has concerns about the layout of Block 3 in P/2012/5040 and the Council's own words re P/2012/4008 are that the layout is acceptable i.e. acceptable rather than high quality.

There is a section in the site document after affordable housing re residential units (I think this section should have been put with layout) re north facing single aspect units. From the plans I would say some of the units are north facing single aspect.

Affordable Housing-3A and viability

Basically my belief is that because, in a majority of cases, development is developer led, new developments will never have 50% provision of affordable housing. I believe the BNP PARABIS report for LBE in 2010 also said it was an ambitious target for all sites.

To repeat what I said re the Core Strategy.

I only heard about the 3 Dragons Toolkit during the Arcadia Inquiry and this time re the St Bernard's site viability is related to the historic nature of the site rather than in the case of Arcadia-rafting over the railway.

In P/2012/5040 the affordable housing element is 27.6 %.( Council figures)  
The GLA response was-'*The level of affordable housing has not yet been shown to be the maximum reasonable that can be suggested & hence compliance with the London Plan has not yet been demonstrated*'.

The GLA then goes on to say that in fact-'the net level of affordable housing is therefore only 37 units (13.5%) which is considered a low level of provision.

With regard to the other application for the site PP/2012/4008 the GLA also raised concerns with regard to the level of affordable housing and residential mix.

Protection and enhancement of Grade II Listed Heritage Assets were cited in the viability assessment.



The Council has asked for there to be a provision of affordable housing to be provided through a registered provider. What this actually means I don't really know- various registered landlords, housing associations, where? No mention of an actual financial contribution.

I would therefore ask- will 50% ever be managed on any of the sites?  
I did inquire at the Core Strategy hearing that given the numerous 9 unit developments that have appeared in the borough, would it be possible for smaller developments to give a financial contribution to affordable housing. I was told-no. However Richmond has such a scheme (Appendix A).

#### Open space using the St Bernard's applications as examples

I used examples in my Core Strategy submissions from recent developments with regard to lack of open space but these recent applications also demonstrate the underprovision of private usable amenity space and playspace. These two applications represent over 500 units and although there are some communal areas the residents are expected to use the public open space (across a busy road) where supposedly the £60,000 of S106 money will be invested. The underprovision of playspace amounts to a contribution of £75,000. But where will the playspace be? It should be on site.

My problem with Policy 7D is that developers can justify a shortfall by paying a financial contribution.

#### Cycling & Parking on this site

This has not been raised in Matters and Issues as a specific policy query but I will also put it under 5.2.

I still maintain that Ealing should have a local policy with regard to cycling and parking, at least Richmond admits that people own cars.  
I have already mentioned in an earlier submission (not accepted) that cycle provision standards are extremely high. There are going to be 842 cycle racks on this site.

I don't think that such statements such as *'The Travel Plan should include measures to discourage car ownership'* are going to be very effective and as the Transport department points out-*'The proposed reduction in parking provision may create displacement issues.'* The approach to the latter seems to be to set up a local CPZ- not ideal.

#### General points on this site which I will later quote under other headings.

#### Affordable and key worker housing

These applications sum up what will be the weaknesses of the Core Strategy combined with the DM DPD and the Sites document.  
The developer, not the Council, has decided the residential mix and what constitutes amenity space/open space and community space (the ballroom becomes a gym).

The site document states that both affordable housing in addition to key worker housing should be provided in both the new and converted buildings. When the whole site was a mental hospital (early 80s) many of the staff lived on site and staff accommodation for the adjacent hospital (Ealing Hospital) was also nearby and I don't quite see why the whole site could not be a combination of keyworker housing, affordable housing and community facilities given that many of the staff in the hospitals are some of the lowest paid people in the borough. There are also many schools nearby and I believe that teachers are eligible for key worker housing.

#### The timescale for building on the St Bernard's site

This was a question to the Council from the Inspector with regard to monitoring.

Not only do the applications have to be accepted by The Mayor but there are also 74 conditions, in all, attached to both applications.

#### Post script-

I have since learnt that the energy centre is going to be near the hospice-an area which used to house the garden centre that was used for therapy purposes. The garden centre has now moved to Horsenden Hill which is impossible to get to by public transport.

