

Sport England/Ealing Council Statement of Common Ground

This statement of Common Ground addresses the matters raised by Sport England in its representation to Ealing's Regulation 19 Local Plan.

Note: Actual plan text is shown in *italics*. Suggested new text is shown by underlining. Suggested deleted text is shown by ~~strikethrough~~.

Reference	Summary of issues	Ealing response (31/10/2024, 06/03/2025 & 10/04/2025)	Sport England response (12/09/2024, 22/01/2025 & 04/04/2025)
Strategic Objectives and Priorities	<p>Sport England, working with Active Travel England and the Office for Health Improvement and Disparities, has produced the 3rd version of 'Active Design' (May 2023), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. Sport England would commend the use of the guidance in the master planning process.</p> <p>Sport England would encourage development in the London Borough of Ealing to be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist as part of the development site policies.</p>	<p>Whilst the Regulation 19 plan doesn't specifically reference the 'Active Design' guide, the 10 key principles are reflected in the strategy. There are clear synergies between these principles and the concept of 20-minute neighbourhoods and Active Travel which are central themes of Ealing's strategy as introduced in chapter 3.</p> <p>It is accepted that the strategic policies of the plan could be more explicit in recognising the role of the built environment in supporting physical activity. Namely the plan could better identify its role in delivering places which provide opportunities for people to lead physically active lives. This could be teased out further under the supporting text to policies SP2 and SP3 including adding reference to 'active environments' and Active Design principles.</p>	Sport England accepts this response

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		<p>Suggested additions include:</p> <p>At the end of paragraph 3.20 add – <u>‘Such spatial concepts also support the creation of ‘active environments’ which allow people to lead more physically active lives.’</u></p> <p>After 3.44 add – <u>‘This plan also seeks to facilitate the creation of active environments, and to this end endorses the principles of ‘Active Design’. This is not just limited to delivering opportunities for sport and formal exercise, but rather seeks to facilitate physical activity through all aspects of place making and design.’</u></p> <p>To guide the Development Management process specifically, it is proposed that additional text is also added to the supporting text of policies DAA and S5 endorsing the principles of Active Design to facilitate the creation of active environments. Further detail is set out below against the respective representation.</p>	
19EA Gurnell Leisure Centre (208)	The proposed use indicates a leisure-led scheme encompassing indoor and outdoor facilities, with enabling	The need to ensure that decisions taken around the replacement/loss of facilities are underpinned by robust evidence of supply	Sport England’s policy and the NPPF does not allow any development on sports facilities. While the

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	<p>residential use. Any replacement or loss of the playing field and leisure centre would need to align with Sport England Policy and NPPF, paragraph 103, for this allocation to be sound. This should be made clear in the document. The provision for sport and physical activity on the site should be backed up by up-to-date evidence to determine strategic need. Sport England considers that any loss, including part of the open space land for sport and recreation should not be lost to residential development.</p>	<p>and demand is accepted, as per paragraph 103 of the NPPF and clause C of London Plan policy S5.</p> <p>As with other policy areas, the Council has made a conscious effort to avoid repeating those provisions in our own Local Plan, as this is deemed to be unnecessary and potentially unhelpful, and future development proposals will continue to be tested against these policy provisions.</p> <p>To provide further comfort however it is recommended that a new bullet point is inserted at the outset of the Design Principles which references Sport England's Playing Fields Policy, as follows:</p> <ul style="list-style-type: none"> • <u>'All proposals will need to be assessed and guided by Sport England's playing fields policy.'</u> <p>The preparation of this allocation itself has been informed by local evidence, namely The Ealing Sports Facility Strategy 2022-2031. This strategy identifies the importance of a replacement facility at Gurnell to meet both existing latent demand and potential future demand for swimming facilities within the Borough. The strategy</p>	<p>current application contains enabling development this is mostly off the playing field, therefore if this scheme were to change, any enabling development would need to still comply with paragraph 103 of the NPPF and Sport England's Playing Fields Policy.</p> <p>Can the wording be amended to reflect this in line with policy.</p> <p>The last bullet point addition to <i>19EA Gurnell Lesure Centre</i> refers to usable playing pitch but it should be usable playing field that should be protected as playing pitches could change over time. Again, noting the wording in the NPPF, paragraph 104, which refers to playing fields and not playing pitches.</p>

