

LONDON BOROUGH LOCAL PLAN CONSULTATION
Comments from the Birkdale Area Residence Association (BARA)

Once again the set of documents is not written in a simple 'layman style' that gives clear precise future intentions of the Council's vision for the future development of the London Borough of Ealing (LBE). It feels more like a list of wishes rather than a set of clear development plans.

- The New Proposed Plan is still driven by providing homes, which is only part of any planning policy. The vision is not clear and it does not explain how the infrastructure for this greater number of 'units' is to be managed. The support infrastructure should be considered first, this being the how the water, waste water, electricity, medical needs and schooling.

In Ealing there is a general emphasis on affordable homes. If the present policy to have this developer lead this will not happen. A developer will always wish to see the maximum profit, which any 50% target is not realistic. To continue to build and find a development is not fully occupied owing to some company or person 'sitting' on that property, but not using it, just means there would continue to be a need to further build. The result of this type of growth means that targets will never be reached.

BARA believe by not fully preparing how and what is to be delivered any proposed schemes will not fulfil the requirements of the NPPF for sustainable development within the Framework and any other Planning Policies, where relevant.

- There are no specific policies for delivering a coherent green infrastructure or for enhancing or conserving the natural environment. There is a mention of making a new regional park, but this area is not defined. (If this is the much publicised removal of the Perivale Golf Club for re-modelling, this is misleading. The space is already a green space and recreational park). To be a NEW park is to provide a space not currently green or to give public access to an area not previously accessed.

The money allocated for this project would frankly be better spent on maintaining our present parks and open green spaces, (including roundabouts which are supposedly sponsored). Brambles have their place, but the number of areas in our parks that are choked with this invasive plant is disgraceful. During the summer months the Haven Green area, the 'heart of this borough' looks neglected with weeds dominating the flowerbeds, and the height of the grassed areas would be temptation for any livestock.

- Guidance in the working document, found in the document Development Management Policies, should be much clearer and succinct. Planners should not be required to interpret the meaning of a set of guidelines. This will lead to a number of different decisions been taken leading to development in the various area of the borough becoming less cohesive.
- There is no guidance given on heritage in this same document, save a passing reference in Point 5.10.
- There is still no Conservation Officer in the planning department. In the Historic England Advice note 12, on page 5 it states under Assessing Significance, Point 11 *Where the significance is not obvious, appropriate expertise would need to be used, as the NPPF points out (paragraph 189). Analysis would generally be undertaken by a suitably qualified specialist, expert in an appropriate branch of conservation* And, again the London Plan also states "All development proposals should be subject to a level of scrutiny appropriate to the scale and/or impact of the project. This design scrutiny should include work by planning case officers and ongoing and informal review by qualified urban design officers and conservation officers".

BARA do not believe the new draft Regulation 19 document is not robust enough and the addition of a full time Conservation Officer would be a great asset.

- It is welcomed to see a great reduction in the de-designating and re-designating much of the Green Belt and MOL land is most welcomed. As the Mayoral Office indicates the green spaces in any borough has much to be revered and should safe-guarded for future inhabitants of this borough.
- However, there are still areas of concern. There appears to be a 'u' turn on the Gurnell Site. In the Regulation 18 document the MOL status was to be kept, but this new proposal Regulation 19, this has not changed to MOL protection removed, and now described as being 'adjacent'.

BARA are concerned that without a specific plan 'operation creep' could be proposed at some future date. Any form of density building in this area could destabilise what is recognised as a 'Fluvial and surface water flood zones' and a 'Site of Importance for Nature Conservation and Priority Habitat'. They are not in favour of the removal of the MOL status. Especially as it is recognised that certain schemes are compatible with MOL designation, one being access for sports facilities. Plus there is already a proviso that if the proposed scheme, as described in Point 2.2.4 to 2.2.8 could have alternative options.

- The second area of concern is the former Barclay's Sports Ground. It is note that the main use for this area is to be a sports ground and the public will have access. This is welcomed. There is a defined proposal to only build on the brown field site, as stated in 2.3.6. However this parcel of land is owned by an investor/developer, so presumably interested in maximising the investment.

BARA believe that there is no need to remove the MOL status from this parcel of land in order to build a small development, as suggested, especially as the trade-off would be to provide further sports provision for the two school adjacent to this area and allow the public access. Generally, we believe, that the NPPF allows for this provided a council submits a planning application fully detailing the proposal and the aims of why this would benefit the community.

- This would be in line with the Mayoral' Office statement on the previous Regulation 18 proposal *"The allocation is entirely MOL and makes up a part of parcel MOL20. It is currently a playing field. As set out in Policy G3 of the LP2021 MOL is afforded the same level of protection as Green Belt land. The proposed use is for a leisure-led scheme with enabling residential use which the Mayor considers would be inappropriate development in MOL. MOL20 is identified for de-designation as MOL and evidence to support exceptional circumstances is required"*

Removing MOL status from both of the above parcels of land is entirely unnecessary, as these development still could be enacted, but would full preserve the spaces as open, green and compatible with climate change considerations.