

SAVE EALING'S CENTRE (SEC): COMMENTS ON GLENKERRIN'S REVISED PROPOSALS FOR THE ARCADIA CENTRE SITE, AS SEEN AT THE EXHIBITION IN EALING ON FRIDAY 25 JULY 2008 AND SATURDAY 26 JULY 2008

REGENERATION

Save Ealing's Centre (SEC) does not accept that that Ealing's future can best be secured by demolishing so much of what is left of our town centre. There are very few instances in London where comprehensive town centre redevelopment has improved anything, and there are many examples where it has been disastrous. The best local authorities (eg Richmond, Camden, Kensington & Chelsea, and Islington) have sought to preserve their historic areas - we believe that Ealing should borrow from their example.

Ealing does not need regenerating in the strict sense of the word. Regeneration is about fixing broken areas, and Ealing is in no way broken - it has just been poorly managed for too long. What is needed is a clear plan for Ealing's revitalisation as a centre that attracts local people back into it, and one that attracts new visitors to come and spend time and money here - by creating some unique attractions. There is nothing in the current proposals to achieve this. We also query the assumption that the whole area has to be demolished and redeveloped. The site is in a Conservation Area and some of the buildings - especially the façades – are still of historic and architectural value.

Retail and residential provision are not the keys to regenerating Ealing centre. The concept of a residential estate in the middle of Ealing as a way of regenerating it is a concept that should be resisted. For the centre to be reinvigorated we must create reasons for people to visit and spend time in the town centre. The current proposals for the Arcadia Centre provide no compelling reasons for people to visit and spend time in the town centre. The flats will be difficult to sell, and many will remain empty for years. The retail offerings will fail because of the White City development, because of lack of car parking, because of lack of an anchor store, because of a temporary credit crunch which will become permanent, and because of the growth of online retailing.

Retailers will follow demand rather than creating it, so Ealing needs other unique attractions that are not readily available in the West London sub-region such as a large arts and conference facility. The Council and Glenkerrin need to take leisure and cultural activities seriously, and not just pay lip service, as they are the key to regenerating the town centre. A good example is the Jazz Festival as an event - it appeals right across the board to young and old, and to people from a wide range of backgrounds. There is nothing in Glenkerrin's plans which even begins to address this important issue.

The key to making the centre of Ealing attractive as a destination is probably in the domains of sport, culture, events, heritage, public safety, and community activities. Regeneration should be driven by improved cultural and leisure facilities. There is a need for a better range of restaurants, including outdoor eating in traffic-free areas.

Unfortunately, the current undesirable trend for many, mostly young, people to visit Ealing town centre on Friday and Saturday evenings, drink to excess, overindulge at late night clubs, and fight in the street dissuades the majority of Ealing residents from visiting the town centre on Friday and Saturday evenings. The "success" of these aspects of the night-time economy needs to be stopped in its tracks as its existence hampers reclaiming the centre of Ealing for the community at large.

Ealing cannot compete with the new White City development, or with more established shopping centres such as Brent Cross, merely by expanding the amount of retail space available. Indeed, it should not try to compete with these enormous developments. Ealing should concentrate on local shopping that addresses the needs of all age segments.

The retail space still seems to be totally unplanned - neither big enough to bring in a department store (would this significantly reduce the suggested total number of 40 shop units?) nor flexible enough for specialist shops.

Glenkerrin still talk of a major “anchor store”, though they said that they will have to wait a couple of years before any serious approach can be made to a potential anchor store company. However, there is no indication of which retailer might be attracted to Ealing, especially as the largest retail unit will only be about 60,000 square feet (5,500 square metres). Glenkerrin said that the units currently displayed along Uxbridge Road should be turned into one large unit for a department store of some 68,000 square feet (6,300 square metres). However, the suggestion of a department store cannot be realised within the projected unit sizes as the minimum space requirement for a new department store is 80,000 square feet (7,500 square metres).

It seems that Glenkerrin are continuing to rely on the Council’s flawed projections of retail growth. These were prepared by consultants for the Regeneration Team in late 2006 and early 2007. They contain material errors and in addition assume a minimum year-on-year growth rate of 3.8% over and above inflation increases.

