

To: localplan@ealing.gov.uk

7TH FEBRUARY 2023

Save Gurnell are a community group of Ealing residents, and we are writing to submit our feedback on the Ealing draft Local Plan Regulation 18. Due to the sheer volume of documents and limited time, we have commented on the topics that pertain to our area of focus (the Gurnell Area) as well as topics that impact the plans for that area.

Our comments are outlined in the following sections:

- POOR TIMING OF THE CONSULTATION
- MISSING DETAILS AND DOCUMENTS THAT SHOULD UNDERPIN THE PROPOSALS IN THE LOCAL PLAN
- LACK OF TRANSPARENCY AND MISSING DOCUMENTATION AROUND HOUSING TARGETS AND DELIVERIES
- BIG CHANGES TO DEVELOPMENT SITES – INCLUDING GURNELL LEISURE CENTRE
- SIGNIFICANT LOSS OF GREEN BELT AND METROPOLITAN OPEN LAND (MOL)
- GURNELL MOL ASSESSMENT
- NEW POLICY ON ENABLING DEVELOPMENT

POOR TIMING OF THE CONSULTATION

The original time period for the consultation was 30 November 2022 to 25 January 2023.

Eight weeks were given to Ealing residents over the holiday period to consult on several large documents with hundreds of pages about the next 15 years of our borough. At a time of year where families get together to celebrate and take a break from working, the council expected us to read through hundreds of pages and respond to them. This was unrealistic, and thanks to public complaints, the council extended the deadline by two weeks, now concluding on 8 February 2023. We still feel that is not enough time and we would ask the council to allow 2-3 more weeks for people to submit feedback. For the Regulation 19 consultation, we please ask the council to consider a longer consultation period that was given for the Regulation 18.

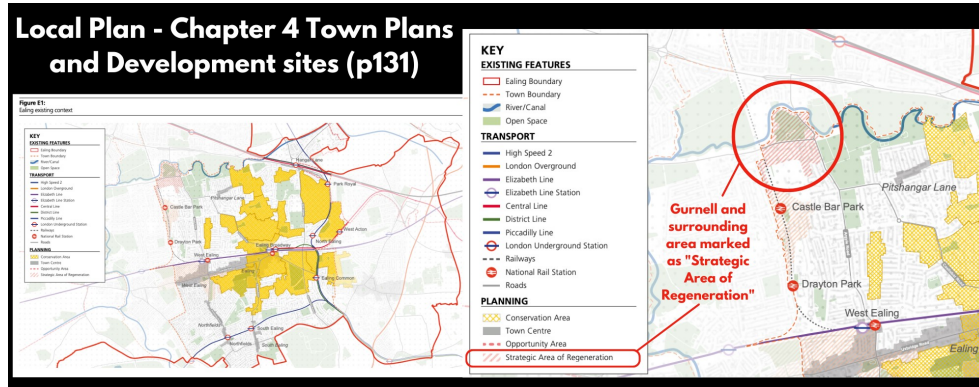
MISSING DETAILS AND DOCUMENTS THAT SHOULD UNDERPIN THE PROPOSALS IN THE LOCAL PLAN

Several documents have missing information and some reference other documents which do not exist or have not been made available. We are being asked to provide feedback on a 15-year plan that has inaccurate or missing information.

The following key documents and information have been omitted from the consultation and should be provided for review by the public:

- **Missing Infrastructure Delivery Plan** o This document is a vital component for the delivery of the local plan. The Infrastructure Topic Report highlights several major problems with the various types of infrastructure in Ealing, yet there is no plan on how to address the current or future challenges.
- **There is no masterplan or a strategic document explaining the strategy or vision for the Strategic Area for Regeneration mentioned on page 131 of Chapter 4 – Town Plans and Development Sites**
 - o [New Local Plan \(Regulation 18\) consultation documents | Ealing Council](#)
 - o This is a significant area around Gurnell where regeneration is being proposed yet the only information we are being given is an image – detailed information must be provided.

- o This area includes Castlebar School, Woodlands Academy, the Gurnell Grove residential area, several streets around Gurnell Grove with private two-story homes, and the Gurnell park area which is classified as MOL.
- o Why is this regeneration being proposed? What is the problem with this area that Ealing Council feel they need to regenerate?
- o Why has this information been omitted from the Local plan?