Art and Music therapy now have to operate in the same room as their individual premises have been set aside for future residential development. None of these issues are acceptable.

who alter their existing shopfronts without planning permission.

The Council will therefore pay special attention to applications to alter or develop these commercial frontages and will ensure that proposals are high in overall quality and make a positive contribution to the character and appearance of the CA. All changes will also have to adhere to the Council's Shopfront Guidance leaflet.

At the moment the Council is undergoing a **Regeneration Programme for Shop Improvements for Acton Town Centre**. The LBE has appointed consultants to undertake an assessment of the potential to improve individual properties, blocks or groups of properties in the above named town centres. The assessment should be based on the need for and the potential impact of improving shops - façades and frontages.

Consultants will draw up / confirm the specific criteria to be used to shortlist properties in their experience that will provide the greatest impact within the town centres for the amount of investment required. These may include:

- Locally listed buildings – or buildings of architectural and historic importance
- Properties that would create maximum visual/ townscape impact (in addition to any landmark buildings)
- Land mark buildings that could be illuminated or that have a significant impact on the town centre
- Properties in poorest state of repair
- Areas of poor street quality with potential for landscaping
- The inclusion of some shops where the owner intends to establish a high standard of quality, design or innovation which may act as an example or precedent
- Groups of buildings of façade value
- Larger properties, 2 or 3 shops in single ownership, to maximise the effective use of resources
- Properties in groups or clusters of several other improvement schemes to maximise impact
- Variety of different trades or shop types
- Properties where the owner or tenant expressed an interest in improvement

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- 9) Where possible, the Council recommends pre-application consultation. Planning Services and applicants may thus work jointly to produce schemes that are successful and high in quality. Experience has demonstrated that advance work of this sort is the most effective and efficient way of preparing applications.

## 5. Preservation and enhancement

### 5.1. Understanding the asset

The Character Appraisal of which this Management Plan forms a part is central to understanding the Acton Town Centre CA and its future needs. As a result of the appraisal process, including the public consultation exercise, the aspects of the area that are under the most threat have been identified and a number of negative features, which need to be addressed in this Management Plan, identified. These are as follows:

#### Spatial:

- Busy traffic dominates the main roads and junctions, exasperated by the mainly cluttered pavements
- Use of utilitarian materials such as concrete slabs
- Areas of very poor paving with disturbed street surfaces
- Dominant street "clutter" e.g. service boxes, redundant railings, signage etc.
- Back land areas and gap sites that create fractures within the urban grain
- Poor connectivity
- Poor western and eastern approaches to the CA from the Steyne Junction and the Raylway Bridge respectively.
- Unattractive advertising boarding
- Loss of front garden trees and fences

#### Buildings:

- Poor condition of some of the buildings in the CA
- Poor quality later developments that are not sympathetic with earlier and valuable architectural remains

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- Poorly designed shopfronts and uncoordinated and redundant street furniture
- Very poor quality shopfronts displaying the following negatives features:
  - Over-deep fascias
  - Garish colours
  - Shopfronts in need of repair
  - Dominant and poor quality lighting
  - Unattractive signage
  -
- Poor quality extensions and alterations generally
- Satellite dishes on many front elevations
- Many buildings in need of repair and require restoration of lost architectural features such as coricing, windows, and doors
- Poor quality roofing materials, such as concrete tiles, have replaced the original natural slate or tile roofs

## 5.2. Maintaining quality

The Council's attention to quality in the Acton Town Centre CA will be maintained through its contribution to the following elements of development and alteration.

### 1) Quality of applications

In line with PPG15 the Council will not accept outline applications for proposals in CAs. Full applications will be required to be supported by properly drafted, accurate, scale drawings with plans, sections and elevations. In many cases for large schemes the Council will also expect analytical drawings, showing proposals in context, either through streetscape sections or three-dimensional images.

### 2) Quality of materials

The Council will, where possible, require that materials proposed are submitted as part of an application and not as a Condition.

### 3) Details

Where appropriate to aid in the assessment of an application, the Council may require the submission of large-scale construction detail drawings. This enables officers to check the quality of what is proposed and ensure that on site design is not left to the builder.