Glenkerrin imply that regeneration is synonymous with retail. There is no explanation as to why an increase in retail floorspace on the Arcadia site would be successful when so many retailers have vacated Ealing town centre over the last few years. This took place well before the opening of competitor shopping locations, such as the White City development, and before the economic downturn. Glenkerrin appear to be proposing to increase both the volume of retail floorspace and the number of medium-sized retail units in the town centre. Surely the most likely consequence will be to exacerbate the current oversupply?

DESIGN AND LAYOUT

Glenkerrin’s revised proposals seem to be a genuine attempt both to improve on the earlier design which included the Leaf, and to resolve some of the critical comments. Unfortunately, many of the basic faults (density, scale and style) are endemic to the Glenkerrin concept, and much more detail (eg about how the massing of the blocks is to be handled) is needed.

Although there were many charts showing that the new buildings were not as poor as in the previous planning application, it was particularly difficult to pick out the design features in a tiny model. There was also no comparison with the requirements of the UDP.

The general reduction in density and massing is an improvement on the earlier plans, but they are still too much for the site, and the buildings are far too high. In particular, a 24-storey tower is unacceptably high for a Conservation Area (see under Other Comments below). The 24-storey “Twig” is a much more slender four-segment block than the Leaf which it has replaced, but seems to be very much the result of a “make the best of a bad job” approach. One of the architects more or less admitted that its height was simply a calculated value based on the ground area available combined with the structural strength of steel, and thus the maximum height that could be supported. This is not the way to design a building!

It is a matter of regret that much modern architecture, including the current proposals for the Arcadia Centre, seems to be “expendable” and not built for longevity.

We also note that the 24-storey tower - even though it is still too high and seems excessive as part of this scheme - bridges only the northern set of rail tracks, which allows a realignment of the main “street” (called Ealing Place on the revised plans) straight from a re-sited crossing leading out of Ealing Broadway station. Although the layout of this central street has been somewhat improved - ie opened out a bit - and access to The Broadway is an improvement, the layout fails to show the benefit of coming north of the railway. We still urge that there should be a smaller scale development to the south of the railway only.

The 9-storey blocks facing Haven Green - now of a uniform height - are also still too high. The height of these blocks is still oppressive, and they represent unacceptable massing. They are nearer to the “mansion block” concept that is needed, but are not there yet. However, the blocks have apparently been tapered, opening up the prospect towards Haven Green, so that light comes through on to Haven Green at more times of the day. Despite this, the design is still totally out of character with the Conservation Area and is still lamentable, harsh and angular, and there is no empathy with the architecture and spatial concepts elsewhere in the surrounding area.

The height of Haven Green Court should be the benchmark for the height of the blocks, with building heights kept low and the style kept vernacular. In practice, this probably means a maximum of four storeys (and perhaps less - see under Residential below) of residential accommodation above one or two storeys for retail, public realm, office, and community use.

Although the blocks facing Haven Green are 9 storeys high, the blocks rise to 11 storeys away from the Haven Green frontage. There seems to have been an unwelcome increase in the height on the eastern side of Block A, but there is not enough detail to comment on design, especially on the new tower block F, the Ealing Broadway frontages (south elevation of Blocks A and B), and the revised frontage on Haven Green.

There is concern about the materials to be used as they are important in maintaining the atmosphere of Ealing town centre. We need to know what materials Glenkerrin are proposing to use, and how they will use them. The design and finish are not in keeping with the rest of the town centre (we suggest they use the style of Haven Green Court). The revised design with the strange cut-back top floors addresses only the issue of Christ Church spire - and that pretty ineffectually, to maintain a view of the church when entering Ealing from the East - but none of the other town centre buildings.

There is as yet no detailed plan of the new buildings, especially the façade treatments (the visualisations are particularly horrid and the materials appear brutalist). There also seems to be no change from the original plans for any of the main Broadway frontages, except for a slight widening of the proposed alley alongside Sainsburys.

With regard to the Broadway frontage buildings, there is at present a pleasant mix of styles so a flat-fronted continuous boring glass building seems inappropriate. One of the architects said that he had some sympathy with our concerns, but that no design had been finalised. He mentioned bricks, but agreed that a long brick monolith (like the British Library) might actually be inappropriate. This raises the question of how a consultation for a planning application can be based on an incomplete design. We consider that the existing Ealing Broadway façades are worth preserving and incorporating into any new design for the Arcadia Centre.