- **There is no Ealing Green Space Strategy or Green Infrastructure Strategy documents.**
 - o The latest one covers 2012-2017 which is now 6 years old. Given that one of LBE's strategic objectives is tackling the climate crisis, how can this crucial strategy not be included in the consultation?
 - o These documents should contain how Ealing Council intend to improve and increase our green infrastructure per capita (rather than declining which seems to be the case by the proposals to reduce MOL in the borough.)

LACK OF TRANSPARENCY AND MISSING STATUTORY DOCUMENTATION AROUND THE HOUSING TARGETS AND DELIVERIES.

Ealing Housing Supply – The planning authority is supposed to monitor housing delivery and project forward what they expect to deliver during the course of their Plan. Two components of this are the 5-year housing land-supply and a housing trajectory. Neither of these statutorily required documents have been provided, nor are they included in the evidence base for the consultation.

The Housing Supply Topic Paper (November 2022), table 3 on page 15 in the evidence base seems to suggest that 24,404 homes have already been given planning permission.

- o These units haven't yet been delivered but should be deliverable within the time frame of the current London Plan (another seven years) as they already have planning permission. If we add them to the units completed since the latest London Plan target for LBE came into force, we reach a total of 29,098 units, which is 35% more than LBE's target of 21,570 units for the ten years to 2028/29. Why is this not clearly stated in the Local Plan? Wouldn't this negate any requirement for building housing on MOL?

The Housing Supply Topic Paper, page 14, states that *'capacity figures have been determined for all site allocations forming part of the Regulation 18 plan where these contain an identified residential component.'* Why have none of the figures for individual sites been included in the site allocation documents?

Housing figures from the current London Plan runs until 2028/29, but Ealing Council have chosen (without any explanation as to why) to roll forward the London Plan target to a 20-year figure of 43,190. Over and above the 24,402 units with planning permission, there are 7,832 existing site allocations and 8,480 units from small sites, which together total 40,714 units. By assuming that LBE's housing target remains at the same level after 2028/29, the Housing Supply Topic Paper concludes that these figures imply a shortfall of 2,476 units against Ealing's chosen target.

This way of portraying the figures seems designed to obscure the actual over-delivery on LBE’s housing target that is taking place.

We must not forget that housing targets are a minimum target. The National Planning Policy Guidance (NPPG) gives examples of circumstances in which they may be exceeded: o growth strategies for the area that are likely to be deliverable

- o strategic infrastructure improvements likely to drive an increase in the homes needed locally or o an authority agreeing to take on unmet need from neighbouring authorities as set out in a statement of common ground.

There is nothing in the evidence base to suggest that any of these circumstances apply in Ealing.

Ealing Council has a stated aim of achieving 50% affordable housing across its housing schemes. There is no evidence of how Ealing Council will achieve this. The London Plan Authority Monitoring Reports 10-16 (covering 2012/13 to 2018/19) show that, over this seven-year period, only 22% of new housing units met the Plan’s broad definition of affordable, the largest share (33%) dating back to 2012/13.

- o Ealing’s Planning Committee has on several occasions, allowed developers to pay a financial contribution towards affordable housing rather than meeting the affordable housing target that Ealing wanted. This was particularly prevalent in the North Acton OPDC area with the high-rise developments of 1-6 Portal Way. For example, in the development for 4 Portal Way, the developer provided 28% affordable housing and covered a gap of 7% by a £6.15M financial contribution. We are providing an actual picture of the development brochure. How is it conceivable for Ealing Council to be passing up these opportunities in urban areas and then proposing to build on our MOL. It’s a sacrilege and should not be allowed.

