



# CERA NEWS



## News from Central Ealing Residents' Association

Email: [info@cera.org.uk](mailto:info@cera.org.uk)

Website: [www.cera.org.uk](http://www.cera.org.uk)

April 2023

### 9–42 The Broadway: the Broadway Connection

*British Land's planning application to redevelop its sadly neglected site opposite Ealing Broadway Station remains out for public consultation – see link in column 2 to register your views. CERA has registered its views, which this article summarises.*

Renewal of this prominent town centre site is long overdue and a largely office scheme with some replacement retail uses would bring a welcome increase in office workers and boost retail trade. BL's scheme would retain some older, locally listed buildings along the Broadway, and create a new town square linked by a pedestrian route from the station to Ealing Broadway, all of which CERA applauds.

However, despite some minor recent changes to the original planning application the development raises a lot of concerns, described in recent criticisms by both Historic England and the GLA:

- the overall scale, density and height of the scheme with its 21-storey tower is far higher than other town centre buildings. As the GLA says: 'The proposed height combined with the breadth of the tower and the substantial length of the lower 9-storey shoulder are not supported due to the alien and dominant building form that would overwhelm the historic town centre.'
- such a massive scheme is inappropriate for a site in the Ealing Town Centre Conservation Area and adjacent to Haven Green CA, both of which are on Historic England's list of heritage assets under threat. The huge development would obtrude into views from within the town centre, and from Haven Green and the streets to the north. As Historic England says: 'The introduction of large-scale buildings here that are more like central London in character would harm the significance of Ealing Town Centre CA, Haven Green CA, and the Grade II\* listed Christ the Saviour Church. ... We judge the level of harm to Ealing Town Centre CA to be particularly high.'
- the quality of architecture of the office towers, despite some minor changes, is a further concern. The GLA believes these improvements



do not mitigate the impact of the substantial height/breadth of the facades.

- so much office space (gross internal area of 35,000 sq m and net floor area of more than 25,000 sq m) in one town centre site is neither desirable nor necessary. A rather smaller office scheme of, say, 15,000 sq m net floor area would create a suitable critical mass opposite the station, close to other major office schemes in central Ealing. This would be sufficient to transform Ealing into a prime west London office centre and attract major occupiers.
- demand for office space has declined following Covid and many office workers are now working from home on average two days a week, so a smaller Broadway Connection office scheme would now be more appropriate in this town centre location. A lower building height of, say, 12 storeys would still be able to accommodate major office tenants in large floorplates, as a 21-storey tower would, and the resulting scheme would have sufficient critical mass to be successful.
- The GLA notes that British Land's commercial choice in terms of critical mass and size of floorplates has not been established through a design-led approach, as it should in a major conservation area, but forms part of the architect's brief.

To comment on these plans go to: <https://pam.ealing.gov.uk/online-applications/simpleSearchResults.do?action=firstPage> and type in application no. 223774FUL.

## Waitrose development near West Ealing Station



Last summer West Ealing Waitrose released its initial ideas for a new store of similar size to the existing store above a ground-floor car park. Flats for rent would be built above the new store and on the rest of the site. During construction, a smaller temporary replacement store would be built in the existing surface car park. The number of new flats and the height of the new development were not disclosed, but a second set of more detailed proposals has now been published for public comment before a planning application expected in the spring.

There is little doubt that better use could be made of this under-used site. The scale of Waitrose's ambitions is quite a shock: some 430 proposed new homes are proposed, provided in four tower blocks rising to a similar height to the heavily criticised Manor Road development opposite, north of the railway next to West Ealing station. The tower blocks would rise above a landscaped podium, a new store and its 170-space shoppers' car park, ranging from ground + 10 storeys to ground + 19 storeys (shown above). These would be completely out of scale with the two-storey houses in Alexandria Road and other nearby roads. The proposed two mews blocks of houses set in landscaped gardens at the west end of the site will make little difference.

At the heart of the scheme a new landscaped

square is planned, together with some new shops and a café on the north side of Alexandria Road, which will be narrowed and have a wider pavement, new trees and increased soft landscaping.

Waitrose's plans have been strongly criticised not just by nearby residents but by the Council Leader, Cllr Peter Mason, who – unusually – has spoken out vehemently against them in the local media. The Council's new Draft Local Plan proposes a 13-storey limit on new development on the Waitrose site. If Waitrose fails to react positively to these signals, CERA will urge the Council to refuse any planning application.

