

**Publication Stage Representation Form
LB Ealing Council New Local Plan
Consultation dates: 28 February to 6pm 10 April 2024**

Please email back to: localplan@ealing.gov.uk or post to: Strategic Planning Team, Perceval House, 14-16 Uxbridge Road, London, W5 2HL

More information on the New Local Plan and consultation documents can be found here: https://www.ealing.gov.uk/info/201164/local_plan/3125/new_local_plan

Refer to our privacy notice (also attached) for how we process your data:
https://www.ealing.gov.uk/info/201164/local_plan/3125/new_local_plan/4

This form has two parts:

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and attached all the papers together.

Part A

1. Personal Details (Mandatory fields if you wish to be part of the next stage of the new local plan, please provide at least one contact information*).**

If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)

Title*:

First Name*:

Last Name*:

Job Title:

Address Line 1:

Line 2:

Line 3:

Line 4:

Post Code:

Telephone Number:

E-mail Address*: saveealingparks@gmail.com

Name of Organisation: Save Ealing Parks

Part B (Please use a separate sheet for each representation).

3. To which part of the Local Plan does this representation relate?

Paragraph:

Policy:

Policies Map:

4. Do you consider the Local Plan is: (please tick)

4.(1) Legally compliant

4.(2) Sound

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please set out your comments below.

Please see attached file:

Save Ealing Parks: Comments on Ealing Council's Reg 19 Local Plan Consultation
consisting of 6 pages





6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

To make Local Plan compliant with the soundness tests, we propose that:

- MOL20: the site should retain MOL status in its entirety
- 21EA: enabling residential development on the site should be removed from the Local Plan
- Policy ENA - Enabling Residential Development should be removed



7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

XXXXX

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Save Ealing Parks represents a large community of Ealing residents, mostly within and around Hanger Hill Ward, who are concerned about the potential loss of our green spaces resulting from Ealing's Draft Local Plan. We have hundreds of engaged subscribers, who, at the Reg 18 stage, submitted their objections to the Council. Many of those concerns have not been resolved in the Reg 19 document, therefore, we find it vital that we are given an opportunity to present these issues to the Planning Inspector.

Overview

Save Ealing Parks represents a large community of Ealing residents, mostly within and around Hanger Hill Ward, who are concerned about the potential loss of our green spaces resulting from Ealing's Draft Local Plan. We have hundreds of engaged subscribers.

Save Ealing Parks objects to the following items in the Reg 19 Local Plan, and asserts that these items **do not satisfy the Local Plan soundness tests**:

- MOL20: the proposal to de-designate as MOL part of Barclays Sports Ground
- 21EA: allowing residential development on part of Barclays Sports Ground (presently designated as MOL)
- Policy ENA - Enabling Residential Development

To make Local Plan compliant with the soundness test, we propose that:

- MOL20: the site should retain MOL status in its entirety
- 21EA: enabling residential development on the site should be removed from the Local Plan
- Policy ENA - Enabling Residential Development should be removed

We explain the reasons for this in this document.

Section 1

We object to the proposal to de-designate part of Barclays Sports ground as MOL, and to enable residential development on site 21EA, because this proposal **does not satisfy the soundness tests as set out below**.

According to Infrastructure Delivery Plan, Part 5 - Infrastructure Delivery Schedule, it mentions the following regarding Barclays Sports Ground:

Project Description:

Outdoor sports facility to include winter and summer sports pitches, ideally hockey compliant artificial grass pitches (AGPs) and ancillary facilities.