4 PORTAL WAY

Economic and community benefits of the proposed development at 4 Portal Way, North Acton

NEW HOMES

- 702 new homes
- 35% affordable housing delivered on site and through a £6.15 million financial contribution
- 197 affordable homes on site, mix of sizes and tenures including LAR

PUBLIC BENEFITS

- High quality public realm activating the street level
- Land secured for future bridge over A40
- A new 159 room hotel with improved facilities
- Exciting new retail facilities, including cafes and restaurants
- Space provided for small office with changing facilities for the Metropolitan Police

LOCAL AUTHORITY BENEFITS

- Up to £17.5 million GVA per annum
- Up to £6.6 million additional tax revenues and £400k in business rates
- £4.7 million S106 contributions for transport, parks and more
- Up to £1.3 million additional council tax income
- £5 million contribution to community infrastructure levy (CIL) (Cross-rail)

EMPLOYMENT BENEFITS

- 2,200sqm of commercial space, reducing the Ealing office supply gap
- On-site employment increase with 180 FTEs

SUSTAINABILITY

- Future-proofed electric systems with performance already 40% over current regulations

If we also consider that for the affordable housing targets to be met, a significant amount of market housing must be delivered. There is no mention of how much market housing is estimated to be delivered in order for the council to achieve the 21,570 affordable homes. Using the data available, we estimate between 72,000 and 108,000 market homes in addition to the 21,570 affordable homes. The potential impact of this magnitude of housing has not been mentioned in the Local Plan.

A critical component of the deliverability of the Local Plan’s housing targets is infrastructure. The Infrastructure Delivery Plan is missing from the consultation which is key in explaining how the existing Infrastructure challenges will be solved as well as all the impacts from the proposed developments in the Local Plan. The Infrastructure Topic Report highlights several major problems with the various types of infrastructure in Ealing. Given the extent to which Ealing is likely to exceed its development targets and a poor track record on retaining let alone increasing infrastructure, why is this not included as part of this consultation?

SIGNIFICANT CHANGES TO DEVELOPMENT SITES – INCLUDING GURNELL LEISURE CENTRE

According to the report itself, the overall aim of the Development Site Selection Report is to “assist the Council in making decisions on the most appropriate sites to allocate for housing and employment development”.

123 sites were assessed (including Gurnell). The full details can be found in the [Site Selection Report](#) and associated appendices. There is no appraisal of approximate capacity or development quantum. There are some sizeable changes from the previous plan including Gurnell now being listed as a development site (it was not previously).

Site EA28 Gurnell Leisure Centre

The specific assessment for Gurnell can be found in [Appendix E, part 2 of 4](#) of the report.

Site EA28 Gurnell Leisure Centre is listed as a site for an enabling housing development. This site is MOL and has not been chosen for de-designation. Therefore, it should not be listed as a potential development site given its protected status.

The previous planning application 201695FUL in 2021 that sought to build an enabling development in EA28 was refused permission. This should justify the removal of EA28 from the proposed development list.

Ealing Council’s current justification to use EA28 for “the local housing need’ is unjustified due to the points we raised in this document about housing in Local Plan. The following excerpt has been taken from the Gurnell Sounding Board meeting papers published on Ealing’s website:

“Housing development - there is an opportunity to develop an innovative urban solution for this site, indicating the type of housing development that could be developed here. This would need to be a planning compliant scheme, taking into account local housing need.”

Apart from our objection of EA28 being in the development site list, we want to also challenge the assessment carried out in the document. It has important information missing and several of the criteria used to assess the site are inaccurate. For example, the criterion “Impact on Green Belt or Metropolitan Open Land” is blank. This is the most important criterion yet it has not been assessed. If all the criteria were assessed correctly, the conclusion would clearly show this site is not appropriate for development. The table below outlines the key issues with the assessment.

Area	Issues
Missing information	<ul style="list-style-type: none"> ● Planning history – The report says “No relevant planning applications.” In fact, there is relevant planning application, 201695FUL from 2021 that was refused for a leisure-led scheme with enabling residential development. The reason for the refusal was for inappropriate housing development on MOL. This is very relevant but also serves as evidence that this site is actually not appropriate for housing.

