

SEC's FULL RESPONSE TO TIBBALDS REPORT May 2008 ON SPATIAL DEVELOPMENT FRAMEWORK FOR EALING METROPOLITAN CENTRE

Following our initial brief response to Dick Johns dated 5th August, our more detailed comments are given below.

For ease of reference, the paragraph numbering is the same as used in the Tibbalds report.

Unfortunately, our comments have been constrained by the absence of background information about the objectives and scope of the study and of Tibbalds' terms of reference. We are also unclear what the Council plans to do now with the study, how it will fit into the Council's wider plan-making activities in the form of the LDF, what weight it will have in current and future Town Centre planning applications, and what further public consultation there will be. Fuller consultation on the report in line with the Council's Statement of Community Involvement is essential. We look forward to hearing how this will be done.

SUMMARY COMMENTS

At a time when Ealing Town centre finds itself confronted by massive pressures for change, we commend the commissioning of the Tibbalds report as providing a major opportunity to develop a framework that can meet the needs of Ealing's residents and businesses for years to come. We particularly welcome Tibbalds' recognition that:

- sustainable growth depends on a competitive cultural/leisure offer
- the poor architectural quality of recent buildings that have replaced high quality Victorian and Edwardian buildings has ignored the character and quality of the earlier grain, and created fractures and visual gaps
- the Town Hall should be refurbished as a hub for community activity
- there is a need to respect historic grain and character of conservation areas
- the number of licensed premises in parts of the centre needs to be constrained
- development of sites OS3 (Ealing Broadway Station) and OS4 (Arcadia) should be considered together.

On the other hand we feel there remain some serious weaknesses in the report that need to be resolved before policies are developed from it. These include:

- continuing to regard Ealing as a Metropolitan Centre competing with other centres of this rank. Ealing has already lost this fight and must reinvent itself. The study has been a missed opportunity to consider what the options are.
- a failure to examine the questions of appropriate townscape, building heights and building mass and density adequately. We note, for example that the West London sub-regional strategy sees a tall buildings policy to be a priority, and we do not understand why this study did not take the opportunity to recommend one.
- a failure to consider the capacity limits for additional residential development in the central area, due to physical and support services constraints
- a failure to highlight the challenges for retail in Ealing.
- a failure to suggest a cultural/leisure centre linked to the Town Hall.
- a lack of ambition in addressing Ealing's strategic transport issues, particularly involving an integrated transport interchange and a long term strategy for improvements to the road network.

1. GENERAL INTRODUCTION

Tibbalds has many interesting ideas in the separate sections which we accept and would like to see incorporated in the final plan documents but we disagree with the following aspects of the general approach:

- a. Tibbalds does not deal with the role of the centre in serving the needs of the growing population of the borough and surrounding area as a whole, and instead over-emphasises certain elements, particularly new homes and shops, thus crowding out other uses.
- b. There should be a better understanding of the impact of changes elsewhere in the region and how they affect Ealing's total offering. Metropolitan status as presently defined is no longer appropriate for Ealing, and the LDF should instead identify and build on the elements that give the centre an appeal distinct from its neighbours. We do not believe the case has been made for extending the retail core of Ealing Broadway town centre.
- c. The Transport & Movement section concentrates entirely on the designated area of the centre without putting it in the context of access from other parts of the borough.
- d. There is no development of any coherent vision for the centre of Ealing, and the study is inhibited by its acceptance of the assumptions made in existing planning applications for the Arcadia centre and Dickens Yard.
- e. Tibbalds should have examined the case for decoupling Ealing and West Ealing so that each one is free to develop strategies appropriate to it. In our view, continuing to treat the two centres as a single unit requiring similar treatment means that the opportunity to establish policies designed to meet the specific requirements of each will be lost.

2. CONTEXT AND ISSUES

2.1. Introduction We welcome the recognition that sustainable growth will depend on a competitive cultural/leisure offer, the need for mixed use growth (especially in office employment), and the need to respect the historic grain and character of the conservation areas. However there is no general view on how the significance of these elements should control proposals for specific sites, nor how the broader interests should be defended against plans that are merely commercially led.

