

Rep: EC/01 (1)	Name: Simon Vince
On behalf of: Heathrow Airport Limited	
Representation: Standard reply email - Aerodromes important to the national air transport system are officially safeguarded by the Civil Aviation Authority and the process of ensuring that their operation and development is not inhibited is an integral part of the town planning system.* A safeguarding map is derived from a series of protected three-dimensional surfaces above and around the aerodrome. The extent of the zone around Heathrow Airport is shown on the official safeguarding map published to each council. Within this area the Planning Authority must consult the Airport Operator on development where the height of any building, structure, erection or works would affect the operation of the airport or the safe movement of aircraft i.e. potentially penetrate the protected surface.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/01 (2)	Name: Simon Vince
On behalf of: Heathrow Airport Limited	
Representation: The aerodrome uses a variety of navigational aids, radio aids and telecommunications systems to facilitate air traffic control and aircraft movements. A new building, structure or extension because of its size, shape, location or construction materials can affect this equipment so the aerodrome must also be consulted to enable an assessment to be made of the potential impact on navigational aids	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/01 (3)	Name: Simon Vince
On behalf of: Heathrow Airport Limited	
Representation: In addition, at night and in low visibility conditions pilots rely on approach and runway lights to align their plane with the runway and touch down at the correct point. Lighting elements of a development also have the potential to distract or confuse pilots, particularly in the immediate vicinity of the aerodrome and the aircraft approach paths. Safeguarding assessments therefore also consider the impact of lighting proposals for developments.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/01 (4)	Name: Simon Vince
On behalf of: Heathrow Airport Limited	
Representation: Bird strikes can cause damage and sometimes catastrophic accidents to aircraft. Over 80% of bird strikes occur on or close to aerodromes as birds cross the airfield and its approaches as they move between sites. Aircraft are particularly vulnerable to collisions with large or flocking birds such as swans and flocks of geese, starlings, pigeons and gulls. Birds can be attracted to the vicinity of an aerodrome or to cross flight paths by the types and location of development, the design of buildings, landscaping and the creation of open standing water. The objective of the safeguarding process is to prevent any increase, and where possible reduce risk to the lowest practicable level, by designing out bird hazards, controlling development and ensuring proper maintenance and management.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/01 (5)	Name: Simon Vince
On behalf of: Heathrow Airport Limited	
Representation: The developments likely to cause most concern are: facilities for the handling, compaction, and treatment of putrescible waste; the creation of areas of standing water in quarries, sewage works, nature reserves, lakes, ponds, wetlands and sustainable urban drainage systems. The types, form and height of planting in landscaping schemes may also create a bird hazard e.g. a starling roost. Whether or not a development is likely to attract birds will depend not only on the nature of the development itself but also its location in relation to other land uses. Buildings may be attractive to birds depending on the design and use of the building and the availability of food nearby. Pigeons and Starlings are the most common birds to be found roosting in and around buildings whilst gulls may rest on flat and shallow roofs. Wherever possible, the design of buildings in close proximity to an aerodrome should incorporate all possible measures to minimise their attractiveness to birds.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/01 (6)	Name: Simon Vince
On behalf of: Heathrow Airport Limited	
Representation: In order to protect aerodromes and aircraft in flight against the hazards of bird strike, safeguarding maps also draw a circle with a 13 kilometres radius from the aerodrome reference point within which the Planning Authority must consult the Aerodrome Operator on any development likely to attract birds. The extent of this zone around Heathrow Airport, is shown on the official safeguarding map published to each council. [alternatively the Proposal Map may show the safeguarded aerodrome reference point from which this distance should be measured if the airport is within the authority's area].	
Changes/suggestions: None supplied	
Council response: Noted.	

Proposed changes: None.

Rep: EC/01 (7)	Name: Simon Vince
On behalf of: Heathrow Airport Limited	
Representation: Government advise* that applicants should initiate discussions with the Planning Authority and the Airport Operator at an early stage before submitting an application to ensure that they understand the constraints and provide the information which will be needed for a detailed assessment to be made of the proposal e.g. a construction methodology, navigational impact assessment, bird hazard risk assessment and bird hazard management plan. If the Planning Authority propose to grant permission or impose conditions contrary to the safeguarding advice of the Airport Operator, they must notify the Civil Aviation Authority and demonstrate they have assessed the application in the light of Government guidance* and provide a statement of reasons. Ultimately, the application could be referred to the Secretary of State who has the power to issue a Direction.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/01 (8)	Name: Simon Vince
On behalf of: Heathrow Airport Limited	
Representation: Safeguarding issues should only prevent development taking place were absolutely necessary to maintain the safe operation of the airport and the movement of aircraft. The safeguarding process rather seeks to mitigate the adverse impacts of development through; alternative design, appropriate landscaping and planting schemes, by conditions restricting how a development operates and may be extended. Legal agreements will be used to deal with aspects of a development, such as implementation of a Bird Hazard Management Plan, which cannot be satisfactorily covered by planning conditions	
Changes/suggestions: None supplied	

Council response: Noted.
Proposed changes: None.

Rep: EC/01 (9)	Name: Simon Vince
On behalf of: Heathrow Airport Limited	
Representation: Within the Safeguarding Zone(s) around Heathrow Airport, shown on the official safeguarding map published to each council. Developments will be permitted which demonstrate that: a) the height of construction equipment, the height of the completed development and associated landscaping will not penetrate the protected surface of the safeguarding zone; development may have to follow an agreed construction methodology, restrictions may be imposed on future extensions and the height of landscaping to maintain the integrity of the protected surface	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/01 (10)	Name: Simon Vince
On behalf of: Heathrow Airport Limited	
Representation: b) the position and height of construction equipment, buildings, telecommunications equipment, landscaping and external lighting arrangements will not interfere with the visual and electronic navigational aids of the airport; restrictions may be imposed to enable further assessment of any proposed changes	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes:	

None.

Rep: EC/01 (11)	Name: Simon Vince
On behalf of: Heathrow Airport Limited	
Representation: c) the design and construction of buildings, mining, engineering and other operations (including landscaping, water features and sustainable urban drainage schemes) and material changes of use of land will not increase the bird hazard risk to the safe operation of the airport or the movement of aircraft; the implementation of a bird hazard management plan will be made the subject of a legal agreement. The safeguarding requirements for Heathrow Airport includes a circle with a 30 kilometres radius drawn from the aerodrome reference point to indicate the area within which the Planning Authority must consult the Airport Operator on proposed wind turbine development. This recognises the fact that the introduction of wind-powered generator turbines as an alternative energy policy can create problems for aviation. In addition to their potential for presenting a physical obstacle to air navigation, wind turbines can affect radar and other electronic aids to air navigation from radio frequency interference (the rotating blades create electromagnetic disturbance which can degrade the performance of these systems and cause incorrect information to be received). The amount of interference depends on a number of factors; the number of turbines, their size, construction materials, location and shape of blades. A wind turbine development is also likely to be the subject of consultation with the Civil Aviation Authority (CAA), NATS En Route Ltd. (NERL) and the Ministry of Defence (MOD).	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/01 (12)	Name: Simon Vince
On behalf of: Heathrow Airport Limited	
Representation: Government advise* applicants to initiate discussions with the Planning Authority and the Airport Operator at an early stage in the process and before submitting an application to ensure that they understand the constraints and provide the information to enable a detailed assessment to be made of the proposed development i.e. a navigational impact	

assessment study. Where it is determined that a planning application for a proposed development may have an effect on navigational or other aeronautical systems, simulation or other types of interference modelling of the effects of the development may need to be conducted before a decision can be made on the application. It is usual for the developer to bear the cost of the modelling.

Changes/suggestions:

None supplied

Council response:

Noted.

Proposed changes:

None.

Rep: EC/01 (13)	Name: Simon Vince
On behalf of: Heathrow Airport Limited	
<p>Representation: Wind Turbine Developments The safeguarding requirements for Heathrow Airport includes a circle with a 30 kilometres radius drawn from the aerodrome reference point to indicate the area within which the Planning Authority must consult the Airport Operator on proposed wind turbine development. This recognises the fact that the introduction of wind-powered generator turbines as an alternative energy policy can create problems for aviation. In addition to their potential for presenting a physical obstacle to air navigation, wind turbines can affect radar and other electronic aids to air navigation from radio frequency interference (the rotating blades create electromagnetic disturbance which can degrade the performance of these systems and cause incorrect information to be received). The amount of interference depends on a number of factors; the number of turbines, their size, construction materials, location and shape of blades. A wind turbine development is also likely to be the subject of consultation with the Civil Aviation Authority (CAA), NATS En Route Ltd. (NERL) and the Ministry of Defence (MOD).</p>	
<p>Changes/suggestions: None supplied</p>	
<p>Council response: Noted.</p>	
<p>Proposed changes: None.</p>	

Rep: EC/01 (14)	Name: Simon Vince
On behalf of: Heathrow Airport Limited	
Representation: Government advise* applicants to initiate discussions with the Planning Authority and the Airport Operator at an early stage in the process and before submitting an application to ensure that they understand the constraints and provide the information to enable a detailed assessment to be made of the proposed development i.e. a navigational impact assessment study. Where it is determined that a planning application for a proposed development may have an effect on navigational or other aeronautical systems, simulation or other types of interference modelling of the effects of the development may need to be conducted before a decision can be made on the application. It is usual for the developer to bear the cost of the modelling.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/01 (15)	Name: Simon Vince
On behalf of: Heathrow Airport Limited	
Representation: Within the safeguarding zone around Heathrow Airport shown on the official safeguarding map published to each council wind turbine development will be permitted that demonstrates for the duration of the construction period and during operation it will not adversely affect the operation of Heathrow Airport or the navigational aids, communication or surveillance equipment used for air navigation at Heathrow Airport.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/02 (1)	Name: Francesca Barker
On behalf of: Natural England	
Representation: Natural England does not consider that the aforementioned SPDs pose any likely or significant risk to those features of the natural environment ¹ for which we would otherwise provide a more detailed consultation response and so does not wish to make in depth comments on the details of this consultation. General advice regarding these SPDs has been given below.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/02 (2)	Name: Francesca Barker
On behalf of: Natural England	
Representation: The SPDs relating to the development of the Ealing Cinema site are of a lower priority for Natural England, unless they impact on nationally protected nature conservation sites.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/03 (1)	Name: Peter Mynors
On behalf of: Ealing Cycling Campaign	
Representation: (An important north-south cycle route is planned along one edge of the site, as shown on the attached plan. This should be referred to in the document) The only mention of cycling is at the start of section 5.1, which refers to	

<ul style="list-style-type: none"> • A lack of cycling facilities within the town centre generally. <p>If Ealing is to reach its planned cycle mode share of 5% by 2026 (compared with 1.6% in 2008), a much more proactive approach in documents such as this one will be required</p> <p>Changes/suggestions:</p> <p>Site Issues – page 13</p> <p>Add a section explaining the need to accommodate or be compatible with the north-south cycle route shown on the attached plan.</p> <p>Section 5.1 - Pedestrian and cyclist movement</p> <p>When considered as a comprehensive development the cinema site has the potential to unlock a series of new pedestrian and cycle routes and connections.</p> <p>Principle 1: Create a new north-south pedestrian and cyclist route overlooked by active frontages connecting New Broadway and Ealing Green</p> <p>A high quality, easy to use, safe and active pedestrian and cyclist orientated route is needed to improve the accessibility of Walpole Park and Ealing Green from the north – particularly now that the Dickens Yard development is going ahead.</p> <p>Figure 5.2</p> <p>In the key make it clear which of the two north-south routes is intended to be used by cyclists (Barnes Pike and/or the new route shown in blue).</p> <p>Section 5.3</p> <p>add new Principle:</p> <p>Principle XX</p> <p>Provide secure cycle parking for cinema goers</p> <p>The cinema will be competing with Vue Acton which has plentiful car parking. This new cinema needs to become the destination of choice for cycling cinema goers as well as those on foot or travelling by public transport.</p>
<p>Council response:</p> <p>The Council considers that London Plan and borough-wide policies regarding cycling and cycle parking facilities are sufficient to ensure that development of the site appropriately responds to and is compatible with strategic objectives for improved cycle routes/provision . It is unnecessary to repeat higher-level policies within an SPD (as suggested through inclusion of a new Principle) , and the principles in Section 5.1 and Figure 5.2 relate to pedestrian movement only.</p>
<p>Proposed changes:</p> <p>None.</p>

Rep: EC/03 (2)	Name: Peter Mynors
On behalf of: Ealing Cycling Campaign	
Representation: London Cycling Design Standards states: 8.3.2 All destinations that attract occasional customers or visitors should be served by cycle parking facilities. Key destinations include: <ul style="list-style-type: none"> • Shopping centres, supermarkets, local shopping areas or isolated convenience stores e.g. food, hardware, chemists, newsagents, bicycle shops, banks • Popular cafes, pubs, restaurants, places of worship • Public buildings – libraries, town halls and hospitals and health centres, post offices, council offices, community centres • Sports, leisure and entertainment centres e.g. cinemas, museums and visitor attractions • Rail, underground stations The brief needs to include a requirement for the sort of cycle parking where a cinema goer will feel comfortable leaving his or her cycle during a performance. This will require more than just token Sheffield stands – maybe a locked compound accessible by a PIN code issued on demand when buying a ticket. This site will be competing with Vue Acton which has plentiful car parking. This new cinema needs to become the destination of choice for cycling cinema goers. Attached is a page from the Ealing Centre Forum 1999 report showing the sort of cycle parking that can be shared between different town centre uses at different times of day. Changes/suggestions: see above	
Council response: The London Plan contains policies on the level of cycle parking required for new developments. The detailed design of such facilities is most appropriately dealt with through the planning application process.	
Proposed changes: None.	

Rep: EC/04 (1)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
Representation: (Rep dated 19th October) We act on behalf of GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd, the joint owners of Walpole House,	

as is shown coloured in yellow on your site ownership plan on page 3 of the Ealing Cinema Site Development Note, dated September 2012 (the "Development Note"). Our clients are aware of the planning history for the Cinema Site (which is shown in red on the site ownership plan) and of the Council's many attempts to advance the development of the approved schemes for the Cinema Site (and for that site alone) over recent years. They are also aware that the Council bought the former YMCA Building in February 2011 "to create an opportunity to combine. this site with the stalled Cinema Scheme on Uxbridge Road, to deliver a more comprehensive mixed-use scheme" (- LB Ealing Cabinet Report, Property Strategy 26 July 2011). There was no intention to include our clients' site in the development proposals. They are also aware of the Council planning policies over the years to promote a cinema at the Cinema Site. Our clients would be fully supportive of the implemented cinema scheme being built out, in accordance with the existing planning permission for the Cinema Site, and they agree that the built out cinema would assist the social and economic change of the area. However, our clients consider that their land has been included in this Development Note site in error and request that the Development Note is re-issued before any proposals from potential development partners are considered, excluding the yellow land.

Changes/suggestions:

None supplied

Council response:

The referenced 'Ealing Cinema Site - Development Note' is not the subject of this consultation and predates the production of the SPD. The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised. The boundary of the site is the same as that for EAL6 Cinema within the Publication Version of the Development Sites DPD (June 2012). This was modified slightly to from the site boundary included in EAL17 in the Initial Proposals version of the Development Sites DPD (September 2010) to exclude 26-42 Bond Street as this permission had been fully implemented. Although 14-16 Bond Street (former YMCA Building) was not shown within the red line boundary of EAL17 due to a mapping error, it was referenced in the current uses and planning history of the site. Throughout the local plan production process, the wider site has been consistently consulted upon and referred to as the 'Cinema' site, and the consultation database confirms that all landowners within the site boundary were notified of the various stages of consultation.

Proposed changes:

None.

