Arcadia redevelopment, Ealing
in the London Borough of Ealing
planning application no. P/2007/4246-ST

Strategic planning application stage 1 update referral (old powers)

The proposal
This is an update report on revised proposals for demolition of the Arcadia Shopping Centre and all existing buildings (except the Sainsbury’s store at nos. 30-34 and the Carphone Warehouse building at no. 35 The Broadway), and the erection of six buildings (including a part 19 and part 25-storey landmark tower) for mixed uses comprising 567 residential units, retail shops, cafes & restaurants, offices and leisure facilities; with associated basement parking, servicing, landscaping and public realm improvements.

The applicant
The applicant is Glenkerrin (UK) Ltd, and the architects are HKR and Foster & Partners

Strategic issues
The revised proposal is for a mixed-use redevelopment to form part of the regeneration of Ealing town centre. The key issues to consider are: the urban design and architectural quality of the revisions, particularly the tall building; the retail, commercial and leisure offer of the scheme; potential employment generation; the residential mix and level of affordable housing; the public transport accessibility (including Crossrail and bus travel in particular); the link across the Great Western Railway line; resolution of the previous access concerns; its contribution to public realm within the town centre; and the overall sustainability of the scheme.

Recommendation
That Ealing Council be advised that the revised mixed-use development is acceptable in strategic planning terms and that the improvements in design and quality of the scheme, the progress made on the associated public transport interchange, and the significant contribution they would make to the regeneration of the town centre, are particularly welcome. The Council should, however, ensure that the affordable housing contribution is the maximum reasonable amount this development can viably support and the applicant addresses any outstanding matters raised in this update report and the original response to the development of this site.
Context

1 On 16 October 2007, Ealing Council consulted the Mayor of London on a planning application to develop the above site for the above uses. The proposal has since undergone major revisions to its design and other details; and on 27 October 2008, the Council consulted the Mayor on those revisions prior to determination of the application. Under the provisions of the Town & Country Planning (Mayor of London) Order 2000 the Mayor has the same opportunity as other statutory consultees to comment on the revised proposal. This report sets out information for the Mayor’s use in deciding what comments to make.

2 The application was referable under Categories 1A, 1B, 1C and 3F of the Schedule to the Order 2000:

1A- “Development which -

(a) Comprises or includes the provision of more than 500 houses, flats, or houses and flat “.

1B- “Development (other than development which only comprises the provision of houses, flats, or houses and flats), which comprises or includes the erection of a building or buildings –

(b) Outside Central London and with a total floorspace of more than 15,000 square metres.”

1C- “Development which comprises or includes the erection of a building in respect of which one or more of the following conditions is met –

(c) The building is more than 30 metres high and outside the City of London.

3F- “Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use”.

3 If Ealing Council subsequently decides that it is minded to grant planning permission, it must first allow the Mayor an opportunity to decide whether to direct the Council to refuse permission.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

5 The Mayor’s comments on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The 1.7-hectare site is situated in the heart of Ealing town centre, adjacent to Ealing Broadway Station. It is bounded on both the south and east by Ealing Broadway, on the north by Haven Green, and on the west by Spring Bridge Road.

7 The site presently comprises the late 1980s, purpose-built, three-storey Arcadia Shopping Centre, which occupies the south-western portion of the site and is separated from the south-eastern portion by a pedestrian lane named Haven Place; some space over the Great Western Railway line (owned by Network Rail), which runs east to west across the northern portion of the
site; an 85-space car park adjoining the north side of the railway line; and a series of three to four-storey retail and commercial units numbered 1-4 Haven Place, 9-42 The Broadway and 1-10 The Broadway (the latter, also known as Central Chambers, is situated over the railway line, directly opposite the station entrance) which, together, form the southern and eastern portions of the site.

8 The site is directly accessed from The Broadway (south and east) and Springbridge Road. Vehicle access is provided from Springbridge Road only. The A4020 Broadway, immediately south of the site, is part of the Strategic Road Network. The nearest section of Transport for London Road Network is the A406 Hanger Lane/Gunnersbury Avenue (the North Circular Road), approximately 1km to the east of the site.

9 Ealing Broadway station, immediately to the east on the opposite side of The Broadway, provides up to 11 overland rail services in each direction per hour (First Great Western and Heathrow Connect) and is the terminus for the District and Central Line underground rail services, providing up to 18 departing services per hour. A total of 15 bus routes serve the site directly, of which 9 terminate at Ealing Broadway. These services provide up to 185 buses per hour. The public transport accessibility level of the site is 5 (where 1 is low and 6 is high).

Image 1: Aerial photograph of the site separated from Haven Green by the Great Western Railway line. (Source: October 2008 Design & Access Statement submitted by the applicant.

10 The surrounding town centre is typified by a mixture of retail, commercial and residential land uses, mostly three to four storeys in height, but an eleven-storey office block, named Villiers House, is situated above Ealing Broadway Station, some 75 metres to the east of the site. Haven Green is a large public open space directly to the north of the site, diagonally bisected by a tarmac bus route and a couple of pedestrian routes across the park. To the south of the site, on the opposite side of The Broadway, lies the Ealing Broadway shopping centre and other commercial uses.

11 To the west, on the opposite side of Springbridge Road, is a multi-storey car park that spans across the Great Western Railway line, with access ramps on either side. Directly south of the car park are a row of two-storey buildings (2-12 Springbridge Road), consisting of retail uses on
the ground floor and residential accommodation above; the Christ Church (Church of England) Junior School, and the grade II* listed Parish Church of Christ the Saviour, situated on the prominent corner of Springbridge Road and New Broadway.