RESIDENTIAL

Housing units are down 18% from 704 to 577. The proportion of affordable accommodation is still much the same as before, at 14% (79 units). However, 577 new homes are still far too many to try to cram on to the Arcadia Centre site, and would produce unacceptable living conditions for new and existing town centre residents alike. The Arcadia Centre site is unsuitable for any significant number of family units because of the lack of appropriate amenity space, and because of pressure on existing social infrastructure. There is not enough room for the infrastructure needed to support this residential density here. These proposals remain unsuitable for Ealing town centre as they would constitute a gross overdevelopment of the Arcadia Centre site. The quantum of housing should be reduced further.

The high number of flats (577) meets no explicit London Plan, Ealing UDP or forthcoming Ealing LDF planning guidelines. The 14% proportion of affordable homes misses by a long way both London Plan and Ealing UDP guidelines. Increasing choice and access to affordable housing is the main and overarching aim of Ealing Council's "Housing Strategy 2004-2009". Yet 577 Arcadia Centre flats together with 698 Dickens Yard flats would turn Ealing centre into a 1275-flat private housing estate. The education, healthcare, transport, sewage and community facilities will collapse under the strain.

There is a strong argument for Glenkerrin to cooperate with the developers of the Dickens Yard site, so that Dickens Yard becomes primarily a residential development and the Arcadia Centre becomes primarily a retail and office/other commercial development. Such an arrangement would make it unnecessary to build over the railway lines. Traditionally, the residential areas in Ealing have been within 15 minutes' walk of railway/tube, not necessarily right in the town centre.

The right proportion of residential development in the centre of Ealing may be as little as one or two storeys over the retail space. At the exhibition, Glenkerrin's architect said that the idea behind their scheme was the traditional idea of the flat above the shop. However, this is usually two storeys at the most and certainly not six storeys and more. We would like to suggest rows of shops with perhaps as few one or two storeys of flats above, which is the traditional idea of living above the shop.

Any flats that may be built should be light and of a good size, and not an excessive number of little boxes which are too small and cramped, and will probably attract buy-to-let or five-day a week commuter or transient occupants who are more suited to city centre living rather than life in the suburbs. They should be decent homes with varying numbers of bedrooms, and should all be spacious enough for use as permanent homes rather than just for Monday to Friday use and/or for company lets. On-site play areas for children should be provided.

There are also very strong arguments that located in the centre of our town should be new cultural, commercial, sporting, community and car parking services for all Ealing residents - and not flats for rich incomers who want to commute during the week to work in places such as the City of London or Canary Wharf. We also need big open spaces, eg piazzas, with cafes and places to sit outside.

TRANSPORT

The relationship of the proposed development to Ealing Broadway station is not good enough, and will be even less so once we see the additional numbers of passengers generated by Crossrail. We need an integrated bus/rail interchange in Ealing – and must not lose so much of Haven Green for use as a bus terminus. Vehicle access into the Arcadia Centre site will still conflict with the access to Christ Church School, even though the basement traffic access has been moved slightly north so as not to be directly opposite the school entrance, and the additional journeys generated by the Arcadia Centre development will cause regular gridlock along Springbridge Road, tailing back on to Uxbridge Road.

The transport proposals are a disaster. A total integrated plan is needed to deal with the present conflicts between vehicle and pedestrian traffic across the whole town centre (see Other Comments below). We believe it is totally unacceptable that

- The station site is not included in the plans.
- The east side of Haven Green has been taken over for a bus (and taxi) gyratory system - the proposed pedestrian section of the diagonal road does not compensate, nor does it offer any benefit in its own right.
- The serious traffic management and air pollution issues around Haven Green and the surrounding road network have not been addressed.
- There is no provision for a westward platform extension at Ealing Broadway station with direct entry to/exit from Crossrail into the Arcadia Centre. This would serve both existing and future residents, office workers, shoppers and visitors more effectively. We believe that Glenkerrin need to work more closely with Crossrail and Network Rail. It is a matter of regret that the major problems of traffic and transport interchanges seem to be outside Glenkerrin's remit.

