

## Save Ealing Parks Group

10 May 2025

FAO: The Planning Inspectors Ealing Local Plan Examination c/o Paige Gaughan,

Programme Officer Ealing Council,

Perceval House 14-16 Uxbridge Road,

Ealing W5 2HL

These representations to the Regulation 19 Plan for Examination are submitted by Save Ealing Parks Group, representing hundreds of Ealing's residents, regarding the proposed Metropolitan Open Land (MOL) boundary changes and residential enabling development at Barclays Sports Ground (Site 21EA).

### Representation 1: Matter 3 - Vision, Objectives and Spatial Strategy - Greenbelt/MOL

**Question 11.** *Paying regard to paragraph 145 of the Framework, do strategic policies establish the need for any changes to Green Belt/MOL boundaries? If so, which ones and how? Are exceptional circumstances for any proposed changes to boundaries evidenced and justified? Are all detailed amendments to boundaries clear and addressed in the evidence?*

Background: The Council proposes MOL boundary changes at the Former Barclays Sports Ground, removing MOL from the north-west corner, citing infrastructure improvement costs and residential enabling development.

Our Representation regarding MOL20 (Barclays Sports Ground):

1. The "grey belt" category referenced by the Council is from an NPPF revision after December 2023, explicitly outside this examination's scope as confirmed by Inspectors' guidance letter EX2.
2. According to S22d - GLA/Ealing Statement of Common Ground - Reference "GB/MOL": "The LP2021 sets out a strategic approach for all London boroughs": "LBNE should adopt a 'brownfield first' approach exhausting all suitable brownfield development opportunities before considering the potential for development on GB and MOL sites." and "In order that the draft Plan is in general conformity with the LP2021, LBE will need to establish the exceptional circumstances that are required by national policy before it can release and reconfigure the borough's GB and MOL".
3. Therefore, to comply with NPPF, as confirmed by GLA, de-designation of MOL20 requires the establishment of **exceptional circumstances** and the fact that all **brownfield development opportunities have been exhausted. Neither of the two criteria are satisfied.** Note that the land of the existing Clubhouse at the northwest part of the site **is not brownfield - it is MOL as the rest of the site.**

4. The EB96 - Green Belt and Metropolitan Open Land (MOL) Review Stage 1 (Arup Report) was challenged by Save Ealing Parks in the Regulation 18 consultation. It contained factual errors, cursory treatment, and internal inconsistencies; thus, it was considered unsound and irrational in law. The Council no longer relies on this evidence post Regulation 19 stage because, at Regulation 19, the Council presented entirely different MOL revision plans based on the invalid "grey belt" argument (EB95 - Green Belt and Metropolitan Open Land Review Stage 2, February 2024), thus abandoning reliance on EB96, and in particular choosing not to address our concerns. Should the Council maintain that MOL Stage 1 report is valid (which we deny is the case at Reg 19 stage), we maintain that our original arguments proving this report unsound and irrational in law apply, and request the right to present them orally. **Exceptional circumstances have not been demonstrated.**
5. Initially, the Council's proposed infrastructure cost was estimated at an inflated figure (£55 million), and was challenged by Save Ealing Parks as excessive and unjustified. The Council later revised this estimate downward to £3m-£3.5m, significantly weakening their justification for MOL boundary changes.
6. Alternative funding sources have not been explored, but are viable given the reduced expected cost. This is a necessary prerequisite, see point 3 above.
7. The Council characterises residential enabling development as merely "likely" rather than essential in their Regulation 19 responses, further undermining their justification.
8. According to EB84 - Stage 2 Ealing Infrastructure Delivery Schedule Report, Barclays Sports Ground is classified as "Desirable," the lowest priority category, placing this project in the **bottom 15% of infrastructure priorities**. The lowest priority of the project means that **no exceptional circumstances** for loss of MOL exist.
9. Section 2.3 of EB95 states the site would remain unused and community needs unmet without development, a claim unsupported by robust evidence, clarity, or exceptional circumstances.

