

22 November 2016

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Central Ealing Neighbourhood Plan – Submission response.

Make it Ealing (previously Ealing Broadway BID) was instrumental in the designation of the neighbourhood forum in 2011 and has sat alongside community partners since then to help draft this submission version. We are proud to support aspects of the plan and appreciate the effort required to produce the plan to this stage.

The Make it Ealing Board of Directors would however like to make the following formal comments on the submission, with the aim of ensuring the plan focuses on the positives that well designed appropriate development brings and ensures the town centre thrives, providing enhanced retail, community and leisure facilities, improved connectivity through the town centre and new homes. We support the aim regarding Ealing's economy for the town to (3.6) 'regain its competitive edge with renewed shopping experience and a vibrant mix of retail and complimentary uses.' Indeed our vision statement is 'together we will ensure Ealing town centre leads as a place to do business and thrives as a creative place for culture, arts and enterprise.'

Our mandate as a business improvement district is to support business and drive commercial regeneration. Businesses in Ealing call for a healthy neighbourhood and a fresh breath of life - an enhanced evening economy and the growth of creativity in the surrounding area. We work to build Ealing's status as a vibrant destination town centre.

With that regard we feel the policies listed below conflict and are counter intuitive to the vision statement in the plan and future prosperity of central Ealing:

Policy E1: New Retail Provision

The current wording would only allow retail uses within Use Class A1 within the defined primary frontages.

It is essential other A use classes be permitted to ensure the delivery of broad use high street bringing increased footfall, and encouraging longer dwell time. This is echoed in 5.1.11, which recognises that 'successful town centre will move away from a reliance on retail for the provision of a broader mix of commercial and employment uses.' We support the growth of a diverse retail and leisure offer. Policy E1 would hinder this and suggest it is deleted.

Policy E2: Diversity of Retail Provision

5.1.11 '... Uses, which are likely to fuel antisocial behaviour, should be strictly controlled.' 'Uses' is unspecified and is subjective. We support the growth a safe, vibrant evening economy based on a variety of leisure activities. Coupled with the late night underground

now serving the town centre this will ensure our town centre thrives.

Policy E4: Encouraging New Business

The office sector is a key driver for the success of the town centre. And, whilst we support the provision of affordable workspace including space suitable for social enterprises, start-up and incubator businesses believe this should be matched with the provision of high-grade flagship office accommodation for the office market seeking larger floor space, and to provide this will mean redevelopment of current spaces to enable us to 'grasp the opportunity for new jobs..' We support the significant development of the Office Corridor.

HBE1: Quality of Design

Whilst we agree that quality of design is key to retaining the special character of the town centre point ii stating '.. avoid dramatic contrasts in scale and massing with nearby buildings typical of the Conservation Area...' does not allow for a site-specific assessments as to whether an individual application adds to the character or appearance. This point restricts development even when no harm may be being done.

RA 4: Shop Front Design

We do not believe that a blanket design guide should be forced upon business occupiers, but instead guidelines should be updated and shop front design be considered for each specific site.

HBE2: Protecting the Townscape

The word 'dominates' is used in point 5.1.7 and HBE2i and is highly subjective and is used with no basis - with negative sentiment.

Point iv. Also seeks to 'restrict the height of frontages to be consistent with those opposite of adjacent to the site.' This gives little consideration to whether the existing building heights or design merits of the buildings are fitting. We support the aim of securing Ealing's character, but believe this point is inappropriate and should be deleted.

HBE3: Building Heights

4.11 states 'it is also recognised that it is rarely appropriate to specify a maximum height for any individual new building..' - this in direct conflict with HBE3 '...Within or adjoining a Conservation Area, any new building taller than six storeys should be set back from the frontage and should not be dominant when viewed from street level.' To place such a blanket prohibition on the scale of new development is inappropriate. Each proposal for development should be considered on its own merits. We recommend the second paragraph should be deleted.

Policy CC3 Cultural Quarter

' to ensure the number and nature of A4 & A5 food and drink outlets, licensed drinking establishments and amusement arcades remain subsidiary to the main cultural activities of the quarter..' Food and drink uses should not be seen as conflicting with the cultural component of the quarter, quite the reverse, these absolutely complement each other as in and are indeed necessary to the life of the development. The success of a the Filmworks site will depend and rely on the healthy combination of leisure and food and drink establishments, increasing footfall for the town centre and ensuring the local economy strengthens.

CENP2

We have severe concerns regarding this site allocation. Any policy, which jeopardises the accessibility or connectivity of the town centre, reduces bus capacity or removes busses entirely from the heart of the town centre, is strongly refused. Ealing Broadway station, is a crucial and key interchange hub and the current unsupported move to change the system is unwarranted. We also feel this conflict with the sentiment underlying 5.3.3, which aims to encourage 'sustainable modes of movement...and public transport...'

Policy T3 Servicing

'where on street loading cannot be avoided, plans should where practical include provision for strictly controlled pavement insets with limited hours of operation.' We would support this with amended wording of 'relevant to business needs' replacing 'limited hours of operation.'

In summary, for the reasons and examples given above, we do not consider the submission version of the CENP to be sound or enable the town centre to grow and remain a competitive town centre to its neighbours.

Yours Sincerely

A handwritten signature in black ink, appearing to be 'CGore', with a long horizontal stroke extending to the right.

Caroline Gore
Board of Directors
Make it Ealing

Cc. Ann Hunter
Chief Executive
Make it Ealing