With developers eager to profit from the Elizabeth Line service, Waitrose's plans are intensifying discussion about the entire area around West Ealing station. Local residents are extremely concerned that cumulatively the developments now being planned will destroy the character of their long-established low-rise family residential community. They say the Council should be working with them to manage these changes.

Impact on local infrastructure is another concern. Thousands of new homes are being built in this area and the existing infrastructure cannot accommodate them. Recent reports say there is insufficient electricity-generating capacity in West London to supply the new homes, schools are full, and health services overstretched.

Access to open space also needs improving. This site abuts the railway in a part of the borough under-served by open space. The closest is across the railway at Drayton Green but getting there involves the use of the pedestrian-

unfriendly Jacob's Ladder footbridge. Waitrose says it is considering how to improve the bridge. It would not just be a major benefit to local residents but it would also improve pedestrian access to the store for residents living north of the railway.

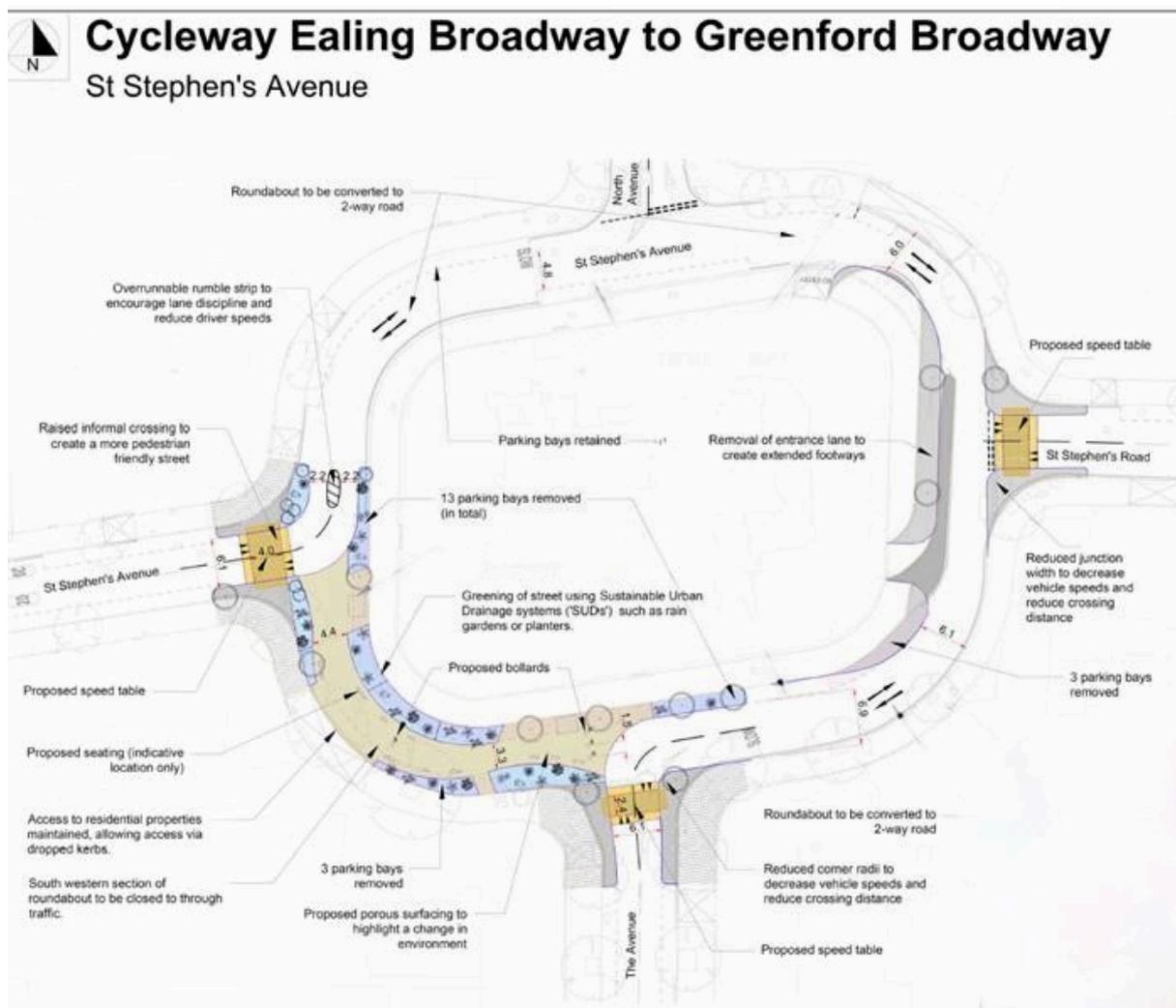
## Greenford-to-Ealing cycleway

This cycleway was originally proposed before Covid. The Greenford end has been completed but the Ealing end has been delayed. Consultation about changes to Gordon Road to benefit cyclists, particularly at the junction with Spring Bridge Road, has been under way for two years now but is nearing agreement.

