



Zack Polanski AM
City Hall
Kamal Chuncie Way
London E16 1ZE
[by email]

28th September 2023

Dear Zack,

Thank you for your open letter.

Both your letter and this reply run to multiple pages, so you can appreciate perhaps why my preference in discussing these issues is best for this medium rather than social media.

Nevertheless, I trust that you intend to publish my response on Twitter, so I have taken the liberty, as I have done with all correspondence relating to the Southall Gasworks development, of publishing a copy on the council's website.

I must start by thanking you for taking an interest in both Warren Farm and the Gasworks. Both projects have been issues of concern for many years, stretching back in the case of Warren Farm to well before 2010, and the Gasworks since 2009.

Whilst I certainly appreciate the opportunity to address your questions, and to clarify the misconceptions within your letter, you should be aware that both matters have extensive background information freely available on the council's website, a small proportion of which have been appended to this letter.

Warren Farm

Full details of the council's current position have already been published, which answer your questions, but I shall repeat it here for clarity.

Following agreement with Imperial College London regarding the long-term management of the land to the northwest of Warren Farm, the council is committed to formally rewilding the majority of the land across both sites. This will also involve removing the significant quantum of dilapidated hard standing that sits at the heart of both fields. Any replacement sports pavilion and changing rooms will be designed in such a way to take up only a proportion of the current amount of land lost to hard standing. The principle of siting any replacement facility closer to the road and away from the heart of the proposed nature reserve is a general point of agreement between stakeholders.

Currently, at the request of the Warren Farm Radio Flyers, and with the agreement of nature reserve campaigners, a large landing strip is perpetually mown into the



centre of the lower half of Warren Farm. A reconfiguration of the whole site would allow for the landing strip to be relocated to a more appropriate location.

As the project is still in progress, the exact specifications and configuration of the site are yet to be agreed. Indicative layouts within the last cabinet report are just that - indicative. They do not represent the final proposals, which are all still subject to agreement. We will continue to work with Imperial College and the local community on how to take the details of the project forward. Full ecological studies across both council-owned and Imperial College land are currently underway by reputable experts.

The Cabinet report lays out in detail the range of sites that the council assessed for football and cricket pitches, and can be found here: [\(Public Pack\)Agenda Document for Cabinet, 25/01/2023 19:00 \(moderngov.co.uk\)](#).

There are no sites that would offer the level of provision possible at Warren Farm Sports Ground. Before falling into disrepair, Warren Farm Sports Ground provided six cricket pitches, and twelve full sized football pitches.

In setting out our vision for a blended future use of Warren Farm Sports Ground, the Council is already committing to radically reducing the overall sports provision to half of that with which it used to provide. We are able to make this compromise because over the last decade we have made investments in community sports facilities such as with London Tigers at Spikes Bridge Park, and with the Middlesex FA at Rectory Park.

Following both the ecological surveys, and further discussions over the final configuration of any proposed facility, the council will work to identify how and who will deliver the project.

I am happy to confirm that there are no proposals for a stadium at Warren Farm Sports Ground. The configuration of facilities is more likely to be a replacement sports pavilion and cafe, changing rooms, kit and equipment store, and an aspiration to deliver community facilities such as a classroom that can be made available to schools and community groups and relate to the future Nature Reserve. We intend to set the sustainability specifications for any facility strictly.

The council will work with community, social and commercial sports organisations and invite them to respond to how they believe the site should be managed. As cited above, this has already proven to be successful at Spikes Bridge Park and Rectory Park. Alternative models of delivery, such as the jointly-owned Gunnersbury Park Trust, which is responsible for the Gunnersbury Park Sports Hub or direct management by the council will also be considered and tested.



Only after this process is complete will the Council be able to confidently set out the final configuration of both the wider site and supporting facilities. All of these processes will be undertaken in line with the council's strict legal, procurement and key decision processes, and you will be able to watch them closely at each stage.

Southall Football Club are an amateur football club currently playing at the 8th tier of the UK football league system without a home ground, having vacated their last grounds in Southall many decades ago. The team has a desire to identify a site within the London Borough of Ealing to return to, and I understand that they have made public announcements regarding their interest in Warren Farm Sports Ground becoming their future home. Their decision to make this announcement is entirely their own and has no bearing on the council's decision making in relation to Warren Farm.

Officers have engaged with informal discussions with Southall FC on their desire to return to the borough, and a management agreement was previously in place at Norwood Hall Playing Fields, which has not progressed. The Council regularly engages with the some 100 sports clubs that operate within and in the environs of the Borough, from our top flight sports teams with their own grounds, such as Ealing Trailfinders RFC, through to smaller sports and social clubs that are tenanted in council facilities or book council owned sports pitches.