**Details of the revised proposal**

12 The revised proposal is for the demolition of the Arcadia Shopping Centre and all existing buildings (except nos. 30-34 and 35 The Broadway) and a redevelopment of the site to provide a mix of uses, as quantified in the table overleaf:

<table>
<thead>
<tr>
<th>proposed land uses</th>
<th>stage 1 scheme Feb. 2008 (sq.m.)</th>
<th>stage 1 revisions Nov. 2008 (sq.m.)</th>
<th>net change</th>
</tr>
</thead>
<tbody>
<tr>
<td>residential</td>
<td>(704 units) 65,670</td>
<td>(567 units) 60,075</td>
<td>(-137 units) 5595</td>
</tr>
<tr>
<td>retail</td>
<td>19,340</td>
<td>17,279</td>
<td>-2061</td>
</tr>
<tr>
<td>cafes/restaurants</td>
<td>816</td>
<td>1,363</td>
<td>+547</td>
</tr>
<tr>
<td>office</td>
<td>1,168</td>
<td>490</td>
<td>-678</td>
</tr>
<tr>
<td>health/leisure centre</td>
<td>1,728</td>
<td>1,861</td>
<td>+133</td>
</tr>
<tr>
<td>parking, plant &amp; storage</td>
<td>21,908</td>
<td>14,345</td>
<td>-7563</td>
</tr>
<tr>
<td><strong>totals</strong></td>
<td>110,630</td>
<td>95,413</td>
<td>-15,217</td>
</tr>
</tbody>
</table>

*Table 1: A comparative breakdown of the previous and revised scheme.*

13 The original number of buildings would be retained at six:

- Block A would be situated in the south-western corner of the site with a range of 2 to 8 storeys.
- Block B would be sited in the centre of The Broadway (southern road) frontage of the site and would range from 3 to 8 storeys.
- Block C would be sited along The Broadway (eastern road). The block would range from 3 to 11 storeys and would partly adjoin the rear of retained buildings on the south-eastern corner of the site.
- Blocks D and E would be sited along the northern part of the site facing Haven Green and consist of a closely-knit cluster of buildings ranging from 2 to 11 storeys.
- Block F would provide a redesigned and significantly shorter replacement for the originally proposed 40-storey tower. Like its predecessor it would be built over the tracks of the Great Western (Bristol to Paddington) railway line, ranging from 19 to 26 storeys.

14 Vehicular access to the development would be from Spring Bridge Road, leading to the car park and service areas provided on two basement levels.

* For purposes of direct floorspace comparison, this revised total excludes 9,054 sq.m. of service corridors and 1,700 sq.m. gross external area to be retained at 30-34 (Sainsbury) and 35 (Carphone Warehouse) The Broadway. Together, these figures would bring the total floorspace of the development to 106,167 sq.m.
15 The scheme would provide a total of 352 car parking spaces, of which 230 (including 16 for a proposed car club and 60 for disabled users) would be retained for residential occupiers; and another 122 spaces (including 7 for disabled users) would be allocated for the retail and commercial uses.

Image 2: Proposed layout of the six blocks and Station Square. (Source: Revised Landscape Plan November 2008 submitted by the applicant).

16 The principal changes to the public realm are as follows:

- The provision of direct pedestrian access routes from Ealing Broadway in the south to Haven Green in the north.

- A setting back of the building line of blocks A and B fronting Ealing Broadway, to facilitate better views of the listed Church of Christ the Saviour.

- Increased permeability with a wider, more direct route and emerging distant view from the proposed Station Square to the 52-metre spire of the Grade II* listed Church of Christ the Saviour, via Haven Court: an east-west civic space designed in the form of a continental-style plaza.

- Improved access for people with impaired mobility.

- Closer integration between the development and the proposed Haven Green transport interchange.
• A four-section tower (Block F) with bay features and distinctive cladding (see below).

Image 3: The redesigned part 19 and part 25-storey tower (Block F) with wide balconies. Source: the November 2008 Design & Access Statement (included in the applicant’s Environmental Statement Addendum Appendix A.

Case history

17 In February 2008, the previous Mayor considered a revised, detailed planning application by Glenkerrin (UK) Ltd for a redevelopment of the adjoining Arcadia shopping centre. It involved the erection of six multi-storey buildings, including a 40-storey landmark tower (The Leaf), for a mix of uses comprising 704 residential units, retail shopping space, cafe/restaurant space, offices and leisure uses, with associated parking, access and public realm improvements. The proposals, alongside the Dicken’s Yard redevelopment proposals, were part of an overall strategy to regenerate Ealing town centre.

18 The former Mayor concluded that the principle of a high-density, mixed-use development, with a landmark building, was acceptable in strategic planning terms, but the shortcomings of the scheme – particularly, its failure to deliver an exemplary design for this strategic location, its meagre contribution to affordable housing, and the applicant’s failure to resolve issues relating to a proposed bus terminus and to enhance the local transport interchange -were disappointing.

19 Ealing Council had similar views to the former Mayor and was minded to refuse the application in its submitted form, but eventually did not make a decision on that scheme.

20 In October 2008, the applicant delivered a model and visual presentation of its proposals for a revised scheme to the present Mayor. The Mayor’s suggestions and changes arising from the presentation have since been submitted. They include a redesigned tower block, reduced to a maximum of 26 storeys, increased permeability through the scheme to Haven Green, a reduction in housing units to 567, moderate changes in the allocation of floor space to various uses (e.g. less
These proposals represent a major revision of the earlier application and not a separate application in its own right.