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		<p>recognises that a new Gurnell Leisure Centre will not just be a local asset but also a regionally significant facility through the provision of a 50m pool.</p> <p>The allocation establishes the need for the wider enhancement of the outdoor offer on the site, but doesn't specify in detail what that will comprise at this stage as this would be a matter which would need to be considered at the point that an application is submitted. The Facilities Strategy advises that as part of a wider feasibility study for the replacement of the leisure centre, it will be necessary to investigate the outdoor sports pitch needs on the site.</p> <p>It is noted that presently there are two playing pitches on the site that have not been used since the closure of the leisure centre in 2020. Prior to the closure of the leisure centre the pitches were used for two seasons each week by a Brent football club and a local school. Since the closure, the football club has maintained a home ground in Wembley and the school now uses the Perivale Park pitches. The strategy not to re-provide the pitches as reflected through the pending planning application has previously been discussed with Sport England. This</p>	

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		<p>position was informed by a number of factors including the availability of the grass and artificial grass pitch facilities close by and the ability of these facilities to meet future demand from local sports clubs. This grass space is not considered to be suitable for other grass pitch sports either, including rugby, cricket and hockey. Not re-providing these pitches allow this space to be used for a wider range of informal recreation uses including play, and the loss of the grass pitches should be weighed in the round considering the full package of indoor and outdoor facilities proposed for this site.</p> <p>As for other similar allocations it may be appropriate to include a cross reference to the Sports Facilities Strategy and future updates under the Design Principles Section, to ensure that proposals have regard to the latest strategic evidence.</p> <p>The following addition is suggested to the first design principle:</p> <ul style="list-style-type: none"> • <i><u>‘Secure a replacement leisure centre and associated outdoor leisure facilities informed by the latest evidence of need as detailed in the Council’s Sports Facilities Strategy and future updates.</u></i> 	

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		<p><i>Some enabling development will be considered if needed to help fund this.'</i></p> <p>Recognising the strong wish to minimise any encroachment onto areas of usable playing pitch, the following addition is proposed at the end of new bullet eight as follows: <i>Built footprint is to principally focus on the existing previously developed land, whilst ensuring the arrangement and form of blocks avoids introducing a hard edge/barrier between Ruislip Road East and the parkland to the north. <u>Proposals should avoid impinging on usable playing fields, through direct encroachment or through prejudicing the ability to access, use and maintain the space.</u></i></p>	
21EA Former Barclays Sports Ground (212)	The proposed use is stated Leisure-led scheme with enabling residential use and facilitating access to sports and play pitches. The residential use must not result in the net loss of playing field or impact the usability of the playing field, i.e. remove ancillary facilities, for the allocation to align with the NPPF, paragraph 103, and Sport England's Playing Field Policy. Sport England is also concerned with the description of	<p>As existing, the site accommodates a disused pavilion/club house in the north-west corner of the site. The reference to 'ancillary' contained in the existing text refers to the current use, and specifically the pavilion/club house buildings which originally comprised ancillary changing facilities etc.</p> <p>The overriding objective for this site is to secure its future use for outdoor sports. To this end, whilst the text envisages that some</p>	<p>Sport England accepts this response but would like to add reference to the Ealing Indoor and Outdoor Sports Facility Strategy as there is reference to the protection of playing fields on this site.</p> <p>Sport England object to the suggested bullets for both policies in respect of</p>

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	<p>'leisure' which could be construed far wider than sport development therefore it considers that more clarity should be provided. Sport England are supportive of the use of the Sports Facilities Strategy to indicate the strategic need of sports such as hockey provision and football and cricket on the site.</p>	<p>enabling development may be necessary, the allocation is clear that this must be managed carefully, and it establishes key principles and parameters which must be satisfied where an applicant is seeking to make the case for enabling works.</p> <p>In order to correctly position the principal use alongside any secondary supporting elements, it is recommended that the 'Proposed Use' text is rearranged giving greatest emphasis to the use of the site as an outdoor sports facility. The amended text would read as follows:</p> <p>PROPOSED USE 'Leisure-led scheme with enabling residential use and facilitating access to sports and play pitches. Sport-led scheme with enhanced community access, supported by enabling residential use as needed.'</p> <p>The design principles clarify that priority is given to outdoor sport activities, and to avoid fixing uses at this stage, it directs applicants to have regard to the latest Sports Facilities Strategy and updates.</p> <p>The following addition is suggested to the first design principle:</p>	<p>the enabling residential development. Residential development that results in the loss of playing field and/or sport facilities would be contrary to our Playing Fields Policy and the NPPF, paragraph 104 (previously 103).</p> <p>If the references to enabling development are removed or its clearly specified that the residential development shall be on non-playing field or non-sport facility land then this should address this issue.</p> <p>The following text for bullet 4 is suggested: "<i>The proposed housing mix (or any proposed non-sport facility development) should represent the optimum one from the perspective of avoiding the loss of useable or potentially useable playing field, whilst maximising the genuinely affordable offer.</i>"</p>

