

## Consultation on Ealing Local Plan Reg 19 Feedback from Greenshoots Racecourse Community Group

We are a greening group, aiming to encourage ‘residents’ engagement with the outdoors through clean-up, greening and community activities – ie residents of the Council Housing Estate itself as well as freeholders and leaseholders embedded across the entire Racecourse Estate. Its origin was a Labour compulsory purchase of the then ‘Northolt Park Racecourse’, alias the Ascot of the 1930’s of which Mandeville Parkway and Northolt Park are the only surviving green open spaces remaining – it is our cultural heritage and sense of place, vital to our mental welfare and sense of community.

In respect of the proposed plan for 02NO - is it sound? Our conclusion is ‘NO’ because:

### Positively UNprepared

1. The planning application referred to (221003FUL) was rushed through (originally with a tall building) and reviewed, only to increase the ‘grab’ onto the green spaces and the demolition of garages (small storage facilities for local businesses & residents)
2. Consultation with local population happened after the design process – and invited tweaking only – we did not feel ‘listened to’ nor part of the design process.
3. The map of the current plan 02NO includes the whole Mandeville Parkway being subject to development, including the Lewes Close housing – this is different from the above planning application and from the submitted plans with Reg 18.
4. The proposed development on Mandeville Parkway is just residential – where is the evidence of retail & service job creation, as part of the Spatial Strategy for Northolt
5. No infrastructure relating to communal/shared workplaces
6. No evidence of addressing the needs of the older, disabled and younger generations.
7. There is no evidence of housing demand being informed by neighbouring areas such as Harrow or Hillingdon or Brent – we refer you to’ Ealing Matters’ feedback on the inflated Ealing housing needs compared to London expected projections - we are currently absorbing about 200 **entirely new** units on the Estate (Faber Green London 194996FUL [completed] & Sussex Crescent 221003FUL [in process])
8. Infrastructure planning: full of inaccuracies – Chapter 4 page 327
  - a. SEND Mandeville School (in Greenford) - expansion is planned for Greenford area;
  - b. Secondary Education – Northolt High School (75% education 25% residential) has been withdrawn from the Council process.
  - c. Mandeville Parkway is edged on 4 sides (not just North and South) and also has several clusters of mature trees along Redcar Close and opposite Wetherby/Cheltenham Close in particular (see 224817FUL Arboricultural Assessment)
  - d. Vehicular Access: ‘existing accesses via Lewes Close/Southwell Avenue and residential cul-de-sac Wetherby Close’ – this cul de sac has 2 ‘Category A’ trees close to the garages and this Close could not possibly

be used as access to Mandeville Parkway - I suspect that what is meant is not Wetherby Close but next road Redcar Close. Nevertheless there are only 2 exits in and out of the Racecourse Estate, narrow and overcrowded roads.

- e. Impact on provision of open space – expected loss in an area already deficient in access to district and regional parks – shouldn't it be protected instead!
  - f. Appendix E p218 – using Greenfield Land in an area deficient in access to district and regional parks – looking at the topography of the area bounded by the A40 to the South, the canal to the East and the National Railway line to the North, and transected by the Central line and the A312 there is very little green spaces as accessible as Mandeville Parkway for open-air recreation and sense of place.
9. The goalpost has changed between descriptors of Reg 19 and Reg 18 –
- a. 01NO – now includes Northolt Leisure Centre and repurposing with residential & mixed use leisure, library, some employment/retail space & public open space (not clear whether this means Mandeville Parkway) and where is the multi-modal transport exchange as spoken of in the planned infrastructure? No reference concerning Northolt health hub.
  - b. 02NO– ‘Northolt Mandeville for residential and now green space ‘ - not clear what is being intended here – we fear that in time most of the open space will be built on.

### **UNjustified**

1. There has been no viability studies, exploring much needed alternatives such as retrofitting/refurbishing 1970's high rise and low rise at the top of the Estate around Northolt Park itself, or any viable infilling. Furthermore Council-owned Racecourse Housing Estate which was to be the focus of sustainable growth (Policy N1 of key infrastructure) has been removed from Reg 19.
2. No evidence of coherence – As sites 01NO and 02NO are both across the road from each other, developing 02NO site before being clear about the key development 01NO plan is not a sensible approach.

### **UNeffective**

1. This 02NO plan development timescale (within the next 5 years) is ahead of 01NO plan (within 6-10 years) - both sites being next to each other, and 01NO being the greater mass - would benefit greatly from being developed at the same time to maximise a sense of continuity and harmony across the landscape, and to be both developed concurrently rather than being stretched over 10 or more years.
2. There is no evidence of any consideration having been given to the West - East connectivity of all Ealing areas North of the A40 corridor to help reduce high car usage and access to other poles of employment, education and retail.

**Consistent with national policy ?** please refer to 'Ealing Matters' and STT concerns over the wider implications of this far too ambitious Local Plan for Ealing. We support

wholeheartedly their submission to the London Borough of Ealing Plan Reg 19.  
Consultation.