

**ED 4 Matter 4**  
**Representor DS 40**  
**Ealing Civic Society**

**ED4. MATTER 4 – DO THE ALLOCATIONS IN THE DEVELOPMENT  
SITES DPD REPRESENT THE MOST APPROPRIATE STRATEGY  
IN THE CIRCUMSTANCES?**

**4.1 Are the alternative proposals that have been put forward in  
representations appropriate and deliverable? Have they been subject  
to sustainability appraisal compatible with that for the Site  
Allocations DPD and to public consultation?**

**4.1a EAL 3 Arcadia DS40(34) DS18(2) The Victorian Society** considers that the Arcadia site has historic buildings of architectural merit identified and recommends they are retained in any redevelopment. ECS support this because it gives an opportunity to develop the part of the site not occupied by the Arcadia Centre to be redeveloped with a varied and interesting frontage. This site has been subject to a range of public consultations including SEC. But the Arcadia Site SPD does not seem to reflect views expressed.

**DS20 (1) New site – Triangle west of Land at Glade Lane** A2 Dominion own the freehold of this site. We object to this proposal ( the available documents are not clear where the land is). Representations DS20 (2) –(21) appears to refer to the same site as (1), shown in the Initial Proposals 2010 as SOU 17. We understood some or all of this land was part of the original housing application and was to be landscaped as a buffer zone between housing and noisy industry and to compensate for lack of garden space in the housing layout. The original planning application is Appendix 4.1.

It is part of the nature conservation site identified in the survey update carried out by GLA/ Ealing Council in 2007 as EAL38 and called Whittle Road Park with neutral grassland allowed to grow long to benefit wildlife. It backs onto Maypole dock( part of the Grand Union Canal, a Site of Metropolitan Importance) which enhances its value for invertebrates. There was free public access.

Southall lacks POS and nature conservation sites and this site, if access is restored, can act as a through route from adjoining housing and areas of employment.

In the Atlas of map changes shows **PM20/15 Glade Lane Canalside Park** It seems unacceptable for there to be unused open land when the area to the west in Southall is deficient in POS and it has nature conservation value.

**DS40 (37) EAL 3 Arcadia** The car park part of the site is north of the railway and can only be developed if the railway is bridged over. This was not viable because high buildings needed to finance it would have damaged the amenity of Haven Green. The car park was provided for Villiers House EAL2 which is likely to be demolished The parking area is the only land adjacent to Haven Green that could be used to compensate for the Common land taken by Ealing Council for a cycling hub.

**DS40(35)** ECS's proposal to increase the size of Haven Green to compensate for the loss of land to bus bays and the cycle Hub is rejected by the Council. but neither the Green Space Strategy, (GSS) the CS nor the DS doc contain any proposals to create

publicly accessible open space. It is unsound for the Council to neither carry out its legal obligations to replace common land nor to take the opportunity to increase the size of this small local park which is so well used ( see the Green Space Strategy).

The GSS has the following overarching outcomes:

- To improve the overall quality of current provision of open spaces within the borough by having no poor quality sites as defined in the quality assessment overall scoring;
- To create wherever possible new publicly accessible open space in areas identified as deficient in open space through effective use of planning powers and obligations;
- To improve accessibility to existing and new open spaces through effective use of transport links, creation of green chains, new entrance points and opening up of suitable restricted access open spaces;
- To prioritise public safety in parks through designing out crime introducing CCTV where feasible and working collaboratively with partners, contractors and residents;
- To maximise external funding opportunities arising from planning obligations benefits, lottery applications, partnership funding and any other opportunistic funding that supports the strategic aims and action plan.

Green Space Strategy prioritises spending on:

- Green Spaces that are located in areas of deficiency in Local and District Parks or Metropolitan Parks since these sites will typically face greater visitor pressure or play a more significant role where there is less other open space in the area;
- Green Spaces in wards with relatively low levels of Public Open Space provision (measured as hectares per 1,000 population);
- Green spaces in wards with low average quality (as measured through the green space audit);
- Green spaces that are currently of lower quality should be a high priority than those of a high quality standard
- Sites below 1 hectare in size should typically be excluded unless local circumstances over ride this factor.

Section 106 money should be spent on open space needed for the future residents. The Strategy projects population on a ward basis but the relevant residential applications that cause the population increase need POS within 400m.

#### **4.2 Representations about other sites will be heard in this session.**

Sites proposed in other representation that ECS wish to comment on:

**Carrolls Yard 47a Scotts Rd /Sussex Rd;** formerly SOU14 , is currently in employment use and the request is that it should become long term residential use. This is a small backland site of 0.6 ha which is likely to only be permitted as low rise residential. It seems rather small for inclusion and is unlikely to make a large contribution to housing targets.

