Ms M Perry
London Borough of Ealing
Perceval House
14-16 Uxbridge Road
Ealing
WS 2HL

7 November 2013

Dear Ms Perry

PP/2013/3938 EALING CINEMA SITE OUTLINE PLANNING APPLICATION

We have been instructed by Aberdeen Asset Management on behalf of GM Investment Trustees Limited & GM (UK) Pension Trustees Limited Pensions Ltd., owners of Walpole House, 18-22 Bond Street, to review the outline planning application relating to the Ealing Cinema site for its redevelopment to provide a multi-screen cinema within a new, mixed use quarter incorporating residential, leisure, and commercial components.

Walpole House is currently in use as office accommodation for the University of West London's administrative headquarters, which has a number of years remaining on its lease. It has been included within the red line of the application site and is proposed to be demolished. Although the Council and Land Securities informed our client of their intentions for the development of the site, they were not consulted on the details of the scheme. As the building is in use, we object to the principle of demolition. As such, we request that the red line is redrawn to exclude our client's property.

The outline application was submitted on 19 September 2013 by Savills on behalf of Land Securities for:

Redevelopment of the site (following demolition of existing buildings except for retained cinema façade) to provide multi-screen cinema of up to 2,503 sq m, incorporating up to 900sq m other Class D2 leisure space, between 4,509 sq m and 4,934 sq m mixed commercial floor space (Classes A1/A2/ A3/A4/ D2) at ground and part first floor level, gallery space (Class D1) and between 143 and 161 residential units (Class C3) in buildings of between 5 and 7 storeys in height. Creation of public realm including outdoor performance space. Change of use of unit to the rear of No.49 New Broadway to bicycle store and change of use of unit to the rear of rear of No.55 New Broadway to management office suite. Alterations to and creation of new vehicular and pedestrian access routes. Associated servicing areas and

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disabled car parking spaces. (Outline Planning Application for layout and access) And PP/2013/3939 Demolition of existing buildings (except existing cinema façade) in connection with the redevelopment of the site to provide multi-screen cinema of up to 2,503 sq m, incorporating up to 900sq m other Class D2 leisure space, between 4,509 sq m and 4,934 sq m mixed commercial floor space (Classes A1/A2/ A3/A4/D2) at ground and part first floor level, gallery space (Class D1) and between 143 and 161 residential units (Class C3) in buildings of between 5 and 7 storeys in height. Creation of public realm including outdoor performance space. Change of use of unit to the rear of No.49 New Broadway to bicycle store and change of use of unit to the rear of rear of No.55 New Broadway to management office suite. Alterations to and creation of new vehicular and pedestrian access routes. Associated servicing areas and disabled car parking spaces.

The application should be refused as:

• The proposal does not provide sufficient affordable homes or affordable homes of the tenure required to satisfy the council’s policies;

• The proposed density for the new development is significantly below targets prescribed by both the London Plan and local development framework documents;

• The loss of employment and office space contradicts policy set out in Ealing’s Development Management DPD and Ealing’s Core Strategy;

• The emerging Development Sites DPD explicitly calls for the retention and enhancement of the YMCA building as part of any development plan for the site whereas the application proposes to completely demolish the building; and

• No justification has been provided for the proposed demolition of Walpole House, or its inclusion within the red line.

Affordable Housing

Both the NPPF and London Plan require local planning authorities to assess their needs for affordable housing provision and ensure that policy documents restate the importance of meeting those needs.

The council’s Strategic Housing Market Assessment identifies a significant shortage of affordable housing in the borough. To address this shortfall policy 1.2 of Ealing’s Core Strategy, adopted in April 2012, seeks affordable housing contributions from all developments of 10 or more units, with a tenure ratio of 60% social housing and 40% market sale. The policy indicates that contributions will be negotiated by taking account of the site-specific
circumstances, seeking the "maximum reasonable amount of affordable housing". The starting point for these negotiations will be 50% affordable housing provided on site.

The application proposes an allocation for affordable housing of just 28 units out of the proposed 143-161 units on site. This works out to a percentage of just less than 20%. Further, the proposed tenure of the affordable units is for discounted market sale only.

Although site-specific allocations have been taken into account alongside a viability assessment for the affordable housing component, the proposed allocation is well below target levels and does not adequately address the needs for the provision of social housing.