London Borough of Ealing  
Local Developments Framework  
Development Sites

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Appendix 1. P. 1

Part A

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Part B

Site EAL3 Arcadia p.32

6. the plan is not deliverable or flexible

Firstly I would like to say that many people find it confusing that this site is called Arcadia. The actual Arcadia Shopping Centre is only a small part of the site and during the Arcadia/Glenkerrin Inquiry many members of the public did not realise that it was a major development plan that covered a large site.

I believe the plan is not deliverable or flexible in that what is set out in the Executive Summary is not necessarily what a developer will choose to submit given the expense of buying the land.

Justification-

Basically the justification states what is blindingly obvious about the characteristics of the site re retail and reiterates roughly what is in the Conservation Area Character Appraisal document re architecture but fails to mention 'a few fine remains of the earlier grain. Particularly noticeable are nos 15-16 and no 14. The latter in particular is a little gem'. I have attached the Mapping for Change map that shows the Locally Listed buildings around the south east corner and the proximity of Listed Buildings.

Executive Summary

Focus on the delivery of high quality retail uses.

The Broadway Centre has been criticised for its lack of larger retail units and Dickens Yard will have relatively small retail units and therefore the only site left for larger retail units is the Arcadia site.  
No large units were planned in the Glenkerrin Arcadia proposed development.

The photographic examples in the Arcadia SPD- Figure 2.1 look remarkably like the ones used for Dickens Yard i.e. smallish units with residential above.

The photographs, as examples, would also imply that, like Dickens Yard development, one is shopping in an open environment. I would question whether or not this is advisable given that one of the attractions of Westfield is that one shops under cover.

To me the solution would be to attract a major department store, like John Lewis, and create a shopping area not unlike the one at Kingston. Sometimes, as in other cities, department stores have two buildings linked by an overhead walkway therefore enabling there to be a diagonal street from the station to the Broadway.

Principle 4 and Principle 13 would seem to be at odds with each other, 4 would seem to imply an open space to replace the 'impermeable block' on the north-east corner yet principle 13 suggests that any new tall or landmark building should be located in the north east corner. The latter has echoes of what was eventually block F of the Glenkkerin plan and was said by the Planning Inspector to not be suitable for the site.

Tall building-yet more confusion. In the SPD Villiers House is marked on the map as a taller building yet in the site document for Ealing Broadway Station a suggestion is made for its demolition.

A developer could currently use Villiers House as a template for height but perhaps in a year or two it will not be there.

My suggestion would be to have no residential units on the site at all as residential units will create problems of lack of amenity space, parking and other facilities.

Major department stores, larger retail units, leisure, health and community uses would seem far more appropriate.

I would also like part of the Ealing Broadway Station transport interchange be included on the site.

8.I wish to participate at the oral examination.

9.I believe alternative suggestions should be made for uses on the site and that the Conservation areas and Listed and Locally Listed buildings involved should be mapped in more detail.

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**mapping for change**

Community Mapping

Mapping for Change Community Maps

**Ealing**  
Ealing local gems and listed buildings

**On the map**  
Please use the check boxes to switch data on and off.

- All Layers
- Local Gems
- Locally Listed Buildings
- Statutorily Listed Buildings

Nationally and locally listed buildings in the London Borough of Ealing and those submitted for local listing in 2011 can be found within the **Local Gems** layer.  
To find out more visit [Ealing Civic Society](#).

Maps developed and hosted by **Mapping for Change** Save The Map Site Map Accessibility Statement  
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Appendix 2  
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Heritage Statement and Design

In the Heritage statement from the applicant it states that

*.....'with the exterior mimicking the red brick, slate roofed Ealing vernacular'*

The Broadway Centre is also red brick and has actually worn very well. Its main problem is the size of the units now needed, not the actual design. The design uses traditional materials suited to the Conservation Area in which it stands, it is not mimicry. The Broadway Centre is also Locally Listed.



