

EALING LOCAL PLAN – EALING ALLOTMENTS PARTNERSHIP RESPONSE

This response to Ealing Council's draft Local Plan is submitted by Ealing Allotments Partnership, the umbrella organisation that oversees the 45 allotment sites across the borough.

We note that the draft Local Plan proposes changes that could make seven allotment sites in the borough vulnerable to development. This conflicts with the Council's Climate and Ecological Emergency Strategy (January 2021), which states that existing allotments should be protected.

Specifically, in the draft Local Plan, the Council proposes:

1. The removal of Metropolitan Open Land (MOL) status from seven large green spaces sites in the borough. This includes four private allotment sites in Acton: Bromyard Avenue, The Vale, Chestnuts and Perryn, and one local authority owned site, Windmill Lane, in Greenford. **We strongly oppose this proposal.**

Indeed, the removal of Green Belt/MOL status appears to be a cynical attempt to weaken or eliminate protection for important green spaces across the borough. It is important to acknowledge the Campaign for the Protection of Rural England - London's observation that the methodology is not in keeping with National Planning Policy Framework or London Plan policy. The London Plan requires Local Plans to include appropriate designations and policies for the protection of open spaces. By de-designating large areas of MOL, this plan does the opposite, and there are no policies to protect existing areas of green space.

Removing this protection is a major step and the law requires that public consultation is carried out before it can happen. We do not regard burying this detail in a complex 500+ page report as a valid public consultation.

The specific de-designation of MOL23 covering Acton Park, Sports Grounds and Trinity Way removes all protection from the four important allotment sites at Bromyard Avenue, The Vale, Chestnuts and Perryn, managed by the Acton Gardening Association and not covered by the protections of the Allotments Act 1925. Irrespective of the outcome of this consultation for Ealing Council, it is imperative that it commits, explicitly, to the 45 allotment sites across the borough with a statement that:

- No allotment site within the borough, whether local authority or privately owned, will be developed other than as a last resort and in all cases the national principle of "adequate provision ... made for allotment holders displaced ..." will be ensured, if necessary as a condition of planning consent.

2. The inclusion of one local authority owned allotment site within an area identified for potential development (Bixley Fields - SO12). The allotment site is on the edge of the proposed development area and we see no need for it, or the adjacent Bixley Fields meadow, to be included within the development area. The development area boundary can be drawn around the perimeter of the allotment site and meadow, focussing the development on the Havelock Estate itself. **For this reason we request that the Bixley allotment site and Bixley Fields meadow should be excluded from the development areas.**

3. The inclusion of the Northfields allotment site, London's oldest allotment site, dating back to 1832, in a proposed Strategic Area for Regeneration, an Area of Intensification, and an Opportunity Area. **We request that the Northfields allotment site should be not be included in these designated areas.**

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Allotment sites are not fungible assets that can be re-positioned at will. They are established places of cultivation where the ground has been consistently improved, usually over many decades, to ensure its fertility for growing. They are also important places of community where neighbourly relations have similarly developed over many years. Upsetting these is akin to the displacement of housing communities but with none of the benefits of improved facilities as a result. This is the reason that national protections exist; a recognition that allotment sites play a vital functional and social role within their local communities.

It is essential that Ealing Council continues to protect allotments throughout the borough. Without MOL protection, sites will be vulnerable to development and the rich and important contribution they make to local communities and the environment will be lost.

- At a time of high inflation they provide high quality, organically grown food that is distributed well beyond the homes of ploholders. Many allotment sites donate produce to charities.
- They provide recreation and exercise for those who seek respite from busy working lives, and solace for those who value their mental health.
- They provide a diverse community that cuts across generations, a sense of belonging and the opportunity to share and work with others, which is vital at a time when many people lead isolated lives.
- They provide a habitat for wildlife, including some protected species.

In recent years these considerations have led to growing demand for allotments, much of it from those who live in small homes without outside space. Allotment waiting lists have expanded as much as sixfold over the last three years.

In short, allotments must be protected because they enhance the quality of life in densely populated cities.

We urgently seek the Council's assurance that it will honour the statement in its Climate and Ecological Emergency Strategy (January 2021), which states that existing allotments should be protected.