



# Save Ealing's Centre

*Only the Best will Do*

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Mr Boris Johnson  
Mayor of London  
Greater London Authority  
City Hall  
The Queen's Walk  
More London  
London SE1 2AA      BY E-MAIL

13<sup>th</sup> January 2009

Your ref: P/2007/4246 & 4248

Dear Boris,

## **ARCADIA DEVELOPMENT - LONDON BOROUGH OF EALING PLANNING APPLICATIONS P/2007/4246 & 4248**

These applications, which were made to Ealing Borough Council as the local planning authority, and approved by the Ealing Planning Committee on 17<sup>th</sup> December, have been referred to you for decision under the Town and Country Planning (Mayor of London) Order 2000. I am writing on behalf of Save Ealing's Centre (SEC) to ask that you direct Ealing to refuse the application.

SEC is a voluntary alliance of 26 local residents' and community groups from Hanwell to Acton. The SEC alliance has been established to promote the good planning of Ealing Town Centre and its development as the focal point of the local residential community. We and our member bodies, which include the Ealing Civic Society, have made detailed objections to the plans which are summarised in the papers that you will have received from Ealing Council.

I know you are aware, from your visit here during the Mayoral election campaign, of the strategic importance of this site and its relationship to other planned developments nearby. The precedent this application will set, and the cumulative effect on the town centre of this and other plans in the pipeline, will have a major impact that we submit has not been adequately addressed.

We would like to draw your attention in particular to certain points which we believe were incorrect or under-stated in the Officer's report and ignored by the Committee. These are apart from the recommendations from your office which have not been dealt with.

### **Council Consultation Process**

The consultation process has been wholly inappropriate and inadequate for such a major development. To give a few examples:-

- The consultation period for the revised plans was just one day greater than the statutory minimum, despite it being a massive proposed development backed by a huge volume of new documentation. Nobody could even read all the documentation in the time allowed, never mind investigate all the issues it raised.
- New documents continued to dribble in beyond the time when the resubmission was first advertised, even until the day of the Planning Committee hearing.

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### **Save Ealing's Centre Alliance**

SEC is a voluntary alliance of 26 Residents' and Community Associations drawn together, as local stakeholders, in response to the proposed developments within the centre of Ealing. Our focus is to promote the revitalisation of Ealing Town Centre and its development as the focal point for the Borough and for the community as a whole, in a manner that meets the needs of our future generations. Our constituency numbers over 15,000 residents from:

■ Ascott Avenue Residents' Association	■ Boston Manor Residents' Association	■ Brentham Society
■ Central Ealing Residents' Association	■ Chiswick Protection Group	■ Creffield Area Residents' Association
■ Ealing Arts & Leisure	■ Ealing Civic Society	■ Ealing Fields Residents' Association
■ Ealing Friends of the Earth	■ Ealing Passenger Transport User's Group (EPTUG)	■ The Five Roads Forum
■ Grange Grove Residents' Association	■ Gunnersbury Avenue Residents' Association	■ Hanger Hill East Residents' Association
■ Gordon Road & Surrounding Streets Residents' Association	■ Hanwell Village Green Conservation Area Residents' Association	■ Kingsdown Residents' Association
■ Madeley & Westbury Roads Residents' Association	■ The Neighbours' Paper	■ The Park Community Group
■ Pitshanger Community Association	■ Walpole Residents' Association	■ Warwick Road Residents' Association
■ West Ealing Neighbours	■ Woodfield Gardens and Regency Close Residents' Association	

- The organisation of the documents on the Council web site was chaotic. New documents were put in the middle of a huge list of superseded ones. There was no index on the Council web site, nor any hint as to what represented the current consistent set of documents.
- Only one working day was allowed between the receipt of objections and production of a report for the planning committee. Even with officers working overtime, this hardly allowed time for the objections to be read. There was certainly no time for them to be thoughtfully considered and any issues raised to be investigated.
- The Council's analysis of representations on the planning application was inaccurate and slanted in favour of the developer. Analysis of these by SEC members produced a sheepish correction from Council officers on the night of the Planning Committee meeting.
- The Council allowed the visitors area of the Council chamber to be packed with developers' representatives, with members of the public confined to another room with a one-way video link. The councillors couldn't hear the gasps of horror when pictures of the proposed development were relayed. It was obvious that most members of the public had not previously appreciated the sheer size of the proposals.

There was no valid reason to rush through this application when the applicant does not plan to start work for almost 3 years. The process that has been followed looks like an attempt to limit consultation as much as possible.

There has been an absolute torrent of design changes. These have continued after the "final" versions of the planning application's supporting documents were published. Amended versions of the documents are still not available for public view. Some of the design changes show up in the endless set of conditions attached to approval of the application.

### **Built Environment**

The development is simply too big for the location, with an overbearing height and mass. Ealing's UDP is clear that buildings over 20m high are not generally acceptable on sites within Conservation Areas, yet in this instance the Council has approved six without explaining properly why. As English Heritage has explained emphatically, this is completely inappropriate in this Conservation Area. With the exception of the very tall Block F, the whole design is bland, featureless and brutal and not an improvement on what is there at present. Neither is it in keeping with surrounding buildings including locally listed frontages on Haven Green.