Another part of the cycleway just to the north of Gordon Road that has recently been resurrected is the St Stephen's roundabout, where the Avenue/North Avenue meets St Stephen's Road/Avenue. This will involve closing the south-west quadrant of the roundabout to motor traffic and traffic on the remaining quadrants would become two-way. Some car parking spaces and part of the pavement will be removed. Consultation on this scheme is expected shortly, but it seems like a major change for only a small benefit to cyclists.

The Gordon Road 'improvements' include banning left-turning motor traffic into Gordon Road from Spring Bridge Road. This change was temporary but the Council now wants to make it permanent even though survey evidence shows it has increased traffic in Longfield and Carlton Roads significantly. As a result the Carlton Road/St Leonard's Road/Gordon Road crossroads is often very congested and potentially more dangerous for cyclists and pedestrians – the opposite of what the Council intended. CERA has pointed this out and a formal road safety audit is now in progress for this junction.

The cycleway is meant to cross Haven Green and end at the station, but the route in front of the station is not yet implemented, owing to shortage of funds. The Council is 'looking for



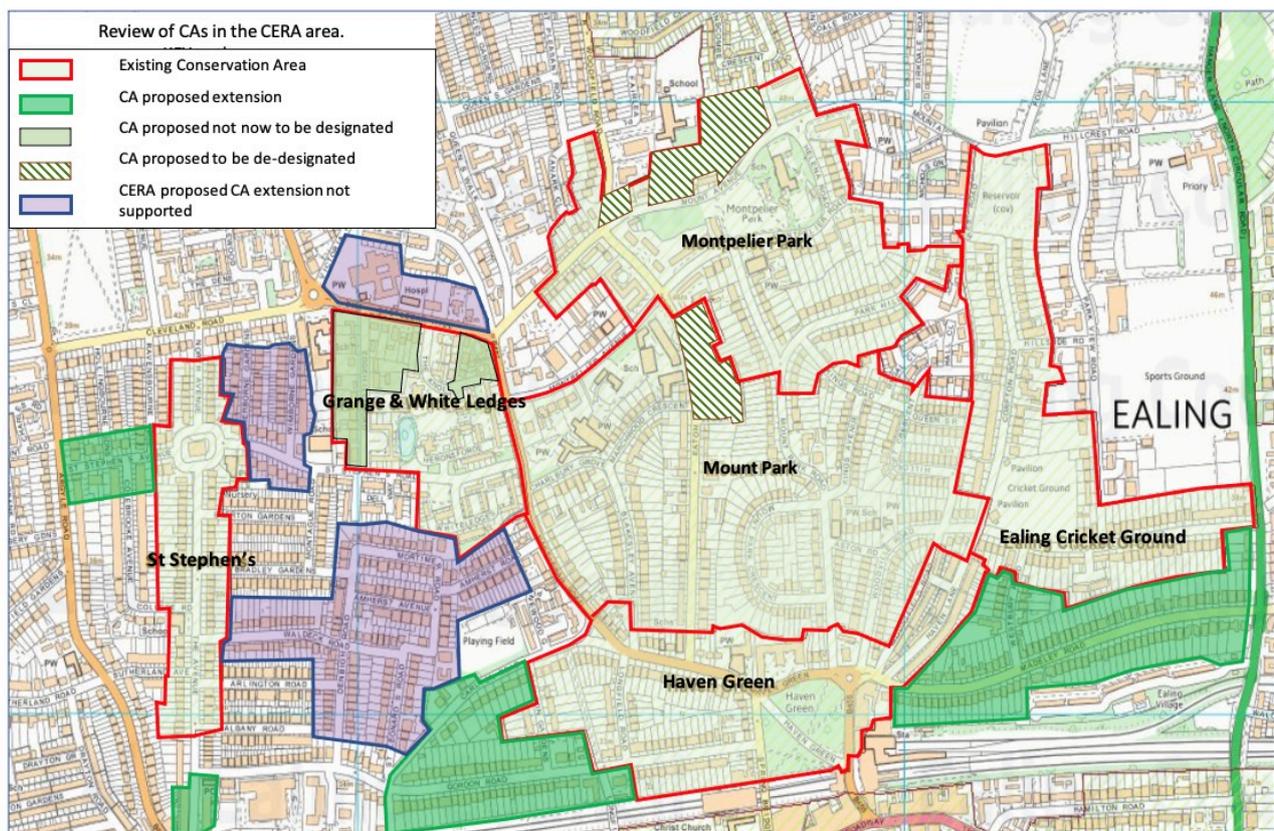
a “quick win” route to reach the main cycle stands in advance of any larger scheme’.