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		<ul style="list-style-type: none"> • <i>'Secure replacement supporting ancillary sports facilities and enable enhancements to the wider sports ground, including securing community access, <u>informed by the latest evidence of need as detailed in the Council's Sports Facilities Strategy and future updates.</u> Some enabling residential development is foreseen as necessary'</i> <p>The distinction between 'leisure' and 'sports' is recognised, and in this instance emphasis should be placed on securing sports facilities. It is suggested therefore that all references to 'leisure' are replaced with 'sports'.</p> <p>The third and fourth 'design principle' has been amended further to assist in understanding what might qualify as enabling development – this is with the intention of minimising or capping the quantum of enabling development. The fifth bullet point is clear that built development should be focused around the existing previously developed land and should</p>	

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		<p>minimise encroachment into usable green space used for sports.</p> <p>In addition, it is noted that the third bullet point under 'Design Principles' references 'the delivery of the replacement leisure centre'. This should be corrected to refer to 'outdoor sports facilities'. The amended text for the third and fourth design principles would read as follows:</p> <ul style="list-style-type: none"> "Limit the quantum of residential development to the amount absolutely necessary to financially secure the delivery of the replacement leisure centre and limit the amount of development on open space. The quantum of facilitating residential development should be no more than is necessary to financially secure the delivery of sports facilities within the allocation site and across the wider sports ground and to optimise the quantum of genuinely affordable housing secured through the development." <p>The fourth 'design principle' is also proposed to be amended as follows:</p>	

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		<ul style="list-style-type: none"> <i><u>“Ensure that an optimised housing mix includes the maximum amount of genuinely affordable housing that is possible within scheme viability. The proposed housing mix (or any proposed non-sport facility development) should represent the optimum one from the perspective of avoiding the loss of useable or potentially useable playing field, whilst maximising the genuinely affordable offer.”</u></i> 	
23EA Old Actonians Sports Ground (216)	<p>Sport England objects to the loss of any of this site to residential development. Allocating any portion of this site for residential redevelopment would not be in line with the NPPF paragraph 103 or Sport England’s Playing Fields Policy. Sport England does note that the allocation refers to the retention of green space but while a playing field could be considered green space not all green spaces are playing field therefore the wording of the allocation represents a loss of provision. Part of the site is to be allocated for residential development to subsidise the refurbishment. It should be</p>	<p>The need to ensure that decisions taken around the replacement/loss of facilities are underpinned by robust evidence of supply and demand is accepted, as per paragraph 103 of the NPPF and clause C of London Plan policy S5. Despite the reference to residential development, the driver for allocating the site is not to unlock land for housing. The overriding objective instead is to secure the long-term future of this site for outdoor sports. To this end the allocation is clear that any development must not reduce sport and recreation capacity and where possible increase the amount of usable pitch/court space. With regard to the latter,</p>	<p>Sport England accept this response with the change made to replace the second reference to leisure with ‘sport and recreation’</p> <p>Again, this should refer to the Ealing Indoor and Outdoor Sports Facility Strategy so that any development on this site ensures the protection of facility space and playing fields.</p> <p>Sport England object to the suggested bullets for</p>

