

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

6th May 2025

Dear sir / Madam

Please find below my representation regarding the proposed Metropolitan Open Land (MOL) boundary changes and residential enabling development at Former 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?*

The London Borough of Ealing (LBE) lacks sufficient evidence to justify designating and altering the boundaries of the Metropolitan Open Land (MOL) that currently safeguards the former Barclays Sports Ground. For years, the ground thrived as a successful venue, hosting cricket, football, tennis, swimming, and other sports activities without the need for boundary redrawing or removal.

LBE asserts that a revised budget of approximately £3.5 million is required to implement the sports provisions. However, they claim that the only feasible way to generate this relatively modest budget is to de-designate a portion of the land for residential development. LBE has failed to present evidence of exploring alternative, less destructive funding models. Notably, the excellent sports facilities constructed in Gunnersbury Park were achieved without the need for a residential development within the park.

In 2016, LBE argued through their 'Schools DPD' that exceptional circumstances necessitated de-designating the South-West portion of the site. Less than a decade later, LBE has returned to attempt de-designating the North-West corner of the same site. At this pace, within 20 years, LBE will have accomplished its objective of de-designating the entire site, resulting in the permanent loss of another valuable piece of Ealing's green space.

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

Site-specific Questions - Question 10 - regarding 21EA:

40. Is the loss of Metropolitan Open Land Justified?

41: Is enabling development appropriate?

42. Will the site allocation be effective in securing appropriate community sports provision?

The lack of sufficient evidence to justify further loss of MOL at the site is evident. By LBE's own calculations, a budget of only £3.5 million is required to deliver the infrastructure and restore the sports ground to the community. This relatively small budget does not warrant the permanent loss of MOL or the construction of a housing development as the sole funding source. There is no indication that alternative funding models have been explored.

LBE's response in the Statement of Consultation Appendix spreadsheet - cell 1571, says: "In accordance with the New Local Plan's enabling development policy, any enabling development is proportional to the development being enabled". This ties the amount of enabling development to the amount of funding that is necessary to be raised.

The project's cost has been revised from £55m (pre-Reg 19 stage) to £3m - £3.5m (post - Reg19 stage). However, the scope and necessity of 'enabling development' and MOL loss are based on the original larger budget figures and have not been revised since the significant 15 times decrease in the necessary funding was discovered during the process.

It is feasible to implement a 'leisure-led scheme' within the current footprint of the clubhouse buildings, as suggested. No evidence to the contrary has been provided.

The 'Design principles' are overly vague, providing a blank canvas for any developer interested in the site. The document mentions 'limiting the quantum of residential development,' but lacks specific figures regarding the number of units or the scale of the development. To preserve the

openness of MOL, any development must be of a comparable size and scale to the existing clubhouse. Allowing residential development on the site sets a precedent and could potentially strengthen the argument for further de-designation and inappropriate development.

The majority of the site comprises open sports fields that can be easily returned to community use at minimal cost. They are currently unused due to the owner's hope that LBE will facilitate the de-designation of MOL, thereby removing protection from the site. The primary purpose of MOL is to safeguard our valuable green space from inappropriate development, not to simply landbank it for future development. Once green space is built, it is irreversibly lost. Therefore, there must be a compelling reason to lose green space; once it is developed, it is gone forever.

Thank you for your consideration in these matters

Yours sincerely

Daniel Hazan