

Written statements relating to Ealing Local Plan regulation 22 examination hearing sessions in block 2

– Cllr Jon Ball, Deputy Leader of the Liberal Democrat Group and opposition spokesperson on housing, development, the local plan and licensing

Matter 6 - Design and amenity, tall buildings, and the historic environment

Tall Buildings

While we welcome the introduction of threshold heights, Policy D9 and table DMP1 do not set an overall height limit for buildings which could be built across the borough and some of the thresholds are excessively tall, for instance 21 storeys in parts of Ealing. This is regrettable as increasingly tall built and proposed buildings are excessively tall for their respective areas and are alienating residents. This is at odds with Ealing Council's stated aim of being carbon neutral by 2030 as high rise has a higher carbon impact than the same number of units of midrise.

Historic Environment

We do not feel that threats to the settings of the listed buildings in the town centres by proposed development are sufficiently articulated in the plan.

Matter 7 - Climate change, the environment and healthy places

Climate Change

We find the lack of specificity on carbon offset payments unclear. This is especially relevant in buildings which are over six storeys high (tall buildings), which by their very nature are not and cannot be carbon neutral but are carbon intensive.

The embedded carbon in existing buildings being demolished in order to enable development should be factored into the overall carbon footprint of a development.

The climate change policy SP2 should be expanded to more urgently encourage transition to more carbon neutral transport modes including the use of electric vehicles and walking with associated infrastructure by modifying paragraphs in this policy as follows:

In B. (vii) to require that on-street EV charging points are low cost, as some of those currently being installed by Ealing Council are several multiples of the cost of charging at home.

Add support for ramps or channels across pavements to allow residents who do not have off-street parking to charge electric vehicles from their domestic electricity supply at low cost.

Add the introduction of welcoming green corridors to encourage walkers.

Matter 8- Town plans

Town Plan Visions and Spatial Strategies

The vague words used to identify levels of growth in each town are too open to interpretation to be sound.

Perhaps more fundamentally, the division of Ealing Borough into “seven towns” is a political concept rather than an undisputed fact. The reality is that a number of areas not identified as towns – West Ealing, Northfields, Norwood Green and so on – have just as much of a specific identity within the borough as Perivale or Northolt, and that the larger identified towns are actually not at all cohesive. In the extreme case, West Twyford and Northfields have nothing in common with each other than being within the same borough but are both regarded as part of the town of Ealing for the purposes of this plan. There are also some ‘towns’ which cross borough boundaries such as Park Royal (recognised by OPDC but the part within our borough is treated as parts of Acton and Ealing in this plan) and Chiswick (recognised by LB Hounslow as a town within its borough but the approximately one third of Chiswick that lies within LB Ealing is treated as part of Acton in this plan).

Matter 9 - Development Sites

Town Plan Development Site Allocations – general

There is a general lack of imagination on identifying development sites outside Ealing, Acton and Southall but we are not allowed to look at omission sites!

Site specific questions

Ealing Development Sites

21EA - Former Barclays Sports Ground

Any enabling residential development should be limited to the existing built footprint. The paragraph under ‘design principles’ for this site that covers that is unhelpfully ambiguous as it both states that development should be “located on the site of the existing club house building and immediate hardstanding only” but also that it should be focussed “around the existing previously developed land and minimise encroachment into usable green space”. We prefer the more specific wording.

We warmly welcome hockey provision on this site but query the wording “potentially linked to the existing facilities at St Augustine’s via combined facilities” as unnecessarily prescriptive. The site is between two schools and linking facilities with those at Ada Lovelace is at least equally desirable.

Specific evidence in the sports facility strategy is cited for hockey use but not for football pitches which are not underprovided to the same extent in the locality and borough. Football therefore should not be included in this site brief.

We feel that the assumption that there will need to be a “quantum of residential development” is flawed as it is possible to develop hockey use on the site funded by national sports funding sources rather than via enabling development. The very special circumstances required to justify development on MOL that is not directly ancillary to a sporting use have not been set out here and so the reference to housing is unsound. While enabling development could take place entirely outside the MOL, due to the proposed removal of the former clubhouse site from MOL20 shown in Map 35 in the Atlas of Change, this is itself unsound because removing the clubhouse from MOL would make it very difficult to resist a freestanding residential development on the former clubhouse site alone. This could be applied for without any hockey development on the remaining MOL within 21EA, and the landowner could continue to landbank the MOL portion of the site.

24EA - Wickes, South Ealing Road

Retail should be required along the South Ealing Road frontage of the site to enhance the South Ealing local shopping offering by the parade opposite and avoid the neighbouring Co-Op supermarket being entirely surrounded by residential.

Northolt Development Sites

09NO - Kingdom Workshop, Sharvel Road

While we recognise that there is a need for six additional permanent traveller pitches in the borough, we question the soundness of the selection of this particular site for this purpose. It threatens the economic viability of Down Barns Farm of which it is a part, and is close to residential streets, which has the potential to lead to tensions between the traveling and settled community.

In addition, there is clear unmet need for traveller transit pitches as well as permanent pitches. The rejection of the need for transit facilities in the Gypsy and Traveller Pitch Provision Site Assessment was inconsistent with the evidence that there are frequent unauthorised traveller encampments in the Borough, clearly indicating an unmet transit need.

Southall Development Sites

11SO - The Green Quarter (Southall Gasworks)

As this is such a huge project that will take many years to build out, it is essential that the phasing of development is tightened up to ensure that more retail and leisure offerings and the school are available within a reasonable time period for the thousands

of new residents who are moving in. This has been a problem in the early phases so would be well worth stating as a design principle for the benefit of current and future residents of the Green Quarter.

16SO Warren Farm and Imperial College Land

During the decade since it was closed for sporting use, Warren Farm rewilded into an informal nature reserve, providing acid grassland habitat supporting many rare species of birds, insects and plants. We strongly object to any development which would threaten this nature reserve, that is anything beyond the required minor development to formalise the Nature Reserve use, for example a visitor centre. In response to pressure from local campaigners and the Opposition, Ealing Council's Cabinet agreed the following resolutions at their meeting on 6th March 2024, after the publication of this Reg 19 consultation:

"I. Agreed that the entirety of the existing green space at Warren Farm Sports Ground is retained and enhanced for the purposes of nature, rewilding and biodiversity.

II. Delegated authority to the Strategic Director of Economy and Sustainability to apply to Natural England with updated plans to designate the entirety of the Warren Farm Sports Ground (in red) as a Local Nature Reserve in accordance with sections 19 and 21 of the National Parks and Access to Countryside Act 1949 (as amended) in collaboration with local user groups to safeguard the land for future generations"

The plan should be further modified to reflect the local authority's determined purpose for the entirety of the Warren Farm part of this site allocation as an official Local Nature Reserve, with the sporting facilities being constructed on the much less environmentally important Imperial College land.