**Strategic planning issues and relevant policies and guidance**

The relevant issues and corresponding policies are as follows:

- **Regeneration**  
  London Plan; the Mayor’s Economic Development Strategy
- **Retail**  
  London Plan; PPS6; PPG13
- **Employment**  
  London Plan; PPG4; draft PPS4; Industrial Capacity SPG
- **Housing**  
  London Plan; PPS3; Housing SPG; Providing for Children and Young People’s Play and Informal Recreation SPG;
- **Affordable housing**  
  London Plan; PPS3; Housing SPG
- **Density**  
  London Plan; PPS3; Housing SPG
- **Mix of uses**  
  London Plan
- **Urban design**  
  London Plan; PPS1
- **Transport/parking**  
  London Plan; the Mayor’s Transport Strategy; PPG13; Land for Transport Functions SPG
- **Access**  
  London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Wheelchair Accessible Housing BPG; Planning and Access for Disabled People: a good practice guide (ODPM)
- **Equal opportunities**  
  London Plan; Planning for Equality and Diversity in Meeting the spatial needs of London’s diverse communities SPG; Diversity and Equality in Planning: A good practice guide (ODPM)
- **Tall buildings/views**  
  London Plan; View Management Framework SPG
- **Sustainable development**  
  London Plan; PPS1, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor’s Energy Strategy; Sustainable Design and Construction SPG
- **Tourism/leisure**  
  London Plan; Managing the Night Time Economy BPG Good Practice Guide on Planning for Tourism (DCLG)

For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2004 Unitary Development Plan (the ‘Ealing Plan for the Environment’) and the London Plan (Consolidated with Alterations since 2004).

The site is designated as a ‘Development Site’ in the Proposals Map of the UDP and for mixed-use redevelopment comprising retail, residential, offices and a cinema. It should also be considered as a potential option for the development of a bus station and interchange with Ealing Broadway Station. Development should also ensure good pedestrian access and significant improvements to the Haven Green open space.

The UDP designation affirms the details of a planning brief ‘The Ealing Town Centre Plan’ (Ealing Centre: A strategy for Sustainable Development 2002-2012) published in October 2002. The brief identifies the site as a Key Development Proposal with potential for a mixed use redevelopment comprising retail, residential, offices and a hotel, using the existing site and building over the railway line to the north. It specifically identifies the potential for increased retail space, the opportunity for a building of high architectural quality, the provision of good pedestrian links to Ealing Broadway Station and the need for a high quality facade with limited overshadowing onto Haven Green.
26 There are no listed buildings within the site boundaries but, land to the south of the Great Western Railway line lies within the Ealing Town Centre Conservation Area, whilst the area to the north is designated as the Haven Green Conservation Area.

27 The Initial Proposals for the LDF Strategy (October 2008) is also a relevant material consideration.

**Town centre regeneration, retail and employment**

28 Ealing town centre (comprising Ealing Broadway on one hand, and West Ealing on the other) is one of ten metropolitan centres identified in the London Plan town centre hierarchy. At the Broadway, the retail offer is contained predominantly within ‘The Broadway Shopping Centre’ on the south and the ‘Arcadia Shopping Centre’ on the north of the A4020 Ealing Broadway.

29 The relative position of Ealing as a retail centre is, however, declining in the wake of competition from major new retail developments at Westfield (White City/Shepherd’s Bush) Brent Cross, Wembley and Kingston. The Mayor’s London-wide Town Centre Health Check 2006 Analysis report, published in 2007, indicated that Ealing had the lowest proportion of floorspace allocated to national chain stores, the second lowest amount allocated to comparison shopping, but the highest percentage of leisure space such as bars and restaurants.

![Image 4: Part of the application site showing The Arcadia Shopping Centre as seen from its main entrance on the north side of Ealing Broadway. Source: The applicant’s Design & Access Statement October 2008).](image)

30 In the light of this persistent decline, it has for several years been a Council priority to secure a comprehensive regeneration of Ealing town centre, as is evident from its planning brief ‘The Ealing Town Centre Plan’ (Ealing Centre: A strategy for Sustainable Development 2002–2012) published in October 2002, its UDP (the ‘Ealing Plan for the Environment’) and accompanying Proposals Map.

31 These objectives are supported in policy 5F.1 of the London Plan, which identifies the strategic priorities for West London and aims, amongst other things, to enhance the attractiveness of town centres and manage their restructuring where necessary.

32 The application proposals are likely to increase the population and make a significant impact on the site, its surroundings and the local community during the construction and operational phases. Potential impacts include an increase the level of employment on the site and the locality; and generate additional local expenditure, spin-off businesses, and the demand for public services and facilities.
Housing issues

33 The residential element of the scheme consists of 567 new dwellings, the breakdown of which is provided in the table 2 below:

<table>
<thead>
<tr>
<th>unit size</th>
<th>affordable housing</th>
<th>market sale</th>
<th>total</th>
<th>% (mix)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>social rent</td>
<td>intermediate</td>
<td>sub-total</td>
<td></td>
</tr>
<tr>
<td>studio</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>12</td>
</tr>
<tr>
<td>1 bedroom</td>
<td>2</td>
<td>11</td>
<td>13</td>
<td>206</td>
</tr>
<tr>
<td>2 bedroom</td>
<td>2</td>
<td>10</td>
<td>12</td>
<td>230</td>
</tr>
<tr>
<td>3 bedroom</td>
<td>45</td>
<td>3</td>
<td>48</td>
<td>40</td>
</tr>
<tr>
<td>4 bedroom</td>
<td>6</td>
<td>0</td>
<td>6</td>
<td>0</td>
</tr>
<tr>
<td>total</td>
<td>55</td>
<td>24</td>
<td>79</td>
<td>488</td>
</tr>
<tr>
<td>% units</td>
<td>9.7</td>
<td>4.3</td>
<td>14</td>
<td>86</td>
</tr>
<tr>
<td>hab. rooms</td>
<td>220</td>
<td>64</td>
<td>284</td>
<td>1274</td>
</tr>
<tr>
<td>% hab. rooms</td>
<td>14.1</td>
<td>4.1</td>
<td>18.2</td>
<td>81.8</td>
</tr>
</tbody>
</table>

Table 2: A breakdown of the revised housing offer.