### **Transport**

There are no current plans to provide for appropriate transport links with Ealing Broadway station. The related planning application P/2008/4025 to rearrange the bus stops/stands on Haven Green was (mercifully) turned down by the same planning committee. This would in any case have merely moved the bus stops rather than created any additional bus capacity.

There is already a problem with bus capacity in the centre of Ealing. Essentially, all available space around Haven Green has already been filled with bus stops and stands. Bus passenger growth will continue, probably at a similar rate to the usage of Ealing Broadway station. This has increased at an average rate of 9%p.a. over the period 2003 to 2007, according to figures on the TfL web site. There will then be the increases flowing from Crossrail, plus the growth directly generated from the Dickens Yard and Arcadia developments. The forecast from Arcadia alone is 575 people in the peak hour. The transport assessment submitted with the present application did not adequately allow for all this growth.

Potential alternative plans do exist. TfL commissioned an Ealing Broadway Interchange study from Halcrow Group Ltd., who produced their report in January 2006. This gave a few scenarios and options for a bus station including an integrated rail/tube interchange, the most relevant being the one labelled "2016 plus Crossrail plus bus growth".

It is clear that the current Arcadia planning application should not be approved until an appropriate plan is in place, either for a bus station spanning the Network rail lines at the north of the Arcadia site,

or (more likely) a bus station over the District Line. Funding arrangements including a Section 106 contribution from the Arcadia developer could then be agreed before this application is approved. This would need to be set at an appropriately high level. Westfield paid £170M for public transport developments on its £1.6B White City development. A similar 10%+ contribution would yield about £40M from the Arcadia development. This would be adequate to fund the extra costs involved.

There are 3 other issues regarding transport:-

- The local road system lacks capacity to accommodate this development, particularly if the adjacent Dickens Yard Development proceeds. New shopper car parking is to be provided which is against UDP and London Plan policies – again without any clear policy rationale, and it will be no more convenient for drivers than the adjacent Springbridge Road car park which is rarely more than a quarter occupied. The only vehicle access to the new development will be at a point almost directly opposite Christchurch school and it is obvious this will give rise to serious conflicts with children at the start and the end of each school day.
- No attempt has been made to change the presently inadequate street layout in this area, by widening streets or radically changing junctions. This could have eased the traffic problems the site itself will generate, as well as easing north-south flows within Ealing generally.
- The buildings spanning the railway line would prevent 5 or 6 tracking of the line west of Ealing Broadway station. This is likely to be needed to cater for suburban growth in West London and improved national links to Heathrow and the West Country. In approving the present application, the Ealing Planning Committee was not made aware of the Council's own report on the Great Western Route Utilisation Strategy at its Transport and Environment Scrutiny Panel on 9 September 2008, which *inter alia* recommended that "It would also be beneficial if Network Rail could be persuaded to investigate the feasibility and costs of a fifth track at least as far as Ealing Broadway" (para 2.3). This is a material consideration which should have been taken into account.

#### **Arts, Culture, Leisure and Entertainment**

- Contrary to the Council's policy in the UDP for a mixed use development on the site (no 63), the application makes no provision for any arts, cultural, or entertainment facilities. It offers one (private) gym when the town centre already has a gym and another is being proposed.
- The site is the perfect place for such provision (concert/conference hall, arts centre, indoor sports, etc) given the immediate access to many transport routes.

#### **Residential**

- The proportion of affordable housing is very low, at 14% by number of units. The site could clearly take a much higher proportion, especially if the flats were targeted at those without children.
- The 3 and 4 bedroom flats in Block B (affordable) all have a combined kitchen/dining/living room, with the only other habitable rooms being bedrooms. This would lead to families being very much on top of one another. This design of flats is much more suitable for a couple who want to cater for overnight visitors. It is inappropriate for families.

#### **Sustainability**

There are some serious gaps in the sustainability aspects of this development:-

- There is no collection and re-use of rainwater.
- There is no grey water re-use scheme.
- Only a tiny proportion of the available roof space is used for solar power.
- Several of the flats are single aspect, such that they are likely to get too hot or too cold.

#### **Cumulative Impacts of this and other Developments**

There is no master plan for Ealing Town Centre that coordinates the overall set of developments that are likely to take place. Without this, key facilities and infrastructure are being overlooked and the

overall developments will be unbalanced. They could also be an unsightly mess, rather than a pleasing, coherent whole. It is premature to decide this planning application before a master plan has been completed. At the very minimum, this proposed development needs to be considered in conjunction with the Dickens Yard development and likely developments at Ealing Broadway station.

For these reasons, we strongly urge you to refuse this application.

Yours sincerely

A handwritten signature in black ink, appearing to be 'N Woolven', with a long, sweeping tail that extends to the right.

Nick Woolven  
Chairman