Density

Given the need for housing in Ealing, achieving density targets is of significant importance. The Ealing Cinema site has a PTAL rating of 6a, and policy 3.4 of Ealing’s draft Development Management DPD identifies the Ealing Cinema site as within a central location, which according to policy 3.2 of the London Plan, would require any development on site to deliver 650-1,100 h/ha. It states, that "development proposals which compromise this policy should be resisted." The proposed scheme, however, indicates a density of just 366 h/ha—approximately half the figure at the lower end of the range set by the London Plan.

The applicant argues that, due to the mixed-use and retail-led nature of the scheme, local development priorities are being met and the proposed density is therefore acceptable. Given the shortage of housing in Ealing, a clear justification needs to be made for such a reduction in density compared to policy guidance.

Employment and Office Space

Policy 4a of the draft Development Management DPD expresses a general presumption against the loss of employment floorspace on non-designated sites. The loss of such floorspace may only be permitted when all of the following can be demonstrated:

- the site is not viable for re-occupation (including renewal and refurbishment);
- the site is not viable for redevelopment/renewal for an alternative employment use (including small offices where appropriate); and
- the proposal does not constrain or undermine neighbouring employment uses.

Moreover, Core Policy 1.1 of Ealing’s Core Strategy seeks an overall increase of 94,500 sqm of office floorspace throughout the borough.

The proposed scheme entails the complete demolition of Wapole House, which is currently in use as a B1 office building, and there is no provision for new
office space as part of the redevelopment. This would result in a net loss of office floorspace on the site.

Considering the criteria for losing employment floorspace set out above, the proposed loss is unacceptable and should be refused. Not only is Walpole House viable for occupation, it is currently occupied as B1 premises with no need for redevelopment or renewal.

The planning statement submitted as part of the outline application attempts to justify this net loss by arguing that the above borough-wide policies should be balanced against the site-specific draft Ealing Cinema SPD. However, due to the fact that the SPD has not been subject to independent examination, the weight given to it in considering the acceptability of the loss of employment space should be minimal.

For the reasons above the applicant has failed to justify the net loss of employment/office floorspace and the demolition of Walpole House.

St George's Hall, 14-16 Bond Street

The proposed scheme entails the demolition of St George's Hall (YMCA Building), a locally listed building within the Ealing Green Conservation Area.

Changes to the Ealing Development Sites DPD from February of 2013 include guidance in respect of 14-16 Bond Street, which states,

"The Edwardian YMCA building positively reflects the original character of this part of the town centre, and would merit retention and enhancement as part of any development proposals."

Further, saved policy 4.7 of Ealing’s UDP states that the council will protect and enhance the character of locally listed buildings, and that proposals for demolition and alterations will be discouraged unless alternative use of the building is not viable.

The application’s proposed demolition of St George’s Hall fails to have regard to the above directives. Ealing’s policies are clear in their intention to retain and enhance locally listed buildings and buildings with façade value, and their demolition should be resisted and subject to suitable alternative uses not being feasible. No evidence is provided to indicate that alternative uses for the building were sought, nor even that the building is unviable in its current use. The applicant argues that the building is of “modest architectural value” and is an anomaly within the context of the Ealing Green Conservation Area so its loss will therefore have marginal impact on the heritage of the immediate area.

Moreover, the NPPF expresses a clear presumption against the loss of heritage assets, and explains that heritage assets are irreplaceable resources that shall be conserved. Paragraph 131 states that, in determining applications, local planning authorities should take account of “the desirability of sustaining and
enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation” as well as “the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality.”

St George’s Hall’s status as a locally listed building within the Ealing Green Conservation Area defines its value as a heritage asset within the borough. The loss of this recognised heritage building would have an obvious negative impact on the character of the Ealing Green Conservation Area and the heritage of the local area. As such, the demolition of the YMCA building included as part of this proposal does not accord with national and local policy and should be resisted.

Summary

From the above information it is clear that proposed application does not accord with planning policies 1.1 and 1.2 of Ealing’s Core Strategy, policies 3.4 and 4a of the draft Development Management DPD, saved policy 4.7 of the UDP, and policy 3.2 of the London Plan, and should be refused.

Walpole House provides viable accommodation for a local university, providing valuable B1 office floorspace to this part of the borough. The application for its redevelopment does not provide substantial evidence to merit its demolition.

Yours sincerely,

[Handwritten signature]

David Graham

cc: Mr S Banks, Aberdeen Asset Management Plc