**DS 45 (1) UK European Investment Ltd New site at West World at Westgate W5 1DT** It is important to maintain SILs. The concentration of a group of offices is more likely to attract office business that can share support facilities and already have nearby hotels and shops/restaurants. A major traffic gyratory is not an ideal location for residential use which would require open space and school places.

**DS59(i) GLA OIS8 Greenford Green** We support the designation of the southern part of the site as a SIL and assume it also includes the railway embankment.

#### **Area 6 - Other important sites-deferred from 3.13**

**Will the other important sites contribute to the CS delivery strategy?**

**Should there be an introduction to this section explaining the role and contribution of these sites to the development strategy?**

An introduction would be helpful together with maps which show sites related to town centres and sectors of the borough.

**Additional site specific matters- those deferred from 3.14 include:**

**• OIS1 – Park Royal Gateway. Are the allocated uses justified/too restrictive/viable?**

**DS40 (110)** This area is almost totally redeveloped for high buildings lacking open space, with poor quality design in a highly polluted environment on what may be described as a large traffic roundabout. The existing flats and student accommodation lack open space and community facilities and should be a centre for the Mayor's cycle ways. Park Royal suffers an open space deficiency and there is nowhere for students to exercise in fresh air nearer than Wormwood scrubs. Roof top terraces are polluted, windy and inadequate.

**• OIS2/3/4 – Is the wording sufficiently clear to ensure a balance between development and landscaping? Are the design principles clear, justified and flexible enough to be effective?**

**DS40(111-116)** The A40 sites were purchased for transport uses and adequate space is needed for separate bicycle ways and footpaths with landscaping and bunds to protect users and housing from the pollution, noise and traffic intrusion. 20m was originally selected as an appropriate width by a council landscape architect to provide enough space for separate paths, an adequate bund and tree planting. Green Corridors if implemented will make a significant improvement in the environment for drivers who at present are subject to a series of advert. hoardings on other sites along the A40 which are distractingly unsafe with a significant loss of amenity. The Council is examining opportunities for removal through enforcement action.

**• OIS5 – How long will Acton Storm Tanks be required by Thames Water? Will this site be viable/deliverable by 2021? How will cross boundary issues with Hammersmith and Fulham Council be dealt 9 with? What are the implications of the Thames Tunnel?**

**DS40(117-119)** It is not clear how much is needed for the tanks so that space left over for POS and residential is in doubt. Housing and storage tanks are not good neighbours. This is unsound if the tanks remain,

**• OIS7 – (Greenford Green formerly OIS8) - Are the allocated uses justified/too restrictive/viable?**

**DS40 (124-126)** The area south of Rockware Ave is too close to railway tracks and too steeply sloping for residential use. It is unsound to allocate land that it is unsuitable for the purpose. The GLA has requested that all land south of the canal is retained as a SIL so we assume that this area is as well.

**• OIS8 (St Bernard's Hospital formerly OIS9) - When is this scheduled by West London Mental Health NHS to become available for development? Are the allocated uses justified/too restrictive/viable?**

OIS8a DS40(127-130) The Council is minded to permit 3 applications on this site subject to direction from the GLA. Ealing Civic Society objected to all of them grounds of loss of trees and landscaping, demolition of a listed building, building three 9 storey buildings that were out of character with a unique group of listed building and an energy centre which will be very visible from POS/Conservation Area and with a 20m plus chimney stack which will pollute the air around Meadow House, a respite care centre, and Ealing Hospital. We appreciate that many listed buildings are to be renovated for residential use but the way the development has been presented in 3 separate applications with complex plans and limited consultation has concerned local people. Letters of objection are included in Appendix 4.2. The future of this current application depends upon the GLA.

OIS8b In the DS DPD We support the classification of the site as suburban and consider that PTAL of 3 represents a reasonable estimation for a site that shows 2/3 on Ealing's Map. It is a long distance from a railway station. The site is not identified as suitable for high buildings so the application should have been refused if the DS DPD had been followed. The interpretation of "new residential development should respect the suburban location of the site" obviously should exclude high buildings.

OIS8c The site brief has no provision for:

1) a school site or on site POS.. Yet local schools are overcrowded and this is an area of open space deficiency. The housing total has been increased by allowing section 106 agreements instead. The Infrastructure Delivery Plan for Primary Schools is dated Dec 2010 and does not seem to take account of the 600 increase in housing units proposed.

2) relocation of existing uses. Although the Mental Health Trust may have done a comprehensive review, the uses replaced by residential may be accommodated by more development to the south and there would be another application that impinged on the Canal Conservation area. The whole site should have been included in the Site Brief especially as the energy centre is outside the area as well.

3) funding the restoration of the Chapel for community use .