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	<p>made clear in this policy that any development should accord with paragraph 103 of the NPPF and Sport England's playing fields policy.</p>	<p>the allocation promotes the consolidation/rationalisation of existing buildings, with the aim of increasing the area of the site which is usable as pitch/court space.</p> <p>In order to correctly position the principal use alongside any secondary supporting elements, it is recommended that the 'Proposed Use' text is rearranged giving greatest emphasis to the use of the site as an outdoor sports facility.</p> <p>As per other allocations the distinction between 'leisure' and 'sports' is recognised, and in this instance emphasis should be placed on securing sports facilities. It is suggested therefore that all references to 'leisure' are replaced with 'sports'.</p> <p>It is noted that the fourth bullet point under 'Design Principles' references '<i>the delivery of the replacement leisure centre</i>'. This should be corrected to refer to '<i>outdoor sports facilities</i>' instead.</p> <p>To this end the following amendments are suggested:</p>	<p>both policies in respect of the enabling residential development. Residential development that results in the loss of playing field and/or sport facilities would be contrary to our Playing Fields Policy and the NPPF, paragraph 104 (previously 103). In relation to the 23EA, the reference to enhance the outdoor sports offer is noted however the national policy states quantity and quality, therefore the amount of outdoor sport facilities should be protected as well as the quality. If the references to enabling development are removed or its clearly specified that the residential development shall be on non-playing field or non-sport facility land then this should address this issue.</p> <p>The following text is suggested under the design principles:</p> <ul style="list-style-type: none"> • <i>Ensure that development</i>

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		<p>Under 'Proposed Use' - Enabling residential development with retention of green space to support improved leisure/sports facilities (primary use). <u>Enhanced outdoor sports facility, supported by enabling residential use as needed.</u></p> <p>Under 'Key Infrastructure Requirements' - Sport, leisure and recreational facilities. Greening and biodiversity measures.</p> <p>Under 'Design Principles' –</p> <ul style="list-style-type: none"> • Ensure that development proposals support the overriding objective to enhance the outdoor leisure<u>sports</u> offer, minimise the reduction of any usable recreation space protect the quantity of playing field and other needed sport facilities and secure the long-term future of these activities. • It is anticipated that some enabling residential development alongside any built leisure<u>sports</u> facilities will be necessary to cross-subsidise the enhancements to the leisure<u>sports</u> offer. • Ensure any built sports<u>leisure</u> facilities are<u>is</u> principally geared to serving the need for outdoor sport <u>leisure</u> activities and appropriately sized relative to this need, with some indoor facilities 	<p>proposals support the overriding objective to enhance the outdoor sports offer, protect the quantity of playing field and other needed sport facilities and secure the long-term future of these activities.</p> <ul style="list-style-type: none"> • It is anticipated that some enabling residential development alongside any built sports facilities will be necessary to cross-subsidise the enhancements to the sports offer. • Ensure any built sports facilities are principally geared to serving the need for outdoor sport activities and appropriately sized relative to this need, with some indoor facilities

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		<p><i>supported where these are shown to be meet a need, are modestly sized, and complement rather than compromise the outdoor sportleisure offer. <u>Proposals should be informed by the latest evidence of need as detailed in the Council's Sports Facilities Strategy and future updates</u></i></p> <ul style="list-style-type: none"> • <i>Limit the quantum of residential development to the amount absolutely necessary to financially secure the delivery of the replacement leisure centre <u>outdoor sports facilities</u> and limit the amount of development on open space.</i> • <i>Locate replacement leisuresports buildings and associated enabling residential development along the southern edge of the site, effectively extending the building line from 162–198 Popes Lane <u>but without reducing the sport facilities needed on the site.</u></i> 	<p><i>supported where these are shown to be meet a need, are modestly sized, and complement rather than compromise the outdoor sport offer. Proposals should be informed by the latest evidence of need as detailed in the Council's Sports Facilities Strategy and future updates</i></p> <ul style="list-style-type: none"> • <i>Limit the quantum of residential development to the amount absolutely necessary to financially secure the delivery of the outdoor sports facilities.</i> • <i>Locate replacement sports buildings and associated enabling residential development along the southern edge of the site, effectively extending the</i>