Three key needs are

- An integrated bus/tube/rail interchange, with Haven Green released from being a bus station.
- Pedestrianisation of Ealing Broadway station forecourt and access so that it becomes far more attractive, is integrated into the centre of Ealing and can cope with the expansion of passenger numbers which Crossrail will generate.
- Preserving the space for widening the rail tracks west of Ealing Broadway station to accommodate the expansion of the main West Country mainline and the local service to West Ealing and beyond. This requires that there should be no building over the railway lines.

It appears that Glenkerrin have tried to address the criticism that no provision was made in the original Leaf designs for a transport interchange. Plans now show a two-way road set of bus stands on the east of Haven Green, balanced by the removal of the diagonal road (though it is not clear whether this will be a formal part of the planning application as it is not part of Glenkerrin's site, and may be part of an Ealing Council scheme based on the Tibbalds report).

There needs to be an integrated transport interchange at Ealing Broadway station, not a bus interchange on Haven Green. The bus stands proposed for the east side of Haven Green might do for 2008, but will be totally inadequate for the extra bus traffic generated by the combination of Glenkerrin's Arcadia Centre development, the Dickens Yard development and the Crossrail service.

The creation of a new transport hub, centred around Crossrail and Ealing Broadway Station, is the highest development priority for the centre of Ealing. This hub should embrace a bus station, ease of access for all, an arrival/departure atrium with retail outlets, and dedicated drop-off/pick-up facilities for taxis, mini-cabs and private cars.

One of the only places where there would be room for such expansion is over the five London Underground tracks (Central Line and District Line). Work on a bus station over the tracks could begin soon. As soon as Crossrail's plans are finalised, work could start on the bus station - we don't need to wait for the Crossrail station to be built.

The proposed bus stands on Haven Green create a further barrier between the west-facing (sunny?) terrace north of the station and Haven Green itself. This terrace could be one of the town centre's café locations, along the lines of what has emerged around Ealing Green. However, this is unlikely to happen if the site faces a bus station, as currently proposed in Glenkerrin's plans. The right place for the bus station and taxi rank may well be over the tube (and rail) station, possibly with the main access from The Mall via the site currently occupied by Carey/Carmelita House. There appears to be space for a double-lane entry and exit there if the dilapidated 1960s building was demolished.

Glenkerrin have added drawings of an improved station forecourt - there is a schematic diagram showing the proposed development of the station and Villiers House sites, opening on to the forecourt and crossing to the realigned main street through the Arcadia Centre site. Glenkerrin said that this was not part of the submission for the Arcadia Centre development, but would be "Phase 2" of their plans. Surely this is a long way in the future, and has no bearing on the Arcadia Centre scheme. Although Glenkerrin own the land, this development will depend very much on Crossrail and Network Rail. The conclusion is that Glenkerrin will push ahead with the current development on its own, and they will then participate in the redevelopment of the station later on, as "Glenkerrin Stage 2". Is this a good idea as it stands?

Glenkerrin still intend to build the Arcadia Centre development across the railway (do they yet have any agreement with Network Rail?). This will prevent any future construction of extra rail tracks as proposed by Network Rail for improved services to the West Country etc. Worse still, the "Twig" now rests on a wall built between the tracks. This takes no account of the potential disruption to - and the future problems of - rail maintenance etc. Glenkerrin need to remember what happened when Tesco tried to build over the rail tracks in Gerrards Cross and the whole building collapsed.

Road access to the town centre and traffic flows through and around the town centre cannot be scaled up in proportion to the number of new road users, so they need to be re-engineered because there will be more traffic on roads which are not capable of enlargement.

Basement car park access continues to be problematic. The combined entry and exit tunnel is located on Springbridge Road, and appears to be in much the same location as in the original planning application. All vehicles will share the same entry and exit, ie shop deliveries, home shopping deliveries for residents, residents' own vehicles, refuse removal, and now shoppers' car parking as well. All these vehicles will access the Arcadia Centre via the single-width one-way Springbridge Road. There still does not appear to be any "holding area" for goods vehicles waiting to enter the basement. There seems to be enormous potential for congestion tailbacks on the town centre roads resulting from even temporary problems on the basement car park access ramp.

The separate streaming of goods and car traffic on the approaches to and within the Ealing Broadway Shopping Centre provides an example of what can and should be done. Even the application for the Dickens Yard development, on the far less busy Longfield Avenue, includes a one-way system for cars in the basement once they reach the bottom of the upper ramp.