2.2. Population and housing The report wrongly turns GLA projections of total growth into targets for the town centre. Instead, it should have considered what suitable provision can be made within the very real constraints of the central area. The construction of Crossrail can be expected to generate significant pressures for new residential development in the town centre, and the study needs to examine how to respond to these pressures. There is already an acute shortage of the support services required for families or older residents around Ealing Broadway, and the physical restrictions of the central zone, already noted in the UDP 10.5, map 4 as an area with moderate "local park deficiency", mean that amenity space suitable for children cannot be expanded. Plans should recognise that the existing predominance of people of working age is an inevitable result of the type of housing available. Other constraints include the existing urban fabric of Victorian street patterns and Victorian and Edwardian developments which enjoy Conservation Area protection. These factors should limit the total number of new housing units to be provided in the town centre when compared to immediately adjacent areas, particularly for families. There is no

justification given for the projected total of over 2,100 new homes (3,315 in the whole Metropolitan centre), with a population growth of 4,000 - 4,500 people.

2.3. Townscape The analysis here is weak, partly due to the artificial boundary of the area being considered, eg when considering the relationship between areas either side of the main central spine (Uxbridge Road) and the surrounding residential streets, and in the impact of new building on conservation areas. The report avoids the issue of the need for a tall buildings policy reflecting these special considerations. Similarly, the adverse effect of increased mass and density on the traditional scale and key views and vistas is underplayed.

2.4. No comment

2.5. Land Use - Retail The assumption made throughout the plan is that, to survive, Ealing Broadway has to “increase the quantum, quality and diversity of its existing retail/leisure offer”. The solution proposed is to increase the amount of shop space available, in the hope that quality retailers will be persuaded that the area can compete with Westfield at White City. This ignores the significance of the two diagrams provided with the report (Figs 2.11 & 2.12) which clearly show that Ealing’s retail catchment area is limited geographically by the proximity of two competing Metropolitan centres (Harrow and Hounslow), as well as Uxbridge to the west and the new developments to the east and north-east. There is no mention of the growth of internet spending and changing patterns locally to “value shopping”. The need for a better leisure element, and in particular some special feature which would provide a unique attraction to the centre other than just shopping, is not mentioned. Without some other element to attract people back the generally declining trend will not be reversed.

2.6. Transport and Movement There is virtually no consideration of how links should be improved with other parts of the borough and the surrounding areas the centre is meant to serve.

5. DEVELOPMENT FRAMEWORK

5.1. Opportunity sites The schedule needs updating.

5.2. Land use We welcome the commitment to a mix of uses in Ealing Broadway developments, particularly for leisure, arts, cultural and office use.

5.2.1. No justification is given for departing from existing UDP policies and accepting the assumptions in the current planning applications for sites OS4 (Arcadia) and OS8 (Dickens Yard).

5.2.2. Retail capacity We do not accept the forecasts of retail capacity demand, and do not agree that the centre needs or could absorb 16,000 sq m of additional retail floorspace. The retail projections the report cites were prepared in the spring of 2007 and therefore predate the current, and foreseeable, economic and retail downturn. They also include optimistic assumptions which almost certainly materially understate the amount of trade which will be lost by Ealing town centre to Westfield White City.

In these circumstances, the challenge will be just to preserve the economic viability of Ealing town centre’s existing retail, rather than to attempt to increase the volume of retail floorspace.

5.2.3. Retail quality The localised catchment area means that retailers providing local independent character are much more likely to succeed than national (bland) chains, or high-end fashion. We need to create a differentiated local retail offer which

complements Ealing's leisure and cultural offerings– the “Ealing Brand”. A focus on quality food could be an integral element of this strategy.

It must be recognised that Ealing will never become a retail destination in the accepted interpretation of this phrase. Road congestion is too great and there are too many competing retail locations for the those who live outside the town centre.

The proposed ‘carrot’ of constructing additional retail space to attract quality retailers appears illusory. Quality retailers will follow demand, not lead, and the right environment has to be created first.