34 As the table indicates, the latest proposal represents a reduction in the number of residential units from the 704 considered by the former Mayor, to a present figure of 567- a reduction of 137 units (almost 20%).

35 The proposed housing density is calculated at 590 units per hectare (or 1,622 habitable rooms per hectare. Given the variety of uses within the scheme, this is based on a net residential site area of 0.960 ha. rather than the total site area of 1.7 ha.

36 Despite a reduction in the number of units compared to ‘The Leaf’ development (February 2008), the density of the scheme would significantly exceed the upper limit (405 units or 1100 habitable rooms per hectare) of the indicative range provided in the London Plan for a metropolitan town centre location with a high level of public transport accessibility. However, this high figure in part reflects the mixed-use nature of the scheme and is achieved through a series of well-designed high-rise blocks with ample permeability, rather than a cramped form of development layout. The existing good public transport links to and from the site are likely to be improved further by the delivery of ‘Crossrail’ a year before this development is completed.

Affordable housing

37 London Plan Policy 3A.10 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages councils to have regard to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements.

38 Policy 3A.10 is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The ‘Three Dragons’ development control toolkit is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified.
39 Ealing Council has, in its UDP, set an overall target of 50% affordable housing on sites with a capacity of 15 or more units unless viability considerations or the realisation of other priority planning objectives indicate otherwise.

40 In line with an overall reduction in residential provision, the revised proposal contains 79 units of affordable housing, compared to the 100 units proposed in ‘The Leaf’ development. The development would deliver 14% affordable housing by unit (or 18% by habitable room) on the assumption that a public housing grant would be available for the social rented and intermediate (‘Newbuild Homebuy’) components of the development. Whilst this is substantially below the Council’s UDP target of 50%, it is equivalent to the level originally proposed, albeit for more units than is currently offered and in much more favourable economic conditions. An independent assessment of the previous scheme indicated a potential provision of up to 25% affordable housing.

41 It has previously been accepted, however, that the Arcadia development is associated with some exceptional costs, most notably, the cost of constructing a raft over the Great Western Railway line (including a payment to Network Rail for the right to build over the airspace above the railway tracks). The latest assumptions include a higher provision for marketing fees to achieve the sales prices assumed in the appraisal; a reduction in the developers’ return to a level below the accepted benchmark; and an enhanced level of financial contribution required to fulfil the proposed legal agreement (including implementation of the Haven Green transport interchange).

42 The applicant’s toolkit appraisal of financial viability is being independently assessed by Ealing Council to ensure that proposed offer is the maximum reasonable amount of affordable housing that can be provided to meet the London Plan policy requirement. The Council is likely to share its conclusions with GLA officers before, or as part of, a future referral of this application back to the Mayor.

43 Within the affordable housing offer, the ratio of social rented to intermediate housing stands at approximately 70:30 by unit (or 77:23 by habitable room). This is satisfactory in London Plan policy terms.

44 The mix of unit sizes is similar to the previous proposal, except for a reduction in the number of studio flats and the introduction of some 4-bedroom units within the latest scheme. For the affordable housing, the latest proposals indicate a substantial reduction in the number of 1 and 2-bedroom units and a corresponding increase in the number of 3-bedroom units. Over 68% of the affordable units would provide three or four bedrooms, with the majority of these in the social rented category. The mix is compliant with London Plan policy expectations and is, therefore, acceptable in strategic planning terms.

Children’s play space

45 Policy 3D .13 of the London Plan sets out that “the Mayor will and the boroughs should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.” Using the methodology within the Mayor’s supplementary planning guidance ‘Providing for Children and Young People’s Play and Informal Recreation’ it is anticipated that there will be approximately 223 children within the development. The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. As such the development should make provision for 2,230 sq.m. of playspace.

46 Excluding the proposed green roofs and balcony play space for toddlers and small children, the development would contain 982 sq.m. of doorstep play space, with unspecified play elements
and features, and an additional 775sq.m of lawns for informal recreation (totalling 1,757sq.m.). This on-site provision is adequate for children under five and for most children of eleven or younger. For older children i.e. those in the 12-16 age group, the development would abut a unified Haven Green, free of existing bus traffic. The play provision is therefore adequate.

**Urban design and architectural quality**

47 A number of significant and welcome revisions have been made to the original scheme. The plan of the scheme now includes an additional route from the Broadway to Haven Green and from the Station Square to the listed church of Christ the Saviour, with the latter forming the focus of the view along this new retail street. These changes help integrate the scheme with the wider townscape, and the adjacent development at Dickens Yard, greatly enhancing visual and pedestrian permeability and providing new views of existing heritage assets.

![Image 5: Open view of the grade II* listed parish Church of Christ the Saviour from the Haven Court shopping frontage facing west towards Springbridge Road. (Source: October 2008 Design & Access Statement).](image)

48 The tower element, which rises to approximately 85m and 25 storeys has been revised to better express its internal plan form and residential use, and provide a more distinctive and place-specific landmark than the original scheme, which had a more generic appearance. The new proposals have glazing that turns the corners of the buildings, with generous balconies defined by bronzed curvilinear louvres. This gives the building an organic form more suitable to its setting when viewed from Haven Green. In addition, the design of the ground floor of the tower has been revised to better integrate it with the other buildings on Station Square. This has been achieved by placing a larger active retail/restaurant use at ground and first floor level and by placing less emphasis on the structure of the building. Overall the tower is considered to have a more arcadian character than its high-tech predecessor. This is a suitable response to its context and the revised design is welcomed.
49 The applicant has provided a comprehensive set of views of the scheme from the surrounding townscape. Whilst the development has a greater height than many of its neighbours, its scale at part 2, 5, 7, 8 and 11 storeys for the main elements, is not considered to overwhelm its town centre context, and the overall reduction in height, mass and bulk from the original schemes are welcomed.

