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FOR THE CONSIDERATION OF THE INSPECTOR Ealing's draft new Local Plan (Regulation 18) consultation

Dear Mr Barton / Inspector

I would like to comment on the draft new local plan documents, I will divide my comments into six sections.

1) The online questionnaire

This questionnaire I found frankly insulting. It was designed to give the answers you / the council want the respondent to give.

The questions, apart from one give in each question a series of statements. I may agree with one or two of the statements but disagree with say the other three, I am then expected to give a smiley face (or other) to the whole section.

There was only one question that I could answer - Should Ealing introduce CIL, to which I answered yes and why has CIL not been introduced for large developments a long time ago.

A very bad consultation and whoever designed / signed it off it should be dismissed.

2) The meetings and walk arounds

The first anybody heard about these was the end of November. The ones for my local area of Greenford were in the lead up to Christmas where people are very busy and therefore myself and many others were unable to attend due to the short notice and the time of year.

All meetings and walk about should have been scheduled with at least a months notice and all after the Christmas period.

This is a standard ruse of developers with a potentially controversial and time limited development proposal, such as a large mobile phone mast.

The application is submitted in late November knowing that in this case the 56 day time limited proposal might not receive a reply within 56 days, due to the council virtually shutting down for about a fortnight over Christmas.

I am the editor of the North Greenford Residents' Association magazine a 16 page magazine that is delivered monthly to over 1000 households in our area. The deadline for the magazine is 20th of the previous month, therefore I was unable to inform our members by way of the December magazine of the Greenford events.

3) Green Spaces

Appendix 3 of the draft plan is concerned with green space, or to put it another way how much currently green space the council can grab for building - the only current concern of Ealing Council.

This is simply an ATTEMPTED LAND GRAB for building sites and I hope the inspector will clearly rule this section as totally unacceptable.

A vast army of highly paid consultants who clearly do not know the area have written a series of reports that propose to delist all Green Belt and several MOL sites.

I can find no member of the public who agrees with these proposals.

Proposal- **All Green Belt sites to be redesigned as MOL**- Although MOL is in the London Plan supposed to have the same protection as MOL in practice this is not the case.

I quote from para 2.4.3 of the report: **"Given these housing pressures, and the scarcity of land for development, it is important to consider all the possible ways of meeting housing need. This includes considering the possibility of Green Belt/MOL providing land for development to a limited extent."**

Ealing planning committee recently passed an 8 tower block development on MOL which also impinged on the local nature reserve (SINC) and requires the removal of many mature trees.

In colloquial parlance they therefore have form in this regard.

Please see [213378FUL](#)

In a similar consultation with regards to the Hounslow draft plan the inspector refused to allow any redesignation of Green Belt to MOL and in Ealing's case it is not just a redesignation of sites, the proposal is to remove totally two Green Belt sites. This is simply unacceptable and unjustified and does not agree with National Planning Policy or the London Plan policy such as below:

8.2.1 The Mayor strongly supports the continued protection of London's Green Belt.

8.2.2 Openness and permanence are essential characteristics of the Green Belt, but, despite being open in character, some parts of the Green Belt do not provide significant benefits to Londoners as they have become derelict and unsightly. This is not, however, an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, and climate resilience. The Mayor will work with boroughs and other strategic partners to enhance access to the Green Belt and to improve the quality of these areas in ways that are appropriate within the Green Belt.

Again I say an attempted LAND GRAB for more tower blocks that is not justified in any way.

Others, such as the letter from CPRE and Friends of the Earth have given detailed replies to the consultation so I will not repeat the text of their contributions, only to say I agree with virtually every word.

In my local area of North Greenford the proposal is to delist Grove Farm (MOL02).

This site is a local nature reserve (SINC) and contains a large area of wood anemones amongst other species.

Why delist a local nature reserve if it is not as a land grab to build more flats.

The development proposal mentioned earlier nibbled away at the area of the local nature reserve and requires the removal of many mature trees.

A proposal that (due to the carbon sequestration of large trees) the developer wants to chop down is at odds the Ealing policy to be carbon neutral by 2030 as mature trees sequester far more carbon than the proposed replacement saplings.*

However the application was still recommended by the planning department and passed by a Labour block vote at the planning committee.



WOOD ANEMONES AT GROVE FARM

* <https://www.pacificforest.org/ee-old-trees-store-more-carbon-more-quicklythan-younger-trees/>

MOL02 contains the David Lloyd formally Ealing Northern sports club. The appraisal states

MOL assessment: The site does not score well against any of the MOL criteria. It is fragmented, with the character of the site changing considerably from one end to the other. The eastern part of the site has substantial residential development. The western part of the site (Ealing Northern Sports Centre) is not in use and is currently inaccessible, with evidence of fly-tipping. In the central part of the site, there is a David Lloyd gym which constitutes a significant built development with substantial areas of hardstanding. Grove farm on the southern part of the site is the only part of the site that resembles MOL but it is relatively small by itself, and it does not score highly against MOL criteria.