Rep: EC/04 (2)

Name: Charles Russell Charles Russell LLP

On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House

<p>Representation:</p> <p>There would of course be no benefit to be gained in terms of establishing an access to Bond Street, by including the yellow land, as there could be an adequate right of access established along the Council's land (shown in blue on the above plan) to that road, and so avoid having to use compulsory purchase powers over the yellow land, unnecessarily</p> <p>Changes/suggestions:</p> <p>None supplied</p>
<p>Council response:</p> <p>The referenced 'Ealing Cinema Site - Development Note' is not the subject of this consultation and predates the production of the SPD. The Council considers that a SPD for the site was necessary due to the lack of progress on the site and the critical role the site plays in achieving one of the key objectives for the town centre, and the long-standing local support for an enlivened cinema/film quarter in this location. The SPD sets out a Vision and corresponding objectives for the site, and the design principles which are considered central to ensuring that the full potential of the area is realised. The Council considers this is the minimum level of guidance necessary to ensure achievement of the key objectives, without undue prescription. The CPO process is outside the scope of this consultation.</p>
<p>Proposed changes:</p> <p>None.</p>

Rep: EC/04 (3)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
<p>Representation:</p> <p>Our clients do not consider it reasonable or necessary for the 1.15 acre Empire site to be extended to a development site of 1.92 acres, including the YMCA buildings (St George's Hall) on Bond Street, 4/12 Bond Street (both of which the Development Note states are locally listed buildings) and our clients' building at Walpole House, at 18/20 Bond Street. A cinema of a larger size than the proposed 20 screen complex would not be necessary or even justifiable in this area. The objectives of the planning policies could easily be met by the Cinema Site alone.</p> <p>Changes/suggestions:</p> <p>None supplied</p>	
<p>Council response:</p> <p>The referenced 'Ealing Cinema Site - Development Note' is not the subject of this consultation and predates the production of the SPD. As stated above, the site boundary of the SPD is consistent with EAL6 in the Development Sites DPD, and the site allocation is in turn consistent with the strategic policy direction for the revitalisation of Ealing Metropolitan Town Centre as set out in the Development Strategy DPD (adopted April 2012). These strategic policies are</p>	

based on the Ealing Town Centre Development Framework, and both DPDs have been the subject of extensive public consultation. The SPD is not predicated on provision of a larger cinema than in the extant permission.
Proposed changes: None.

Rep: EC/04 (4)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
Representation: Our clients' property is currently fully let and a redevelopment proposal, including our clients' land, would obviously jeopardise the renewal of the lease to the University of West London. By including our clients' land in the plan in the Development Note in error, the Council is therefore blighting that land unreasonably. It would not be in the public interest to lose the existing use of Walpole House, which is occupied by the University of West London. The use is on-going. With its good public transport links, the University values the convenience of the location and the ease for staff working there (and some students sitting examinations there from time to time).	
Changes/suggestions: None supplied	
Council response: The referenced 'Ealing Cinema Site - Development Note' is not the subject of this consultation and predates the production of the SPD. As stated above, the site boundary of the SPD is consistent with EAL6 in the Development Sites DPD, and the site allocation is in turn consistent with the strategic policy direction for the revitalisation of Ealing Metropolitan Town Centre as set out in the Development Strategy DPD (adopted April 2012). These strategic policies are based on the Ealing Town Centre Development Framework, and both DPDs have been the subject of extensive public consultation.	
Proposed changes: None.	

Rep: EC/04 (5)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
Representation: There are various other redevelopment schemes progressing in the area at the moment, including a variety of uses, so there is not the justifiable need (for example) for any more A1 retail space or residential units, by the use of compulsory	

purchase powers over our clients' land. Changes/suggestions: None supplied
Council response: The referenced 'Ealing Cinema Site - Development Note' is not the subject of this consultation and predates the production of the SPD. The CPO process is outside the scope of this consultation.
Proposed changes: None.

Rep: EC/04 (6)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
Representation: As you will be aware, a Council should not deprive an owner of his property, unless it is "necessarily in the public interest" to do so (Prest v Secretary of State for Wales). The redevelopment of the Cinema Site is of course not dependant on our clients' land being included, as the previous and existing planning consents for the red land have shown. A larger cinema is not required in this location and it could not be justified here, especially as the cinema in Westfield is relatively close. It would be a loss to the public for the existing office and occasional educational use in our clients' building to be ended. Use of compulsory powers must only be as a last resort, not just in order to increase the scale of the development and so to add to the developer's and the Council's profits from a development scheme	
Changes/suggestions: We would be grateful if you could re-issue the Development Note having removed the yellow land from the site ownership plan.	
Council response: The referenced 'Ealing Cinema Site - Development Note' is not the subject of this consultation and predates the production of the SPD. The CPO process is outside the scope of this consultation.	
Proposed changes: None.	

Rep: EC/05 (1)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
Representation: (Rep dated 23 November)	

<p>The core aim in the draft SPD is for a new cinema to be built on the whole of the Cinema Site, which is shown to include Walpole House. The full potential of that aim and for all the Council's requirements for it as set out in the draft SPD can however be achieved without Walpole House forming part of the development scheme. The aims of the draft SPD are set out (in summary) as a design concept and vision for the Cinema Site, to include:</p> <ul style="list-style-type: none"> · comprehensive redevelopment to maximise benefits for the town centre; · focus on delivery of high quality leisure and cultural uses; · an appropriate mix of secondary and ancillary uses, tenures and forms of development; and · improvements to the environment and the public realm in and around the Site. <p>Achievement of none of these aims is dependant on Walpole House being included within the Site.</p> <p>Changes/suggestions: None supplied</p>
<p>Council response:</p> <p>The town centre has been without a cinema since 2008, and the failure to complete the extant permission within a reasonable timescale is significantly undermining efforts to revitalise the town centre. However, the delay in the Empire Cinema development has allowed the Council to further develop its regeneration and planning policy position in relation to this part of the town centre, particularly in the context of the emerging development elsewhere in the town centre including the confirmation of Crossrail and redevelopment of Dickens Yard. The approach, the strategic direction of which is set out in the adopted Development Strategy DPD, has now evolved to the extent that it provides justification for the re-provision of the cinema as part of a redevelopment of a wider site forming part of the 'cultural quarter' of the Town Centre. The core aim of providing a an enlivened film/cultural quarter in this location is widely supported by the local community, as evidenced through the substantial consultation that was carried out as part of the preparation of the Development Strategy DPD, and subsequently the Development Sites DPD. The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised.</p>
<p>Proposed changes: None.</p>

Rep: EC/05 (2)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
<p>Representation:</p> <p>The draft SPD considers the potential for new pedestrian routes and connections in a comprehensive development of the Cinema Site and much importance is placed on those routes and that connectivity.</p>	

There are 10 principles set out in the draft SPD, which the Council aims to achieve. All of these 10 principles could indeed be achieved without Walpole House being part of the redevelopment scheme, as we have shown below:

1 - A north-south pedestrian route could be established along the road running beside no. 2 Mattock Lane, part of which is currently in our client's ownership (subject to the satisfactory conclusion of negotiations with our clients over rights of access over that pedestrian access way), but without affecting the nearby envelope of Walpole House itself;

Changes/suggestions:

None supplied

Council response:

The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.

Proposed changes:

None.

Rep: EC/05 (3)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
Representation: 2 - an east-west link could be created, running over land currently owned by the Council, in the location as is shown on the plan in the draft SPD at Figure 5.2. This would not affect our clients' land;	
Changes/suggestions: None supplied	
Council response: The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway	

Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.
Proposed changes: None.

Rep: EC/05 (4)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
Representation: 3 - new public space could be created around a new cinema on the large expanse of the Cinema Site, without affecting the envelope of Walpole House;	
Changes/suggestions: None supplied	
Council response: The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.	
Proposed changes: None.	

Rep: EC/05 (5)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
Representation: 4 - an integrated network of new space could be created throughout the Site, in mixed use, with active frontages at ground floor level, without Walpole House being included;	
Changes/suggestions: None supplied	
Council response: The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision	

for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.

Proposed changes:

None.

Rep: EC/05 (6)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
Representation: 5 - there is plenty of space for the "Cinema Box" to be moved around on the rest of the Cinema Site, without Walpole House being required for such relocation;	
Changes/suggestions: None supplied	
Council response: The siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to locate a modern multi-screen cinema behind the façade of the previous cinema be under-estimated.	
Proposed changes: None.	

Rep: EC/05 (7)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
Representation: 6 - the opportunity to replace Walpole House with a building which might, but would not necessarily, be considered a better design in relation to the Conservation Area, cannot be adequate justification for the use of compulsory purchase powers;	
Changes/suggestions: None supplied	

<p>Council response: It is acknowledged that further guidance regarding the scale of buildings and their location on the site in the context of the surrounding character is appropriate.</p>
<p>Proposed changes: Revise supporting wording to Principle 7 on page 22 to read: "There are significant benefits to a sympathetic scale of development on the edges of the site generally relating to the heights of neighbouring buildings. However, development on the southern edge of the site should be scaled a least to screen the bulk of the cinema block as well as responding to its role in the setting of Ealing Green Conservation Area and the statutory listed assets to the south". Also revise wording to figure 5.6, fourth description in the legend on page 23 to read : "Built form of appropriate scale to screen cinema block"</p>

Rep: EC/05 (8)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
<p>Representation: 7 - similarly, the use of Walpole House site to provide a building designed primarily to mitigate the harmful impact of a large building mass which would otherwise be unacceptable, cannot be adequate justification for the use of compulsory purchase powers;</p> <p>Changes/suggestions: None supplied</p>	
<p>Council response: It is acknowledged that further guidance regarding the scale of buildings and their location on the site in the context of the surrounding character is appropriate.</p>	
<p>Proposed changes: Revise supporting wording to Principle 7 on page 22 to read: "There are significant benefits to a sympathetic scale of development on the edges of the site generally relating to the heights of neighbouring buildings. However, development on the southern edge of the site should be scaled a least to screen the bulk of the cinema block as well as responding to its role in the setting of Ealing Green Conservation Area and the statutory listed assets to the south". Also revise wording to figure 5.6, fourth description in the legend on page 23 to read : "Built form of appropriate scale to screen cinema block"</p>	

Rep: EC/05 (9)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	

<p>Representation: 8 - any proposed buildings here should fit with the height and scale of buildings in the surrounding area. Use of compulsory purchase powers to acquire Walpole House in order to make the whole scheme conform to the heights and scale of the area would not be justifiable;</p> <p>Changes/suggestions: None supplied</p>
<p>Council response: It is acknowledged that further guidance regarding the scale of buildings and their location on the site in the context of the surrounding character is appropriate.</p>
<p>Proposed changes: Revise supporting wording to Principle 7 on page 22 to read: "There are significant benefits to a sympathetic scale of development on the edges of the site generally relating to the heights of neighbouring buildings. However, development on the southern edge of the site should be scaled a least to screen the bulk of the cinema block as well as responding to its role in the setting of Ealing Green Conservation Area and the statutory listed assets to the south". Also revise wording to figure 5.6, fourth description in the legend on page 23 to read : "Built form of appropriate scale to screen cinema block"</p>

Rep: EC/05 (10)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
<p>Representation: 9 - the incorporation of Walpole House in the development proposals would have no impact on the careful integration of the retained cinema frontage on New Broadway</p> <p>Changes/suggestions: None supplied</p>	
<p>Council response: The siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to located a modern multi-screen cinema behind the façade of the pervious cinema be under-estimated.</p>	
<p>Proposed changes: None.</p>	

Rep: EC/05 (11)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
Representation: 10 - Walpole House being brought in as part of the development scheme would have no impact or added benefit to the range of uses available elsewhere on the Site.	
Changes/suggestions: None supplied	
Council response: The siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to located a modern multi-screen cinema behind the façade of the pervious cinema be under-estimated.	
Proposed changes: None.	

Rep: EC/05 (12)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
Representation: Our clients are keen that the Council commences discussions with them over use of the access way, as we have covered in no. 1 above. So far, no contact has been made with our clients. Once a satisfactory conclusion to those discussions can be reached, our clients consider that should mean that the ownership of the main part of Walpole House could remain unaffected by the overall development plans for the Cinema Site. The Council could therefore avoid the use of any compulsory purchase powers in relation to the land in our clients' ownership.	
Changes/suggestions: None supplied	
Council response: The Council has carried out regular liaison with all landowners. The CPO process is outside the scope of this consultation.	
Proposed changes: None.	

Rep: EC/05 (13)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	

<p>Representation:</p> <p>The Ealing Metropolitan Centre SDF requirements for a new film focused cultural quarter, which encourages night time economy uses, could all also be met without Walpole House being part of the scheme brought forward. There is plenty of space in the remainder of the Site for a cinema, restaurants, cultural facilities, outdoor screen space, niche retail and set back contemporary buildings. There is scope for those other buildings to work well together without the need for Walpole House to be part of the scheme.</p> <p>Changes/suggestions:</p> <p>None supplied</p>
<p>Council response:</p> <p>The town centre has been without a cinema since 2008, and the failure to complete the extant permission within a reasonable timescale is significantly undermining efforts to revitalise the town centre. However, the delay in the Empire Cinema development has allowed the Council to further develop its regeneration and planning policy position in relation to this part of the town centre, particularly in the context of the emerging development elsewhere in the town centre including the confirmation of Crossrail and redevelopment of Dickens Yard. The approach, the strategic direction of which is set out in the adopted Development Strategy DPD, has now evolved to the extent that it provides justification for the re-provision of the cinema as part of a redevelopment of a wider site forming part of the 'cultural quarter' of the Town Centre. The core aim of providing a an enlivened film/cultural quarter in this location is widely supported by the local community, as evidenced through the substantial consultation that was carried out as part of the preparation of the Development Strategy DPD, and subsequently the Development Sites DPD. The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised.</p>
<p>Proposed changes:</p> <p>None.</p>

Rep: EC/05 (14)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
<p>Representation:</p> <p>Similarly, both i) the Development Sites DPD requirement for EAL6 to have a mixed use development, appropriate for the town centre, including multi screen cinema, retail, commercial and residential (with potential for student accommodation) and ii) the Development Strategy DPD requirements, regarding the character and roles of the area, could all be met without Walpole House. The Site covers a large area and these policies could easily be achieved elsewhere, without the need for our clients' land.</p>	

Changes/suggestions: None supplied
Council response: The boundary of the site is the same as that for EAL6 Cinema within the Publication Version of the Development Sites DPD (June 2012). This was modified slightly to from the site boundary included in EAL17 in the Initial Proposals version of the Development Sites DPD (September 2010) to exclude 26-42 Bond Street as this permission had been fully implemented. Although 14-16 Bond Street (former YMCA Building) was not shown within the red line boundary of EAL17 due to a mapping error, it was referenced in the current uses and planning history of the site. Throughout the local plan production process, the wider site has been consistently consulted upon and referred to as the 'Cinema' site.
Proposed changes: None.

Rep: EC/05 (15)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
Representation: The London Plan 2011 Metropolitan town centre definition requirements could all also be accommodated without Walpole House.	
Changes/suggestions: None supplied	
Council response: The London Plan does not set out detailed requirements for Ealing Metropolitan Town Centre.	
Proposed changes: None.	

Rep: EC/05 (16)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
Representation: In line with the NPPF criteria, good design and quality of development, reflecting the character of the area, could be achieved on the rest of the Cinema Site, without Walpole House. This states that Council local plans should not be too prescriptive, but should focus on issues such as overall scale, layout, access, materials etc., in relation to neighbouring buildings. All of these factors above, including (as we have set out on page 2 of this letter) the potential access advantages in a large site being developed, could be achieved without Walpole House.	

Changes/suggestions:
None supplied
Council response:
The Council considers that a SPD for the site was necessary due to the lack of progress on the site and the critical role the site plays in achieving one of the key objectives for the town centre, and the long-standing local support for an enlivened cinema/film quarter in this location. The SPD sets out a Vision and corresponding objectives for the site, and the design principles which are considered central to ensuring that the full potential of the area is realised. The Council considers this is the minimum level of guidance necessary to ensure achievement of the key objectives, without undue prescription. As stated above, the site boundary of the SPD is consistent with EAL6 in the Development Sites DPD, and the site allocation is in turn consistent with the strategic policy direction for the revitalisation of Ealing Metropolitan Town Centre as set out in the Development Strategy DPD (adopted April 2012). These strategic policies are based on the Ealing Town Centre Development Framework, and both DPDs have been the subject of extensive public consultation. This approach is fully in line with the NPPF.
Proposed changes:
None.