50 The internal layouts of the flats have been reconsidered to reduce internal corridor runs and provide more dual aspect flats which is a very welcome aspect of the scheme and should ensure that although high density the quality of the flats provided should be of a high quality. Amenity space has generally been provided at podium level and there relatively open aspect should ensure they are well lit with access being provided to these spaces for all the occupiers of the flats. The access cores to the flats open out onto the new streets at ground level, which should ensure that those spaces are well animated.

51 The applicant has provided further details of the retail design and these indicate crisp contemporary shop fronts not dissimilar to those found at Odhams Walk in Covent Garden.

52 Overall the applicant has responded well to the initial criticisms made of the scheme, resulting in a high quality well-considered design that would enhance Ealing town centre and contribute to its regeneration as both a shopping destination and place to live.

**Commission for Architecture and the Built Environment**

53 After a number of previous commentaries and revisions, CABE has issued its formal response to the revised submission for consideration by Ealing Council. The Commission
acknowledges that significant improvements in the urban design of the scheme have been achieved, including a new route to the Church of Christ the Saviour and additional residential entrances.

54 CABE also welcomes the revised design of the tall building, it considers, has the potential to become an innovative and unique landmark for Ealing. CABE is now happy to offer its support to this development proposal, subject to conditions relating to detailed design.

55 The additional street linking Haven Court and Springbridge Road is also welcomed by CABE. The Commission considers that it would have the dual benefits of improving access for pedestrians through the development, and providing a visual link between the centre of the development and the church spire. Such specific engagement with existing landmarks in Ealing would enable the new development to become a well-integrated part of the town. The Commission also welcomes the design of the generous pedestrian crossing between Ealing Broadway Station and Station Square.

56 CABE also observes that significant improvements have been made in the quality of housing proposed. In the tower and blocks CABE applauds the generosity of the living spaces, the elimination of long corridors and the great efforts to reduce the amount single-aspect apartments. The Commission considers that the roof gardens are very important as amenity space for residents and welcomes the steps taken to increase the amount of sunlight that would reach these spaces. The latest iteration of the design provides additional residential entrances, and these would be valuable in bringing life and activity to the streets at ground level.

57 On the whole, CABE has been upbeat and positive in its comments on the revised proposal. It highlights the importance of retaining the aspirations to quality envisaged by the present team of architects at the more detailed stages of design and implementation; it also encourages the Council and developer to secure implementation of the Haven Green transport interchange proposals to complement this development.

**Inclusive design and access**

58 London Plan policy 4B.5 requires all development to meet the highest standards of accessibility and inclusion, and that the principles of inclusive design should be integrated into proposed developments, with information on how inclusion will be maintained and managed.

59 The public realm proposals are notable for a preponderance of steps, including tapering steps, within the main shopping plaza. Although not ideal in the context of a London Plan aspiration to achieve the highest standards of accessibility, four wheelchair accessible lifts would be provided as alternatives to the use of the slopes/ramps at the end of the tapering steps.

60 Of significant concern is an apparent lack of a commitment to the proposed shopmobility scheme to serve the town centre. The access statement refers to the scheme, but does not commit any space within the development to provide it. Alternative locations are suggested, but none of them are within the ownership or control of the applicant. This raises concern that the shopmobility scheme might not be delivered by either the Arcadia or Dicken’s Yard developments, thereby resulting in a missed opportunity to implement the scheme.

61 With regard to the residential element, the generous room sizes, especially of the wheelchair accessible rooms, are especially welcome. The overall assessment, however, is that the scheme is overly reliant on meeting the minimum Part M requirements of the Building Regulations rather than exceeding them, as the London Plan aims to achieve.
Climate change mitigation

Energy

62 The applicant has retained the single heat network and energy centre proposed in the earlier scheme, which is welcomed. However, the combined heat and power (CHP) plant size supplying this network has been reduced significantly. The applicant needs to demonstrate that CHP plant size has been optimised before the consideration of any renewable energy technologies. The applicant has also completely changed the renewable energy strategy from biomass CHP and wind turbines to ground source heat pumps and photovoltaics.

Energy demand reduction

63 The carbon savings achieved through demand reduction measures alone have been changed. While the savings achieved on the residential element are satisfactory, the applicant should consider whether further savings could be achieved on the non-residential element.

Community heating network and CHP

64 A single heat network and energy centre is still proposed to serve both commercial and residential units. However, this network would be supplied by gas-fired CHP only, instead of a combination of gas-fired CHP and biomass CHP as initially proposed. The applicant proposes a total CHP capacity of 90Kwe to supply the single heat network, which would reduce CO2 savings by a further 4%.

65 The previous proposal was for a number of small CHP units accounting for a total capacity for 615kWe. This total capacity is much larger than the 90kWe currently proposed. The applicant should explain why the total CHP capacity has decreased so dramatically from the original proposal. In addition, the applicant needs to demonstrate that the CHP plant has been optimised based on the total thermal load of the scheme, before renewable energy technologies are considered, and specifically the ground source heat pumps proposed. The applicant should also describe how the phasing of the scheme would accommodate the single heat network and energy centre.

Renewable energy

66 The renewable energy strategy has changed completely. The applicant was previously requested to provide further information on the selection of biomass CHP and wind turbines as the renewable energy technologies for this site and their technical feasibility. The applicant has not responded to any of the specific questions raised about these two technologies, but has now excluded them as technically unfeasible.

67 The applicant is now proposes a combination of ground source heat pumps and 200 metres square of PV, which have together been estimated to reduce CO2 emissions by 13.5% (0.4% from the PV installation and the rest from the ground source heat pumps).