Presumably the residential development referred to is the Kellogg tower and the proposed development not yet built. This area (to the east of the small stream) does contain a part of the SINC designation of the site and a large area of green space to the south of the Kellogg Tower, the designation on this area therefore should be maintained to avoid further reduction in the borough's green space by further poor decisions by the planning committee.

The area to the north and west of the Kellogg Tower (on the other side of the stream) is designated as a local nature reserve (SINC) with the David Lloyd section being POS and MOL.

Other MOL areas in the borough such as Horsenden Hill contain sports facilities with club houses, sports pavilion and parking areas, however there is no suggestion in the report to delist parts of Horsenden Hill. So why should an area which is also shown on the GIS Local Plan map as an area of park deficiency at local and district level be removed from MOL designation ?

It is agreed that the area is subject to fly tipping, but this is due to neglect by the council and should not be an excuse to delist a site, as is confirmed in policy 8.2.2 of the London Plan of openness and permanence (as above) and 8.3.1 as below

8.3.1 MOL protects and enhances the open environment and improves Londoners' quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity.

Therefore the argument that the David Lloyd centre is not suitable as MOL is contrary to the above policy as it is a sports and leisure facility.

You should also note that a group of volunteers - The Friends of Grove Farm have in the last few years made substantial improvements to the area.

The London Plan requires Local Plans to include appropriate designations and policies for the protection of open space to meet needs and address deficiencies. By designating large areas of MOL, this draft plan does the opposite. Plans should also promote the creation of new areas of publicly accessible open space particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change. LBE's Plan does not do this and there are no policies to protect existing areas of green space.

The proposal to dewild sections of Warren Farm is absolutely appalling and I am sure you will have many objections to this proposal with fully detailed arguments.

A good recommendation however is to leave Horsenden Hill as the highest specification of MOL.

4) Tall Buildings

The whole thrust of Ealing's planning policy in recent years seems to be to build as many tower blocks as possible on as many sites as possible.

The previous local plan that limited tower blocks to three specific areas has been totally ignored by developers, planning officers, and the Labour members of the planning committee (who usually vote as though they were a whipped committee). Eg please see the development on the Glaxo site of over 2000 units about half a mile south of the Kellogg Tower.

The table DMP1 gives a tall building in Greenford as 6 story, why therefore was the Glaxo site allowed to have multiple towers of up to 18 story. Totally out of character with the area where the tallest tower in the area is the Kellogg tower.

This policy of more and more tall tower blocks is not supported by the general public but only by developers and the apparatchiks of Ealing council.

The Plan will make tall buildings even easier to build and its policies do not meet the London Plan's requirements for them. The criteria used to define what constitutes a tall building and the implications of their designation are unclear and unjustified. It is for example ludicrous to suggest that a 20-storey building in central Ealing between Popes Lane and Castlebar Road would not be 'tall'.

Tall buildings means, more densification, more traffic in a confined area, increased pollution and due to cement and steel production being the highest industrial emitters of CO₂, more greenhouse warming gasses. See link below.

**<https://www.newscientist.com/article/mg24432560-700-steel-and-concrete-are-climate-changes-hard-problem-can-we-solve-it/>

5) Westway Cross

Proposal- 4.3.61 There are opportunities to improve the appearance and density of the site, through moderate mixed-use development and public realm improvements. Providing better and safer active travel routes to the centre will reduce car reliance and traffic congestion and will also enable the better use of part of the large and currently UNDERUTILISED car parking area.

A fine example of consultants having little knowledge of the area.

The car park is heavily used on most days, perhaps it was summer holidays when they visited.

If I want to buy a heavy or bulky item, I will use my car as I would be unable to carry such items the 1.5 miles to my house.

If I go to Boots for a covid jab I walk.

When will the people in the ivory towers realise the car is here to stay and even if I could ride a bike (due to being a 75 year old partially disabled pensioner I cannot) it would be impractical for anybody to carry large amounts of shopping on a bike.

6) Ealing to be Carbon Neutral by 2030

As Friends of the Earth say “Given the Climate Emergency Strategy adopted by the Council, the proposal to lose all of Ealing’s Green Belt and some areas of MOL (Metropolitan Open Land), is incomprehensible.”

The draft report is also add odds with the policy for Ealing to be carbon neutral by 2030.

I recently attended a lecture by an Ealing officer who proudly announced that all new builds by the council would be carbon neutral.

When he was questioned in detail the officer admitted what this actually meant was that the new builds would be carbon neutral with regards to their running but the vast amount of embedded carbon used in their construction would be ignored in this regard.

It seems that embedded carbon in construction is. as far as I can establish being ignored with regards to the Ealing target to be carbon neutral by 2030. Do they think we are all stupid?

Please see New Scientist article link above.**

The Ealing 15-year vision seeks to as a **strategic objective** to **tackle CLIMATE CHANGE.**

Not only will this draft plan not tackle climate change, it will by increasing CO2, by way of large construction projects, make the climate crisis worse.

THIS PROPOSED PLAN and the STRATEGIC OBJECTIVE TO TAKLE THE CLIMATE CRISIS are MUTUALLY EXCLUSIVE.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.

Secretary North Greenford Residents' Association