At the very least, the southern end of Springbridge Road should be broadened to accommodate two-way traffic, with a left-turn-only junction on to The Broadway. This measure would reduce the volume of traffic circumnavigating Haven Green.

In Glenkerrin's revised plans, the building lines have been moved backwards, adding 6.5 metres of space along Springbridge Road, on the eastern side. The road can therefore be widened, but Glenkerrin do not plan to do this.

For this reason, the Springbridge Road building line is still unsatisfactory. The pavement has been widened at the southern end, but is then blocked off where the westernmost block is constructed over the railway line, on the site of the florist's shop. The whole development should be set back to the east so that there is both room for an additional traffic lane in Springbridge Road and space for a "holding area" for at least two goods delivery vehicles and shoppers' cars waiting to enter the basement ramp.

There is already considerable pressure on car parking in the town centre and in surrounding areas. Although some retail parking spaces to bring in customers have been included in the revised plans, significantly more accessible, pay-on-exit car parking spaces need to be provided in the town centre if a potentially viable attempt is to be made to create retail outlets for aspirational shoppers.

Including some car parking spaces for shoppers is a good standard "textbook" proposal, as suburban mid-to-up market fashion retailing is dependent on such measures. TfL Buses commissioned a report which emphasised this relationship. The Retail Statement which accompanied Glenkerrin's planning application last autumn acknowledged that they were under pressure from Ealing Council's planners to provide such parking. The dilemma is over the amount. White City will have 4,500 spaces and Uxbridge added 1,500 spaces when The Chimes shopping centre was built. The 140 spaces (to be shared by shoppers and visitors) proposed by Glenkerrin is meagre by comparison. Glenkerrin's proposals are significant enough to compound road congestion problems, without providing for anywhere near the volume of additional shoppers who are needed just to stabilise the town centre's retail economy, let alone increase it.

The newly widened access opposite the Broadway Centre traffic crossing is good but there also needs to be more separation of traffic and pedestrians, such as a big footbridge over The Broadway. Glenkerrin insist that the wider pedestrian crossing is adequate - any idea of an overpass has been dismissed out of hand.

There is still no provision for a pedestrian underpass between the eastern end of the proposed development and the station. To benefit the majority of pedestrians, and town centre retailers, this needs to be to the south of the railway line. Glenkerrin said this is not possible as they do not own the building between the station forecourt and the Town House pub. As this is one of the critical town centre integration/permeability issues, it might justify a CPO.

Glenkerrin were also asked why there was no underpass to provide access to Ealing Broadway station, granted that it would be possible to run an underpass from the District line to the north side of the "Twig". Technically, the underpass would have to emerge on Haven Green (but on the concreted area) for which permission has to be sought. However, Glenkerrin said that the Crossrail proposal makes no mention of such an idea. Glenkerrin claimed that changing the Crossrail plans would involve the agreement of at least four organisations, which would take a very long time and might be impossible.

A large residential estate with cars for the residents as proposed by Glenkerrin (240 residents' parking spaces are proposed) will also cause huge traffic problems in Ealing. A majority of dwellings in the Arcadia Centre should be "low-car" or "no-car" as they are so close to the station - this site has such good access to public transport. It is reasonable to suggest that there should be no increase in parking provision over what we have today. This fits in well with the aspirations of the London Plan and with broader Government policies on sustainable development.

OTHER COMMENTS

Sustainable Development

We want sustainable development too, and Glenkerrin have not mentioned this. It is important that we all try to decrease our carbon footprint. What, if any, are Glenkerrin's plans for sustainable development?

Although Glenkerrin have made improvements to their earlier plans and taken notice of criticisms, this is just tinkering. People at the exhibition were not expressing enthusiasm, but doubt and anxiety about the density of the residences and the number of people who will be living right in the town centre, about the amount of traffic this will generate, about green issues, about crime, and about the height of the “landmark” building

Infrastructure

Ealing, with nearly 310,000 residents, is massively neglected in terms of basic infrastructural services. It boasts the worst hospital in England, overcrowded GP facilities, and only two functioning Police Stations - in Acton and Southall. Its major railway station - Ealing Broadway - is unfit for purpose. Dormers Wells Ward is one of the poorest and most deprived areas in England. Despite all this, the town has good public transport access into and out of London, many solidly built family homes and some wonderful parks (thanks to our Victorian and Edwardian forbears), and the centre of Ealing still has the feel of a large market town. The revised proposals for the Arcadia Centre will destroy the look and the feel of Ealing town centre for ever. They do absolutely nothing to address Ealing's chronic infrastructural inadequacies, nor do they enable any cultural or leisure activities to take place - this doesn't seem to have been considered at all.