Rep: EC/05 (17)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
Representation:	
The draft SPD also emphasises that more than a cinema should be put on the Site, which could easily be achieved without the Walpole House forming part of the scheme. The “major development opportunity” to incorporate new pedestrian routes and connections, high quality cultural and leisure offering, with retail and cafes at ground level and studios and residential above, could all be achieved and built out on other parts of the Cinema Site, away from our clients’ land.	
Changes/suggestions:	
None supplied	
Council response:	
The town centre has been without a cinema since 2008, and the failure to complete the extant permission within a reasonable timescale is significantly undermining efforts to revitalise the town centre. However, the delay in the Empire Cinema development has allowed the Council to develop its regeneration and planning policy position in relation to this part of the town centre, particularly in the context of the emerging development elsewhere in the town centre including the confirmation of Crossrail and redevelopment of Dickens Yard. The approach, the strategic direction of which is set out in	

the adopted Development Strategy DPD, has now evolved to the extent that it provides justification for the re-provision of the cinema as part of a redevelopment of a wider site forming part of the 'cultural quarter' of the Town Centre. The core aim of providing a an enlivened film/cultural quarter in this location is widely supported by the local community, as evidenced through the substantial consultation that was carried out as part of the preparation of the Development Strategy DPD, and subsequently the Development Sites DPD. The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised.

Proposed changes:

None.

Rep: EC/05 (18)

Name: Charles Russell Charles Russell LLP

On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House

Representation:

As we stated in our previous letter, our clients' property is currently fully let and a redevelopment proposal, including our clients' land, would obviously jeopardise the renewal of the current lease to the University of West London. By including our clients' land in the plan in the Development Note and now also in the draft SPD in error, the Council is therefore blighting the Walpole House land unreasonably.

Changes/suggestions:

None supplied

Council response:

The boundary of the site is the same as that for EAL6 Cinema within the Publication Version of the Development Sites DPD (June 2012). This was modified slightly to from the site boundary included in EAL17 in the Initial Proposals version of the Development Sites DPD (September 2010) to exclude 26-42 Bond Street as this permission had been fully implemented. Although 14-16 Bond Street (former YMCA Building) was not shown within the red line boundary of EAL17 due to a mapping error, it was referenced in the current uses and planning history of the site. Throughout the local plan production process, the wider site has been consistently consulted upon and referred to as the 'Cinema' site.

Proposed changes:

None.

Rep: EC/05 (19)

Name: Charles Russell Charles Russell LLP

On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House

Representation:

<p>As well as there being no need to include Walpole House in the Cinema Site for the purpose of achieving all of the Council's 10 principles and the other aims in the draft SPD, as is shown above, there are various other redevelopment schemes progressing in the area at the moment, including a variety of uses, so there is no justifiable need (for example) for any more A1 retail space or residential units, by the use of compulsory purchase powers over our clients' land.</p> <p>Changes/suggestions: None supplied</p>	
<p>Council response: The town centre has been without a cinema since 2008, and the failure to complete the extant permission within a reasonable timescale is significantly undermining efforts to revitalise the town centre. However, the delay in the Empire Cinema development has allowed the Council to further develop its regeneration and planning policy position in relation to this part of the town centre, particularly in the context of the emerging development elsewhere in the town centre including the confirmation of Crossrail and redevelopment of Dickens Yard. The approach, the strategic direction of which is set out in the adopted Development Strategy DPD, has now evolved to the extent that it provides justification for the re-provision of the cinema as part of a redevelopment of a wider site forming part of the 'cultural quarter' of the Town Centre. The core aim of providing a an enlivened film/cultural quarter in this location is widely supported by the local community, as evidenced through the substantial consultation that was carried out as part of the preparation of the Development Strategy DPD, and subsequently the Development Sites DPD. The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised.</p>	
<p>Proposed changes: None.</p>	

Rep: EC/05 (20)	Name: Charles Russell Charles Russell LLP
On behalf of: GM Investment Trustee Ltd and GM (UK) Pension Trustees Ltd - joint owners of Walpole House	
<p>Representation: As you will be aware and as we have reminded you previously, a Council should not deprive an owner of his property, unless it is "necessarily in the public interest" to do so (Prest v Secretary of State for Wales). The redevelopment of the Cinema Site is of course not dependant on our clients' land being included, as the previous and existing planning consents for the red land have shown. The Council must have considered that the previous Cinema planning permission was a workable and satisfactory development proposal, as it was granted planning permission by the Council on a number of occasions – it cannot now be claimed by the Council that a development on that part of the site, excluding Walpole House, would not work here. A larger cinema is not required in this location and it could not be justified,</p>	

especially as the cinema in Westfield is relatively close. There are no justifiable reasons revealed by the draft SPD or any of the other policies referred to in that Document, to allow the compulsory purchase of Walpole House. Use of compulsory powers must only be as a last resort, not just in order to increase the scale of a proposed development and so to add to a developer's and the Council's profits from a development scheme.

Changes/suggestions:

None supplied

Council response:

The CPO process is outside the scope of this consultation. The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised. The boundary of the site is the same as that for EAL6 Cinema within the Publication Version of the Development Sites DPD (June 2012). This was modified slightly to from the site boundary included in EAL17 in the Initial Proposals version of the Development Sites DPD (September 2010) to exclude 26-42 Bond Street as this permission had been fully implemented. Although 14-16 Bond Street (former YMCA Building) was not shown within the red line boundary of EAL17 due to a mapping error, it was referenced in the current uses and planning history of the site.

Proposed changes:

None.

Rep: EC/06 (1)	Name: Corrine Templer
On behalf of: Ealing Green & Ealing Town Centre Conservation Advisory Panel	
Representation: The Panel has considered this document carefully and makes the following observations: 1. The current state of the cinema is extremely harmful to the Conservation Areas and for this reason the Panel supports the Council's decision to CPO the actual cinema site.	
Changes/suggestions: None supplied	
Council response: Support noted.	
Proposed changes: None.	

Rep: EC/06 (2)	Name: Corrine Templer
On behalf of: Ealing Green & Ealing Town Centre Conservation Advisory Panel	
Representation: 2. The approved development for the demolished cinema in the Town Centre Conservation Area was an on-site cinema, not merely the locally listed façade. The cinema redevelopment must therefore remain on site, incorporating the façade and not leaving it isolated.	
Changes/suggestions: None supplied	
Council response: Principle 9, page 22 of the Draft SPD, sets out that the retained façade must be sensitively integrated into any proposals. It would be inappropriately prescriptive to require the cinema to be located on a particular part of the site, as achievement of the Vision is not dependent on the cinema box being located behind the facade. However, the siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to locate a modern multi-screen cinema behind the façade of the previous cinema be under-estimated.	
Proposed changes: None.	

Rep: EC/06 (3)	Name: Corrine Templer
On behalf of: Ealing Green & Ealing Town Centre Conservation Advisory Panel	
Representation: 3. However, the proposed assemblage of land (including Walpole House and Flavas bar) is too large for the purpose of achieving the core aim of compulsory purchase of the cinema site and could lead to planning blight over a much larger area of both Conservation Areas if the owners were not willing to sell.	
Changes/suggestions: None supplied	
Council response: The town centre has been without a cinema since 2008, and the failure to complete the extant permission within a reasonable timescale is significantly undermining efforts to revitalise the town centre. However, the delay in the Empire Cinema development has allowed the Council to further develop its regeneration and planning policy position in relation to this part of the town centre, particularly in the context of the emerging development elsewhere in the town centre including	

the confirmation of Crossrail and redevelopment of Dickens Yard. The approach, the strategic direction of which is set out in the adopted Development Strategy DPD, has now evolved to the extent that it provides justification for the re-provision of the cinema as part of a redevelopment of a wider site forming part of the 'cultural quarter' of the Town Centre. The core aim of providing a an enlivened film/cultural quarter in this location is widely supported by the local community, as evidenced through the substantial consultation that was carried out as part of the preparation of the Development Strategy DPD, and subsequently the Development Sites DPD. The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised.

Proposed changes:

None.

Rep: EC/06 (4)

Name: Corrine Templer

On behalf of: Ealing Green & Ealing Town Centre Conservation Advisory Panel

Representation:

4. The proposed north/south and east/west permeability routes are not essential for redevelopment. An upgrading of Barnes Pike would satisfy the latter; the existing east/west routes are perfectly satisfactory for the existing cinema site.

Changes/suggestions:

None supplied

Council response:

The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.

Proposed changes:

None.

Rep: EC/06 (5)

Name: Corrine Templer

On behalf of: Ealing Green & Ealing Town Centre Conservation Advisory Panel

Representation:

<p>5. The Panel opposes the proposal for taller elements (of unspecified height) to be located on the south of the site because of the potential harm to the Grade I listed Pitshanger Manor and to the Conservation Area (view from Ealing Green). Maximum heights should be specified within the SPD.</p> <p>Changes/suggestions: None supplied</p>
<p>Council response: Setting maximum building heights would not be in line with London Plan or Local Plan guidance. However, it is acknowledged that further guidance regarding the scale of buildings and their location on the site in the context of the surrounding character is necessary.</p>
<p>Proposed changes: Revise supporting wording to Principle 7 on page 22 to read: "There are significant benefits to a sympathetic scale of development on the edges of the site generally relating to the heights of neighbouring buildings. However, development on the southern edge of the site should be scaled a least to screen the bulk of the cinema block as well as responding to its role in the setting of Ealing Green Conservation Area and the statutory listed assets to the south". Also revise wording to figure 5.6, fourth description in the legend on page 23 to read : "Built form of appropriate scale to screen cinema block"</p>

Rep: EC/06 (6)	Name: Corrine Templer
On behalf of: Ealing Green & Ealing Town Centre Conservation Advisory Panel	
<p>Representation: 6. the YMCA facade should be retained and the Walpole Picture Theatre facade should be relocated and incorporated into the development so that it has a meaningful use rather than left isolated adjacent to the side of 2 Mattock Lane.</p> <p>Changes/suggestions: None supplied</p>	
<p>Council response: Noted</p>	
<p>Proposed changes: None.</p>	

Rep: EC/06 (7)	Name: Corrine Templer
On behalf of: Ealing Green & Ealing Town Centre Conservation Advisory Panel	
Representation:	

7. Page 12 acknowledges that "many people continue to drive into the town centre, in particular for evening uses such as the theatre or cinema". The Panel therefore questions whether the proposals would be commercially viable without (preferably underground) car parking.

Changes/suggestions:

None supplied

Council response:

The London Plan contains policies on maximum levels of car parking for various uses. As the site has an excellent Public Transport Accessibility (PTAL) of 6, the Council considers that car parking levels should therefore be kept to a minimum in the interests of sustainability and promoting modal shift away from private car use. Actual levels of car parking are most appropriately determined through the planning application process.

Proposed changes:

None.

Rep: EC/07 (1)

Name: Richard Chilton

On behalf of:

Representation:

The primary purpose of this SPD must be to enable the compulsory purchase of the cinema site from its current owners, to enable a cinema to be constructed in the centre of Ealing as quickly as possible. Whilst some aspects of the wider proposals could provide overall benefits, some of them seem to create at least as many problems as they solve.

Changes/suggestions:

There should be a clear statement that this SPD should be withdrawn if the current planning approval (P/2011/4526 etc.) for a new cinema is fully implemented and the cinema opened within the next 3 years.

Otherwise, the whole concept of the scope of the site and the proposals need to be re-thought. One possibility would be to limit it to just the current cinema site and the old YMCA building.

Council response:

The town centre has been without a cinema since 2008, and the failure to complete the extant permission within a reasonable timescale is significantly undermining efforts to revitalise the town centre. However, the delay in the Empire Cinema development has allowed the Council to develop its regeneration and planning policy position in relation to this part of the town centre, particularly in the context of the emerging development elsewhere in the town centre including the confirmation of Crossrail and redevelopment of Dickens Yard. The approach, the strategic direction of which is set out in the adopted Development Strategy DPD, has now evolved to the extent that it provides justification for the re-provision of the cinema as part of a redevelopment of a wider site forming part of the 'cultural quarter' of the Town Centre. The core

aim of providing a an enlivened film/cultural quarter in this location is widely supported by the local community, as evidenced through the substantial consultation that was carried out as part of the preparation of the Development Strategy DPD, and subsequently the Development Sites DPD. The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised.

Proposed changes:

None.

Rep: EC/07 (2)

Name: Richard Chilton

On behalf of:

Representation:

- The proposed north/south and east/west pedestrian permeability routes could provide some benefits. However, the relatively small size of the block and the good footpaths on all sides mean that permeability isn't a current problem.

Changes/suggestions:

None supplied

Council response:

The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.

Proposed changes:

None.

Rep: EC/07 (3)

Name: Richard Chilton

On behalf of:

Representation:

- The proposed relocation of the cinema to the centre of the site just seems to create problems. The locally listed façade of the old cinema would probably look out of place on any other building, as well as creating practical problems for design of such a building. The new cinema would be hidden out of sight from the street, making it more difficult to find for new

patrons and no longer any sort of landmark. Changes/suggestions: as above
Council response: Principle 9, page 22 of the Draft SPD, sets out that the retained façade must be sensitively integrated into any proposals. It would be inappropriately prescriptive to require the cinema to be located on a particular part of the site, as achievement of the Vision is not dependent on the cinema box being located behind the facade. However, the siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to locate a modern multi-screen cinema behind the façade of the previous cinema be under-estimated.
Proposed changes: None.

Rep: EC/07 (4)	Name: Richard Chilton
On behalf of:	
Representation: • The proposed higher building on the south of the site would cause harm to the setting of Pitshanger Manor and the views from and around Ealing Green. Any building here should be of lower height than Hotel Xanadu	
Changes/suggestions: as above	
Council response: Setting maximum building heights would not be in line with London Plan or Local Plan guidance. However, it is acknowledged that further guidance regarding the scale of buildings and their location on the site in the context of the surrounding character is appropriate.	
Proposed changes: Revise supporting wording to Principle 7 on page 22 to read: "There are significant benefits to a sympathetic scale of development on the edges of the site generally relating to the heights of neighbouring buildings. However, development on the southern edge of the site should be scaled at least to screen the bulk of the cinema block as well as responding to its role in the setting of Ealing Green Conservation Area and the statutory listed assets to the south". Also revise wording to figure 5.6, fourth description in the legend on page 23 to read : "Built form of appropriate scale to screen cinema block"	

Rep: EC/07 (5)	Name: Richard Chilton
On behalf of:	
Representation: <ul style="list-style-type: none"> • The inclusion of Walpole House and Flavas Bar in the site creates additional problems. These are structurally sound late 20th century buildings which, whilst not exceptional, are not objectionable either. To knock them down and replace them would not look good from a sustainability point of view. It may also not make good economics. This could discourage their current owners from selling them voluntarily and help them fight any compulsory purchase order. These difficulties in assembling the larger site could blight this area for many years especially if, as proposed, any development of just part of the site was not permitted. 	
Changes/suggestions: as above	
Council response: <p>The town centre has been without a cinema since 2008, and the failure to complete the extant permission within a reasonable timescale is significantly undermining efforts to revitalise the town centre. However, the delay in the Empire Cinema development has allowed the Council to develop its regeneration and planning policy position in relation to this part of the town centre, particularly in the context of the emerging development elsewhere in the town centre including the confirmation of Crossrail and redevelopment of Dickens Yard. The approach, the strategic direction of which is set out in the adopted Development Strategy DPD, has now evolved to the extent that it provides justification for the re-provision of the cinema as part of a redevelopment of a wider site forming part of the 'cultural quarter' of the Town Centre. The core aim of providing a an enlivened film/cultural quarter in this location is widely supported by the local community, as evidenced through the substantial consultation that was carried out as part of the preparation of the Development Strategy DPD, and subsequently the Development Sites DPD. The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised.</p>	
Proposed changes: None.	
Rep: EC/08 (1)	Name: Simon Neate Indigo Planning Ltd
On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd	
Representation: <p>This representation is written on behalf of GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd (c/o Aberdeen</p>	

Asset Management), who have an interest the Ealing Cinema Site (as the owners Walpole House, 18-22 Bond Street). The building is occupied by the University of West London and within the proposed development boundary for Ealing Cinema Site, which this SPD identifies for 'comprehensive' redevelopment. The Council has not approached or engaged with our client on their intention to include Walpole House within this wholesale redevelopment or provided an adequate justification for its inclusion.