*The Broadway centre south side.*

The London Plan 7.31 states that

*'Heritage Assets such as conservation areas make a significant contribution to local character and should be protected from inappropriate development that is not sympathetic in terms of scale, materials, details and form.'*

NPPF, as quoted in the applicants Heritage statement-

*'It sustains or enhances the significance of a heritage asset and the contribution of its setting.*

*It is an appropriate design for its context and makes a positive contribution to the appearance, character, quality and local distinctiveness of the historic environment.'*

Not only is the Arcadia Site in a Conservation Area it is opposite the Listed building of Christ the Saviour which unfortunately is already dominated by the marketing suite for Dickens Yard (this eyesore could be in situ for another five years).

I believe the application contravenes these policies and the proposed design neither improves the setting of the listed Church or the Conservation Area as a whole.

7.5.2 Heritage statement-'The tacky clock tower' is now to be replaced by a tacky clock (Appendix A) and we are to be presented with double height slightly framed glazing that is completely unsuitable for the Conservation Area (Appendix B). However the applicant draws our attention to a photo of Ealing Broadway in 1907 (Appendix C) and mentions 'Note the two storey display shopfronts'. This is an

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P.2.

absolutely ridiculous comparison. The 1907 windows are relatively small with intricate framework.

Tk Maxx, although an excellent store, is not noted for its window displays and does not require enormous windows.

In Brighton Tk Maxx is carefully renovating a corner building of a similar vintage to Sayers. The windows are of a similar design to those of the windows in the 1907 photo of Ealing.



What will be the new TK Maxx in Brighton

Why the rather beautiful building of Bentalls (1960 photo) was pulled down one will never know. Many department stores of a similar design still remain in many town centres today.

However by illustrating what the streetscape was like in 1907 the applicant has shown that another solution would be possible. It would not have to be a pastiche but with a clever use of traditional materials and smaller windows the site could be developed with a design more in keeping with the Conservation Area.

The LDF SPD for the site does not mention that there are a few Edwardian/Victorian buildings of note in The Broadway

*'Particularly noticeable are nos 15-16 and No 14. The latter in particular is a little gem...No 9 is also interesting with its curved aspect on its west side.'*

Ealing Town Centre Conservation Area. Character Appraisal.

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The shops illustrated are in The Broadway (North side) and are part of the original Victorian/Edwardian fabric. The Poundkingdom signage has now gone and Jessops is now closed, soon to be a Harris and Hoole (another loss of retail) Tesco's answer to Costa and Starbucks-an 'artisan' coffee shop.

I do not think the proposed facades are appropriate and they are certainly not 'an appropriate contemporary interpretation of craftsmanship and decoration of local heritage.' (7.5.3. Heritage Statement).

There are already acres of plate glass in the Broadway Centre and there will be in Dickens Yard and so it is important that the windows are smaller and reflect the designs of the Edwardian/Victorian period.

I find little craftsmanship contained within the design, especially compared with the Broadway Centre, and the overall impression is of something built in the 70s at the Elephant & Castle that has subsequently been pulled down.

The refurbished site (a rather vague interpretation of the word refurbish) will not provide a high quality frontage that includes a well detailed, contemporary-styled corner in a key town centre.

Re heritage assets and design, I believe this application contravenes policies as stated in  
The NPPF, The London Plan, UDP 4.1

#### In Conclusion

I would ask the Council to reject the application and ask the developers to produce a plan both for the site and its uses more in keeping with a Metropolitan Town Centre in a Conservation Area.

Yours sincerely

Susan New

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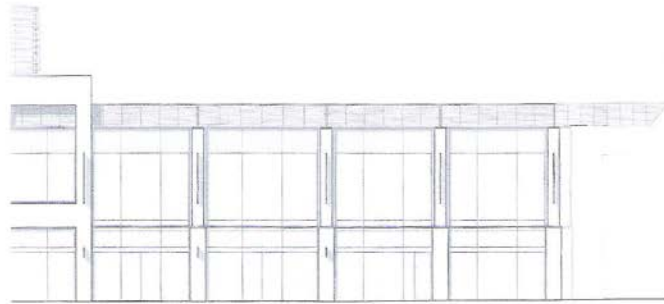
Appendix A



View of 43 The Quadrant after the proposed redevelopment, showing the new 'Corner' entrance, glass and brick chimney stack and street scene.

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Appendix B



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Appendix C

