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## **Comments on Planning Application PP/2015/3479 Proposed development at 9-42 The Broadway**

Save Ealing's Centre (SEC) opposed the previous application for redevelopment of this site by Glenkerrin and this was ultimately rejected in 2009 by the Planning Inspector and Secretary of State on a number of grounds. We have examined the current application by Benson Elliot in some detail and whilst we consider it to be superior to the Glenkerrin scheme we still believe that it is not sufficiently sensitive to this highly important location at the heart of the Town Centre Conservation Area and immediately adjacent to the Haven Green Conservation Area. We also contend that the proposal fails to comply with the recommendations for the site previously made by the Planning Inspector. SEC is therefore objecting on behalf of our supporters on a number of grounds which are detailed below.

### **Our objections are made under six principal headings:**

1. The failure to retain Locally Listed facades and many other existing buildings which are important elements in the character of the Town Centre Conservation Area and provide a sympathetic setting for Listed Buildings nearby.
2. The height and positioning of taller buildings around the perimeter of the site rather than within the central core. This approach would have a negative effect on both The Broadway and also the Haven Green Conservation Area and is contrary to the recommendations of the Inspector when rejecting the previous Glenkerrin proposals.
3. The architectural quality of buildings, not least the proposed 18 storey tower, does not respond to the setting and although attention has been paid to detailing this is still somewhat characterless and appears to accentuate bulk. Overall the scheme is not sufficiently differentiated from numerous developments elsewhere and pays little regard to the location within a Conservation Area.
4. The potential negative effects on the proposed segregated cycle route up Station Broadway (to the 'Cycle Hub') and on pedestrian and bus movements as a result of the proposed vehicle access for residential parking.
5. The insufficient emphasis placed on the need for affordable, key worker and social housing in Ealing.
6. That the scheme does not make sufficient provision for 'Town Centre Uses' including social and community facilities as recommended by the Planning Inspector.

## **Viewpoints**

We believe that the visual impacts of the scheme have not been assessed from sufficient viewpoints and that the limited viewpoints offered fail to demonstrate the widespread impacts of the higher elements. It should be borne in mind that the residential areas to the North are on rising ground and the impacts on these Conservation Areas must be considered from greater distances. Further viewpoints from the pavements outside the 'Metro Bank', the 'North Star' public house and 'Lloyds Bank' are required to better assess impacts on lines of sight and the overall setting of the Grade II\* Listed Christ The Saviour Church.

### **Further detail on SEC Objections:**

#### **1. Preservation of historic facades**

- 1.1 9-16 The Broadway (some of which are Locally Listed) are seen as providing an important framing of views of the Grade II\* Listed Christ The Saviour Church and are pivotal in reinforcing the historic character and identity of the Town Centre Conservation Area when viewed from locations along the southern side of The Broadway. They should be retained.
- 1.2 The attractive and significant Locally Listed 'landmark' Carphone Warehouse corner building (number 35) should also be retained for the balance and context it gives to the Metro Bank and Grade II Listed NatWest Bank buildings immediately alongside on the junction with The Mall.
- 1.3 Buildings along Station Broadway form an important frontage which should confirm the character of the Town Centre and Haven Green Conservation Areas for those entering Ealing from the train station and by bus. These buildings also need to provide an appropriate setting for the Carphone Warehouse corner building. In the absence of a proposal of sympathetic scale, design and materials from the developer, the existing facades should be retained with new buildings on the site being located behind and towards the core of the site. SEC accepts that some shopfronts at street level are in need of improvement, however this should not be used as an excuse to demolish the facades and rooflines.
- 1.4 The proposed building adjacent to Central Chambers is out of scale. Ideally the Haart estate agents frontage (number 42) should be retained because its style and alignment, slightly forward of the Chambers, provides a pleasing transition to the area of older, more important buildings to the south and along The Mall.
- 1.5 Any elements of new design to replace the (more modern) frontages currently interspersed amongst the period buildings should be sensitive and complementary and should respect the heights, proportions and materials of those facades to be retained.

## **2. Height and positioning of buildings**

- 2.1 The Planning Inspector's report was clear that higher elements of any development should be positioned away from the perimeters of the site to minimise detrimental impacts on the surrounding (Conservation) areas. Although the proposal does provide for some set back of taller buildings along The Broadway, it nevertheless would situate excessively tall buildings on the SE corner and an 18 storey tower to the NW boundary closest to the Common Land of Haven Green. SEC objects to the heights proposed in both locations.
- 2.2 Whilst we are not strongly opposed to the siting of a taller element of the overall design on the NW corner of the site we feel that this should be limited to a maximum of 8-10 storeys in order to minimise visual intrusion on the highly valued and intensively used open space of Haven Green and more widely on the surrounding residential areas. This would allow new buildings to nestle within the tree line. SEC believes that views of this northern side of the proposed development are more damaging to the character of the Conservation Area than those of the southern elevation.
- 2.3 Where the SE part of the site is concerned, we do not object in principle to location of some higher elements but these should be set back substantially towards the core of the site and not be located on the perimeter. SEC objects to the positioning of 9 storey buildings directly against the pavements on Station Broadway and on the corner. A higher building set behind the 'Carphone Warehouse' corner building and well away from The Broadway/Station Broadway frontages would be the most sympathetic response in this context.
- 2.4 We do not see the SW corner of the site as being appropriate for any development taller than the existing buildings at numbers 9-16. Any higher structures here would obscure views of the church, particularly from viewpoints to the east including those from the pavements outside the Metro Bank. We therefore oppose the scale of the most westerly blocks sited along The Broadway.
- 2.5 In general SEC believes that the negative impact of placing taller buildings towards the perimeter of the site - supposedly allowing a very limited glimpse of the church spire along the proposed Haven Place - is far greater than any marginal benefit claimed. However both objectives could be achieved by a further reduction of density on the site and SEC urges the planners to consider this point in light of the particularly sensitive Conservation Area settings.

