

Public Inquiry into the called in planning application for :

Demolition of existing buildings and erection of 7 buildings Block A North - 2/6/7 storeys, A South - 1/2/4/6/8 storey with basement, B 2/5/7/8 storey, C - 3/5/11 storey, D - 2/3/9/10/11/12 storey, E 2/3/9/10/11/12 storey and F 19/25/26 storeys containing approximately 17,279 square metres of retail shops (Use Class A1), 1,363 square metres of cafes/restaurants (A3), 490 square metres of offices (B1(a)), 1,861 square metres of leisure facilities (D2) and 567 residential units, provision of 2 basement floors containing 352 car parking spaces (of which 230 are for the residential element including 16 spaces for the car club and 60 disabled spaces and 122 are for the retail and commercial uses including 7 disabled spaces), parking for 631 cycles (567 for the residential use and 64 for the retail and commercial uses), servicing area and plant and equipment with vehicular access off Springbridge Road, pedestrian accesses off Springbridge Road, Haven Green and The Broadway, landscaping, formation of areas of public realm, amenity space for the residential uses and ancillary works

at:

Arcadia Centre (all), 9 - 29 (consecutive) and 36 - 42 (consecutive) The Broadway
1 - 10 (consecutive) Central Chambers 1 - 4 (consecutive) Haven Place Flower
Haven Springbridge Road, land over the Railway between Springbridge Road and
Central Chambers and car park adjacent to Haven Green. EALING

Proof of Evidence

The Planning and Policy Framework

SUMMARY

WILL FRENCH

BA, MCD, MBA, MRTPI

on behalf of

SAVE EALING CENTRE (SEC)

Planning Inspectorate reference :

APP/A5270/V/09/2097739

London Borough of Ealing reference :

P/2007/4246

Introduction

- 1.1 My name is Will French. I have lived in Ealing, for 15 years. My home is less than 100m from the site and will be overshadowed by the development.
- 1.2 I am chairman of Save Ealing's Centre, (SEC) an alliance of 26 residents' associations and community groups, who speak for over 12,500 members of the Ealing community. SEC was established in 2007 to provide a community response to proposals within Ealing Town centre.
- 1.3 SEC's promotes the revitalisation and overall improvement of Ealing as a town centre to better serve the needs and aspirations of the entire community living or working in Ealing. Ealing is our town centre and we have a major stake in its future.
- 1.4 I am also a town planner with degrees in Social sciences, Civic Design and Business Administration. I have 35 years of experience in a variety of planning fields but am not expert on the matters surrounding the current proposals.

2 Objective of the Evidence

- 2.1 The Secretary of State asks whether these proposals '*are appropriate in their context and take the opportunities available for improving the character and quality of the area and the way it functions.*'
- 2.2 My evidence examines how to make such an assessment. In the context of S38 (6) of the 2004 Planning Act, it proposes a three stage analysis,
 - (i) Establish the context of the development.
 - (ii) Consider the planning policies that are relevant.
 - (iii) Consider other 'material considerations' and what weight should be given to them.
- 2.3 My evidence takes an overview of the spatial planning framework and establishes a context other SEC evidence develops in greater detail. Its premise is that in supporting the Arcadia proposals, the Council has set aside statutory considerations and judged the scheme on non-planning grounds.

3 The Context

- 3.1 The Arcadia site is an extremely complex one in planning terms and impacts on the lives of all those who live, work or pass through the town centre. The lynchpin of the Ealing Metropolitan Area and situated in and surrounded by Conservation Areas, its development affects a very complicated set of planning interests.

4 Planning Policy Base

- 4.1 **PPS12** establishes the Government's objectives for Local Spatial Planning. It looks at strategic land use and says Action Area plans provide a framework for areas of significant change. After the early adoption of its SCI, the LDF in

Ealing has become becalmed. There is little strategic thinking about land use and, despite pressures for change in the town centre, no plans for an Action Area Plan. Instead, the Planning Authority seems content to let individual developers identify strategic sites on an ad hoc basis without affording the community any voice in changes that will have major long term impacts.