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			<i>building line from 162–198 Popes Lane but without reducing the sport facilities needed on the site.”</i>
05HA Marshall Site, Gold’s Gym & Garages on Montague Avenue (292)	The allocation states a proposed residential-led, mixed use scheme. A replacement gym, therefore, could arguably be considered to fall into the ‘mixed use’ element stated but to ensure that the allocation is sound Sport England recommends that the allocation makes clear that any replacement gym should be of equivalent size and quality as the existing facility otherwise the allocation may not be compliant with national policy unless the gym has been strategically identified as surplus to the local or wider borough needs.	<p>It is agreed that the allocation would benefit from more explicit reference to leisure/sport uses forming part of the ‘Proposed Use’. It is suggested that this be amended to read as: <i>‘Residential-led, mixed scheme including leisure/sport and community use’</i>.</p> <p>In a Development Management context the existing London Plan policy S5 clause C already helpfully outlines key tests for managing any change in provision, similarly advising that any replacement provision should be equivalent or better in terms of quantity and quality.</p> <p>The site is already subject to various planning applications, including a proposal (215983FUL) to extend above the gym creating new residential accommodation, which has been approved pending the legal agreement being signed. The existing gym at</p>	Sport England accept this response.

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		ground and first floor level is to be retained as part of this scheme.	
04NO Northolt Driving Range (330)	Sport England objects to the loss of the Boxing club/gym and driving range as it is not clear from evidence that these are surplus to borough wide needs and, therefore, this allocation would not be compliant with paragraph 103 of the NPPF or Sport England's Playing Fields Policy. Even if the site is not in active use, the lack of use should not be taken as necessarily indicating an absence of need in an area. Sport England would like to see wording in this policy to indicate that alternative sports and recreation provision in a suitable location of equal or better provision in terms of quality and quantity is delivered or strategic evidence is demonstrated to show that the golf driving range is surplus to current and future local need.	<p>This site originally accommodated a 38-bay floodlit driving range and golf shop which closed over 10 years ago. The buildings containing the earlier golf shop have reverted to a health and fitness facility (Pure Gym), with the driving range largely remaining unused save for some limited use for open storage on an ad hoc basis.</p> <p>The Ealing Sports Facility Strategy 2022-2031 identified that there is only one formal practice facility operating in Ealing at present, which is the floodlit 26 bay driving range at West London Golf Centre also located in Northolt but further west of the allocation site. However, there are additional practice facilities at a number of golf courses in the borough comprising practice putting and chipping greens and practice areas. In addition, a new golf course has opened very recently in Northolt on Wood End Road.</p> <p>Whilst the strategy seeks to maintain a core supply of golf facilities in the borough, this is not contingent on the retention of the allocation site for golf. The strategy advises that it would be appropriate to consider</p>	Sport England accepts this with the wording at the end amended to 'Employment led, mixed use including sport use'

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		<p>alternative outdoor sports and recreational facility options for the allocation site, that complement the adjacent outdoor facilities at Rectory Park and Northala Fields. To reflect specific needs this might also be extended to include consideration of indoor sports facilities as well.</p> <p>Regarding the existing indoor facilities Pure Gym operate three affordable 24/7 membership based sites in the borough, with the Northolt site comprising a 220 station gym, one of the larger health and fitness facilities in the borough. The retention/reprovision of the gym on-site is supported. Whilst the allocation references 'mixed-use' as part of the proposed use, and this would include leisure/sports uses, it is accepted that the allocation text should be amended to specify leisure/sports uses as a proposed use.</p> <p>It is suggested that this be amended to read as: <i>'Employment-led, mixed scheme including leisure/sport use'</i>.</p>	

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04SO Southall West London College (416)	<p>The allocation suggests that the sports centre will not be retained. As stated in the NPPF, paragraph 103, and Sport England's Policy, a sports facility can only be lost if there is updated evidence to show that the site is surplus to requirements. There is no reference to the sports centre in the updated Sport Facility Strategy. There is no indication from policy that a replacement leisure centre will be delivered in an appropriate location with equal or better quality and quantity. The policy also doesn't reference the new Built Facilities Strategy or policy S5 Sports and Recreation. This should all be referenced to protect the use of sport and physical activity centres in the area.</p>	<p>Southall Sport Centre closed at the end of March 2022, following the decision of the West London College to reclaim their campus. The Ealing Sports Facility Strategy 2022-2031 factored for this loss when assessing need for sports halls as part of the FPM analysis. The strategy identified that demand for sports halls is high in Southall with unmet demand equating to three courts. Recognising this need the Council are currently in discussions with another developer in the locality with the aim to secure a replacement facility which will have a sports hall, gym, women only gym and studio space close to the original location of the college.</p> <p>Whilst the reference in the allocation to 'community uses' is intended to also encapsulate leisure/sport uses, it is accepted that the allocation might benefit from more explicit reference to leisure/sport uses forming part of the 'Proposed Use'. It is suggested that this be amended to read as: <i>'Residential, education, community and leisure/sport use'</i>.</p>	<p>As above, Sport England would accept this with the wording changed to 'Residential, education, community and sport use'</p>