68 Once the CHP plant size has been reviewed, the applicant should:

- Describe how the ground source heat pumps would be integrated within the single heat network and absorption chillers
- Demonstrate the feasibility of a ground source cooling system only, if a ground source heating and cooling strategy is no longer deemed compatible with an optimised CHP plant in light of comments above
Demonstrate that the area available for PV has been optimised.

**Transport for London’s comments**

69 Detailed TfL comments are provided as ‘Appendix A’ attached to this report.

**London Development Agency’s Comments**

70 The LDA comments made in response to the initial referral (contained in the original report PDU 1668/01) remain valid for the revised scheme.

**Local planning authority’s position**

71 Ealing Council officers propose to report this revised scheme to the local planning committee on 17 December 2008, with a recommendation for approval.

**Legal considerations**

72 Under the arrangements set out in article 3 of the Town and Country Planning (Mayor of London) Order 2000 the Mayor has an opportunity to make representations to Ealing Council at this stage. If the Council subsequently resolves to grant planning permission, it must allow the Mayor an opportunity to decide whether to direct it to refuse planning permission. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s comments unless specifically stated.

**Financial considerations**

73 There are no financial considerations at this stage.

**Conclusion**

74 In strategic planning terms, the revised scheme represents a marked and welcome improvement over the initial attempt to deliver a mixed-use redevelopment of the Arcadia shopping centre and adjoining land. Whilst there might still be scope to provide a higher contribution to affordable housing on the site, as required in the London Plan and Ealing Council’s UDP, most of the shortcomings of its earlier design have been addressed, and the issue of an appropriate bus interchange facility with Transport for London satisfactorily resolved.

75 In its present form, the proposals would, in conjunction with an upgraded transport interchange at Haven Green and an emerging development on the adjoining Dicken’s Yard site, facilitate the regeneration of Ealing core shopping area to a status befitting its London Plan designation as a metropolitan town centre.

76 Most specifically it would enhance the retail offer of the centre; generate new employment, introduce a significant amount of residential accommodation in a location with excellent public transport accessibility; deliver a landmark building; unify the town centre over the Great Western Railway line that bisects the northern portion of the site; and secure major improvements to the public realm of the site.

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APPENDIX A

PDU/1668/02: ARCADIA CENTRE REDEVELOPMENT UPDATE REPORT
Transport for London’s comments

Buses

77 Ealing Broadway is a busy transport interchange with 9 bus terminating routes and 6 through routes. Of these, 10 routes directly serve Ealing Broadway station, although the bus stops and stands are currently dispersed over a relatively wide area around Haven Green and the Broadway.

78 This means that some bus facilities are quite remote from both the station and the town centre. The bus stops on the diagonal road through Haven Green are not adjacent to any active land uses, which reduces their attractiveness for some bus passengers, particularly at night. There are no central information/ticketing facilities, waiting areas or toilets for passengers, nor are there any toilets specifically for bus drivers. There can be congestion on footways adjacent to certain bus stops. Traffic congestion can also cause delays to buses and create difficulties with manoeuvring in and out of bus stops/stands.

79 In addition, the existing bus facilities at Ealing Broadway are already close to capacity, and expansion will also be required in order to accommodate future demand in this area.

80 The transport assessment states that the number of additional bus passengers generated by the development will be in the order of 575 (arriving and departing) trips in the weekday evening peak period (5-6pm) and 1,200 in the Saturday peak (1-2pm). This is a lower level of demand than the previous, larger development proposal, but it still constitutes a significant impact on the local bus network.

81 In response to the previous application, TfL stated that a new bus station or interchange was required in order to address current issues with the existing facilities, and until this matter was addressed TfL could not fully support the development proposals. Following this, the developer agreed to work with TfL and the council to find a solution, and in partnership with all parties a new bus interchange was designed and has now been submitted as a separate planning application.

82 The work carried out to investigate a bus solution concluded that the only realistic or achievable option was to build a new bus interchange on the east side of Haven Green, utilising public highway and a small part of the eastern side of the Green while removing the existing diagonal road through the Green and returning it to green space. TfL has provided more detailed comments on the planning application for the bus interchange, but it is important to note in relation to the Arcadia site application that the new interchange does not provide any additional capacity to accommodate the additional demand generated by the development proposals, and therefore the new facility will be unable to accommodate growth within the local bus network.

83 TfL recognises that, within the existing constraints at Ealing Broadway, there are currently no other possible options for increasing the capacity of the bus stopping and standing facilities at Ealing Broadway. The new bus interchange will essentially be a ‘like-for-like’ replacement of the current facilities. However the new facility will improve interchange between different modes of transport, and between buses and the town centre. It will also improve the passenger-waiting environment and will include facilities for bus drivers, which are currently not available. On this basis, TfL is satisfied with the current solution that has been designed for buses, given the current circumstances.

84 It is important to note that there is no funding available to build the new bus interchange apart from Section 106 contributions. The proposed development on the Arcadia site will
contribute to the pressing need for bus improvements and it is therefore reasonable to request that the applicant contributes to these improvements.

85 Even if funding was potentially available from TfL, the business case would not be strong enough because the new facility does not provide additional capacity. Therefore TfL expects the bus interchange to be fully developer funded, and suggests that the total cost should be shared between the nearby Dickens Yard scheme and the Arcadia scheme.

86 TfL has requested a cost estimate for constructing the bus interchange from the developer, and wishes to discuss the Section 106 contributions with Ealing Council and the two developers once this information has been provided.

87 It is important to note that the delivery of the new bus interchange is not only dependent on it being fully developer-funded, but also on a number of other issues as follows:

- Haven Green is designated as Common Land. Although the proposal will result in a small net gain of Common Land, approvals will still be required to enable the compensatory ‘re-allocation’ of the Common Land through the removal of the diagonal road and extension of the public highway on Haven Green East into the Green. TfL is unable to provide any funding or resources to assist with this approval process.