Changes/suggestions:

There are ten principles included in the SPD, all of which could be met without Walpole House being included as part of the redevelopment scheme, and our client is not persuaded to dispose of the property. We therefore request that all references to the inclusion of Walpole House in the comprehensive redevelopment are removed from both the text and plans. In particular, we request that:

1. In the second paragraph of the Executive Summary, the words 'a building occupied by West London University' are removed;
2. The red lines on both aerial photos in Figure 1.3 are amended to exclude Walpole House and its curtilage;
3. The red lines on Figures 2.1, 2.2, 2.4, 2.5, 2.6, 3.1, 3.10, 3.11, 3.16, 5.2, 5.4 and 5.6 are amended to exclude Walpole House and its curtilage;
4. The third paragraph of Section 3 is amended to 'the site has frontages onto 23-42 Bond Street...'; and
5. The fourth paragraph of Section 3 is amended by deleting the third bullet point and, if appropriate, adjusting the reference to the number of property owners.

Council response:

The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised. The boundary of the site is the same as that for EAL6 Cinema within the Publication Version of the Development Sites DPD (June 2012). This was modified slightly to from the site boundary included in EAL17 in the Initial Proposals version of the Development Sites DPD (September 2010) to exclude 26-42 Bond Street as this permission had been fully implemented. Although 14-16 Bond Street (former YMCA Building) was not shown within the red line boundary of EAL17 due to a mapping error, it was referenced in the current uses and planning history of the site. Throughout the local plan production process, the wider site has been consistently consulted upon and referred to as the 'Cinema' site, and the consultation database confirms that all landowners within the site boundary were notified of the various stages of consultation.

Proposed changes:

None.

Rep: EC/08 (2)

Name: Simon Neate Indigo Planning Ltd

On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd	
Representation: Our client supports the redevelopment of the adjacent land, for which there is an extant planning permission (for a multiplex cinema including 20 screens and seven A3 units and one A4 unit (LPA ref. P/2011/4526)). Until this SPD was published for consultation, whilst our clients' land had been included within the development boundary of the site allocation, there had been no indication of a 'comprehensive' development approach. Our client understands that the Council wishes to see the area developed as the new cultural and leisure quarter, but holds that the exclusion of Walpole House would not prejudice this wider redevelopment.	
Changes/suggestions: as above	
Council response: The town centre has been without a cinema since 2008, and the failure to complete the extant permission within a reasonable timescale is significantly undermining efforts to revitalise the town centre. However, the delay in the Empire Cinema development has allowed the Council to develop its regeneration and planning policy position in relation to this part of the town centre, particularly in the context of the emerging development elsewhere in the town centre including the confirmation of Crossrail and redevelopment of Dickens Yard. The approach, the strategic direction of which is set out in the adopted Development Strategy DPD, has now evolved to the extent that it provides justification for the re-provision of the cinema as part of a redevelopment of a wider site forming part of the 'cultural quarter' of the Town Centre. The core aim of providing a an enlivened film/cultural quarter in this location is widely supported by the local community, as evidenced through the substantial consultation that was carried out as part of the preparation of the Development Strategy DPD, and subsequently the Development Sites DPD. The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised.	
Proposed changes: None.	

Rep: EC/08 (3)	Name: Simon Neate Indigo Planning Ltd
On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd	
Representation: In summary, we raise the following objections to the comprehensive redevelopment approach adopted by this SPD: 1. It is not reasonable or necessary for the 0.47ha Empire site to be extended to include Walpole House. There are amendments to the scheme, as recent as October 2011, which increased the number of screens to 20 and include	

<p>additional units on land which did not include our client's building. As such the rationale for the inclusion of our client's land is unclear;</p> <p>Changes/suggestions: as above</p>
<p>Council response:</p> <p>The town centre has been without a cinema since 2008, and the failure to complete the extant permission within a reasonable timescale is significantly undermining efforts to revitalise the town centre. However, the delay in the Empire Cinema development has allowed the Council to develop its regeneration and planning policy position in relation to this part of the town centre, particularly in the context of the emerging development elsewhere in the town centre including the confirmation of Crossrail and redevelopment of Dickens Yard. The approach, the strategic direction of which is set out in the adopted Development Strategy DPD, has now evolved to the extent that it provides justification for the re-provision of the cinema as part of a redevelopment of a wider site forming part of the 'cultural quarter' of the Town Centre. The core aim of providing a an enlivened film/cultural quarter in this location is widely supported by the local community, as evidenced through the substantial consultation that was carried out as part of the preparation of the Development Strategy DPD, and subsequently the Development Sites DPD. The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised.</p>
<p>Proposed changes: None.</p>

Rep: EC/08 (4)	Name: Simon Neate Indigo Planning Ltd
On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd	
<p>Representation:</p> <p>2. The objective of creating east-west links can be realised without the need to acquire Walpole House. The reason for the Council purchasing the former YMCA building next to Walpole House in 2011 was to enable the implementation of a more comprehensive mixed-use scheme and, importantly, to enable the link through to Bond Street; and</p>	
<p>Changes/suggestions: as above</p>	
<p>Council response:</p> <p>The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south</p>	

connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.

Proposed changes:

None.

Rep: EC/08 (5)

Name: Simon Neate Indigo Planning Ltd

On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd

Representation:

3. Neither the building, nor the current use of Walpole House, are incompatible with the principles set out in the SPD or Development Plan. Therefore, the SPD is not justified and, as such, is unsound as it would not provide the most appropriate strategy, when considered against the reasonable alternatives. By excluding Walpole House from the proposed scheme, the redevelopment would still be able to adequately satisfy Paragraph 58 of the National Planning Policy Framework ('Framework') which sets out the guiding principles of good quality development/design and also the objective and principles of the SPD, as demonstrated below:

Changes/suggestions:

as above

Council response:

The siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to located a modern multi-screen cinema behind the façade of the pervious cinema be under-estimated.

Proposed changes:

None.

Rep: EC/08 (6)

Name: Simon Neate Indigo Planning Ltd

On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd

Representation:

Principle 1: Create a new north-south pedestrian route overlooked by active frontages connecting New Broadway and Ealing Green (p.18):

A pedestrian route could be established along the roadway running beside no. 2 Mattock Lane, part of which is currently

<p>in our clients' ownership (subject to the satisfactory conclusion of negotiations with our clients over rights of access over that pedestrian footway), but without affecting the nearby envelope of Walpole House.</p> <p>Changes/suggestions: as above</p>
<p>Council response: The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.</p>
<p>Proposed changes: None.</p>

Rep: EC/08 (7)	Name: Simon Neate Indigo Planning Ltd
On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd	
<p>Representation: Principle 2: Open up an east-west link to the site from Bond Street (p.18) This link could be created, running over land currently owned by the Council, in the location as is shown on the plan in the SPD at Figure 5.2. This would not affect our clients' land.</p>	
<p>Changes/suggestions: as above</p>	
<p>Council response: The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.</p>	
Proposed changes:	

None.

Rep: EC/08 (8)	Name: Simon Neate Indigo Planning Ltd
On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd	
Representation: Principle 3: Create a new public space within the cinema site (p.20) An adequately sized public space could be created around a new cinema, without affecting the envelope of Walpole House.	
Changes/suggestions: as above	
Council response: The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.	
Proposed changes: None.	

Rep: EC/08 (9)	Name: Simon Neate Indigo Planning Ltd
On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd	
Representation: Principle 4: Create an integrated network of spaces, street lanes, and routes though the site, and to ensure that any new or replacement buildings proving active frontages at ground level. Use these streets and spaces to create an attractive mixed use area (p.20) This could be achieved without Walpole House being included in the redevelopment proposals.	
Changes/suggestions: as above	
Council response: The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision	

for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.

Proposed changes:

None.

Rep: EC/08 (10)

Name: Simon Neate Indigo Planning Ltd

On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd

Representation:

Principle 5: The cinema 'box' needs to be carefully sited in order to enable a positive urban environment across the whole site area (p.22)

There is plenty of space for the cinema 'box' to be moved around on the rest of the Cinema Site, without Walpole House being required for such relocation.

Changes/suggestions:

as above

Council response:

The siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to located a modern multi-screen cinema behind the façade of the pervious cinema be under-estimated.

Proposed changes:

None.

Rep: EC/08 (11)

Name: Simon Neate Indigo Planning Ltd

On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd

Representation:

Principle 6: Buildings facing onto New Broadway and Bond Street need to respect the conservation areas and adjacent listed buildings (p.22)

Walpole House is currently maintained to a good standard and is of an acceptable design. Furthermore, the existing

<p>building preserves and does not harm the character and appearance of the conservation area or the setting and appearance of the adjacent listed buildings.</p> <p>Changes/suggestions: as above</p>
<p>Council response: The siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to located a modern multi-screen cinema behind the façade of the pervious cinema be under-estimated.</p>
<p>Proposed changes: None.</p>

Rep: EC/08 (12)	Name: Simon Neate Indigo Planning Ltd
On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd	
<p>Representation: Principle 7: Development to the south of the site should be designed to mask any negative effects of the massing of the cinema box on Pitshanger Manor and to the overlook the open spaces of Ealing Green (p.22) The exclusion of Walpole House would not prevent this from being achieved.</p>	
<p>Changes/suggestions: as above</p>	
<p>Council response: The siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to located a modern multi-screen cinema behind the façade of the pervious cinema be under-estimated.</p>	
<p>Proposed changes: None.</p>	

Rep: EC/08 (13)	Name: Simon Neate Indigo Planning Ltd
On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd	
<p>Representation: Principle 8: Building heights within the site and overlooking the new public square should be appropriate to the size and</p>	

<p>scale of the streets and squares (p.22)</p> <p>Any scheme would be designed to take account of the wider context and there is no reason why this principle cannot be met with the exclusion of Walpole House.</p> <p>Changes/suggestions:</p> <p>as above</p>
<p>Council response:</p> <p>It is acknowledged that further guidance regarding the scale of buildings and their location on the site in the context of the surrounding character is necessary.</p>
<p>Proposed changes:</p> <p>Revise supporting wording to Principle 7 on page 22 to read: "There are significant benefits to a sympathetic scale of development on the edges of the site generally relating to the heights of neighbouring buildings. However, development on the southern edge of the site should be scaled a least to screen the bulk of the cinema block as well as responding to its role in the setting of Ealing Green Conservation Area and the statutory listed assets to the south".</p> <p>Also revise wording to figure 5.6, fourth description in the legend on page 23 to read : "Built form of appropriate scale to screen cinema block"</p>

Rep: EC/08 (14)	Name: Simon Neate Indigo Planning Ltd
On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd	
<p>Representation:</p> <p>Principle 9: Carefully integrate the retained cinema frontage on New Broadway (p.22)</p> <p>Excluding Walpole House from this scheme would not prevent this principle from being achieved.</p>	
<p>Changes/suggestions:</p> <p>as above</p>	
<p>Council response:</p> <p>The siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to located a modern multi-screen cinema behind the façade of the pervious cinema be under-estimated.</p>	
<p>Proposed changes:</p> <p>None.</p>	

Rep: EC/08 (15)	Name: Simon Neate Indigo Planning Ltd
On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd	
Representation: Principle 10: Create a range of uses, in addition to the cinema use, that support the town centre and the evening economy (restaurants/bars etc.) (p.22) Walpole House not being brought in as part of the wider development scheme would not prejudice the range of uses that could be provided.	
Changes/suggestions: as above	
Council response: The siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to located a modern multi-screen cinema behind the façade of the pervious cinema be under-estimated.	
Proposed changes: None.	

Rep: EC/08 (16)	Name: Simon Neate Indigo Planning Ltd
On behalf of: GM Investment Trustees Ltd and GM (UK) Pension Trustees Ltd	
Representation: Planning Procedures It also appears that the correct procedure might not have been followed because there has not been a strategic environmental assessment of the significant environmental effects that are likely to arise from the comprehensive redevelopment of the Ealing Cinema Site (R (on the application of Wakil (t/a Orya Textiles) v Hammersmith and Fulham [2012] EWHC 1411).	
Changes/suggestions: as above	
Council response: Both the Development Strategy DPD and Development Sites DPD were subject to full Sustainability Appraisals, encompassing SEA requirements as set out in the legislation. The SPD does not establish new policies. It provides further guidance on the implementation of those policies contained with Ealing's Local Plan, and the Development Sites DPD in particular provides a sufficient level of detail such that an additional SA of the SPD is not considered appropriate; the SPD	

does not propose a development quantum/mix of uses which is different to that within the Development Sites DPD.
Proposed changes: None.

Rep: EC/09 (1)	Name: Stuart Morley Central Ealing Residents Association (CERA)
On behalf of: Central Ealing Residents Association (CERA)	
<p>Representation: CERA strongly supports the draft SPD with regard for the need for a new multi-screen cinema in Ealing town centre. We also support new leisure and cultural/arts uses in principle and some residential uses on the site.</p> <p>Changes/suggestions: Sections 1, 2 and 3 provide a good context, but Sections 4 and 5 need changes as summarised below:</p> <ul style="list-style-type: none"> • The new multi-screen cinema should be located behind the listed frontage on Uxbridge Road, where it already has planning permission, enabling an early start to development of a coherent new multi- screen cinema with main road frontage. • The site is substantial, irregularly shaped and complex to develop – it should be developed in phases with the southern half implemented later due to various land ownerships, potential acquisition problems, and the proposed mixture of uses (residential, cultural and leisure). • A comprehensive, detailed masterplan is needed for the whole site to show how the various phases would link together. • Indicative building heights (number of stories) should be indicated in the SPD and shown on the masterplan for each part of the site due to conservation area sensitivities. • The SPD needs to justify why pedestrian streets and a central square are needed and how they would relate to the different uses which are intended for the site and show how active street frontages can be achieved. • The SPD should show where residential and leisure/cultural uses would be located and whether there would be single use or multi use buildings. • The SPD needs to explain how viability can be achieved with high existing use value buildings located in the southern part of the site (there needs to be comment on acquisition costs). • The SPD should comment on the likelihood of a CPO Inquiry for land in the southern part of the site, provide a schedule of floorspace for individual uses, and comment on likely timescales of development, ie likely start dates and completion dates for development. 	
<p>Council response: Support noted.</p>	

Proposed changes: None.

Rep: EC/09 (2)	Name: Stuart Morley
On behalf of: Central Ealing Residents Association (CERA)	
Representation: But CERA does not support the concept of comprehensive development if it means that the whole site must be acquired and then developed as a single phase, which would involve a lengthy CPO process, a lengthy layout/design process and a lengthy development selection process, as this would further delay the construction of a new much needed cinema in Ealing town centre. An acceptable cinema scheme already has planning permission, the site is cleared and it should be developed as soon as possible behind the listed cinema façade.	
Changes/suggestions: as above	
Council response: The town centre has been without a cinema since 2008, and the failure to complete the extant permission within a reasonable timescale is significantly undermining efforts to revitalise the town centre. However, the delay in the Empire Cinema development has allowed the Council to develop its regeneration and planning policy position in relation to this part of the town centre, particularly in the context of the emerging development elsewhere in the town centre including the confirmation of Crossrail and redevelopment of Dickens Yard. The approach, the strategic direction of which is set out in the adopted Development Strategy DPD, has now evolved to the extent that it provides justification for the re-provision of the cinema as part of a redevelopment of a wider site forming part of the 'cultural quarter' of the Town Centre. The core aim of providing a an enlivened film/cultural quarter in this location is widely supported by the local community, as evidenced through the substantial consultation that was carried out as part of the preparation of the Development Strategy DPD, and subsequently the Development Sites DPD. The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised.	
Proposed changes: None.	