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		<p>In a DM context the existing London Plan policy S5 clause C already helpfully outlines key tests for managing any change in provision, similarly advising that any replacement provision should be equivalent or better in terms of quantity and quality. It is not deemed necessary to repeat this policy or the local variation in the allocation itself.</p>	
<p>16SO Warren Farm and Imperial College Land (440)</p>	<p>Sport England support this site's allocation for outdoor sports facility but has concerns regarding the location of the nature reserve and any loss of existing playing fields. There is also reference to relevant national and local policy in addition to information relevant in the Sports Facility Strategy. Sport England is concerned about the sites loss of playing field for alternative uses. The policy must comply with paragraph 103 of the NPPF and Sport England's Playing Field Policy.</p>	<p>It should be noted that the site boundary has been extended between Regulation 18 and Regulation 19 to now also encompass land owned by Imperial College to the north. This extension should allow the site to accommodate a nature reserve without compromising the outdoor sports offer. Guided by ecological assessments it is now proposed that the new pitches are located on the Imperial College side, with the remainder of the site (the entirety of the existing green space at Warren Farm Sports Ground) being rewilded. An indicative masterplan for the new sports facilities was shared at a Cabinet meeting on the 6th March 2024, but the exact provision is to be decided once a development partner / operator has been selected.</p>	<p>Sport England accepts this response</p>

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18SO Golf Link Estates (444)	<p>The protection of the existing Birkdale Court Outdoor Sports Facility and open space must be mentioned in the policy and any residential infill does not reduce the amount of playing field and sport facility provision on the site. The policy must comply with paragraph 103 of the NPPF and Sport England Playing Fields Policy.</p>	<p>The open space currently comprises a small children's play area and communal amenity space serving the adjacent residential properties. The space is not managed formally for sports, and therefore has been mislabelled, and will need to be corrected.</p> <p>It is suggested that the text under 'Current Uses' is amended as follows: 'Golf Links housing estate, as well as Birkdale Court Outdoor Sports facility and open space.'</p> <p>Notwithstanding this error, the open space remains a valuable asset for recreation. Whilst it is envisaged that such space may ultimately be reconfigured, the design principles written into the allocation already provide a clear steer that any future development should seek to create more open space and play areas within the estate.</p>	<p>Sport England accept this response.</p>
Policy G4 Open Space (470)	<p>Sport England would like to see a link between Policy G4 and Policy S5. This policy should indicate that playing fields function for sport should also be protected under this policy.</p>	<p>Policy G4 is considered to be comprehensive covering the full range of green space types with reference to the main functions (including recreation) and the full set of designations. This policy suite encapsulates all existing outdoor leisure and sports facilities.</p>	<p>Sport England accepts this additional wording to include 'outdoor leisure and sports facilities'</p>

Reference	Summary of issues	Ealing response (31/10/2024, 06/03/2025 & 10/04/2025)	Sport England response (12/09/2024, 22/01/2025 & 04/04/2025)
Policy S5 Sports and Recreation Facilities (472)	<ul style="list-style-type: none"> Paragraph 5.44 – Sport England would like to see revised wording for this as it currently is not considered in line with national policy. Indoor and outdoor sport facilities should be protected regardless of if they are active or not. The loss of any sport provision should be retained unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or, the loss would result in alternative sports and recreation provision in a suitable location of equal or better provision in terms of quality and quantity; or, the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. Sport England considers that a lack of use of a playing field should not be taken as necessarily indicating an absence of need in an area. Such land can retain the potential to provide playing pitches to meet current or future needs in the local area. Any loss of sport provision should be guided by the Council’s Indoor and Outdoor Sports Facility Strategy. Policy S5 F. Sport England would recommend that affordable community 	<p>The need to ensure that decisions taken around the replacement/loss of facilities are underpinned by robust evidence of supply and demand is accepted, as per paragraph 103 of the NPPF and clause C of London Plan policy S5.</p> <p>As with other policy areas, the Council has made a conscious effort to avoid repeating those provisions in our own Local Plan, as this is deemed to be unnecessary and potential unhelpful, and future development proposals will continue to be tested against these provisions.</p> <p>It is accepted that paragraph 5.44 should be amended to ensure that redundant facilities also fall within the definition as well.</p> <p>It is suggested that the text be amended as follows:</p> <p><i>5.44 – Sports facilities include all indoor or built provision, and also any existing fields or external spaces which are <u>or were</u> in active use or identified as being in use for sporting activities’.</i></p> <p>It is accepted that where reference is made to ‘need’ that this should be based on an</p>	Sport England accepts this response to policy S5