**Conclusion:** No credible exceptional circumstances have been demonstrated; no alternative funding for the pitches has been explored; no alternative brownfield development sites have been explored. The Council has admitted that development on MOL20 is a low-priority project. Therefore, the proposed MOL boundary changes are unsound, and **Barclays Sports Ground must retain its full MOL designation.**

## **Representation 2: Matter 9 - Development Sites (Ealing Development Sites) - 21EA - Former Barclays Sports Ground**

### **Background:**

The Council proposes residential enabling development on Barclays Sports Ground (MOL20), removing MOL status from the north-west corner.

The Council initially proposed excessive infrastructure costs (£55 million), challenged by Save Ealing Parks as unjustified, later reducing this to £3m-£3.5m. The "grey belt" argument relied upon by the Council is invalid per NPPF December 2023 and Inspectors' guidance

letter EX2. Exceptional circumstances for loss of MOL are absent. According to EB84 - Stage 2 Ealing Infrastructure Delivery Schedule Report, Barclays Sports Ground is classified as "Desirable," the lowest priority category, placing this project in the bottom 15% of infrastructure priorities. **Site-specific Questions - Question 10 - regarding 21EA:**

**c. Boundaries and extent justified?**

Our representation:

1. The extent is unjustified; the necessary funding (£3m-£3.5m) could be raised without enabling development, or development of a small scale (size of the existing Clubhouse)
2. Alternative funding sources have not been explored, but are viable given the reduced expected cost.
3. Given the low infrastructure priority (EB84), boundary changes and development are unjustified, weighted against loss of MOL.
4. According to S22d - GLA/Ealing Statement of Common Ground - Reference "GB/MOL": *"The LP2021 sets out a strategic approach for all London boroughs": "LBNE should adopt a 'brownfield first' approach exhausting all suitable brownfield development opportunities before considering the potential for development on GB and MOL sites"* - evidence that brownfield opportunities have not been explored and **exhausted** is absent, but is an imperative prerequisite.

**Proposed modifications:** Residential development should be disallowed. If permitted, new construction must match the existing Clubhouse size to preserve MOL openness, and the dimensions of the allowed development must be fixed in the Local Plan.

**g. Technical constraints and mitigation?**

Our representation:

1. Severe traffic congestion on Park View Road, particularly near Ada Lovelace School and St Augustine's Priory School, constitutes unresolved technical constraints.
2. Montpelier Primary and West Acton Primary schools are oversubscribed, exacerbating the issue.

**Proposed modifications:** Residential development should be disallowed. If permitted, construction must match the existing Clubhouse size, to minimise impact on infrastructure.

**j. Building heights justification?**

1. To maintain local character consistent with surrounding structures, any new construction, if allowed, must match the existing Clubhouse size and not exceed **three** storeys.

**o. Viability and scale of development?**

1. No clear evidence supports the viability or necessity of development given the small funding required, project's low priority, and lack of exceptional circumstances.

**Proposed modifications:** Residential development on Site 21EA should be disallowed.

**Any modifications necessary for soundness?**

1. The Site Selection Report (EB104) inaccurately represents the site's suitability for residential development, especially in **Health and Safety, Vehicular Access, Distance to Nearest Infant/Primary School, Impact on Green Belt/MOL, and Open Space categories, all of which should rank "Red", as per our Reg 19 submission**. This modification is required for soundness. The sound outcome of this revision is that site 21EA is unsuitable for development. If allowed, construction must match the scale of the existing Clubhouse, to minimise impact on infrastructure, and this restriction must be fixed in the Local Plan.