Tree Preservation Order	<ul style="list-style-type: none"> • This criterion does not fairly measure the impact of the site with respect to trees. Just because there is no TPO for the trees impacted doesn't mean that the trees in this site have no value or can easily be replaced. • A redevelopment of this site would cause a loss of around 160 mature trees. These trees were planted when the leisure centre was built so they are roughly 40 years old. The intrinsic value of trees is also not being assessed. • These trees provide habitats for animals and insects. Given the council's strategic policy "<i>SP.2: Tackling the climate crisis, part E, Maintaining, enhancing and expanding the network of green infrastructure</i>", this criterion should carry more weight and be Yellow.
Vehicular Access to the site	<ul style="list-style-type: none"> • The qualitative assessment does not consider the impact of access for a residential development. It would be significantly different with a car park servicing 500 homes and a leisure centre. If the proposed use was to maintain the current use of the car park and leisure centre, there would be no problem. If you change the use to residential plus leisure centre, then there would be impact on the adjacent roads Ruislip Road East or Argyle Road, both of which suffer from major congestion and pollution over the desired thresholds established by the council. Therefore, this category should be marked as Red.
Impact on provision of open space	<ul style="list-style-type: none"> • This criterion states "<i>The development is unlikely to involve the loss of any open space; or the development may involve the loss of open space but there are opportunities for on-site offsetting or mitigation.</i>" • If a residential development is placed in this location, the existing open space that development will occupy will be lost. The qualitative assessment states that "<i>Development may result in the loss of open space, however there may be opportunities to accommodate open space within the layout or re-provide.</i>" • If an open space is built on, then that open space no longer exists. It is lost forever. Suggesting that there "<i>may be opportunities to accommodate open space</i>" cannot be possible with a local plan which has a net loss of MOL. Therefore, this criterion should be marked Red.
Impact on Green Belt or Metropolitan Open Land	<ul style="list-style-type: none"> • This criterion, probably the most important, has been left blank and needs to be assessed. According to the Site Selection Report Suitability Criteria, page D-70, an assessment of Red would be correct because the "<i>Site is located within Green Belt/MOL. The Green</i>
	<p><i>Belt/MOL Review recommended site would not be suitable for release.</i>" Given that there is no de-designation proposed, then the site is not suitable for release. Therefore, this criterion should be marked Red.</p>
Distance to nearest infant/primary school	<ul style="list-style-type: none"> • '<i>Distance to nearest school</i>' is not a valuable criterion because it does not consider school capacity. If there is no capacity, then using the nearest school is not possible. If local capacity is not known, then this criterion should be marked Yellow pending more data.

<p>Distance to nearest secondary school</p>	<ul style="list-style-type: none"> • <i>‘Distance to nearest school’</i> is not a valuable criterion because it does not consider school capacity. If there is no capacity, then using the nearest school is not possible. • According to the Infrastructure Topic report from November 2022 for Ealing, “ Majority of secondary schools are oversubscribed and have waiting lists.” Given this evidence, the assessment result for this criterion should be Red.
<p>Distance to nearest GP surgery</p>	<ul style="list-style-type: none"> • <i>‘Distance to nearest GP’</i> is not a valuable criterion because it doesn’t consider if there is available capacity. In the Infrastructure topic paper November 2022, it states on page 44, “ majority of GP surgeries in Ealing (70%) are over capacity, particularly in Hanwell (100%), Southall (90%), and Northolt (83%). Four GP practices in Ealing have more than 5,000 patients per one Full Time Equivalent (FTE) GP (the national benchmark is 1,800). Given this evidence, the assessment result for this criterion should be Red.

In conclusion, site EA28 should not be listed as a development site due to:

- o Its protected MOL status o A recent refused planning application for an enabling housing development o Flawed impact assessment o No evidence-based “local housing need”

SIGNIFICANT LOSS OF GREEN BELT AND METROPOLITAN OPEN LAND (MOL)

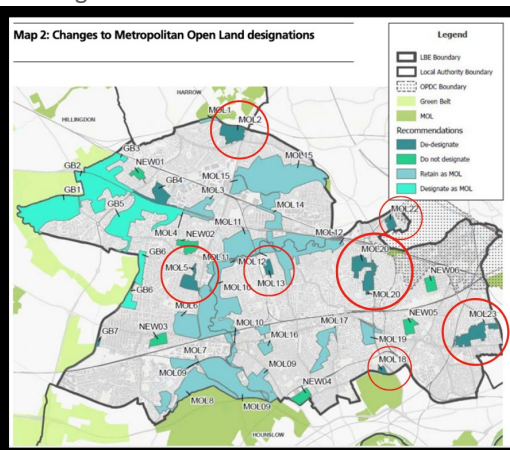
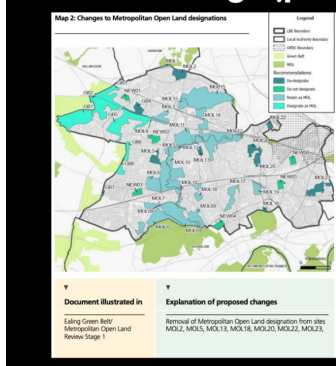
Potential changes to Green Belt and Metropolitan Open Land (MOL) are set out in the following documents:

- [Appendix 3 – Atlas of change](#)
- [Green Belt and Metropolitan Open Land \(MOL\) Review Stage 1 and appendices](#)

The reports propose to:

- Remove Green Belt (GB) designation from all seven GB sites (GB1, GB2, GB3, GB4, GB5, GB6, GB7).
- Remove Metropolitan Open Land designation from sites MOL2, MOL5, MOL13, MOL18, MOL20, MOL22 and MOL23.
- No new MOL is proposed.
- Change the boundaries to some remaining MOL.

Local Plan - Appendix 3 Atlas of Change (p521)



Proposed MOL sites to be removed

- MOL2 - Former Kellogg Tower / Grove Farm / Ealing Northern Sports Centre
- MOL5 - Greenford Cemetery & Windmill Lane Allotments
- MOL13 - Trailfinders
- MOL18 - Gunnersbury Sports Grounds/ Old Actonians
- MOL20 - Hanger Hill Park & former Barclays Sports Ground
- MOL22 - Twyford Abbey (planning permission already granted on this site)
- MOL23 - Acton Park, Sports Grounds and Trinity Way

We strongly object to all these GB and MOL proposed changes because:

- o The criteria used for assessment does not stand up to scrutiny. o Ealing council has created its own criteria which does not align with NPFF or London Plan policy.
- o A visual look at each individual site on Google Satellite view shows all the sites are connected to wider Green Belt and meet the most significant Green Belt purposes.
- o The changes contradict Ealing's Tackling the Climate Crisis strategic objective.
- o There is no Ealing Green Space Strategy or Green Infrastructure Strategy. o MOL boundary changes should only consider building footprint and not open spaces.

GURNELL AREA MOL ASSESSMENT (MOL12 AND MOL13)

MOL12 – BRENT RIVER PARK

Gurnell sits within MOL12 (Brent River Park - north of Ruislip Road East)- the report states that:

"MOL12 is one of the largest and best scoring MOLs in the borough. Brent River Park as a whole is one of the most important green space determinants in the urban 46 Site reference Site name MOL assessment Comments structure of Ealing."

We welcome that the piece of Metropolitan Open Land (MOL) that Gurnell sits within (MOL12) has not been identified for de-designation (although this is contradicted by the fact that development site EA28 has been proposed within MOL12.)

Given this site is one of the best scoring MOL's in our borough, we should protect it and not allow site EA28 Gurnell Leisure Centre to be identified as a location for a housing development. We do not want to lose more pieces of our best scoring open land.

There are some proposed boundary changes to MOL 12 (outlined in Appendix C):

- Removal of the residential units (Peel Gardens) at the corner of Ruislip Road East and Argyle Road.
- Removal of the Enterprise Lodge (Stockdove Way).
- Removal of the hotel site between Perivale Lane and A40 / Western Avenue.

We ask that the MOL boundary changes are adjusted to exclude only building footprints. Car parks and other open spaces within these sites must retain its MOL status. We would like to point out that these developments are a reminder of our dwindling MOL because they were previously undeveloped areas that have been built on historically despite their MOL designation.