CERA fears that there will be increased heavy construction traffic along Gordon Road and other residential roads during the Perceval House redevelopment – hardly appropriate for the proposed cycleway along Gordon Road. CERA wants consultation on the construction management plan

and a review of the left turn ban from Longfield Avenue to Uxbridge Road.

The Highways team agrees that conflicts between cyclists and construction traffic are not desirable. They said they would raise this with the planners but think that the obvious solution of suspending the Longfield Avenue turning bans is unlikely to happen.

## Conservation Area review



Regular readers may recall that in March 2022 we outlined the Council’s review of the borough’s Conservation Areas. The report on the review, now published, recommends some significant CA boundary changes in CERA territory. Subject to various further statutory hurdles, three of our existing CAs look set to be extended to include streets the review thinks need greater protection from unsympathetic development. The proposed changes are shown in the map above.

The largest extension would be in the Ealing Cricket Club CA and would include all of Madeley Road. Haven Green CA would be extended westwards along Gordon Road as far as Carlton Road, which will also be included. St Stephen’s Avenue west of the church (now flats) will be added to St Stephen’s CA along with the shops (and flats above) at the southern end of The Avenue. Some small areas of modern housing in Mount Park and

Montpelier CAs are to have their protection removed through de-designation.

Many of these changes have been shaped by the inputs of CERA and the specialist Conservatory Advisory Panels for each area. In particular, the decision to extend Haven Green CA and not to remove the protections to parts of the Grange and White Ledges CA are a direct result of our lobbying. But we did not get everything we asked for. CERA is especially disappointed that St Stephen’s CA has not been extended eastwards as we proposed, and as shown on the map.

Recognising the particular pressures on our town centre, the review also calls for an Ealing town centre heritage-led strategy to be prepared. Historic England is very supportive of the proposal, and has said it would greatly value early engagement in the production of this document.

## The Victoria Hall tribunal

The much-delayed tribunal hearing, to decide whether or not to allow Ealing Council's 'Scheme' to dispose of the Victoria and Prince's Halls to a property developer, was held over three days a few weeks ago, 20–22 February. If the Council's Scheme were allowed this would largely end the Halls' charitable status and availability for community use. No verdict is expected for at least another month.

The Friends of the Victoria Hall's initial challenge was to the Charity Commission, for rubber-stamping Ealing Council's plans to lease the charitable property (along with the rest of the Town Hall) to a property developer and thereby effectively prevent the community that paid for the Victoria Hall from using it, as was the original intention. Late in the day, however, Ealing Council asked to be 'joined' in the case, so the Friends were pitted against not one but two top-dollar barristers. A few days before the tribunal, the Friends appointed a young barrister, Ted Loveday, to represent them.

His main arguments centred on the spirit of the 'gift' (i.e. that the Victorian benefactors made to the people of Ealing in the 1880s); the conflict of interest inherent in the Council acting as both charity trustee and corporate entity; the extent of the charitable

property (the Council uses the area footage for allocating staff and upkeep costs); the financial viability of the charity, hamstrung for many years by the Council's actions, including its ever-increasing hire charges; and the terms of the Scheme.

The Council claimed that the original purpose of the Victoria Hall was irrelevant; that the Council was capable of acting both in its own interests and in the charity's interests at the same time, and that the Friends' fully costed business plan could not work. It argued that the charity could not be self-sustaining.

The Friends consider that their barrister did an excellent job, despite having very little time to prepare for this complex case involving charity law, local authority law, property law and other areas.

The cost, however, has been considerable. If you would like to contribute to the Friends' legal costs, you can do so either directly to their HMRC charity bank account, Friends of the Victoria Hall, Lloyds Bank, 30-92-92, a/c no 39588668; or via CrowdJustice [www.crowdjustice.com/case/save-the-victoria-hall](http://www.crowdjustice.com/case/save-the-victoria-hall) If you do the former and sign up for Gift Aid (see <https://savethevictoriahall.weebly.com> and scroll down for how to donate and sign up for Gift Aid, this will augment your donation by 25 per cent.