We do not dispute the desirability of attracting a quality department store to Ealing Broadway. However we note that both of Ealing's recent department stores, Beales and Daniels, have closed. This suggests that the local retail catchment area is probably too small to support a modern department store, a view supported by retail property specialists. White City will include two department stores, House of Fraser and Debenhams. These will be in significantly larger units than anything proposed by the developers of the Dickens Yard and Arcadia sites, and will be only 15 minutes from Ealing Broadway. It is therefore difficult to see any retailer even considering opening a department store in Ealing.

5.2.4. **Retail form**

The Mall/eastern gateway. We welcome the recognition of the need for constraint on the number of licensed premises.

Retail core/transport interchange We agree that development of sites OS3 (Ealing Broadway Station) and OS4 (Arcadia) should be considered together. The pedestrian retail “circuit” (Fig 5.5) needs to be corrected to recognise that the main east/west link should be via Springbridge Mews, and not through Christchurch School.

The report suggests that this area is suitable for “taller landmark buildings”, subject to testing “in the context of London Planning Policy and other relevant guidance”. Such a proposal would conflict with UDP policy and in our view is unjustified. We believe it is essential that any such change in Ealing's characteristic low rise nature should also only be considered after the most extensive local consultation and discussion.

Retail core, Dickens Yard. We support the proposal to refurbish and link the Town Hall as a hub for community activity. This should be linked to a purpose-built civic arts and conference centre, which in turn should link to the existing listed Stable Block with provision for small low-cost units for leisure and artistic activities. We are concerned at the failure to integrate the as yet unspecified proposals for the Town Hall with the development of the Dickens Yard site immediately behind it. These two projects should form part of an integrated proposal.

Retail core, Ealing Broadway centre. The report (page 128 of the Consultation appendix) suggests investigating the scope for markets in Ealing Broadway. This is a positive proposal and would introduce a way in which small and independent traders could establish a retail presence without excessive premise costs and commitments. A revival of low margin activities such as in the Pavilions shopping centre in Uxbridge, or more craft focused indoor market in Greenwich, would be welcome. Potential locations for such activities should be include not only the Broadway Centre (OS7), but

also the areas in and surrounding the Arcadia, Broadway station and Dickens Yard sites (OS3, OS4 & OS8).

- 5.2.5. **Office/commercial** We agree with the objectives, but would like to see more incubator business startups in the geographical centre. Ealing Studios has shown how this can be done. There should be an emphasis on SME rather than large HQs.
- 5.2.6. **Arts, culture & entertainment** Ealing already has a distinct cultural/arts brand. We have three senior and one leading youth orchestra and five choirs, none of whom have a home. There is no cultural centre of quality west of Sloane Square or south-west of Wembley, and no flexible mid-sized conference facility anywhere in West London. A hall of 1,000 or more seats is both practical and highly desirable for Ealing, and would provide a much needed target destination for the region.
- 5.2.7. **Sports and Leisure** Ealing Common, as a designated Public Open Space and common land, cannot be used for sports facilities as suggested. For the same reasons, Haven Green is unsuitable for controlled play facilities. The key is not to increase pressure on limited central areas by allowing high density residential development. . However, small-scale indoor sports should be linked to the Arts and Leisure complex. There is a precedent for sports facilities, eg tennis/MUGA, in Lammas and Walpole parks.
- 5.2.8. **Community facilities** We agree that the projected increase of 3,315 new homes with over 6,500 new residents would place considerable strains on health, education and other services. Central Ealing is one of the worst served areas for health services, and primary and secondary educational facilities are already over-stretched. It also has a non-functional police station, for which new provision must be made. As noted in 5.2.4, Ealing Town Hall needs revitalising to be the borough hub. Better community facilities will attract people to the town centre for leisure as well as shopping or business. The total quantum on new housing in the Ealing Broadway town centre must not be allowed to outstrip the capacity of the area to provide the necessary support services.
- 5.2.9. **Housing.** This section is particularly weak, and needs strengthening particularly in relation to the redevelopment of the Green Man Lane estate. Better examination needs to be made to establish the appropriate quantum, type and style of housing in the central area so that it respects its existing character and meshes in with the broader vision of what the centre should be in the future.