Rep: EC/09 (3)	Name: Stuart Morley
On behalf of: Central Ealing Residents Association (CERA)	
Representation:	

One or more other parts of the site can be redeveloped separately as later phases. These parts of the site are in three different ownerships and contain substantial buildings, one of which is six stories in height and, therefore, contains a significant amount of floorspace with a relatively high value/acquisition cost. This makes redevelopment viability difficult, unless the density and height of new buildings increases, which in a conservation area close to the grade 1 listed Pitshanger Manor, Ealing Green and Walpole Park, is unlikely to be desirable or acceptable. So the redevelopment of the southern half of the site will, inevitably, be controversial, difficult and time consuming to plan, potentially difficult to acquire compulsorily and difficult to make viable. This suggests that it is more suited to later phases of development as part of an overall masterplan.

Changes/suggestions:

as above

Council response:

It is important to clarify that comprehensive redevelopment does not exclude a phased approach to development/construction, for example the approach which has been taken at Dickens Yard. The SPD provides sufficient guidance for those bringing forward proposals to develop a detailed masterplan as part of the planning application process. This may or may not include phased redevelopment depending on the nature of the scheme proposed. The evidence for a link between development viability and a direct requirement for increased heights is unclear and unsubstantiated.

Proposed changes:

None.

Rep: EC/09 (4)

Name: Stuart Morley

On behalf of: Central Ealing Residents Association (CERA)

Representation:

CERA wishes to make the following detailed specific points:

- Compulsory purchase procedures have a number of repercussions:
 - they require a clear strategic framework for the site which is so far missing from the draft SPD.
 - they require detailed plans which have been subject to full consultation (see below) which are missing from the draft SPD.
 - they require that the scheme is viable (not even mentioned let alone considered in the SPD).
 - the scheme needs to reflect that the site is in two conservation areas and has height constraints due to the proximity of the grade 1 listed Pitshanger Manor, Ealing Green and Walpole Park.
 - owners of sites may well object to the proposals and object to acquisition of their sites, so a public inquiry seems

<p>inevitable and CPO powers may be difficult to achieve.</p> <ul style="list-style-type: none"> - there will need to be a development competition to select an appropriate developer, ideally before a CPO public inquiry, which will be time consuming and cause further delay. However, CERA is encouraged to hear about the progress which may already have been achieved in this regard. - the overall timescale to implement comprehensive development of the whole site would take many years, which Ealing town centre cannot afford. So a phased implementation would be preferred, with a new cinema on the cleared northern part of the site behind the listed façade developed first and not dependant on other elements. <p>Changes/suggestions: as above</p>
<p>Council response: The CPO process is outside the scope of this consultation.</p>
<p>Proposed changes: None.</p>

Rep: EC/09 (5)	Name: Stuart Morley
On behalf of: Central Ealing Residents Association (CERA)	
<p>Representation: New pedestrian routes through the site appear attractive in some ways in theory, but may not be in practice as they may not have a heavy footfall and could potentially attract crime.</p> <p>Changes/suggestions: as above</p>	
<p>Council response: New routes are required to be overlooked by active frontages, which will discourage crime.</p>	
<p>Proposed changes: None.</p>	

Rep: EC/09 (6)	Name: Stuart Morley
On behalf of: Central Ealing Residents Association (CERA)	
<p>Representation: New east-west and north-south streets, plus a new central square would take up a considerable amount of developable space and could restrict the flexibility of the layout.</p> <p>Changes/suggestions:</p>	

as above
Council response: The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.
Proposed changes: None.

Rep: EC/09 (7)	Name: Stuart Morley
On behalf of: Central Ealing Residents Association (CERA)	
Representation: The need to set back new development from the backs of buildings fronting New Broadway and Bond Street, so as to leave adequate light to the windows in these buildings, coupled with new internal streets and a new square, further limit development flexibility.	
Changes/suggestions: as above	
Council response: The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.	
Proposed changes: None.	

Rep: EC/09 (8)	Name: Stuart Morley
On behalf of: Central Ealing Residents Association (CERA)	
Representation: However, some access into the site from Bond Street and Uxbridge Road/New Broadway might be advantageous if it can be demonstrated that substantial pedestrian numbers could be attracted into the centre of the site and there is substantial and unsatisfied demand for alternative routes compared to the present street alignment.	
Changes/suggestions: as above	
Council response: The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.	
Proposed changes: None.	

Rep: EC/09 (9)	Name: Stuart Morley
On behalf of: Central Ealing Residents Association (CERA)	
Representation: The proposed new streets and a square would need active frontages, but with low potential footfall this could be difficult to achieve to the extent envisaged and may well necessitate rental incentives. New streets need to lead somewhere which acts as a draw or magnet and with a relatively small site this will be difficult to achieve. In addition, the plans in the draft SPD relating to the location of the central square appear to be contradictory, as the location of the square in Fig 5.4 lies underneath the north-west corner of the proposed cinema in Fig 5.6. The location of the square also leaves too little space to the north-east of the square to allow for any development, due to the proximity of the backs of buildings fronting New Broadway.	
Changes/suggestions: as above	
Council response:	

The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.

Proposed changes:

None.

Rep: EC/09 (10)

Name: Stuart Morley

On behalf of: Central Ealing Residents Association (CERA)

Representation:

New streets criss-crossing the site, as shown in the draft SPD, may be unnecessary as the site is narrow and there is good north-south access on either side (Bond Street and Barnes Pikle). Some improvement of Barnes Pikle would be easy to achieve through S106 money already approved by the cinema planning permission.

Changes/suggestions:

as above

Council response:

The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.

Proposed changes:

None.

Rep: EC/09 (11)

Name: Stuart Morley

On behalf of: Central Ealing Residents Association (CERA)

Representation:

<ul style="list-style-type: none"> • We strongly believe that the much needed new cinema should be located immediately behind the preserved listed cinema façade, which would also mean that the cinema would benefit from a main road frontage, which is essential to achieve the prominence to make it viable. The already approved cinema is not excessively bulky and we think it is essential that the façade, which is an Ealing landmark, should form the frontage of the new cinema and not be divorced from it and used for some other purpose. Furthermore, if the cinema were located in the southern part of the site, as the draft SPD proposes, its bulk would conflict with the nearby grade 1 listed Pitshanger Manor, Ealing Green and Walpole Park. If the cinema then had to be screened by tall buildings to hide its bulk, as the draft SPD proposes, this would just create additional and insurmountable conflicts. <p>Changes/suggestions: as above</p>
<p>Council response: Principle 9, page 22 of the Draft SPD, sets out that the retained façade must be sensitively integrated into any proposals. It would be inappropriately prescriptive to require the cinema to be located on a particular part of the site, as achievement of the Vision is not dependent on the cinema box being located behind the facade. However, the siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to locate a modern multi-screen cinema behind the façade of the previous cinema be under-estimated.</p>
<p>Proposed changes: None.</p>

Rep: EC/09 (12)	Name: Stuart Morley
On behalf of: Central Ealing Residents Association (CERA)	
<p>Representation:</p> <ul style="list-style-type: none"> • The site is awkward in shape and is overlooked by the backs of buildings which front New Broadway and Bond Street, which are immediately adjacent and have south and west facing windows looking over the site, so any new development would need to take this into account and be set back from these elevations. The site is also in two conservation areas and very close to the grade 1 listed Pitshanger Manor, to Ealing Green and to Walpole Park. The precise location and height of new buildings on the site, therefore, require very careful detailed planning and an imaginative layout and design. This is needed to see exactly what can best be accommodated on the site and what benefits, if any, comprehensive development of the whole site would actually achieve. It also reinforces our view that a phased development, in accordance with a masterplan, is the best solution. 	

Changes/suggestions: as above
Council response: Setting maximum building heights would not be in line with London Plan or Local Plan guidance. However, it is acknowledged that further guidance regarding the scale of buildings and their location on the site in the context of the surrounding character is necessary.
Proposed changes: Revise supporting wording to Principle 7 on page 22 to read: "There are significant benefits to a sympathetic scale of development on the edges of the site generally relating to the heights of neighbouring buildings. However, development on the southern edge of the site should be scaled a least to screen the bulk of the cinema block as well as responding to its role in the setting of Ealing Green Conservation Area and the statutory listed assets to the south". Also revise wording to figure 5.6, fourth description in the legend on page 23 to read : "Built form of appropriate scale to screen cinema block"

Rep: EC/09 (13)	Name: Stuart Morley
On behalf of: Central Ealing Residents Association (CERA)	
Representation: As it stands, CERA considers that the plans in the draft SPD are too vague, too contradictory and some of the proposals are undesirable and unworkable. CPO powers would be needed as the site is in multiple ownership and some owners might well object. A CPO Inquiry would then be inevitable and CPO powers might not be granted. Even if they were eventually granted there would be delays in planning such a complex scheme, selecting a development partner, undertaking a CPO Inquiry, finding a cinema operator and developing out the proposed scheme. Many years would elapse before Ealing had the new cinema it so desperately needs.	
Changes/suggestions: as above	
Council response: The Council considers that the level of detail provided in the SPD is the minimum necessary to ensure achievement of the Vision for the site.	
Proposed changes: None.	

Rep: EC/09 (14)	Name: Stuart Morley
On behalf of: Central Ealing Residents Association (CERA)	
Representation: CERA cannot, therefore, endorse the draft SPD in its current form, but would strongly support a comprehensive approach which might anticipate a phased development but with a cinema located on the northern part of the site behind the listed façade as the first and most essential component	
Changes/suggestions: as above	
Council response: The need to clarify the council's position on phasing	
Proposed changes: Revise wording in the second column under 'extend of redevelopment opportunity' on page 16 to read "Proposals brought forward must be based on a masterplan for the site as a whole that addresses the urban design objectives and realise the full potential of the site. The Council wants approaches based on a clear design concept that advances a vision for the site as a whole; piecemeal development (for example based on land ownership) that prejudices the ability to deliver the site's full development potential will not be supported."	

Rep: EC/10 (1)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: We note that this document covers a larger area than the cinema/YMCA site -- it also includes Walpole House and Flavas bar. Whilst neither of these buildings is worthy of retention we suggest that extension of the site to include them will make the problem of aggregation of sites more complex than it needs to be. It could therefore lead to planning blight over a much larger area of central Ealing and would be harmful to the Conservation Areas. However, if a larger development site is pursued, we consider that the overriding priority for the enlarged site should be to secure a wide range of leisure and cultural activities that can help attract local residents and visitors into the town centre. That said, we support in principle the proposals included in this document but we have a number of detailed comments.	
Changes/suggestions: None supplied	
Council response: Supported noted.	
Proposed changes:	

None.

Rep: EC/10 (2)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: Executive summary On page 2, please note that the cinema was demolished in 2008/9.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: Revise wording in the second para, 6th line on page 2 to read "The former Empire cinema dating from 1934 was demolished in 2008/09 with only the front façade now retained."	

Rep: EC/10 (3)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: Site context Page 8: note that 'Lammerton' should read "Lamertons" (we have pointed this out on several occasions previously).	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: Revise wording on the 5th bullet point on page 8 to read "The Lamerton Site, proposed for retail and supporting uses." Revise wording to figure 2.4, bullet point 5 in the legend on page 8 to read "Lamerton"	

Rep: EC/10 (4)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: Site issues	

Page 10: Empire site history: relevance of "fifth of six cinemas built in Ealing during the 1930s and 40s" not clear. In any case, many of the early ones were built before the 1930s and none was built in 1940s. The style of the former Empire cinema was classical rather than pseudo-Egyptian as stated (see below). The cinema closed in 2008 and was demolished in 2008/9. The paragraph implies that more of the building stands than the locally-listed facade when it says "it is now the only surviving cinema in the town centre". It might be worth amplifying here or elsewhere the references to the extent to which efforts have been made to get Empire to bring their project to fruition.

Changes/suggestions:

None supplied

Council response:

Correction noted. Paragraph 3 of the section makes it clear that only the façade remains.

Proposed changes:

Revise wording to first para, first sentence, under "Empire Site history" on page 10 to read "The Empire Cinema opened in 1934 and was the fifth of six cinemas built in Ealing."

Rep: EC/10 (5)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: Page 11: figure 3.1 has no key indicating the significance (?name, ownership) of the building/site numbers.	
Changes/suggestions: None supplied	
Council response: Correction noted.	
Proposed changes: For figure 3.1 on page 11 - Insert either a key for numbered points 1 to 6 or provide better cross reference to text on Page 10, Para 5.	

Rep: EC/10 (6)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: Page 14: in the "building quality" paragraph the terrace to the north of the site fronting on New Broadway is currently being renovated and the wording needs to be amended. Reference should be made to the fact that that the site is in a	

conservation area Changes/suggestions: None supplied
Council response: Correction noted. This renovation occurred since the SPD was drafted.
Proposed changes: Revise wording to 2nd para, 2nd sentence on page 14 to read "The terrace to the north of the site, fronting on to New Broadway, has been renovated recently and provides an attractive façade.

Rep: EC/10 (7)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: Page 15: reference should be made to the fact that Grade I Pitshanger Manor lies immediately to the south west of the site.	
Changes/suggestions: None supplied	
Council response: This section relates to open space. Reference to the listed status is made on page 9.	
Proposed changes: None.	

Rep: EC/10 (8)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: Site development principles Page 18 (principal 1/2): we are not convinced of the need to have new North-South pedestrian routes when Barnes Pike already exists. Provided that this is upgraded it could provide an adequate substitute.	
Changes/suggestions: None supplied	
Council response: The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through	

the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.

Proposed changes:

None.

Rep: EC/10 (9)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: Page 20 (Principle 3): delete "outdated" in first sentence: this space was updated around five years ago. We have to question the practicality of introducing a new public space into this area. Whilst we do not object to the principle of a new space provided that could be devoted to an outdoor performance area it may be difficult to deliver in practice given the site constraints.	
Changes/suggestions: None supplied	
Council response: The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site and therefore any proposals coming forward must demonstrate achievement of this objective. The routes/spaces shown in the SPD are indicative only, and any proposals coming forward would be required to provide detail on how these routes/spaces would function in practice.	
Proposed changes: Revise wording to principle 3, first sentence of supporting text on page 20 to read "Currently in Ealing there are no significant pedestrian friendly public spaces other a small isolated town square within the Broadway centre."	

Rep: EC/10 (10)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: Page 22 (Principle 5): the document should not presuppose the number of screens at this stage; it would be logical for the cinema "box" to be sited immediately behind the facade rather than in the centre of the site.	