## **3. Detailed design**

- 3.1 Materials and detailing on proposed new facades are generally rather mundane and do not respond to the character of the Conservation Area. Designs should be improved to create a more visually interesting appearance, respectful of the period buildings within the Conservation Area and also in the wider context of the location.
- 3.2 A greater use of stone would be preferred to provide architectural detailing referencing traditional styles in the area.

- 3.3 Balcony design introduces a jarring element into the overall composition and we would prefer these to be better integrated into the facades.
- 3.4 Treatment of upper storeys is generally poor and further emphasises the feeling of massing and bulk. These should be revised with particular reference to removal of exposed 'framework' elements on the upper parts of buildings and with clear provision of set-back. The angled offset of upper storeys on the tower is an unattractive detail and should be removed.
- 3.5 We are generally opposed to the angled jumble of buildings on the site and to the shape and design – as well as the height - of the 18 storey tower. We do not feel that the tower demonstrates outstanding quality of design and is therefore not in accordance with policy guidelines for tall buildings.

#### **4. Vehicle access**

- 4.1 SEC objects to the inclusion of a vehicle access point on Station Broadway and believes that the location of the site at the hub of exceptional public transport links (PTAL 6+) points to making the development car-free for residential occupiers.
- 4.2 The proposed residential vehicle parking access/egress fails to consider the negative impacts on the 'Mini Holland' scheme which we understand will include a segregated cycle route along the western side of Station Broadway. SEC is yet to be convinced that allowing vehicles to cross this route will not introduce congestion and/or danger to thousands of cyclists.
- 4.3 In addition to the effect on cyclists, the Developer does not provide convincing arguments that pedestrian movement along the pavement on the western side of Station Broadway will not be inconvenienced by vehicles and bicycles crossing their path. Rather than leading to improvements in pedestrian flow as is claimed we suspect the proposals would lead to a significantly worse provision and experience for both able-bodied and disabled pedestrians.
- 4.4 Contrary to what the developer seems to imply, SEC suspects that the proposed pedestrian route 'Haven Place' would not introduce a significant desire line for pedestrians due to its relatively narrow width and dog-leg layout. If this is the case the majority of pedestrians would still use the pavements around the perimeter and thus be affected by the proposed residential vehicle access.
- 4.5 Movement of buses including E2, E7, E8 and 65 would also be impeded by vehicles entering and exiting the proposed parking leading to increased congestion in this area. These buses all have stops on the eastern side of Station Broadway, but then must cross the existing southbound flow of traffic in order to make a right turn and proceed westwards along The Broadway.

## **5. Affordable, Key Worker and Social Housing**

- 5.1 The London Borough of Ealing sets a target of 50% for affordable housing including provision of social housing as well as intermediate rentals to address local housing needs. This policy is constantly cited as justification for greater density within residential developments in Ealing, however the scheme fails to meet these targets notwithstanding the relatively high proposed density.
- 5.2 SEC would not want to see still greater density of development in an attempt to meet targets. The developer ought to be required to make a very significant contribution to provision of an appropriate number of affordable, key worker and social housing units elsewhere within the Borough of Ealing, whilst still providing a range of accommodation types within this development.
- 5.3 Further to this point we are concerned with the fact that viability assessments are not open to public scrutiny. The granting of planning permission subject to suitable provision of affordable housing within private developments is a form of public private partnership and as such should be transparent in operation.

## **6. Appropriate facilities for Town Centre Uses**

- 6.1 9-42 The Broadway is located in the most important area of the Borough's historic town centre. SEC welcome the suggestion that the Ealing Club would be provided with a new venue on the site, and hopefully the inclusion of a new small screen cinema, however the development should guarantee significantly more provision of entertainment and social/community space. Our town centre cannot compete with the Westfield Centre on mainstream retail, and must find other ways to attract people and service the needs of residents and visitors.
- 6.2 A business co-working hub could provide a (non-retail) commercial element as such facilities are not available elsewhere in Ealing Town Centre.

## **Conclusion**

Save Ealing's Centre opposes the development in its current form and requests that Ealing Council refuses to grant planning permission.

For the Committee  
Save Ealing's Centre

September 2015