We should:

- reflect the existing medium density profile within the Ealing Broadway area, and not accept 2,100 new homes by 2016;
- provide for family occupation within the constraints of the London Plan and the suitability of specific sites, aiming for a balanced age/family profile but avoiding large units in the town centre;
- follow the model of Haven Green Court and incorporate some three-bed apartments to increase housing stock for families and allow movement within the area;
- concentrate larger new housing development outside but easily accessible to the centre;
- incorporate adequate communal amenity space and protect Ealing's existing green spaces.

Residential development in the centre should aim for a positive impact:

- by meeting existing demand rather than drawing in new residents;
- if it does not materially change the nature of the area (e.g. by encouraging HMO and rental at the expense of families).

5.3. Transport and Movement In general, the report concentrates on minor improvements, most of which are welcome, but does not adequately address the major issues of (a) relieving pressure on the main routes which are essential for improving access particularly to the Ealing Broadway developments (north-south as well as east-west), and (b) the need for a fully integrated interchange at Ealing Broadway station.

5.3.1. Bus (Haven Green) A bus terminus on the east side of Haven Green by moving bus stops and stands from the diagonal road would not have adequate space to allow for extra services to be introduced to cope with Crossrail-generated bus journeys, as well as having other drawbacks. A far better solution would be to build a full bus station over the London Underground tracks and platforms of Ealing Broadway station. To make this work there should be a new bus and taxi road entrance and exit to the station from The Mall, probably where Carmelita House now stands.

The proposal to ban left turns from Ealing Broadway into The Mall (proposal BP2a) would have an adverse effect as with the present road arrangements there is no practical alternative for east-bound traffic from the station area, including cars setting down or picking up, taxis and buses (112). A more radical approach is needed instead, such as banning right turns at The Mall junction or total pedestrianisation of The Broadway from Haven Green to The Mall in conjunction with two-way working in Springbridge Road (see 5.3.7).

5.3.2. Rail Plans must allow for Network Rail's projected expansion of the Great Western main line, and the need for additional rail capacity particularly between Ealing Broadway and West Ealing (such as the possible fifth track proposed by the Rail Utilisation study). Alternative arrangements for the Greenford branch line must also be allowed for.

5.3.3. Taxi To assist kiss-and-ride and taxi drop-offs at Ealing Broadway station there could be new access to and from the station transport interchange proposed above from Hanger Lane or Madeley Road. This should be used as an alternative service route to the station and not as additional capacity to bring more road traffic into Ealing Broadway.

5.3.4. Walking The suggested east-west pedestrian route north of the Broadway (fig 5.13) ignores the existence of Christchurch School. A suitable route would require re-design of both Arcadia and Dickens Yard plans to provide space directly adjacent to the railway, using Springbridge Mews.

5.3.5. *No comment.*

5.3.6. *No comment.*

5.3.7. Highways We suggest that the one way system on the B455 north of Uxbridge Road round Haven Green could be abandoned. To achieve this Springbridge Road would be widened and made two-way thereby removing through traffic from the station section of The Broadway and reducing traffic on the Uxbridge Road section of

The Broadway. This would also enable access to Springbridge Road car park to/from the north without sending traffic into the centre.

This could be considered in parallel with pedestrianisation of either Bond Street or High Street and return of the other to two-way working.

SUMMARY

SEC welcomes the report as a good first step towards producing a development strategy for a Town Centre that can meet the opportunities and the challenges for the future to the benefit of residents and businesses alike.

However, there are some serious deficiencies in the study that need now to be addressed. We strongly encourage the London Borough of Ealing to examine these areas and develop responses to them.

We are confident that by working together with all interested stakeholders the Council will be well-positioned to develop a framework for the future of the Town Centre that well meets the needs of Ealing residents and businesses both now and in years to come. SEC looks forward to contributing to this process.

SEC Tibbalds response
16 Sept 08