## CERA: response to draft Local Plan

As our last newsletter went to press the Council began consulting on [a new local plan](#) – the key document for managing the Borough's development. If approved, the new plan will have huge impacts on the CERA area, many of them detrimental. [Ealing Matters has collected community responses](#) from across the Borough. We specially recommend [SEC's comments](#) on what the new plan means for Ealing Town Centre.

Here (slightly edited for reasons of space) is CERA's response to the consultation.

- 1 It is unacceptable that Regulation 18 of the Planning and Compulsory Purchase Act 2004 has been ignored. There should have been a consultation on what this Local Plan would cover, not a *fait accompli* comprising hundreds of pages and only made public just before the Christmas holiday season, with a very tight deadline for comment.
- 2 The Draft Local Plan has been prepared in a manner contrary to recent and proposed Government planning reforms that put communities at the heart of the planning system. There are forthcoming changes to the NPPF and recent amendments to the Levelling Up and Regeneration Bill which reflect this.
- 3 There is no overall vision for Ealing Town Centre. The draft Plan is driven by numbers and targets, not by a detailed and informed character appraisal of the Centre and a focus on 'place'. We need a full character analysis of the age, height and appearance of buildings and density of development. As the existence of Conservation Areas in central Ealing is largely ignored, the draft Plan does not reflect the priorities and aspirations of CERA residents.
- 4 The Government has made clear (Gove – statement on 6 December 2021 and his more recent announcements) that housing targets are an advisory starting point to inform plan-making. They are not mandatory and should not encourage development at densities significantly out of character or at an inappropriate scale and impact. This is highly relevant for places like Ealing where the Draft Local Plan proposes high-rise buildings for numerous sites in the town centre that are entirely out of scale with existing buildings.
- 5 The concept of '20-minute neighbourhoods' appears in the Plan. These can only happen if businesses create them, not local authorities. They are unrealistic and unimplementable. Moreover, from examples elsewhere (Oxford, Canterbury) it seems that the purpose is to bring in restrictions on residents needing to drive outside their own areas. Residents do not want to have to get permits to move around, nor will they tolerate increased surveillance by CCTV or road blocks in their streets, let alone restrictions on their movement. LBE has recently backtracked on the catastrophic imposition of LTNs and must not risk making the same mistake again.
- 6 A substantial number of utility/amenity sites are deemed to be unworthy of retention in the Draft Local Plan and so potentially available for re-development (primarily for residential use), such as car parks (standalone and ancillary), builders' merchants, supermarkets, vehicle repair and MOT centres, and many others. Quite apart from being anti-consumer and anti-business, the removal of such facilities will require residents to drive greater distances. Even community and health centres are on the hit list, which makes no sense at all.
- 7 Policy C0 makes reference to 'carbon offsetting' but scant consideration is given to embodied carbon in existing buildings, many of which would be adversely affected as a result of inevitable demolitions to

accommodate high-rise developments using large quantities of cement/reinforced concrete. There is growing government support for the re-use of existing buildings and retrofit measures to minimise emissions as far as possible, with demolition being the least preferred option. This is a major concern if wholesale demolition of relatively recently built developments, such as the Ealing Broadway Centre, is approved over the Local Plan period. LBE cannot possibly meet its own Net-Zero carbon emissions target by 2030.

- 8 Lacking is any policy which has a presumption for the retention and adaptation of existing buildings, in particular the Ealing Broadway Centre (EA 02) built in 1985. The proposal to demolish and replace with 'perimeter blocks of varied heights' is contrary to the London Plan and Government intentions. Development Management policy DAA (Design and Amenity) is vague and inadequate to prevent inappropriate development being brought forward.
- 9 Buildings above 4–6 storeys are currently an exception in the town centre. There is no justification for a policy which does not regard buildings up to 21 storeys as 'tall'. What is the significance of 21 storeys when this height is so much greater than that of existing buildings in the town centre? A definition of a 'tall' building should reflect this. The Plan should acknowledge the vernacular, using sensitivity criteria and an urban design appraisal, as over-scaled development can – and has – caused damage to the skyline, to vistas and to the backdrop to buildings of merit.
- 10 Conservation Areas, heritage and urban design policies are missing. This leaves it wide open for exploitation of the planning system by those intending to build at densities harmful to the character and appearance of central Ealing. Densification of appropriate sites with sensitive adaptation and high standards of design could be welcomed, but the Plan fails to provide policies and guidance to achieve this. It lacks an acceptable vision.
- 11 Individual sites in the town centre are mentioned with indicative development heights and design principles and reference to a Tall Buildings Strategy, but there is no reference to the location of Conservation Areas or consideration of existing building heights adjacent to or near development sites. No justification is provided for the proposed building heights on any of the Local Plan sites or why all sites north of the Broadway, New Broadway or Uxbridge Road, including Ealing Broadway Station and the Central Chambers site opposite, may be redeveloped up to 21 storeys, far higher than existing buildings; similarly, the sites opposite on the south side of the Broadway and New Broadway where the maximum height for redevelopments is considered to be 8–12 storeys.