MOL13 TRAILFINDERS

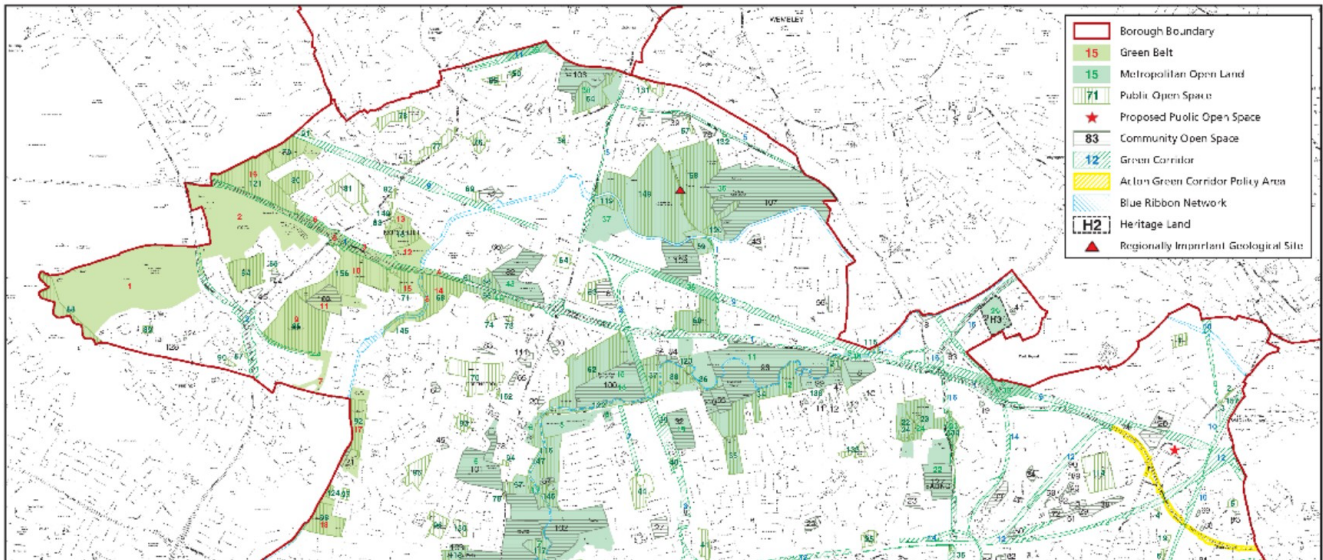
The assessment for MOL13 states *"Although located within close proximity of the Brent River Park (MOL12), a much larger area of MOL, the site is nonetheless disconnected from this open space, both physically and visually. The presence of various residential blocks on the Gurnell Estate breaks views between the parcels, and a physical separation of 180m weakens this connection further."*

This is incorrect. MOL13 is actually connected to MOL12, with a green corridor and other green open spaces that have been excluded. In the Green Belt and Metropolitan Open Land Review Stage 1 document, on page 18, figure 5 shows the 2012/2013 Green Belt and MOL locations.

Number 32 is MOL13, which can be seen next to a green corridor.



Figure 5 - Current Green Belt/MOL extents as defined in 2012/13 (not including amendments arising from schools DPD)



It is peculiar that in defining the boundaries of MOL13 in this draft local plan, planners have decided to exclude the previously documented green corridors as well as adjacent open green spaces next to MOL13. Those additional spaces would make it an even larger MOL space.



Looking at the Google satellite image above, it's clear that between MOL13 and the train tracks, exists more open spaces; grass playing fields and the strip of green corridor which carries high value and should be included. These additional open green spaces need to be added to MOL13 and protected because they provide the connection to MOL12.

We also disagree with the assessment of MOL13 which claims it serves primarily the "local need." This is incorrect. It includes open air facilities, especially for sport, which serves London and National needs. The Trailfinders website provides evidence of professional rugby games with national teams and says "We continue to build excellent relationships with National and Local businesses." There is also a Rugby Academy for women and men. It is therefore incorrect to say a facility of this size primarily meets 'local' need. It is also a large open space which contributes to the physical structure of London by being clearly distinguishable from the built-up area, as we have explained above.

For the reasons stated, we strongly object to removing the MOL designation because the assessment is flawed and the area that was identified was done incorrectly (leaving out adjacent open spaces and a green corridor.) Removing the designation would leave it exceptionally vulnerable to development.

NEW POLICY ON ENABLING DEVELOPMENT

This new policy has appeared with little justification and the term is not defined in the glossary. Without definition this policy could be freely used as an excuse to build where planning permission would not normally be granted – for example on MOL at site EA28.

Ealing Council should use Historic England’s definition as a guide for developing a transparent and sensible policy around this term. Linked here: [Enabling Development and Heritage Assets | Historic England](#)

Thank you for taking the time to read and consider our submission, we hope to see these issues resolved and changes reflected in the next iteration.

Kind regards,



On behalf of Save Gurnell