We are working in close partnership with Imperial College. The College has agreed that their land will be included and rewilded within the overall footprint of Warren Farm, with the exact specifications yet to be agreed, as detailed above.

We take our responsibility to explain and justify the decisions we make very seriously, and we have done that at every stage of the Warren Farm project, as we will for the stages to come.

Southall Gasworks & Clean Air for Southall and Hayes (CASH)

As with Warren Farm, this is a long-running issue for Southall residents, and has been the subject of long-standing discussions between both CASH and the council, including both in-person and virtual meetings over a sustained period.

I (and others at the council) correspond consistently with CASH, and this correspondence is published here: [Southall Gasworks correspondence | Ealing Council](#). This covers the matter you have raised regarding Berkeley Group sponsorship.



When I became Leader of the Council, I set out a seven-point plan on complaints of air quality and ground pollution at the Southall Gasworks, including but not limited to;

- installing independent air quality monitoring of the site,
- appointing a dedicated environmental health officer for Southall as well as strengthening the council's ability to process environmental complaints,
- publication of now two sets of independent legal advice reviewing the council's current and past monitoring and enforcement action over the site,
- reviewing the council's relationships more generally with developers and specifically with Berkeley Group.

At the request of CASH, we additionally undertook soil sampling at the site to monitor for contamination within the council's statutory responsibilities.

It is important to bear in mind when discussing this development that the council opposed the Southall Gasworks development in 2009. It was called in and approved against our wishes by the then Mayor of London, Boris Johnson.

We will continue to hold the Berkeley Group to account on a range of issues, from construction disruption and air quality to affordable housing provision, with all the powers available to us.

We are limited as a local authority in what we can do, but we will also continue to campaign for additional enforcement capabilities. As we have discussed with CASH on many occasions and have shown by publishing our independent legal advice, the Council would not have been able to demonstrate that a statutory nuisance had occurred, even when the foul smells from the remediation of soil at the Gasworks site were at their most acute and a soil hospital was in operation, regulated by the Environment Agency.

At subsequent stages of the development after the decommissioning of the soil hospital, and following reports by Public Health England which examined the impacts on health from exposure to poor air quality, the council and other agencies again could not demonstrate that a statutory nuisance had occurred.

That is true as environmental law and the national Air Quality Standards Regulations currently stand. Any attempt to bring about a statutory abatement notice at the Gasworks site would lead to almost certain failure within the courts, and significantly damage the Council's ability to enforce any potential or future breach.

I understand that this has and continues to be a difficult message for CASH to absorb, however it is the only conclusion that can be reached after years of investigation and testing under the current environmental protection thresholds and standards. I wish CASH every success in their growing work through Gasworks



Communities United in lobbying Parliament for the necessary legislative change to amend air quality thresholds and strengthen enforcement powers.

I am sure you and I would both agree that further reform to the UK's environmental protection laws is required. Given announcements made only last week by the Prime Minister, I doubt that they will be forthcoming in the foreseeable future.

The government has consistently dragged its heels over heeding the latest WHO air quality guidance (which was published in 2021). Indeed, the Government's own Air Quality Strategy (published last month) reconfirmed that the Government intends to work to the thresholds within their own Environmental Act 2021, and not to the more stringent WHO guidance. The WHO guidance recommends lower emissions limit values (for example for fine particulates), which would offer better public health protection.

The work by Imperial College London in their biomonitoring trial, and by the Centric Lab in developing a Health Impact Assessment Toolkit will both be welcome additions to the growing body of evidence that current environmental and public health protection and air quality standards within the UK need to keep pace with improvements in environmental standards globally, as illustrated by improvements in WHO's air quality guidelines (AQG) on thresholds and limits for key air pollutants.

Whilst it has been some time since my last meeting with the Centric Lab, I have recently received an invitation to meet with them to explore their toolkit, and look forward to meeting them soon. The Council will very shortly publish its own renewed Air Quality Strategy and we will explore opportunities to work together on our action plan.

Yours sincerely,

Cllr Peter Mason

Leader, London Borough of Ealing



Additional Information:

[Warren Farm Cabinet Report, January 2023.](#)

[Letter to CASH, May 2021](#)

[Letter to CASH, June 2021](#)

[Letter to Berkeley Group, June 2021](#)

[Letter to CASH, July 2021](#)

[Letter to CASH, September 2021](#)

[Letter to CASH, October 2021](#)

[Letter to CASH, November 2022](#)

[Letter to CASH, August 2023](#)

[Letter to CASH, August 2023](#)