

## Comments and areas of objection to Ealing's draft Local Plan

 on behalf of the Brent River & Canal Society

The Brent River & Canal Society welcomes the opportunity to comment on Ealing's draft Local Plan and raises the following concerns which it trusts will be addressed in the revised version. We would make the observation that the draft as published lacks clarity and is unnecessarily padded with vague and at times misleading text, plagued by omissions, and should be reworked to focus on policy and detail. We would draw your attention to, for example, Ealing's 2004 'Plan for the Environment' which is clearly and concisely written.

This draft is incomplete as it fails adequately to consider Ealing's green environment and biodiversity. The draft is almost entirely focussed on housing and the built environment with no corresponding sections to deal with the Council's statutory biodiversity duties or to deliver its Climate & Ecological Emergency Strategy. It completely fails to consider the Government's commitment to protect 30% of land for nature by 2030. The government has committed to halt and reverse biodiversity loss and to become nature positive by 2030 and Ealing's Local Plan which covers most of this time period must be able to deliver this. This draft does not consider National Planning Policy Framework 15 - Conserving and enhancing the natural environment (paragraphs 174 to 188). The Council has not met its obligations in this regard and still needs to prepare and consult this substantial missing part of its new Local Plan.

The Council is in error in proposing the denotification or transfer to MOL of designated Green Belt land. It is also in error in proposing to dedesignate entire MOL sites or parts of these sites. Government policy and the Council's Ecological & Emergency Strategy and Biodiversity Action Plans instead require the Council to manage, improve, protect and extend all MOL and Green Belt land within its custodianship, with a target of connecting isolated sites into a network of green areas amounting to 30% of the Borough's land area by 2030. The view (p 53) that the Council may use development as a potential enabler needs to be qualified by stating that such enabling development is precluded by existing policies protecting Green Belt, MOL, and parks and open spaces.

The use of Masterplans (formerly Planning Briefs) for the redevelopment of brownfield sites is welcomed but in order to deliver NPPF 15, 30% for 2030, the Council's Climate & Ecological Emergency Strategy and Biodiversity Action Plans, such Masterplans should require each site or group of sites to restore at least 30% of the total brownfield ground area

to natural green space. Such green space should be separated from adjacent multi-storey buildings by the use of adequate buffer zones.

The draft plan is in error in proposing built development on any vacant or underused open or green land. Government and Council policies require that such land is conserved as green space, which implies that the Local Plan should instead seek to protect and designate such land as additional MOL or Green Belt. The Council has still to complete its long overdue review of Sites of Importance for Nature Conservation, but it is highly likely that most or all of this vacant or underused open or green land will meet the criteria for SINC designation. Until this review is complete, the precautionary principle should preclude any built development on such land.

Ealing has yet to complete its Ecological Networks Map as required by its 2022 Biodiversity Action Plan which states 'to create an ecological network that operates more naturally and effectively, we need more, bigger, better and joined-up sites'. The Map is required to provide the foundation for the preparation of a Local Nature Recovery Strategy. The BAP states 'the Local Plan and council strategic documents will uphold the BAP vision, aims and Habitat and Species Action Plans through strengthened plan-making and decision-making policies and processes that require the protection, conservation and enhancement of biodiversity in Ealing'. Ealing has yet to complete its Local Nature Recovery Strategy but it is clear that this will have to be delivered by policies in the new Local Plan.

The draft plan fails to identify any of the Borough's Nature Conservation Management Areas as mapped in Ealing's 2004 Plan for the Environment. All of these are still extant, and will necessarily form the basis of the Ecological Networks Map and Local Nature Recovery Strategy when written. In order to deliver national and local targets, the new Local Plan should map and protect all the existing NCMA's and at the same time identify new ones and substantially extend and connect these areas. The term 'Nature Management Areas' or 'Nature Recovery Areas' is suggested for these extended and new NCMA's.

Specifically and as a minimum:

The new Local Plan should extend the existing Brent River Park NCMA to include the MOL, SINC's and Green Corridors and Parks at Osterley, Tentelow Lane, Norwood Green, Norwood Toplock and Glade Lane, Ravenor Park, Costons Allotments, railside land N of Greenford Halt, Ealing Central, Trailfinders, Gurnell Grove and Castlebar, Cuckoo Park and Littlejohn Field.

Horsenden Hill NCMA should be extended to include Perivale Wood LNR with adjacent railside land, Paradise Field, Carr Road Nature Reserve with adjacent railside land, Grove Farm with Ealing Northern and Halsbury Road.

The two existing NCMA's at Greenford & Northolt Countryside Park need to be joined and extended to include the A40 corridor and all MOL to the north with the Golf Range, Northolt Manor, Greenford Birch Wood and adjacent sports grounds, Litten LNR, the Grand Union Canal Green Corridor to the south with open land at Greenford Urban Village, Southall Cricket Club, King George's Field, Durdans Park, Cranleigh Gardens and Spikes Bridge Park.

The Lime Trees GC NCMA should be extended to include all Green Belt land to the west including West London Shooting Grounds and Yeading Valley Park, south to Lime Trees Park, north to the BA Sports Ground, Islip Manor Fields, Lord Halsbury's Memorial Field, the railside Green Corridor and Islip Manor Park and east along the A40 corridor and Northolt Academy.

South Ealing Cemetery NCMA should be redesignated as part of a new North Circular NMA/NRA, by adding all open land along the A404, including Barons Pond and the Old Actonians Sports Ground, Popesfield, LRT railsides, Ealing Common, Hanger Lane and Woodland, Barclays Sports Ground, Hanger Hill Park, Fox Wood, Hanger Lane Gyratory and railside Green Corridor, former Guinness Mounds and Park Royal LRT railside land, Park Royal estate at Lakeside Drive and Twyford Abbey.

Acton Cemetery NCMA should be extended and renamed Acton NMA/NRA to include the railside Green Corridors and the A40 corridor, North Acton Playing Fields, Great Western Allotments and adjacent schools sports areas, Twyford Avenue Sports Ground, Springfield, Acton Park and the MOL to the east including David Lloyd with the other sports grounds and allotments, Southfields Rec and the railside Green Corridor to Gunnersbury Triangle. In particular, Masterplans for the redevelopment of industrial parks at Horn Lane and elsewhere should seek to connect open areas in Acton by the creation of new parks and green spaces.

BRCs would add that the consultation period for this large and complex series of documents should have been extended further, as various groups requested. We did not have sufficient time properly to consider all detail in this draft and have had to restrict our comments to the green environment and biodiversity. We approached the Planning Team in good time requesting specific information on the total area of designated green space in LB Ealing but are still awaiting that data.

We would hope that a longer period of consultation is given for the revised plan and that it will be more comprehensive and balanced in its coverage, with policies clearly set out without being hidden behind an excess of irrelevant material. Bold planning policies are required to address the climate emergency and the Local Plan needs to give green issues equal weight in its revised version.