*Prioritisation: **Desirable***

Total cost (lower): 22 million

Total cost (upper): 87 million

*Total cost: **55 million***

Funding secured: TBC

Anticipated funding source: Developer Contributions

We point out the following issues with this:

1. The sum of £55 million is **not justified, and potentially not sound**. It is not clear why the construction of hockey grass pitches would require this staggering sum. For comparison, the redevelopment from scratch of Gurnell Leisure Centre has a similar or smaller budget, and involves the construction of a state-of-the-art indoor gym and Olympic sized swimming pool. It is likely that the construction of hockey patches should cost much less.
2. It is unrealistic that the funds raised from the developer by allowing residential development on site 21EA (part of Barclays Sports Ground) could raise a sum approaching 55 million. For comparison, similar (or even lower) sum that is being proposed to allow the development of Gurnell involves the construction of 300-600 homes, and spans an area much larger than the area of the site 21EA, and much larger than the part of MOL20 that is supposed to be de-designated. This shows that site 21EA is **not deliverable**, and the proposals concerning 21EA (and therefore concerning MOL20) **are not sound, and not positively prepared**.
3. The prioritisation for this site, *Desirable*, is the lowest type of priority within Part 5 - Infrastructure Delivery Schedule. Only around 10 out of around 70-90 items Part 5 - Infrastructure Delivery Schedule have this lowest ranking. This means that **site 21EA ranks in the bottom 15% of all infrastructure projects by priority. This low priority means that there are no exceptional reasons for this project to go ahead at the cost of losing MOL**. Therefore, the de-designation of part of MOL20 and the residential development on EA21 is **inconsistent with national policy** (NPPF protection of MOL).
4. Related to the above point, we observe the following statement from Section 2.3. Former Barclays Sports Ground (Ealing) of Ealing Green Belt and Metropolitan Open Land Review Stage 2 February 2024: *In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet*. There is no indication of what community needs are implied in this statement, except for the hockey pitch, given the extremely vague description of the scheme for 21EA. There is no evidence base to support this claim. There is also **no evidence that the hockey pitches and other sports facilities could not be funded by sources other than enabling residential development**, especially given that the funding required is likely to be much less than the sums cited above. We conclude that Ealing council has not sought or considered alternative approaches to the funding. This way, the statement cited in this item is **not positively prepared and lacks evidence**. It also means that exceptional circumstances for MOL de-designation have not been demonstrated and therefore the proposal is **inconsistent with national policy** (NPPF protection of MOL).

Section 2

We object to the proposal to de-designate part of Barclays Sports ground as MOL, and to enable residential development on site 21EA, because this proposal **does not satisfy the soundness tests as set out below.**

We argue that the Site Selection Report regarding site Ealing – 21EA **contains multiple factual errors that greatly inflate the site's suitability**, while in reality the site is **not suitable** for the proposed scheme. By being factually incorrect, Site Selection Report regarding Ealing – 21EA is **not sound**. Residential development on 21EA should not be allowed; therefore, the proposal to de-designate of part of MOL20 should be dropped, as well.

5.1 Health and safety. Reg 19 ranking: green, proposed correction: red.



Figure: current traffic on Park View Road near

Ada Lovelace School is already chaotic and poses a health and safety risk for the schoolchildren. All mitigatory measures (improved lights, signage prohibiting U-turns, road bumps) have already been implemented. Any further traffic increase on this road is unsustainable and will multiply the health and safety risks for the school.

5.1a The site is adjacent to Ada Lovelace School and very close to St Augustines Priory school. Residential development will cause severe safety issues for the schools. Traffic is already a serious health & safety concern for Ada Lovelace School. **Traffic on Park View Road (along Barclays Sports Ground) becomes extremely dense and dangerous**

during school drop off / on times. It already exceeds the capacity of the road. The school was forced to take extra measures to mitigate this risk even at the current traffic levels: increased lighting, ban on U-turns, etc. **All sources of mitigatory measures have already been used to mitigate the current situation and there is no more room for mitigating additional increases in traffic. Any further traffic increase will pose an unsustainably severe health and safety risk.**

5.1b It should be noted that when Ealing Council proposed the construction of Ada Lovelace school, residents pointed out that the traffic on Park View Road would become chaotic. **The Council dismissed those concerns, citing using unrealistic traffic modelling.** This shows that the Ealing Council's ability to correctly estimate traffic changes that arise from new development is compromised: **Ealing Council tends to underestimate the severity of these problems.**