Reference	Summary of issues	Ealing response (31/10/2024, 06/03/2025 & 10/04/2025)	Sport England response (12/09/2024, 22/01/2025 & 04/04/2025)
	<p>access is secured through Community Use Agreements or another legally enforceable mechanism.</p>	<p>understanding of existing and future needs as established at the time of the application.</p> <p>Amendments are proposed as follows: <i>'5.45 – Ealing’s Sports Facilities Strategy and current Sport England guidance emphasise that the provision of sports facilities is primarily a consideration of the quality of provision relative to its usage, rather than capitated provision targets. As a result, sufficient provision of sports facilities must be evaluated against <u>a the current context understanding of existing and future needs and provision at the time of the application.</u></i></p> <p><i>'5.46 - On-site provision will not normally be sought in developments of less than 300 residential units, but must in all cases form the best type of provision based upon <u>current needsan understanding of need (existing and future) as established within the Sports Facilities Strategy and any future updates.</u></i></p> <p>The policy itself doesn't specify the mechanism for securing community access, but Community Use Agreements are used in practice in Ealing.</p>	

Reference	Summary of issues	Ealing response (31/10/2024, 06/03/2025 & 10/04/2025)	Sport England response (12/09/2024, 22/01/2025 & 04/04/2025)
		<p>As detailed above various additions have been proposed to the supporting text of the spatial policies in chapter 3 supporting the creation of active environments through the application of Active Design principles. To guide the Development Management process specifically, it is proposed that additional text is also added to the supporting text of policies DAA and S5 endorsing these principles.</p> <p>The following revisions (underlined for emphasis here) are proposed under policy DAA as follows:</p> <p><i>'5.7 - High quality design is that which successfully resolves otherwise competing needs of the scheme and its surroundings. This includes coherent development of the site so that the scheme as a whole is physically accessible and visually legible regardless of whether development has occurred at different times, and an appropriate level of development that complements the local context, including relevant policy designations, in massing and the extent of site coverage. <u>Development proposals should also reflect the strategic design principles of 20 minute neighbourhoods and active environments in</u></i></p>	

Reference	Summary of issues	Ealing response (31/10/2024, 06/03/2025 & 10/04/2025)	Sport England response (12/09/2024, 22/01/2025 & 04/04/2025)
		<p><i><u>planning for active design.</u> Good design also means the use of high-quality materials and components, and that extensions to existing buildings ensure that the new development as a whole meets current design standards.'</i></p> <p>Recognising the evolving nature of guidance and best practice over the life of a Local Plan, it is suggested that reference to specific design based guidance and tools are included in the Council's web-based Local Planning Practice Guidance. The intention is to include reference to the latest Active Design guidance and checklist here. Reflecting this position a new paragraph under policy DAA is proposed as follows:</p> <p><i><u>'5.12 - Useful guidance on design is constantly being prepared and updated by the Council and by other expert bodies. References to best practice guidance will be included in the web-based LPPG to ensure that it remains up to date over the lifetime of the plan.'</u></i></p> <p>The following addition is proposed after paragraph 5.47 under policy S5:</p>	

Reference	Summary of issues	Ealing response (31/10/2024, 06/03/2025 & 10/04/2025)	Sport England response (12/09/2024, 22/01/2025 & 04/04/2025)
		<u>'This policy also supports the wider objective of creating active environments, and proposals should therefore be assessed against Active Design principles.'</u>	

V. 2.4

Name: Steve Barton, Strategic Planning Manager

Signed: *Steve Barton*

Date: 8th May 2025

On behalf of Ealing Council

Name: Mark Furnish, Planning Manager

Signed: *Mark Furnish*

Date: 21st May 2025

On behalf of Sport England