**Additional Questions - 21EA - Former Barclays Sports Ground:**

**Question 40: Is the loss of MOL justified?**

1. **Exceptional circumstances** required under NPPF December 2023 (paragraphs 140-142 and 147-151) **have not been demonstrated**. The EB96 - Green Belt and Metropolitan Open Land (MOL) Review Stage 1 (Arup Report) was challenged by Save Ealing Parks in the Regulation 18 consultation. It contained factual errors, cursory treatment, and internal inconsistencies; thus, it was considered unsound and irrational in law. The Council no longer relies on this evidence post Regulation 19 stage because, at Regulation 19, the Council presented entirely different MOL revision plans based on the invalid "grey belt" argument (EB95 - Green Belt and Metropolitan Open Land Review Stage 2, February 2024), thus abandoning reliance on EB96, and in particular **choosing not to address exceptional circumstances at all**. Should the Council maintain that MOL Stage 1 report is valid (which we deny is the case at Reg 19 stage), we maintain that our original arguments proving this report unsound and irrational in law apply, and request the right to present them orally.
2. The "grey belt" argument relied upon by the Council is invalid (see background), which is confirmed multiple times in EX2 and S22d.
3. The council initially proposed excessive infrastructure costs (£55 million), subsequently revised downwards to £3m-£3.5m, undermining MOL loss justification.
4. There has been no genuine effort to explore alternative funding sources, which are viable in view of the reduced funding needs.
5. The project is identified as a low priority (in EB84, see background), further weakening justification.
6. According to S22d - GLA/Ealing Statement of Common Ground - Reference "GB/MOL": "The LP2021 sets out a strategic approach for all London boroughs": "LBNE should adopt a 'brownfield first' approach **exhausting all suitable brownfield development** opportunities before considering the potential for development on GB and MOL sites". Evidence that brownfield opportunities have not been explored and **exhausted** is absent, but is an imperative prerequisite for MOL de-designation.

**Proposed modifications:** Residential development on site 21EA should be disallowed.

#### Question 41: Is enabling development appropriate?

1. Enabling development is described by the council as merely "likely" in its Reg 19 responses (to Save Ealing Parks) indicating uncertainty about its necessity.
2. The small funding required (£3m-£3.5m) could feasibly be obtained through alternative funding mechanisms, which have not been explored by the council.
3. The site's low priority (Desirable ranking - bottom 15%) within the Infrastructure Delivery Schedule (EB84) further undermines justification for enabling development weighted against MOL loss.
4. According to S22d - GLA/Ealing Statement of Common Ground - Reference "GB/MOL": *"The LP2021 sets out a strategic approach for all London boroughs": "LBNE should adopt a 'brownfield first' approach exhausting all suitable brownfield development opportunities before considering the potential for development on GB and MOL sites"*. Evidence that brownfield opportunities have not been explored and **exhausted** is absent, but is an imperative prerequisite to allow enabling development.

**Proposed modifications:** Residential enabling development should be disallowed. If permitted, new construction must strictly match the existing Clubhouse dimensions, and this restriction must be fixed in the Local Plan.

**Conclusion:** The enabling development is unjustified, unsound, and ineffective. Barclays Sports Ground must retain full MOL status. The Council acknowledges the project's low priority. Development at site EA21 is undeliverable and unsound, as detailed above, particularly regarding traffic congestion and school capacity. The site should be removed from the Local Plan or strictly limited to existing Clubhouse dimensions if retained.

#### Representation 3: Matter 10 - Delivery and Monitoring - Policy ENA

**Background:** Policy ENA proposes residential enabling development for community infrastructure improvements at site 21EA.

Our Representation regarding enabling development for 21EA:

1. The initial proposed costs (£55 million) were unjustified, challenged by Save Ealing Parks, and later revised downward (£3m-£3.5m), weakening policy justification.
2. The site's low priority (Desirable ranking - bottom 15%) within the Infrastructure Delivery Schedule (EB84) further undermines justification for enabling development.
3. Policy ENA lacks clarity and certainty regarding enabling development conditions, creating ambiguity for decision-makers.
4. The policy is neither justified by evidence nor consistent with national policy (paragraphs 140-142 and 147-151 of NPPF December 2023).

**Conclusion:** Policy ENA regarding Barclays Sports Ground (21EA) is unjustified and unsound, and thus should be removed from the Local Plan.

We request that all three representations be fully considered as written representations on their respective matters.

Thank you for your careful consideration.

Yours sincerely,

Save Ealing Parks Group