- The Crossrail project requires the southeast section of Haven Green for a works compound while the new Crossrail station is constructed at Ealing Broadway. The new bus interchange cannot therefore be built until after the Crossrail works compound is no longer required. Crossrail is expected to be operational by 2016 and the Arcadia development is expected to be complete in 2017. Because the new bus interchange does not provide additional capacity, the timescale for delivering the bus interchange does not affect bus operations significantly, and therefore TfL is willing to continue operating the existing facilities until the new facility becomes available.

- The proposed bus interchange will occupy Ealing-owned land (currently public highway and Common Land (Haven Green)). The completed bus facility will be on public highway entirely and TfL’s only property interest will be the bus driver facilities that will be leased to TfL by Ealing Council. The side road to the west of Haven Green East to be occupied by bus stops and stands will need to be made Bus Only to ensure the safe and efficient operation of the bus facilities in this area. These arrangements will need to be confirmed and agreed in more detail with Ealing as the Highway Authority for Haven Green East.

88 Provided that the bus interchange is fully funded and is delivered without incurring any costs to TfL, TfL will not request an additional financial contribution towards increasing the capacity of the local bus network. If, however, the bus interchange cannot be delivered for whatever reason, TfL requests that the Section 106 funds be re-allocated towards general bus facility and network capacity improvements instead. These improvements may include but are not limited to the following: increasing the frequency of bus services, converting routes from single deck to double-deck buses, making cosmetic improvements to existing bus stops and facilities, or investigation into alternative options for expanding the existing facilities. The Section 106 agreement will need to be drafted to take account of these requirements in the event that the interchange does not go ahead.

89 Addressing these issues will ensure compliance with London Plan Policies 3C.1 Integrating transport and development, 3C.2 Matching development to transport capacity, 3C.3 Sustainable transport in London, 3C.4 Land for transport, 3C.9 Increasing the capacity, quality and integration of public transport to meet London’s needs, and 3C.20 Improving conditions for buses.
Underground and rail

90 The forecast additional Underground and rail trips generated by the development will be in the order of 180 (arriving and departing) trips in the weekday evening peak (5-6pm) and 220 in the Saturday peak (1-2pm).

91 Given that the District and Central Underground Lines both terminate at Ealing Broadway station, with up 18 services departing every hour, it is accepted that the additional passengers generated by the proposed development can be absorbed without significant impact on the Underground network and therefore London Underground has not raised any concerns regarding the impact of development trips on network capacity. The development proposals with regard to this mode therefore comply with London Plan Policies 3C.2 Matching development to transport capacity and 3C.13 Improved Underground and DLR services.

92 It is also noted that in addition to Underground services there are up to 11 rail services in each direction from Ealing Broadway station. These services are operated by First Great Western and Heathrow Connect (BAA), and are not within TfL’s control.

93 The Crossrail project, which is due to be completed by 2017, will include the redevelopment of Ealing Broadway station. Crossrail will improve overall access and relieve congestion in the station, and will provide faster and more direct access to Ealing Broadway from the West End and east London, creating significant benefits for users of the proposed development.

94 It is understood that Cross London Rail Links (CLRL) has been consulted on the latest development proposals under the Crossrail Safeguarding Direction (February 2005). An interim review of the application by CLRL indicates that the scheme on the Arcadia site does not conflict with the Crossrail proposals in that area. In the event that planning permission is granted, it is likely that CLRL will request a planning condition to ensure that construction of the scheme does not impede the construction or operation of Crossrail.

Pedestrians, cyclists, taxis and public realm

95 Overall the development makes a positive contribution to pedestrian permeability and the quality of the public realm in Ealing town centre. The integration of the site with surrounding areas will be significantly improved, with better connection between Haven Green, the station, the main shopping area in the town centre and the nearby Dickens Yard site. TfL welcomes the proposed surface treatment of The Broadway immediately outside the station, creation of a pedestrian-friendly forecourt, and provision of a wide pedestrian crossing between the tower and the station entrance. The development proposals therefore comply with London Plan Policies 3C.3 Sustainable transport in London, 3C.21 Improving conditions for walking and 3C.22 Improving conditions for cycling.

96 The impact of any changes must take account of the requirement to enhance and extend bus stop and stand facilities. Any surface treatment must be suitable for buses. TfL wishes to continue working closely with the developer and the council on detailed design and implementation of the public realm and traffic proposals in this area.

97 It is also noted that the footway along The Broadway to the south of the proposed development will be widened by setting back the building line of the development, and the possibility of relocating the existing signalised pedestrian crossing on The Broadway will be explored, to provide a more direct connection between the proposed development and The Broadway Shopping Centre. These proposals are welcomed, along with the proposal to introduce a new crossing on Springbridge Road.
98 The impact of any new crossings must be understood as part of the wider impact on traffic management, in particular how they affect bus priority and bus journey time. Again, TfL expects to be consulted and involved in the detailed design and implementation of any proposed schemes.

99 TfL would strongly support measures to reduce the volume of general traffic between the station and the development site/Haven Green, provided that this does not affect the efficient operation of the local bus network. Re-allocation of road space could improve pedestrian and cyclist movement, and would potentially improve the waiting environment for bus passengers at the on-street bus stops. It would also assist with achieving London Plan Policies 3C.17 *Tackling congestion and reducing traffic* and 3C.18 *Allocation of street space*.