At CP House on the south side of Uxbridge Road planning permission for a 12-storey redevelopment was recently granted. The Draft Plan now indicates an acceptable height would be 9–21 storeys. Even more extraordinary is the small car park site at Arden Road slightly further west in West Ealing and owned by the Council, where planning approval was recently granted for a 9-storey development, but the site is shown in the Draft Local Plan as being suitable for 9–21 storeys! Equally perverse is the Perceval House site, owned by the Council, which should include a policy to state that if the current scheme does not proceed a tower of 26 storeys in any revised scheme will not accord with the policies and design principles of the Local Plan.

- 12 It is clear that some of the good design work and conclusions concerning design by Allies and Morrison, the Council's urban design consultants, have at last been published with the Draft Local Plan, but should now be brought forward as policy and as a central part of the Local Plan. This might relate to the points referred to above and help explain them but there has been insufficient time for residents to read and digest all these consultants' documents.

We need examples of inappropriate development and guidance on what are unacceptable and inappropriate building heights that negatively impact the local townscape due to massing, plus the identification of those aspects of local character worthy of protection, including townscape qualities that have helped the town centre establish itself as a centre with a distinct and attractive ambience — and a presumption against development which undermines these principles. We also need a policy that covers buildings that significantly exceed the height of their immediate surroundings and which will not be considered as an appropriate form of development.

- 13 CERA has great concerns about recent urban design changes in central Ealing and the policies in the Draft Plan fail to address these. In fact they seem likely to make them worse. Also of concern are pressures for flat conversions or the redevelopment of the large Victorian/Edwardian houses surrounding the town centre. We need policies to prevent over-development, creation of over-large basements and backland development in back gardens.
- 14 Strong policies are needed in the Local Plan covering these schemes, which are often of excessive scale and propose large rear balconies and patios, which impact on privacy for adjoining properties and lower-level flats in the houses being converted. The vibration from construction work to create enormous new basements potentially causes long-term problems of subsidence, drainage and increased risk of flooding to adjacent houses. Many of these existing houses have small Victorian basements which are often flooded because of the high water table and pressure on the Victorian drainage and sewage system.
- 15 NPPF and the London Plan both require development plans to identify, protect and enhance valued landscapes, including sites of biodiversity or geological value. The Plan's proposals to de-designate large areas of Green Belt or Metropolitan Open Land, some of which are close to CERA's boundaries, will destroy rather than protect the existing precious green spaces in Ealing, strongly suggesting that these spaces will become more available for development. All allotments are under threat too, it seems. These proposals are totally unacceptable. The Plan should focus on the creation of new areas of green space that would be accessible to the growing population. The Draft Local Plan also ignores the value of local waterways such as the River Brent and thus fails to take advantage of their social, environmental and economic benefits, as well as overlooking the fact that water companies regularly discharge effluent into them – a result of over-development in the borough.
- 16 We further note that a new policy on 'Enabling development' has appeared with little justification and the term is not defined in the Plan's glossary. It would appear to establish a principle for allowing development where planning permission would not normally be granted, for example, on MOL at Gurnell or on the Barclays Sports Ground, where 'a leisure-led scheme is proposed with enabling residential use facilitating access to sports and play pitches'. What does 'enabling residential use' mean when this is already a sports ground with access?
- 17 Moreover, certain vital components of the Plan are missing altogether. There is no infrastructure delivery plan, for example. The Infrastructure Topic Report highlights several major problems with various aspects of infrastructure in Ealing, yet there is nothing which spells out how the current or future challenges are to be addressed.
- 18 Also missing are documents addressing the management of Ealing's green space and green infrastructure, especially Haven Green. Given LBE's strategic climate crisis objective, how can this not be covered in the Draft Local Plan? Judging by LBE's recent Warren Farm nature reserve decision, all green spaces in Ealing are under threat.
- 19 This Local Plan, when finalised, should be carefully monitored and reported upon, unlike previous plans.