Changes/suggestions: None supplied	
Council response: The viability of the cinema use on the site is dependent on a certain minimum number of screens. It is acknowledged that this range is greater than 10-12 and the wording should be adjusted accordingly. Principle 9, page 22 of the Draft SPD, sets out that the retained façade must be sensitively integrated into any proposals. It would be inappropriately prescriptive to require the cinema to be located on a particular part of the site, as achievement of the Vision is not dependent on the cinema box being located behind the facade. However, the siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to locate a modern multi-screen cinema behind the façade of the previous cinema be under-estimated.	
Proposed changes: Revise wording to principle 5, first sentence of supporting text on page 22 to read "Whilst it is appreciated that a multi-screen cinema by its nature has a certain bulk and massing,..." Revise wording to figure 5.6, third description in legend on page 23 to read "Indicative site of multi-screen cinema"	

Rep: EC/10 (11)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: Page 22 (Principle 6): the preferred maximum height should be clearly stated here (i.e. 4-6 storeys). Also, careful regard should be given to the future of the facade of the locally listed YMCA building which ideally should be retained in any scheme.	
Changes/suggestions: None supplied	
Council response: Setting maximum building heights would not be in line with London Plan or Local Plan guidance. However, it is acknowledged that further guidance regarding the scale of buildings and their location on the site in the context of the surrounding character is necessary.	
Proposed changes: Revise supporting wording to Principle 7 on page 22 to read: "There are significant benefits to a sympathetic scale of development on the edges of the site generally relating to the heights of neighbouring buildings. However, development on the southern edge of the site should be scaled at least to screen the bulk of the cinema block as well as responding to	

its role in the setting of Ealing Green Conservation Area and the statutory listed assets to the south”.
Also revise wording to figure 5.6, fourth description in the legend on page 23 to read : “Built form of appropriate scale to screen cinema block”

Rep: EC/10 (12)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: Page 22 (Principle 7): it is not logical to have the taller elements of the site to the south given the close proximity of Grade I listed Pitshanger Manor: English Heritage will have views on this.	
Changes/suggestions: None supplied	
Council response: Setting maximum building heights would not be in line with London Plan or Local Plan guidance. However, it is acknowledged that further guidance regarding the scale of buildings and their location on the site in the context of the surrounding character is necessary.	
Proposed changes: Revise supporting wording to Principle 7 on page 22 to read: "There are significant benefits to a sympathetic scale of development on the edges of the site generally relating to the heights of neighbouring buildings. However, development on the southern edge of the site should be scaled a least to screen the bulk of the cinema block as well as responding to its role in the setting of Ealing Green Conservation Area and the statutory listed assets to the south”. Also revise wording to figure 5.6, fourth description in the legend on page 23 to read : “Built form of appropriate scale to screen cinema block”	

Rep: EC/10 (13)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: Page 22 (Principle 9): there is misunderstanding about the architecture of the original cinema: it was deliberately designed by John Stanley Beard in a classical idiom as a reaction against the fashionable art deco designs of the typical Odeon type cinema of the day. Ideally, the surviving arch from the Walpole Picture Theatre (not as stated) should also be included in the redevelopment -- possibly as a new entrance -- rather than left forlornly stranded on the side of the Mattock Lane house.	
Changes/suggestions:	

None supplied
Council response: Noted
Proposed changes: None.

Rep: EC/10 (14)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: Page 22 (Principle 10): the range of uses specified should include leisure and culture. Bars should be specifically excluded from the development apart possibly from a replacement for Flavas.	
Changes/suggestions: None supplied	
Council response: The supporting text to principle 10 already lists cultural and arts facilities, other uses will be supported to the extent that they complement the cinema development as a whole, taking account of its substantial residential component.	
Proposed changes: None.	

Rep: EC/10 (15)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: Page 23: delete reference to the preferred number of screens (see above).	
Changes/suggestions: None supplied	
Council response: To be modified as per Principle 5.	
Proposed changes: Revise wording to principle 5, first sentence of supporting text on page 22 to read "Whilst it is appreciated that a multi-screen cinema by its nature has a certain bulk and massing,..." Revise wording to figure 5.6, third description in legend on page 23 to read "Indicative site of multi-screen cinema"	

Rep: EC/10 (16)	Name: Robert Gurd
On behalf of: Ealing Civic Society	
Representation: Other: there is little or no reference to car parking on the site. It might be necessary to incorporate some underground car parking in any redevelopment in order to make evening uses viable. Finally, we believe that the emerging Ealing Centre Neighbourhood Forum is the appropriate body to input stakeholder ideas into the scheme as it develops.	
Changes/suggestions: None supplied	
Council response: The London Plan contains policies on maximum levels of car parking for various uses. As the site has an excellent Public Transport Accessibility (PTAL) of 6, the Council considers that car parking levels should therefore be kept to a minimum in the interests of sustainability and promoting modal shift away from private car use. Actual levels of car parking are most appropriately determined through the planning application process.	
Proposed changes: None.	

Rep: EC/11 (1)	Name: Susan New
On behalf of:	
Representation: Not effective I have already written at length in my original submission re this site and my views have not changed having read the SPD. I have attached my original submission and I would like it to be regarded as Appendix A. I will send Appendix A separately - see appendix A However I would like to make a few comments on the SPD. There are a few inaccuracies re the site but I believe these have been covered by the Ealing Civic Society's submission.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/11 (2)	Name: Susan New
On behalf of:	
Representation: General Comments There is one cinema in the whole of Ealing and it is at Park Royal. The latter cinema is very difficult to get to by public transport and only serves the north east of the Borough. For people who actually enjoy going to the cinema it can be a very unsatisfactory experience as many people just use the cinema as a meeting/eating venue and so film viewing is constantly interrupted by people talking, eating and moving from screen to screen.	
Changes/suggestions: None supplied	
Council response: The quality of the cinema viewing experience is outside the scope of the SPD.	
Proposed changes: None.	

Rep: EC/11 (3)	Name: Susan New
On behalf of:	
Representation: The multiplex at Westfield is also not easy to get to by public transport as it can take up to 3/4 of an hour to get there by bus and if one uses the Central Line to Shepherd's Bush in the evening one has to push through the commuter crowds arriving at Ealing Broadway. There is no lift at Shepherd's Bush.	
Changes/suggestions: None supplied	
Council response: The accessibility by public transport to cinemas outside the borough is outside the scope of the SPD.	
Proposed changes: None.	

Rep: EC/11 (4)	Name: Susan New
On behalf of:	
Representation:	

<p>Empire Cinemas allowed the cinema to deteriorate to the extent that the cinema was unheated and much of the seating was broken and taped up. However prior to that the cinema had been successful and quite often there were queues for popular films like 'Lord of the Rings' and children's films. At one point we even had Tuesdays devoted to independent films and there were screenings of certain films prior to general release.</p> <p>Changes/suggestions: None supplied</p>
<p>Council response: The state of repair of the now demolished cinema is outside the scope of the SPD.</p>
<p>Proposed changes: None.</p>

Rep: EC/11 (5)	Name: Susan New
On behalf of:	
<p>Representation: My belief was that one of the purposes of the LDF and the LIP was to encourage walking, cycling and the use of public transport. It would help if the public transport situation was improved near the cinema site. The nearest bus stop on the south side does not even have Countdown and the 207/427/83 stop not only does not have Countdown but has inadequate shelter and a disgusting uneven bit of paving. The 65 bus stop southbound does not have Countdown. (Public Transport and vehicular Movement P.12 of the SPD)</p> <p>Changes/suggestions: None supplied</p>	
<p>Council response: The site is located in PTAL zone 6, the highest rating.</p>	
<p>Proposed changes: None.</p>	

Rep: EC/11 (6)	Name: Susan New
On behalf of:	
<p>Representation: It is imperative to that a cinema is built in the centre of Ealing which, after all, is a Metropolitan Centre and the cinema would also serve the whole of the Borough.</p>	

Changes/suggestions: None supplied
Council response: Agreed.
Proposed changes: None.

Rep: EC/11 (7)	Name: Susan New
On behalf of:	
Representation: Pedestrian movement Principle 1. From what I can remember from the original documentation re the original cinema re-build, S106 money was allocated to improving Barnes Pike. This agreement should be upheld. If the cinema, and it should be, is constructed where the frontage has been retained there is a possibility of a link to Mattock Lane but I am not sure what the benefit would be.	
Changes/suggestions: None supplied	
Council response: Principle 9, page 22 of the Draft SPD, sets out that the retained façade must be sensitively integrated into any proposals. It would be inappropriately prescriptive to require the cinema to be located on a particular part of the site, as achievement of the Vision is not dependent on the cinema box being located behind the facade. However, the siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to locate a modern multi-screen cinema behind the façade of the previous cinema be under-estimated.	
Proposed changes: None.	

Rep: EC/11 (8)	Name: Susan New
On behalf of:	
Representation:	

<p>Principle 2.</p> <p>I see no point in opening up an east-west route especially as it seems to necessitate knocking down the YMCA building (please refer to my comments on this building in EAL6). The SPD implies a cinema that can be entered from more than one direction but such a feature is extremely rare in cinema architecture.</p> <p>Changes/suggestions:</p> <p>None supplied</p>
<p>Council response:</p> <p>Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections.</p>
<p>Proposed changes:</p> <p>None.</p>

Rep: EC/11 (9)	Name: Susan New
<p>On behalf of:</p>	
<p>Representation:</p> <p>Streets and Spaces</p> <p>We do not need another public space as there is already one in the Broadway Centre and there is one proposed in the Dickens Yard development. I have also suggested in my Lamertons Site submission that the area now used infrequently as a car park should be a public space. The latter would be far larger than the one that could be constructed on this site. I have attached my original submission and I would like it to be Appendix B.</p>	
<p>Changes/suggestions:</p> <p>None supplied</p>	
<p>Council response:</p> <p>The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.</p>	
<p>Proposed changes:</p>	

None.

Rep: EC/11 (10)	Name: Susan New
------------------------	------------------------

On behalf of:

Representation: Built Form, Massing and Uses Principle 5 A cinema box is a ludicrous idea. The cinema should be built where the frontage has been retained. I would suggest that perhaps some of the screens should be at basement level as in the Curzon Shaftesbury Avenue and the Renoir Bloomsbury. This would enable more screens to be on a smaller site. I therefore think Principle 9 is irrelevant. Changes/suggestions: None supplied

Council response: Principle 9, page 22 of the Draft SPD, sets out that the retained façade must be sensitively integrated into any proposals. It would be inappropriately prescriptive to require the cinema to be located on a particular part of the site, as achievement of the Vision is not dependent on the cinema box being located behind the facade. However, the siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to locate a modern multi-screen cinema behind the façade of the previous cinema be under-estimated.
--

Proposed changes: None.

Rep: EC/11 (11)	Name: Susan New
------------------------	------------------------

On behalf of:

Representation: Principles 6, 7 and 8 On P.9 of the SPD the Conservation areas have been incorrectly mapped. Changes/suggestions: None supplied

Council response: Noted

Proposed changes: None.

Rep: EC/11 (12)	Name: Susan New
On behalf of:	
Representation: This site is part of the Ealing Town Centre Conservation Area and the Ealing Green Conservation Area. These Conservation Areas have already suffered in appearance from insensitive development, inappropriate shop fronts and unnecessary over illuminated signage and hoardings and therefore it is imperative that any development on this site should preserve and enhance the Conservation Areas in which it stands.	
Changes/suggestions: None supplied	
Council response: Noted	
Proposed changes: None.	

Rep: EC/11 (13)	Name: Susan New
On behalf of:	
Representation: This also applies to the streetscape of New Broadway .It is rather unwelcoming and gloomy streetscape at night. Even the Christmas lights, that unfortunately are blue, create a feeling of gloom rather than the magical landscape that is created, for example, with the trees at the skating rink at the Natural History museum.	
Changes/suggestions: None supplied	
Council response: The lighting strategy is a matter most appropriately agreed through the planning application process.	
Proposed changes: None.	

Rep: EC/11 (14)	Name: Susan New
On behalf of:	

Representation: The streetscape outside the Town Hall opposite the site has been improved but because the Town Hall has not been imaginatively illuminated the cinema site is opposite yet another under lit streetscape.
Changes/suggestions: None supplied
Council response: The lighting strategy is a matter most appropriately agreed through the planning application process.
Proposed changes: None.

Rep: EC/11 (15)	Name: Susan New
On behalf of:	
Representation: I hope it will be part of the development agreement that this whole area of New Broadway has an improved and imaginatively lit streetscape.	
Changes/suggestions: None supplied	
Council response: The lighting strategy is a matter most appropriately agreed through the planning application process.	
Proposed changes: None.	

Rep: EC/11 (16)	Name: Susan New
On behalf of:	
Representation: A cinema does not necessarily have to be a solid mass. I have attached a photo of the Cinematheque Francaise in Paris that illustrates an interesting and imaginative design for a cinema and cinema museum. Appendix C.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes:	

None.

Rep: EC/11 (17)	Name: Susan New
On behalf of:	
Representation: Principle 10 I do understand that to make the site viable that a range of uses of properties will have to be built on the site. However I believe residential development should be kept to a minimum and perhaps there should be eateries similar to the ones on the South Bank site. In my earlier submission I suggested a cinema museum and café.	
Changes/suggestions: None supplied	
Council response: The rationale for minimising residential development is unclear. The Council considers that increased residential development in the town centre will increase footfall, reduce the need to travel, and make a positive overall contribution to the vitality and viability of the area.	
Proposed changes: None.	

Rep: EC/12 (1)	Name: Will French
On behalf of: Save Ealing's Centre	
Representation: 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.	
Changes/suggestions: None supplied	
Council response: Support noted.	
Proposed changes:	

None.

Rep: EC/12 (2)	Name: Will French
On behalf of: Save Ealing's Centre	
Representation: 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.	
Changes/suggestions: None supplied	
Council response: The boundary of the site is the same as that for EAL6 Cinema within the Publication Version of the Development Sites DPD (June 2012). This was modified slightly to from the site boundary included in EAL17 in the Initial Proposals version of the Development Sites DPD (September 2010) to exclude 26-42 Bond Street as this permission had been fully implemented. Although 14-16 Bond Street (former YMCA Building) was not shown within the red line boundary of EAL17 due to a mapping error, it was referenced in the current uses and planning history of the site. Throughout the local plan production process, the wider site has been consistently consulted upon and referred to as the 'Cinema' site.	
Proposed changes: None.	

Rep: EC/12 (3)	Name: Will French
On behalf of: Save Ealing's Centre	
Representation: 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.	
Changes/suggestions:	

None supplied
Council response: Noted.
Proposed changes: None.

Rep: EC/12 (4)	Name: Will French
On behalf of: Save Ealing's Centre	
Representation: 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.	
Changes/suggestions: None supplied	
Council response: The referenced 'Ealing Cinema Site - Development Note' is not the subject of this consultation and predates the production of the SPD. As stated above, the site boundary of the SPD is consistent with EAL6 in the Development Sites DPD.	
Proposed changes: None.	

Rep: EC/12 (5)	Name: Will French
On behalf of: Save Ealing's Centre	
Representation:	

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.

Changes/suggestions:

None supplied

Council response:

The referenced 'Ealing Cinema Site - Development Note' is not the subject of this consultation and predates the production of the SPD. As stated above, the site boundary of the SPD is consistent with EAL6 in the Development Sites DPD, and the site allocation is in turn consistent with the strategic policy direction for the revitalisation of Ealing Metropolitan Town Centre as set out in the Development Strategy DPD (adopted April 2012). These strategic policies are based on the Ealing Town Centre Development Framework, and both DPDs have been the subject of extensive public consultation.

Proposed changes:

None.

Rep: EC/12 (6)	Name: Will French
On behalf of: Save Ealing's Centre	
<p>Representation:</p> <p>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.</p>	
<p>Changes/suggestions:</p> <p>None supplied</p>	
Council response:	

<p>The referenced 'Ealing Cinema Site - Development Note' is not the subject of this consultation and predates the production of the SPD. The Council considers that a SPD for the site was necessary due to the lack of progress on the site and the critical role the site plays in achieving one of the key objectives for the town centre, and the long-standing local support for an enlivened cinema/film quarter in this location. The SPD sets out a Vision and corresponding objectives for the site, and the design principles which are considered central to ensuring that the full potential of the area is realised. The Council considers this is the minimum level of guidance necessary to ensure achievement of the key objectives, without undue prescription.</p>
<p>Proposed changes: None.</p>

Rep: EC/12 (7)	Name: Will French
On behalf of: Save Ealing's Centre	
<p>Representation: 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.</p> <p>Changes/suggestions: None supplied</p>	
<p>Council response: The referenced 'Ealing Cinema Site - Development Note' is not the subject of this consultation and predates the production of the SPD. The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised. The boundary of the site is the same as that for EAL6 Cinema within the Publication Version of the Development Sites DPD (June 2012). This was modified slightly to from the site boundary included in EAL17 in the Initial Proposals version of the Development Sites DPD (September 2010) to exclude 26-42 Bond Street as this permission had been fully implemented. Although 14-16 Bond Street (former YMCA Building) was not shown within the red line boundary of EAL17 due to a mapping error, it was referenced in the current uses and planning history of the site. Throughout the local plan production process, the wider site has been consistently consulted upon and referred to as the 'Cinema' site.</p>	
<p>Proposed changes: None.</p>	

Rep: EC/12 (8)	Name: Will French
On behalf of: Save Ealing's Centre	
Representation: 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.	
Changes/suggestions: None supplied	
Council response: The referenced 'Ealing Cinema Site - Development Note' is not the subject of this consultation and predates the production of the SPD. The supporting text to principle 10 already lists cultural and arts facilities, other uses will be supported to the extent that they complement the cinema development as a whole, taking account of its substantial residential component.	
Proposed changes: None.	