If OIS 8 is to be sound there should be a requirement 1-3 above

**Appendix 4.1 Planning Application for land west of Glade Lane.**

**Appendix 4.2 3 letters of objection E-mailed separately.**

Words 1913 including Inspectors





# EALING CIVIC SOCIETY

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30 April 2003

Mayor of London  
Planning  
Dear Sir

**St Bernards Hospital PP/2012/4008 &3827; PP/2012/4305 &4036; PP/2012/5040 &4666.**

The boxes of documents and complex on line detail have proved very difficult to follow over these planning applications so that Ealing Civic Society consider the poor response recorded by English Heritage is due to the difficulty of working out exactly what is happening from 3 separate applications. Even the reports to Ealing planning lacks adequate explanations. We consider a land use change of this magnitude should be subject to more public scrutiny. The exhibition was available in the Chapel after a short public session but we did not know this.

**PP/2012/5040 and 4666 Items 07 and 08 on Ealing Committee report**

ECS objects to the erection of 3 buildings 9 storey high and the loss of an avenue of trees. We are concerned that the sum of these applications amounts to a large neighbourhood which lacks a school site and public open space. There is nowhere for older children to play, there are too few larger units to accommodate families so that the smaller units are likely to become overcrowded and the parking provision is inadequate for an area with low PTAL 1-4.

**PP/2012/4008 and 3827 Items 09 and 10 on Ealing Committee report**

ECS objects to the demolition of Mott House which is an attractive Grade II listed building. Section 106 finance is required for school provision but a new school actually requires a site. Otherwise the existing schools have to be increased in size with temporary class rooms on much needed playground space or they are built on Metropolitan Open Land as in N Greenford. There should be a more considered examination of the local school situation. The report says that a range of children's play spaces will be provided yet the legal agreement number x states that £75,000 will be required for under provision on site or outside. That amount of money is unlikely to provide a range of sites and it is important to provide space near children's homes in a large enough open space to avoid noise nuisance.

**PP/2012/4305 Items 11 and 12** We object to the loss of Grade II listed buildings especially the attractive Mott House and although the report justifies this on the grounds of operational efficiency, the vehicle access seems overextended making a complex entrance to the housing estate. This is not an ideal access especially when extended to include the Energy Centre on the east side of the hospital site Why this

particular route is needed is not explained in the committee report. An alternative perhaps shorter route might be possible without the demolition of Grade II listed buildings.

These applications amount to a major scheme adding another residential neighbourhood on the borders of Hanwell and Southall. The aim in finding use for fine listed buildings in an important landscape is laudable but we are concerned that in maximising the number of housing units the changes lack cohesion, and the amenity of the site overall will be lost.

This site is identified in the draft Development Sites DPD as OIS 9 which does not include the energy centre. Permission at this stage would exclude public scrutiny through the hearing in June. ECS understood that national changes to planning policy would result in more public input not less. We consider that to avoid maximising the housing rather than optimising it the scheme should be reconsidered to ensure more mixed uses including public open space and the relocation of the energy centre in the centre of the site.

Yours sincerely  
Judy Harris Secretary



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30 April 2003

Mayor of London

Planning

Dear Sir

## **Energy Centre Ealing Hospital PP/2012 /3826 & 2012 5040**

Ealing Civic Society wish to object to the above application which will have a visual impact on the Public Open Space along FitzHerbert Walk which is a narrow link in the Brent River Park MOL and on Meadow House Hospice which provides important care for people with cancer.

We are surprised that the report says consultees were generally in support of the proposal when there is a very limited list and Hanwell and Canals Conservation Panel were major objectors. We note that the Brent River and Canal Society were not consulted and perhaps when scanning the weekly list thought that it was in the St Bernards part of the site. ECS originally thought that a central location had been selected and only objected when it was reported to Ealing Planning Committee.

We wish to support Hanwell and Canals Conservation Area comments. These are:  
[Hanwell and Canals Conservation Panel](#)

- Object to the proposal on the basis that it will be highly damaging to the character of the conservation area for the following reasons:
- The building will be overwhelming and visually intrusive to the local areas;
- There will be a loss of open space adjacent to the River Brent and Fitzherbert Walk;
- There will be a loss of 44 car parking spaces for an already problematic parking facility for the hospitals;
- The building will overshadow Meadow House Hospice;
- There will be increased pollution in the area.

The committee report states that it will not affect the area used by patients of the hospice but only the offices. We understand that the conservatory for the day care patients does overlook the proposed location. This proposal would introduce an industrial type use with a chimney over 20 m in close proximity to a respite care centre supported by cancer charities. The chimney will impact on all patients who visit the centre because it will be visible over the top of the building. The pollution will spread over the whole of Ealing Hospital are including the maternity unit. The choice of location is very insensitive. We request the GLA to seek refusal of this application on the grounds that it is part of larger schemes over which it has jurisdiction.

Yours sincerely     Judy Harris     Secretary