Conservation Area

This is a Conservation Area, and most of the existing buildings – and certainly the façades - should be retained and refurbished in a way that enhances the Conservation Area. There can be no case for a 24-storey tower within the Conservation Area, nor for 9-storey blocks looming along the rest of Haven Green.

The architectural style and scale of the new buildings must respect the existing character of the Victorian/Edwardian town centre, as well as the fine grain of the Broadway. The Broadway frontages are therefore particularly important and have not been given the attention or quality they deserve.

The character of Haven Green and the surrounding Conservation Area must not be compromised as once it is lost it can never be recovered. It is the only open space immediately adjacent to the town centre and, as common land, must be kept free of any permanent structure and remain - as its name implies - a haven from the busier areas of the town.

Integration of Planning for the Ealing of the Future

Glenkerrin's architect said that Ealing has no master plan, and that the Council is relying on the developers to create one. This is not a developer's role. We still need a master plan to define how Ealing is to develop. Until this happens, Glenkerrin will go on creating its own vision and tinkering around the edges to appease "public opinion". This means that we shall continue to have the problems of a piecemeal approach to redeveloping and revitalising the centre of Ealing. An overall view is needed to get all the components in the right place, which means that a master plan is essential.

Everyone seems to be agreed on the importance of an integrated solution for the town centre. Glenkerrin are reported to own Villiers House and the station forecourt. Two of their display panels, "The Objectives of our Redesign" and "Greater Shopping Choice" clearly include designs for the station. Why were Glenkerrin so reluctant to share their proposals for the station site - "Phase 2" of their plans? If they are as committed to public consultation as they claim to be, we expect them to be more forthcoming. After all, whatever happens to the station will have a direct impact on the success of both the Arcadia Centre and Dickens Yard developments.

Glenkerrin's Revised Proposals and Consultation

We appreciate the fact that Glenkerrin have clearly learnt from their mistake over their earlier lack of public consultation, and welcome Glenkerrin's interest in seeking the views of residents on their revised proposals and for ensuring that - rather than a team of ill-informed PR girls - so many members of the project team staff were available to discuss the plans at the exhibition, although no retail specialist was on hand on Friday afternoon. This was a much better attempt to explain the concepts, and to try to show they have responded to criticism and are still open to comment. There seems to be a genuine wish to get an informed public response, in contrast to the previous approach.

However, we are concerned that Glenkerrin are calling the current exercise a "consultation". The whole of this consultation has taken place during a holiday period when it is to be expected that many residents will be away. Residents were given less than two weeks' notice of the exhibition in the letter from Green Issues Communications dated and sent out on Friday 11 July, and only one week's notice by means of the public announcements in the local newspapers dated 17 July and 18 July. This is very short advance notice of an exhibition which appears to be linked to a major planning application. The exhibition was open for six hours on Friday 25 July and for five hours on Saturday 26 July. It was all rather rushed for a significant engagement with the public. We understand that shortly before the exhibition closed on the Saturday, visitor numbers over the two days were reckoned to have reached just under 400 people.

Visitors were asked either to complete the "comments" card at the exhibition or to complete it later (or to comment online) and submit their comments by the deadline of Friday 8 August. With the exhibition taking place at the start of the school holidays, it is inevitable that many residents will have not had the opportunity to visit the exhibition, think through the revised plans and submit informed comments. They may, therefore, feel that they have been left out of the consultation for what will be a major planning application, and that the consultation is not as representative of the community's views as it could have been.

It is also a matter of regret that the Glenkerrin exhibition panels and models and "comments" cards were not left on display for a longer period of time for access by those members of the public who could not get to the exhibition. After all, at the previous exhibition last December and January, the panels were left on display for some weeks, even though they were only staffed for part of the time.