Rep: EC/12 (9)	Name: Will French
On behalf of: Save Ealing's Centre	
Representation: 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:	
Changes/suggestions: None supplied	
Council response:	

Support noted.
Proposed changes: None.

Rep: EC/12 (10)	Name: Will French
On behalf of: Save Ealing's Centre	
Representation: 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.	
Changes/suggestions: None supplied	
Council response: The site boundary of the SPD is consistent with EAL6 in the Development Sites DPD, and the site allocation is in turn consistent with the strategic policy direction for the revitalisation of Ealing Metropolitan Town Centre as set out in the Development Strategy DPD (adopted April 2012). These strategic policies are based on the Ealing Town Centre Development Framework, and both DPDs have been the subject of extensive public consultation.	
Proposed changes: None.	

Rep: EC/12 (11)	Name: Will French
On behalf of: Save Ealing's Centre	
Representation: 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.	
Changes/suggestions: None supplied	
Council response: The supporting text to principle 10 already lists cultural and arts facilities, other uses will be supported to the extent that	

they complement the cinema development as a whole, taking account of its substantial residential component. As set out in Development Strategy Policy 2.5 relating to Ealing Town Centre, a number of key development sites are considered central to delivering the objectives for the town centre, and the Cinema site has a key role to play in delivery of the Cultural Quarter.

Proposed changes:

None.

Rep: EC/12 (12)	Name: Will French
On behalf of: Save Ealing's Centre	
<p>Representation: 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 Pitshanger Manor.</p> <p>Changes/suggestions: None supplied</p>	
<p>Council response: Setting maximum building heights would not be in line with London Plan or Local Plan guidance. However, it is acknowledged that further guidance regarding the scale of buildings and their location on the site in the context of the surrounding character is necessary.</p>	
<p>Proposed changes: Revise supporting wording to Principle 7 on page 22 to read: "There are significant benefits to a sympathetic scale of development on the edges of the site generally relating to the heights of neighbouring buildings. However, development on the southern edge of the site should be scaled a least to screen the bulk of the cinema block as well as responding to its role in the setting of Ealing Green Conservation Area and the statutory listed assets to the south". Also revise wording to figure 5.6, fourth description in the legend on page 23 to read : "Built form of appropriate scale to screen cinema block"</p>	

Rep: EC/12 (13)	Name: Will French
On behalf of: Save Ealing's Centre	
<p>Representation: Good pedestrian routes are always desirable, but we do not feel they are a high priority in this part of Ealing where the</p>	

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.

Changes/suggestions:

None supplied

Council response:

The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.

Proposed changes:

None.

Rep: EC/12 (14)	Name: Will French
On behalf of: Save Ealing's Centre	
Representation: 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.	
Changes/suggestions: None supplied	
Council response: The Historic Environment is described on page 9 of the SPD, including identification of local heritage assets in Figure 2.5. The SPD does not proposal redevelopment of buildings outside of the site boundary.	
Proposed changes:	

None.

Rep: EC/12 (15)	Name: Will French
On behalf of: Save Ealing's Centre	
Representation: 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.	
Changes/suggestions: None supplied	
Council response: Principle 9, page 22 of the Draft SPD, sets out that the retained façade must be sensitively integrated into any proposals. It would be inappropriately prescriptive to require the cinema to be located on a particular part of the site, as achievement of the Vision is not dependent on the cinema box being located behind the facade. However, the siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to locate a modern multi-screen cinema behind the façade of the previous cinema be under-estimated.	
Proposed changes: None.	

Rep: EC/12 (16)	Name: Will French
On behalf of: Save Ealing's Centre	
Representation: Opportunities for including the surviving arch from the Walpole Picture Theatre now stranded on the side of a Mattock Lane house also need consideration.	
Changes/suggestions: None supplied	
Council response:	

Noted
Proposed changes: None.

Rep: EC/12 (17)	Name: Will French
On behalf of: Save Ealing's Centre	
Representation: 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	
Changes/suggestions: None supplied	
Council response: Noted	
Proposed changes: None.	

Rep: EC/12 (18)	Name: Will French
On behalf of: Save Ealing's Centre	
Representation: 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.	
Changes/suggestions: None supplied	
Council response: The CPO process is outside the scope of this consultation.	

Proposed changes: None.

Rep: EC/13 (1)	Name: Jill McGregor CBRE
On behalf of: Empire Cinema 2 Limited	
Representation: CBRE Planning is instructed by Empire Cinema 2 Limited ("Empire"), the owners of land at 59-63 New Broadway, Ealing which comprises part of the site identified in the Ealing Cinema Draft Supplementary Document (SPD). Empire objects to the draft SPD as the current planning permissions for redevelopment of the site (LPA Refs: P/2003/5043, P/2003/5047, P/2010/3704 and P/2011/4526) remain extant and Empire is committed to delivering a new mixed use cinema and leisure scheme in Ealing town centre. Works are expected to recommence at the end of 2012/early 2013.	
Changes/suggestions: None supplied	
Council response: As of August 2013, works have not commenced on site.	
Proposed changes: None.	

Rep: EC/13 (2)	Name: Jill McGregor CBRE
On behalf of: Empire Cinema 2 Limited	
Representation: The draft SPD is considered premature pending adoption of the Development Sites DPD and it is noted that the Publication version of this document (June 2012) recognises that there is an outstanding planning permission for a multiscreen cinema on the Empire site that "...will provide a significant leisure development within the town centre, which Ealing currently lacks, and restore the retained facade as a key townscape element."	
Changes/suggestions: None supplied	
Council response: The site boundary of the SPD is consistent with EAL6 in the Development Sites DPD, and the site allocation is in turn consistent with the strategic policy direction for the revitalisation of Ealing Metropolitan Town Centre as set out in the Development Strategy DPD (adopted April 2012). These strategic policies are based on the Ealing Town Centre Development Framework, and both DPDs have been the subject of extensive public consultation. Based on the	

consultation responses received on the Final Proposals, and the publication of the draft SPD, minor revisions were suggested to the Secretary of State in the Submission Version (February 2013) to remove reference to the extant planning permission and ensure delivery. The Council considers that the extant permission, submitted as it was over ten years ago under a different, and largely absent, policy context and within a much different town centre context would not satisfy the design principles for the site (which were unaltered in the Submission Version) not realise the full potential of this key town centre site.

Proposed changes:

None.

Rep: EC/13 (3)

Name: Jill McGregor CBRE

On behalf of: Empire Cinema 2 Limited

Representation:

Specific comments on the Ealing Cinema Draft SPD are set out below: Section 3 No justification is provided in the draft SPD for the rationale for preparing an Ealing Cinema SPD given that planning permission has been granted for a mixed cinema and leisure scheme on the Empire site and the designation of a site which includes the YMCA building, the West London University building and car park, a restaurant unit and the Empire site on New Broadway. As identified above the SPD is also considered premature pending adoption of the Development Sites DPD.

Changes/suggestions:

None supplied

Council response:

The town centre has been without a cinema since 2008, and the failure to complete the extant permission within a reasonable timescale is significantly undermining efforts to revitalise the town centre. However, the delay in the Empire Cinema development has allowed the Council to develop its regeneration and planning policy position in relation to this part of the town centre, particularly in the context of the emerging development elsewhere in the town centre including the confirmation of Crossrail and redevelopment of Dickens Yard. The approach, the strategic direction of which is set out in the adopted Development Strategy DPD, has now evolved to the extent that it provides justification for the re-provision of the cinema as part of a redevelopment of a wider site forming part of the 'cultural quarter' of the Town Centre. The core aim of providing a an enlivened film/cultural quarter in this location is widely supported by the local community, as evidenced through the substantial consultation that was carried out as part of the preparation of the Development Strategy DPD, and subsequently the Development Sites DPD. The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised.

Proposed changes: None.

Rep: EC/13 (4)	Name: Jill McGregor CBRE
On behalf of: Empire Cinema 2 Limited	
Representation: Empire questions the deliverability of the draft SPD vision given, as identified on page 10, the site is in multiple ownerships with 4 separate owners. The site will therefore require significant land assembly before comprehensive redevelopment can be brought forward whilst the Empire site benefits from planning permission for redevelopment and is expected to be recommence at the end of 2012/early 2013.	
Changes/suggestions: None supplied	
Council response: As of August 2013, works have not commenced on site, suggesting that the extant permissions are not deliverable. The Council considers that the extant permission, submitted as it was over ten years ago under a different, and largely absent, policy context and within a much different town centre context would not satisfy the design principles for the site as set out in the Development Sites DPD (which were unaltered in the Submission Version) not realise the full potential of this key town centre site.	
Proposed changes: None.	

Rep: EC/13 (5)	Name: Jill McGregor CBRE
On behalf of: Empire Cinema 2 Limited	
Representation: The draft SPD incorrectly refers throughout the document to the various planning permissions granted for the Empire site and makes no reference to the fact that these permissions are extant and can be implemented.	
Changes/suggestions: None supplied	
Council response: As of August 2013, works have not commenced on site, suggesting that the extant permissions are not deliverable. The Council considers that the extant permission, submitted as it was over ten years ago under a different, and largely absent, policy context and within a much different town centre context would not satisfy the design principles for the site as set out	

in the Development Sites DPD (which were unaltered in the Submission Version) not realise the full potential of this key town centre site.
Proposed changes: None.

Rep: EC/13 (6)	Name: Jill McGregor CBRE
On behalf of: Empire Cinema 2 Limited	
Representation: A planning application for redevelopment of the Empire site was submitted in 2003 and a resolution to grant planning permission and conservation area consent was granted in 2004.	
Changes/suggestions: None supplied	
Council response: As of August 2013, works have not commenced on site, suggesting that the extant permissions are not deliverable. The Council considers that the extant permission, submitted as it was over ten years ago under a different, and largely absent, policy context and within a much different town centre context would not satisfy the design principles for the site as set out in the Development Sites DPD (which were unaltered in the Submission Version) not realise the full potential of this key town centre site.	
Proposed changes: None.	

Rep: EC/13 (7)	Name: Jill McGregor CBRE
On behalf of: Empire Cinema 2 Limited	
Representation: Formal planning permission for redevelopment of the site was granted in 2008 and an application to vary condition 13 of the planning permission was granted in 2010. Non-material amendments (not a variation as identified in the SPD) were granted in November 2011 to enable an increase in the number of cinema screens from 16 to 20 and the provision of A3/A4 units at ground floor level as well as the reduction in total floorspace by removing the proposed basement level.	
Changes/suggestions: None supplied	
Council response: As of August 2013, works have not commenced on site, suggesting that the extant permissions are not deliverable. The	

Council considers that the extant permission, submitted as it was over ten years ago under a different, and largely absent, policy context and within a much different town centre context would not satisfy the design principles for the site as set out in the Development Sites DPD (which were unaltered in the Submission Version) not realise the full potential of this key town centre site.

Proposed changes:

None.

Rep: EC/13 (8)	Name: Jill McGregor CBRE
-----------------------	---------------------------------

On behalf of: Empire Cinema 2 Limited

Representation:

Demolition of the former cinema, excepting the locally listed facade was undertaken in 2009 and discussions with LB Ealing have been on-going between 2008 and 2009 and from 2010 to 2011 to enable non-material amendments to the approved scheme. The amendments were required to align the format of the cinema with changing trends in the cinema and leisure market since the application was submitted in 2003 - principally, the shift to mixed use cinema developments incorporating restaurant and cafes and the provision of more screens so that a range of films can be shown at any one time.

Changes/suggestions:

None supplied

Council response:

As of August 2013, works have not commenced on site, suggesting that the extant permissions are not deliverable. The Council considers that the extant permission, submitted as it was over ten years ago under a different, and largely absent, policy context and within a much different town centre context would not satisfy the design principles for the site as set out in the Development Sites DPD (which were unaltered in the Submission Version) not realise the full potential of this key town centre site.

Proposed changes:

None.

Rep: EC/13 (9)	Name: Jill McGregor CBRE
-----------------------	---------------------------------

On behalf of: Empire Cinema 2 Limited

Representation:

Further engagement with LB Ealing has been undertaken in 2012 to discuss the re-commencement of works in 2013.

Changes/suggestions:

None supplied
Council response: As of August 2013, works have not commenced on site, suggesting that the extant permissions are not deliverable. The Council considers that the extant permission, submitted as it was over ten years ago under a different, and largely absent, policy context
Proposed changes: None.

Rep: EC/13 (10)	Name: Jill McGregor CBRE
On behalf of: Empire Cinema 2 Limited	
Representation: The draft SPD vision and development principles for the wider „Ealing Cinema“ site is contrary to the planning permission granted for the Empire site and will only delay the regeneration of this site and the provision of a new cinema and leisure scheme in Ealing.	
Changes/suggestions: None supplied	
Council response: The town centre has been without a cinema since 2008, and the failure to complete the extant permission within a reasonable timescale is significantly undermining efforts to revitalise the town centre. However, the delay in the Empire Cinema development has allowed the Council to develop its regeneration and planning policy position in relation to this part of the town centre, particularly in the context of the emerging development elsewhere in the town centre including the confirmation of Crossrail and redevelopment of Dickens Yard. The approach, the strategic direction of which is set out in the adopted Development Strategy DPD, has now evolved to the extent that it provides justification for the re-provision of the cinema as part of a redevelopment of a wider site forming part of the 'cultural quarter' of the Town Centre. The core aim of providing a an enlivened film/cultural quarter in this location is widely supported by the local community, as evidenced through the substantial consultation that was carried out as part of the preparation of the Development Strategy DPD, and subsequently the Development Sites DPD. The Draft SPD clearly demonstrates the need for connected thinking in terms of the whole site and about the necessary requirements for redevelopment proposals which are central to ensuring that the full potential of the area is realised.	
Proposed changes: None.	

Rep: EC/13 (11)	Name: Jill McGregor CBRE
On behalf of: Empire Cinema 2 Limited	
Representation: Section 4 The draft SPD vision sets out overarching objectives for the „Ealing Cinema“ site including comprehensive redevelopment to achieve the most benefits for the town centre, the creation of new pedestrian routes and connections; high quality culture and leisure uses; a new cinema square and improvements to the environment.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/13 (12)	Name: Jill McGregor CBRE
On behalf of: Empire Cinema 2 Limited	
Representation: The vision goes on to require that proposals must be based on a masterplan for the site as a whole which address the urban design objectives and realise the full potential of the site.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/13 (13)	Name: Jill McGregor CBRE
On behalf of: Empire Cinema 2 Limited	
Representation: The draft SPD is considered contrary to the National Planning Policy Framework (NPPF) objectives of achieving sustainable development. The NPPF advises that “Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens of development” (para 153). The Ealing Cinema draft SPD is considered contrary to this guidance	

and is not required given that planning permission on the Empire site has already been granted and it will only add unnecessary financial burdens on the development of both the Empire and wider Ealing Cinema site. Changes/suggestions: None supplied
Council response: As of August 2013, works have not commenced on site, suggesting that the extant permissions are not deliverable. The Council considers that the extant permission, submitted as it was over ten years ago under a different, and largely absent, policy context and within a much different town centre context would not satisfy the design principles for the site as set out in the Development Sites DPD (which were unaltered in the Submission Version) not realise the full potential of this key town centre site. The Council considered that an SPD for the site was necessary due to the lack of progress on the site and the critical role the site plays in achieving the key objectives for the town centre. It demonstrates the need for connected thinking in terms of the site and the necessary requirements within which new, deliverable proposals may come forward.
Proposed changes: None.