100 In respect of cycle parking, the proposal for 1 space per residential unit (567 spaces) complies with TfL’s cycle parking standards. However, the proposed provision of 64 cycle parking spaces for the non-residential elements of the scheme is likely to be insufficient. A minimum of 1 space per 300sqm must be provided for retail (58 spaces) and 1 space per 250sqm for commercial (2 spaces). This totals 60 cycle parking spaces, but in addition to this, TfL also requires a minimum of 1 space per 20 staff plus 1 space per 20 seats for the restaurant/cafe component, and 1 space per 10 staff plus 1 space per 20 peak period visitors for the leisure component.

101 The transport assessment states that residential cycle parking will be “securely located” with “spaces for retail and commercial uses in key locations throughout the development”. More information on the location and design of cycle parking is required. Residential cycle parking not only needs to be secure but easily accessible to residents as well, for example immediately adjacent to lifts or entrances. The non-residential cycle parking needs to be a mixture of secure facilities for staff preferably inside buildings or basements, and visitor parking in accessible, overlooked locations at surface level within the development site. Staff parking facilities should also be accompanied by shower and changing facilities.

102 In ongoing discussions with the developer and the council, the developer has previously agreed to provide some additional cycle stands within the site which could serve the wider area, for example longer term cycle parking for rail passengers. These facilities could either replace or add to the cycle parking on Haven Green. There may also be some scope for a cycle hire scheme on the site. Addressing these and the above issues will ensure compliance with London Plan Policy 3C.22 *Improving conditions for cycling*.

103 The existing taxi rank on the south-east corner of Haven Green serves the town centre and currently accommodates 24 taxis. The Public Carriage Office supports the proposals for the new bus interchange, which include the relocation of the taxi rank to the western side of the Haven Green East carriageway and the provision of a new pick-up point in front of Ealing Broadway station. Taxi drivers will also be provided with new facilities in a kiosk on the island between the main carriageway and the bus only road. Any further proposals to alter the public realm or public transport facilities in the vicinity should not result in any adverse effects on the operation of the taxi facilities.

**Travel plan**

104 A framework travel plan has been submitted as part of the planning application. This plan is a good start but requires some further work in order to comply with London Plan Policy 3C.2 *Matching development to transport capacity*. Clarification of the process for bringing forward individual travel plans and the division of responsibilities would be welcomed. The targets are slightly ambiguous, which should be addressed. An implementation / action plan is needed to
clarify how and when the proposed measures will come forward. TfL’s Smarter Travel Unit can provide more detailed comments upon request.

105 The proposals include provision of a car club with about 16 dedicated parking spaces in the basement. It is recommended that this proposal is discussed with local car club operators early, to confirm their interest. Many car club operators prefer to locate their vehicles at street level rather than in basements, because they to operate the telematics technology required for the car club.

106 A specific travel plan for construction will be required, as will a servicing management plan and a parking management plan.

Car parking

107 The proposals include the provision of 230 car parking spaces for the residential element of the scheme, of which 16 are to be allocated to the car club and 60 for disabled use. Excluding the car club and disabled parking which should be considered separately, this equates to 0.3 standard parking spaces per unit. TfL supports this low level of car parking given the site’s extremely accessible location, adjacent to a major public transport interchange and within a Metropolitan town centre.

108 TfL recommends that residential parking spaces are not allocated to individual units but are managed as a collective resource, to maximise efficiency and sustainable parking management. Many residential developments now operate a system whereby residents can buy ‘right to park’ permits, rather than owning a specific parking space attached to a specific unit, which is much less flexible. Residents should also be excluded from eligibility for on-street residential car parking permits, to avoid overspill parking problems.

109 The development proposals now include 122 car parking spaces for the retail element of the scheme, in response to Ealing Council’s request for on-site retail parking. In the previous application no retail car parking was proposed, which TfL supported because of the site’s highly accessible, town centre location. It is disappointing that additional retail parking is now being provided as TfL does not consider this to be necessary, however the proposed level of provision does not exceed the maximum London Plan parking standards and will now enable some disabled parking to be provided which had not been included in the previous proposals.

110 No parking is proposed for any other uses on the site, and this is supported. Overall, the parking proposals comply with London Plan Policy 3C.23 Parking strategy.

Servicing

111 Provision has been made for a 16-bay service yard at basement level to accommodate servicing and deliveries. This is supported as it ensures that all servicing is kept off-street. TfL’s Freight Unit considers that the proposed number of servicing bays is appropriate for the needs of a development of this size.

112 The Waste and Servicing Strategy is welcomed. TfL suggests that a concierge service is provided to reduce the potential for missed deliveries and thus wasted trips. The Environmental Management Plan is also welcomed, which covers transport issues during demolition and construction. This plan should also include cumulative impacts of construction traffic, likely generation of construction trips and any proposed mitigation measures. Details should include site access arrangements, booking systems, construction phasing, vehicle routes and scope for load consolidation in order to reduce the number of road trips generated. Overall the development proposals comply with London Plan Policy 3C.25 Freight strategy.
Trip generation and traffic impact assessment

113 Generally the development proposals comply with London Plan Policy 3C.17 *Tackling congestion and reducing traffic*. However TfL Surface Transport has made some detailed comments regarding trip generation and traffic impacts, and these will be provided separately to the council and the developer. Overall, TfL’s concerns about the trip generation and traffic impacts are not so significant that they would lead to a major change in the outcome or conclusions of the transport assessment, however the issues should be addressed to provide an accurate picture of the development impacts.

Conclusion

114 TfL has no objection to the development in principle, provided that an appropriate Section 106 contribution is secured towards the new bus interchange, or towards other bus improvements should the new interchange facility become undeliverable.

115 Some further work is required in respect of the trip generation and traffic impact assessment. Cycle parking needs to be provided in accordance with TfL standards. TfL also wishes to be consulted on the details of any public realm and highway improvements.

116 Should this application be granted planning permission, the developer and their representatives are reminded that this does not discharge the requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for any permanent highway scheme and any temporary highway works required during the construction phase of the development.

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