5.2 Vehicular access. Reg 19 ranking: green, proposed correction: red.

Site Selection Report says that *'Depending on the proposed layout of the site, and due to the site's size, this access may require upgrading, and new accesses may be considered from Park View Road to the west or Hanger Lane to the east.'* As explained above, this is not possible, as additional traffic on Park View Road will greatly exceed the capacity of the road. It creates a health and safety risk for the school that cannot be mitigated. Additionally, it would severely decrease the quality of life of Park View Road residents. Likewise, access from North Circular Road is also unsustainable because this part of North Circular Road already has very dense traffic (See section on Infrastructure Topic Paper). Moreover, access to North Circular Road would require building on MOL20 which is Metropolitan Open Land, as is therefore **inconsistent with national policy** (NPPF protection of MOL).

5.3 Distance to nearest infant/primary school. Reg 19 ranking: green, proposed correction: red.

5.3a The nearest primary schools (Montpelier and West Acton Primary) are oversubscribed and the site does not fall into their catchment areas. The criterion's proposed 'green' distance of 1000m is unrealistic in this case: catchment area considerations should be given priority. There is generally a severe lack of primary schools in the area.

5.3b Ealing Council's *'Infrastructure Topic Paper'* acknowledges, in the Primary Schools section, that *'Pockets of sustained high demand remain, particularly in central, south and east Ealing where schools are near or at capacity'*. This concerns the schools around 21EA.

5.4 Impact on Green Belt or Metropolitan Open Land. Reg 19 ranking: green, proposed correction: red.

21EA scores as "Green" in the category "Impact on Green Belt or Metropolitan Open Land"; the justification is that the MOL is proposed for the de-designation. This is not a valid argument because of circular reasoning: the de-designation of MOL is justified within the local plan by enabling development (i.e., enabling 21EA). **The fact is that site 21EA results in the loss of (part of) MOL20. We believe that it should score as "Red" in that category.**

5.5 Impact on Green Belt or Metropolitan Open Land. Reg 19 ranking: green, proposed correction: red.

Likewise, in "Impact on provision of open space", 21EA **should also score as "Red"**, not "Green", because it results in loss of MOL.

5.5 Site marketability. Reg 19 ranking: yellow, proposed correction: red.

The justification says that *Site is being actively marketed for development or enquiries have been received from a developer. This is factually incorrect.* Freedom of Information request from Save Ealing Parks (FOI Response 24-0409 FINAL, April 2024) reports the following:

Your request:

1. Copies of all communications (if any) between Ealing Council and Leisure and Entertainment Ltd, and between Ealing Council and Parkview Group, regarding the potential use and/or development on Barclays Sports Ground, which took place in the last 24 months;

2. Copies of all communications (if any) between Ealing Council and any owner, developer or prospective developer of the land on Barclays Sports Ground which took place in the last 24 months, including any expressions of interest in any development (residential or otherwise) on Barclays Sports Ground or proposals of any such development.

Your request has been assessed and the following information is provided in response:

We have had no discussions regarding the development of the requested site within the time period requested.

Similar request was made a year ago by ParkCrest Association, with similar results - no communication from the developer in the preceding 2 years. The last communications by the owner that are known date back to 2015 during the construction of Ada Lovelace School on a part of Barclays Sports Ground.

Therefore, we conclude that **there has been no interest from the owner / any developers in developing Barclays Sports Ground.**

The factual error also demonstrates that Site Selection Report on Site 21EA is **not positively prepared**.

Section 3

We object to the proposal to de-designate part of Barclays Sports ground as MOL, and to enable residential development on site 21EA, because this proposal **does not satisfy the soundness tests as set out below.**

Ealing Green Belt and Metropolitan Open Land Review Stage 2 February 2024 paragraph 1.1.7 states that:

we will only proceed with our recommendations for specific GB and/or MOL sites ... for a small number of sites (or parts of sites) that do not contribute to the Green Belt/MOL objectives

It is nowhere justified in the Reg 19 Local Plan that some parts of Barclays Sports Ground do not serve the purposes of MOL: **there is no assessment of the site in respect of its MOL objectives.** Thus, the proposal to de-designate part of Barclays Sports Ground as MOL is **not justified and not sound** (because it is inconsistent with the above cited paragraph). In particular, Ealing Green Belt and Metropolitan Open Land Review Stage 2 February 2024 section 2.3 on Former Barclays Sports Ground, does not assess Barclays Sports Ground in terms of its MOL objectives.