Rep: EC/13 (14)	Name: Jill McGregor CBRE
On behalf of: Empire Cinema 2 Limited	
Representation: The NPPF further states that Local Plans “..should be aspirational but realistic” (para 154) and Empire questions whether the vision and mix of development identified in the draft SPD is either viable or deliverable given the need for land assembly and the relocation of existing uses. The SPD also identifies that a smaller 10-12 screen cinema could be provided on the site and Empire notes that this is significant less screens than Westfield London (White City) and that this smaller cinema would offer less film choice and showings than the scheme granted on the Empire site.	
Changes/suggestions: None supplied	
Council response: As of August 2013, works have not commenced on site, suggesting that the extant permissions are not deliverable. The Council considers that the extant permission, submitted as it was over ten years ago under a different, and largely absent, policy context and within a much different town centre context would not satisfy the design principles for the site as set out in the Development Sites DPD (which were unaltered in the Submission Version) not realise the full potential of this key town centre site. The Council considered that an SPD for the site was necessary due to the lack of progress on the site	

and the critical role the site plays in achieving the key objectives for the town centre. It demonstrates the need for connected thinking in terms of the site and the necessary requirements within which new, deliverable proposals may come forward.
Proposed changes: None.

Rep: EC/13 (15)	Name: Jill McGregor CBRE
On behalf of: Empire Cinema 2 Limited	
Representation: Section 5 Empire notes that the site development principles proposes (amongst others) a north-south pedestrian link, a new public square and a range of uses in addition to the cinema use on the Empire site.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/13 (16)	Name: Jill McGregor CBRE
On behalf of: Empire Cinema 2 Limited	
Representation: The illustrative location of the north-south pedestrian link and new public square as shown Figs 5.2, 5.4 and 5.6 reduces the extent of land and in turn, the scale of a new cinema that can be accommodated on the wider Ealing Cinema site. Empire questions the need for a new north-south pedestrian link given that Barnes Pike on the western boundary of the Ealing Cinema site already provides a direct and convenient link from New Broadway to Mattock Lane.	
Changes/suggestions: None supplied	
Council response: The achievement of a new public square that connects new and existing links and spaces is a key objectives of the Vision for the site. Sections 5.1 and 5.2 clearly set out the rationale for improved north/south and east/west permeability through the site, and the corresponding requirements for new as opposed to upgraded connections. Improvement of north-south connections through the site is about far more than access. Ealing town centre is in the process of changing from a linear	

form into a more complex pattern of uses and spaces fanning out from and reflecting the dominance of Ealing Broadway Station. High quality public spaces accessible to the centre but not exposed to the traffic of the Uxbridge Road are essential to the continuing regeneration of the town centre.
Proposed changes: None.

Rep: EC/13 (17)	Name: Jill McGregor CBRE
On behalf of: Empire Cinema 2 Limited	
Representation: Principle 5 and Fig 5.6 shows a 10-12 screen cinema and the supporting text on page 22 states “..It is clear that a modern and efficient cinema cannot actually be located within any single individual site and the assembled site needs to be considered as a whole in order to achieve the principles set out in this document”. This is clearly not the case given that planning permission has been granted for a 20 screen cinema wholly on the Empire site and the draft SPD vision will in fact result in a reduced cinema/ cultural contribution to the town centre.	
Changes/suggestions: None supplied	
Council response: The siting of the cinema box is fundamental to the whole programme for regeneration of this area; to locate the cinema box where it cannot be screened by appropriate uses will inevitably create poor quality and blank frontages and sterilise parts of the site for development. Nor should the effect of trying to located a modern multi-screen cinema behind the façade of the pervious cinema be under-estimated.	
Proposed changes: None.	

Rep: EC/13 (18)	Name: Jill McGregor CBRE
On behalf of: Empire Cinema 2 Limited	
Representation: The draft SPD will reduce the range of cultural and leisure facilities that can be provided on the site, contrary to Core Strategy policy 2.5 for the revitalisation of Ealing town centre	
Changes/suggestions: None supplied	
Council response:	

No justification is provided for this assertion.
Proposed changes: None.

Rep: EC/14 (1)	Name: Nick Bishop
On behalf of: English Heritage	
Representation: Background The Ealing Cinema site lies close to the historic centre of Ealing and is surrounded by a number of heritage assets whose settings could be affected by its development. To the north is the Grade II listed Town Hall, and to the south, a group of structures clustered around the Grade I listed Pitshanger Manor (now the PM Gallery and House). The Manor was remodelled by Sir John Soane between 1801 and 1811 as his own country house. The Manor is fronted by a separately Grade I listed entrance archway, also by Soane, built in a rustic classical style. A section of the northern boundary wall to Walpole Park running between the public conveniences and entrance archway is also separately listed. Walpole Park to the south west, is a Registered Park and Garden, a very rare surviving example of Soane's close involvement with gardens and also a rare example of the work of John Haverfield, who was celebrated in his lifetime but is now little known (National Heritage List for England). The Park was awarded a £2.4m Heritage Lottery Fund grant in July 2011, and has been subject to a bid this year for further restoration works which will reconnect the Manor with its Regency landscape. The site also straddles the Ealing Green and Ealing Town Centre Conservation Areas. The Conservation Area Appraisal for Ealing Town Centre (2007) notes the very prominent position occupied by the Town Hall and Church of Christ of the Saviours (p 10). Ealing town centre is identified as being on English Heritage's Register of Heritage at Risk (2012). The site also lies within an Archaeological Priority Area (APA). Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/14 (2)	Name: Nick Bishop
On behalf of: English Heritage	
Representation:	

<p>Relevant Policy and Guidance The National Planning Policy Framework (NPPF) (2012) requires that, in their Local Plans, Local Authorities set out a “positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats” (paragraph 126). Specifically in relation to Conservation Areas paragraph 137 also requires Local Authorities to “look for opportunities for new development within Conservation Areas...and within the setting of heritage assets to enhance or better reveal their significance.”</p> <p>This SPD provides an opportunity to implement these requirements of the NPPF within the design of new development on the site.</p> <p>Changes/suggestions: None supplied</p>
<p>Council response: Noted.</p>
<p>Proposed changes: None.</p>

Rep: EC/14 (3)	Name: Nick Bishop
On behalf of: English Heritage	
<p>Representation: Also relevant to this document is English Heritage's Guidance on The Setting of Heritage Assets (2011). According to the methodology set out within this document, the historic significance of an asset should first be identified, and then the contribution made by its setting to that significance.</p> <p>Changes/suggestions: None supplied</p>	
<p>Council response: Noted.</p>	
<p>Proposed changes: None.</p>	

Rep: EC/14 (4)	Name: Nick Bishop
On behalf of: English Heritage	
<p>Representation: At a local level, the Development Sites DPD (Final Proposals June 2012) states that: “The heritage setting of the southern and eastern boundaries of the site will require a high quality design that sits comfortably within the surrounding area and</p>	

<p>complements the dominant Edwardian vernacular. ...The height and massing of new buildings should be commensurate with the surrounding built form to ensure that the amenity of existing residential properties, Ealing Green/Walpole Park, and the character and appearance Conservation Area are preserved. On the perimeter of the site, the building line established by adjacent properties should be continued; on Mattock Lane buildings will be expected to retain the generous setback of properties to the west with a high quality landscaping treatment to the front. Achieving better integration of Ealing Green/Walpole Park should be a key outcome of proposals on this site, and this should be reflected in the arrangement of new buildings.”</p> <p>Changes/suggestions: None supplied</p>
<p>Council response: Noted.</p>
<p>Proposed changes: None.</p>

Rep: EC/14 (5)	Name: Nick Bishop
On behalf of: English Heritage	
<p>Representation: General comments on the SPD English Heritage supports the regeneration of this site which could enhance the Ealing Town Centre Conservation Area by bringing the locally listed former cinema façade back into use. However, we have concerns regarding the treatment of the southern frontage of the site and are keen to ensure that the height of any new development within the setting of Pitshanger Manor, its gate and the park around it. Principle 7 of the Site Development Principles (section 5.3) states that “it may be appropriate to accommodate additional development of greater height to the south of mask the bulk of the cinema block and overlook Ealing Green and Walpole Park. We suggest that the SPD should provide greater clarity on how tall such development could be whilst still being considered commensurate with the surrounding built form, continuing the building line established by adjacent properties and preserving the character and appearance of the conservation area.</p> <p>Changes/suggestions: None supplied</p>	
<p>Council response: Support noted. See detailed response below.</p>	
Proposed changes:	

None.

Rep: EC/14 (6)	Name: Nick Bishop
On behalf of: English Heritage	
Representation: In addition, this judgement should take account of any impacts on the setting of the Grade I listed entrance archway, using English Heritage's guidance on the setting of heritage assets.	
Changes/suggestions: None supplied	
Council response: Noted. See detailed response below.	
Proposed changes: None.	

Rep: EC/14 (7)	Name: Nick Bishop
On behalf of: English Heritage	
Representation: With this in mind, we have provided the following detailed comments which we believe will strengthen the document in conserving the historic environment: Detailed comments Executive Summary Principle 7 – Development to the south of the site should also provide an appropriate frontage to Pitshanger Manor and Walpole park which is informed by their historic significance.	
Changes/suggestions: None supplied	
Council response: Noted. See detailed response below.	
Proposed changes: None.	

Rep: EC/14 (8)	Name: Nick Bishop
On behalf of: English Heritage	
Representation:	

Policy Context (p4) – the policy review provided should recognise the role of the NPPF in conserving heritage assets (in particular section 12).
Changes/suggestions: None supplied
Council response:
Proposed changes: None.

Rep: EC/14 (9)	Name: Nick Bishop
On behalf of: English Heritage	
Representation: Section 2 Site context – we welcome the provision of a historic environment section with this chapter. This could be further improved with a recognition of the landmark value within the townscape of historic buildings such as the town hall and Parish Church of Christ the Saviour. It would also be helpful to provide some analysis of the historic development of the area, for example, map regressions to show its resulting urban grain, scale of buildings and key routes which have resulted in its current character.	
Changes/suggestions: None supplied	
Council response: Christ the Saviour is designated as a Landmark in the Development Management DPD and although this is unrelated to its heritage value, it is considered appropriate to acknowledge this in the historic environment section. The historical development of the area including map regressions does form part of the CAA, however it should be stressed that the SPD is designed to lead an intervention in the urban fabric of Ealing that reflects its shift from a linear form to a more radial focus and this may be lost with any overemphasis of the historical pattern of development rather than the extant heritage value of the site and the broader town centre.	
Proposed changes: Add new para after fourth para on page 9 to read “The Town Hall and the Parish Church of Christ the Saviour are also designated as local “landmarks” in the emerging Development Management DPD.”	

Rep: EC/14 (10)	Name: Nick Bishop
On behalf of: English Heritage	
Representation:	

Section 3 Site Issues – The 3rd paragraph states that the site has been chosen to avoid locally listed buildings, yet figure 2.5 opposite shows a locally listed building within the site boundary. Changes/suggestions: None supplied
Council response: Noted
Proposed changes: Revise wording to third para, third sentence on page 10 to read “The site area has been carefully chosen to avoid listed buildings or groups that reinforce the Victorian character of the town centre, but to include....”

Rep: EC/14 (11)	Name: Nick Bishop
On behalf of: English Heritage	
Representation: Given the number and significance of heritage assets surrounding the site we recommend that this section should include a historic environment paragraph. This could acknowledge the presence of these heritage assets and their national significance, and the strong historic character of the area which is recognised in its various conservation area designations. It would also be worth stating that the development of the site provides an opportunity to enhance the historic significance of the conservation area (in reflection of NPPF paragraph 137), and to enhance the settings of a number of heritage assets. In particular, the settings of the Grade I listed assets to the south of the site currently include a poor frontage which could be enhanced with an appropriate frontage to Ealing Green. There could also be opportunities to enhance the frontage to Bond Street through façade detailing and massing which reflects the rhythm of the fine grain plots there.	
Changes/suggestions: None supplied	
Council response: The site issues section exists solely to describe the site and therefore relates to the site itself, not its surroundings or design issues that stem from this context. Reference to the surrounding heritage assets will be strengthened in the Historic Environment Section.	
Proposed changes: Revise wording to para 4 on page 9 to read: "The town centre supports a good range of historic buildings which form distinct elements in the town centre. Those within or directly adjacent to the cinema site, and to which the site forms an important part of their setting include:"	

Rep: EC/14 (12)	Name: Nick Bishop
On behalf of: English Heritage	
Representation: The Open space (page 15) should acknowledge that Northern boundary wall to Walpole Park, as well as several of the structures identified within it, are listed, and that any modifications to the wall could require listed building consent.	
Changes/suggestions: None supplied	
Council response: Agreed.	
Proposed changes: Add new para at end of text on 'Walpole Park' on page 15 to read "The northern boundary wall to Walpole Park, as well as several of the structures within the park, are listed and any modifications could require listed building consent."	

Rep: EC/14 (13)	Name: Nick Bishop
On behalf of: English Heritage	
Representation: In respect of the site's designation as an archaeological priority area (APA), the Greater London Archaeological Advisory Service (GLAAS) Charter recommends that planning applicants refer to GLAAS for archaeological advice at pre-application stage for all sites over 0.4ha, or those which sit within an APA.	
Changes/suggestions: None supplied	
Council response: Noted.	
Proposed changes: None.	

Rep: EC/14 (14)	Name: Nick Bishop
On behalf of: English Heritage	
Representation: Section 4 Vision – following on from the issues section we suggest inserting a paragraph within the vision, or augmenting the improve the environment paragraph to incorporate some elements which address the historic environment. This could	

include, for example, enhancing the Ealing Green Town Centre and Ealing Green conservation areas, and the settings of surrounding heritage assets with appropriate design and materials. Changes/suggestions: None supplied
Council response: Agreed.
Proposed changes: Revise wording in first column, last bullet point on page 16 to read “Improve the environment on and around the site, including the surrounding streets and spaces. This includes the delivery of buildings and spaces of the highest architectural quality on the site itself. The height and massing of any new buildings should be commensurate with the surrounding built form to ensure that the amenity of existing residential properties, Ealing Green/Walpole Park and the character and appearance of the Conservation Areas are preserved.”

Rep: EC/14 (15)	Name: Nick Bishop
On behalf of: English Heritage	
Representation: Section 5.3 Site Development Principles – as stated earlier, we have concerns that the proposal for taller elements at the southern end of the site does not adequately take into account the historic significance of the Grade I listed Pitshanger Manor and its entrance archway. In response to the historic environment policies contained within the NPPF the site principles should provide a clear steer on the height of development which could be accommodated without harming the historic significance of these heritage assets. Currently, the policy is open-ended and does not have adequate regard for the potential impacts of development on the settings of surrounding heritage assets. This applies also to figure 5.6 on the final page, which shows the potential for taller buildings over looking Ealing Green.	
Changes/suggestions: None supplied	
Council response: The basic principle that development should be used to screen the bulk of the cinema box is a sound one and LBE is surprised by the implication that the height of development on the southern edge of the site is the sole consideration in maintaining and enhancing the significance of the Grade I listed heritage assets and Conservation Area. However it is acknowledged that the advice to properly screen the cinema block is put in the context of the valuable urban environment of Ealing Green and Pitshanger Manor.	
Proposed changes:	

Revise supporting wording to Principle 7 on page 22 to read: "There are significant benefits to a sympathetic scale of development on the edges of the site generally relating to the heights of neighbouring buildings. However, development on the southern edge of the site should be scaled at least to screen the bulk of the cinema block as well as responding to its role in the setting of Ealing Green Conservation Area and the statutory listed assets to the south".

Also revise wording to figure 5.6, fourth description in the legend on page 23 to read : "Built form of appropriate scale to screen cinema block"