- 4.2 **PPS 6 and the London Plan** call for development frameworks to be prepared for town centre to ensure a healthy mix of uses to serve the community. But despite the complexity of issues in Ealing, no spatial planning framework exists or for this major site within it. Instead, an over-provision of housing means that opportunities for other essential uses such as employment, arts, leisure, culture and entertainment will be lost permanently.
- 4.3 the London Plan also requires development to take account of transport interchanges. With a site standing immediately opposite Ealing Broadway station which is due to be redeveloped to accommodate Crossrail, and one that is located on a site that has long been proposed for a new bus station, there should be a plan for a public transport interchange.
- 4.4 Ealing's **UDP** never anticipated a development of this magnitude and many of its policies eg on building heights, play space and privacy are not observed by it. Nor does the scheme reflect Volume 2's site-specific development principles for site 63. These departures have not been explained.
- 4.5 Having 'been through a full public participation process' several SPGs are also material but their provisions are overlooked.
- **Ealing Town Centre Strategy 2002 – 2012** promises inter-alia an agreed urban design strategy, and site planning briefs.
 - **SPG for Site 63 – the Arcadia site** sets out principles for this site – 'a Mixed use redevelopment comprising ... retail, leisure (include some residential), offices, cinema ... option site for bus station and interchange with Ealing Broadway Station'. The Design principles are listed that are not reflected in the current scheme.
 - **SPG 6: Plot Ratios** states:
... ratios should not normally exceed 1.5:1, but ratios up to 2:1 might be acceptable..... note that the London Plan indicates that there may be some sites where a plot ratio nearer to 5:1 can be achieved. It is not envisaged that any such sites will available within Ealing, as these ratios are normally only expected in Central London sites.
The report to the 17th December Planning Committee calculates the plot ratio of the development as 5.89:1.
- 4.6 In summary contrary to the 2004 Act the Council has entirely ignored the planning policy framework by supporting this scheme.

5 Other material considerations

- 5.1 Disregarding the 2004 Act, the Planning Committee report says '**regeneration benefits**' override all other considerations. Yet, no regeneration policies exist

to justify overriding adopted planning policies and Ealing is not a designated regeneration area either by the Borough or the London Plan. Instead the London Plan expects Ealing to benefit from the investments that Crossrail will bring.

- 5.2 Anyway potential regeneration benefits are minimal:
- Additional retail floorspace will add to existing over supply;
 - there will be a net loss of office floor space and the services it provides
 - New leisure uses equate to just 1861m² (D2) of private facilities
 - *'the new bus interchange facility opposite Ealing Broadway Station'* was refused planning consent
 - Regeneration benefits from the £8m Section 106 payments are minimal.
- 5.3 The Council suggests the most significant regeneration benefits will be provision **new town centre housing**. Ealing needs more homes, but the strategy seems to be to cram as much housing as possible into the Metropolitan centre.
- 5.4 While some parts of this site could be used more intensively, National, regional and local planning policies do not anticipate densities of the Arcadia's levels. The GLA agrees:
'the density of the scheme would significantly exceed the upper limit (405 units or 1100 habitable rooms per hectare) of the indicative range provided in the London Plan'.
- 5.5 An not much affordable housing will even be provided. Development along the lines anticipated by the SPG would yield 110 affordable units - 31 more than the current proposals.
- 5.6 At a time when much of the rest of the town centre is 'ripe for development' the enormous scale of the Arcadia development, and its position as the very centrepiece of this bigger jigsaw demand it be viewed in the light of **what it would mean for the centre as a whole**, but there is no plan for the town centre.
- 5.7 Until then these **proposals are premature**. The Government says it is entirely justifiable to take this view in circumstances where a DPD is being prepared or is under review.
- 5.8 Approval of this development at this time will also encourage other developers to claim a precedent of setting aside UDP policies.
- 5.9 SEC has published its own Vision for Ealing which identifies opportunities for enhancing the area. We consider this an important item of our evidence.

6 **Conclusion**

- 6.1 Ealing needs to change, but this massive scheme at the heart of Ealing has been drawn up outside the framework of all national, regional or local

planning policies. Perhaps this is why it meets none of the essential needs of the town centre.

- 6.2 While the purported regeneration benefits are, at best, minimal, development of this central site in the manner proposed will cause lasting damage. The scheme is too big for the site, too out of keeping with the character of the area, and the wrong mix of uses. It would also permanently remove options for improving the way that the town centre functions before they have been properly appraised.
- 6.3 Ealing needs an Action Area Plan. Until work on this has made real progress, any assessment of the extent to which the proposals, *'are appropriate in their context and take the opportunities available for improving the character and quality of the area and the way it functions'* will be a matter of blind guesswork.
- 6.4 For all these reasons, and on behalf of all the 26 local groups and residents associations that constitute the SEC alliance, I therefore request that the Secretary of State should be advised that consent should not be granted.