The Reg 18 consultation documents did attempt an evidence-based assessment of MOL sites in terms of their contribution to MOL objectives. It was argued in many responses, including the response by Save Ealing Parks, that that assessment was flawed. In fact, MOL20 (including Barclays Sports Ground in its entirety) **does contribute very highly towards the MOL objectives**, as demonstrated in Save Ealing Parks' Reg 18 submission.

We request that our Reg 18 assessment of MOL20 in terms of its MOL objectives be included as part of our Reg 19 submission; it will be submitted as an attachment.

Section 4

We object to the proposal to de-designate part of Barclays Sports ground as MOL, and to enable residential development on site 21EA, because this proposal **does not satisfy the soundness tests as set out below.**

Ealing Green Belt and Metropolitan Open Land Review Stage 2 February 2024, Section 2.3.5 says that:

The proposed use of the site is as a leisure-led scheme with enabling residential use and facilitating access to sports and play pitches.

This description is **extremely unclear**:

1. It is **not clear** what 'leisure-led scheme' consists of, what would be its budget, and why this budget could not be funded by means other than "enabling development"
2. The size, number of homes, and any other parameters of the "enabling residential development" are **not clear**.

Further to this, in an email dated 27 Feb 2023, Save Ealing Parks asked Ealing Council (addressed to Planning Department and Steve Barton, with a subsequent reminder, made during the Reg 19 consultation period) the following questions, among others:

3. Does Reg 19 documentation provide any evidence that the extensive budget (£22 million and £87 million) related to Barclays Sports Ground can be raised by development on the de-designated piece of the Barclays Sports Ground only? For comparison, Gurnell Leisure centre redevelopment projects have a similar budget, and the proposed enabling development is a large-scale housing estate (300-600 homes).

4. What percentage of the £22-87 million budget is expected to be spent on the leisure led component versus the enabling residential component of the scheme?

Save Ealing Parks received no response from Ealing Council to both the initial email and the reminder. We are left to conclude that **Ealing Council does not have answers to these essential questions.**

Without having these details, it is **impossible to demonstrate that the scheme is deliverable and justified.**

This means the purpose for MOL de-designation is also **not justified.**

Likewise, it is impossible to demonstrate exceptional circumstances for MOL de-designation without assessing the scheme in its detail. The ambiguity of the purpose of the scheme means that exceptional circumstances are not demonstrated and therefore the proposal is **inconsistent with national policy** (NPPF protection of MOL).

Section 5

We object to the proposal to de-designate part of Barclays Sports ground as MOL, and to enable residential development on site 21EA, because this proposal **does not satisfy the soundness tests as set out below.**

Ealing Council's BIODIVERSITY ACTION PLAN 2022 – 2027 states, page 5 states that:

Green spaces and green infrastructure in Ealing range from parks and open spaces, to ... brownfield sites ... All these places create crucial green networks, corridors and stepping-stones of different habitat types for wildlife to live in and move through the borough.

Barclays Sports Ground, including its Clubhouse and the carpark, are part of the larger MOL20, which includes ancient woodland and SINC sites (Hanger Hill Wood and Fox Wood) and therefore unquestionably form part of an important green network. (We note, by the way, that the Clubhouse is not a brownfield site because it is not listed on Ealing Council's map of brownfield sites.) It must be taken into account that the Clubhouse and the associated hard standing have been used for its intended purpose for over 20 years, and rewilding has essentially already been naturally allowed to occur on the hard standing over this time.

Loss of this part of MOL to development, as opposed to regenerating/rewilding/retaining for MOL purposes, goes against the Biodiversity Action Plan.

Therefore, the proposal to de-designate part of Barclays Sports Ground is **inconsistent with Ealing Council's own policies, and is therefore not sound.**