

Beechcroft House Management (BHM)
47-49 Park View Road
Ealing
W5 2JF

11th of 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

Dear Inspectors,

Written Representation to Examination: Matters 3 and 9

MOL20 and Site 21EA (Barclays Sports Ground)

Beechcroft House Management (BHM) represents leaseholders residents of Beechcroft House, situated directly adjacent to Barclays Sports Ground (Site 21EA).

We submit our written representation on Ealing Council's New Local Plan - Examination stage (Reg 22), mostly concerned by the loss of MOL on part of MOL20 (Barclays Sports Ground) and the proposed residential development on the site (21EA). We find both proposals unsound, not compliant with NPPF, and not supported by the available evidence base. Our representations on Matters 3 and 9 overlap, and we respectfully request that they are given full consideration on each Matter separately.

Matter 3 - regarding MOL20

Matter 3 - 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?*

Our response.

A-1. Exceptional circumstances must be demonstrated for any MOL de-designation, according to NPPF 2023. This is reconfirmed by S22d - GLA/Ealing Statement of Common Ground - Reference "GB/MOL: *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.*"

A-2. EB96 - Green Belt and Metropolitan Open Land (MOL) Review Stage 1 attempted to demonstrate "exceptional circumstances" to de-designate several MOL sites including MOL20. Multiple submissions demonstrated the fact that that report was **unsound and irrational in law**.

A-3. At Reg 19 stage, Ealing Council dropped reliance on EB96. Instead it relies on the completely different and vastly shorter document EB95 - Green Belt and Metropolitan Open Land (MOL) Review Stage 2. In the section of EB95 devoted to MOL20, **no mention of exceptional circumstances, let alone any attempt to demonstrate such, is found**. No evidence base that would be required to establish such circumstances (such as in EB96) is referred to or given.

A-4. By comparison, regarding MOL de-designation of Gurnell Leisure Centre, EB96 employs a 4-stage evidence-based Alternative Sites Assessment, including a Capacity Study, whose conclusion was: *The ASA demonstrated that there are no other sites or combination of sites within the borough that are more suitable to deliver a new leisure centre and / or the requisite enabling residential development*. However, no such study/evidence base was presented for MOL20. That is, **EB96 itself establishes a standard of proof of exceptional circumstances which is evidently not met regarding MOL20**.

A-5. Instead, the proposal to de-designate part of MOL20 which is the surrounding of the existing Clubhouse is exclusively driven by the notion of development on "grey belt". This is confirmed by the Council's response Council's response S21 - cell 146 - to Alice Roberts: *"The main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt" category that should be considered for development."* However, EX2 confirms that examination is based on NPPF Dec 2023, which importantly has no reference to "grey belt", so **any "grey belt" argument alone is not compliant with regulations**.

A-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*". We note that MOL20, including the existing Clubhouse, is **not brownfield**. **No evidence** that Ealing Council has **exhausted brownfield alternatives** for enabling development is given.

A-7. Reg 19 documents represented a significantly inflated necessary funding of **£55m** to deliver sports pitches on the site (see EB84 - Stage 2 Ealing Infrastructure Delivery Schedule Report - 5. Infrastructure Delivery Schedule table - Entry: New outdoor and indoor sports facilities at the former Barclays Bank Sports Ground). These numbers were successfully challenged by the public. At Reg 22 stage we have the new figure, **reduced by more than 10-fold to £3m - £3.5m**, see the Council's response in S21 - cell 216 - to Mohammad Alrazad: "*The council ... have identified that the consultants produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m...*". Given the drastically reduced amount necessary funding, it becomes evident that alternative funding sources (not requiring enabling development / MOL de-designation) are possible. However, **alternative sources have not been examined or re-examined after the corrected estimates**, which means no exceptional circumstances have been demonstrated.

A-8. Council's response in S21 - cell 1571 - to Mike Straw says: "*In accordance with the New Local Plan's enabling development policy, any enabling development is proportional to the development being enabled*". The project's cost was revised from £55m (pre-Reg 19 stage) to £3m - £3.5m (post - Reg19 stage), but the scope of enabling development / MOL loss has not been revised accordingly, **inconsistent with the policy**.

A-9. According to EB84 - Stage 2 Ealing Infrastructure Delivery Schedule Report - 5. Infrastructure Delivery Schedule (table), 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.

Summary. For the proposal to de-designate part of MOL20 to be sound and compliant, there are two necessary conditions: exceptional circumstances must be proven, and all other brownfield sites and funding alternatives must be exhausted. **Neither of the two conditions are satisfied. The proposal to de-designate part of MOL20 is unsound.**

Required changes. The proposal to de-designate MOL20 must be removed from the Local Plan; **MOL20 must keep MOL status in its entirety.**

In EB84 - Stage 2 Ealing Infrastructure Delivery Schedule Report - 5. Infrastructure Delivery Schedule - Entry: New outdoor and indoor sports facilities at the former Barclays Bank Sports Ground - **estimated costs must be changed to the updated figure £3m - £3.5m** according to S21 - cell 216 - to Mohammad Alrazad.

We fully expect that the Planning Inspectors will agree. In the unlikely case they should not, we ask the following modifications to be added to the Local Plan, to keep the permanent loss from the de-designation of part of MOL20 to the minimum:

- 1 Only the footprint of the existing Clubhouse (not the surrounding area) on MOL20 must be allowed for de-designation.
- 2 Any residential development on the site must be strictly limited in dimensions to the dimensions of the existing Clubhouse, in particular, not exceed 3 storeys, and this should be fixed in the Site EA21 Design Principles.
- 3 Alternatively, site 21EA could be moved to the north-east corner of MOL20 where impact on MOL would be smaller due to proximity to North Circular Road, and the already existing high building in that location.

Matter 9 - regarding Site 21EA and MOL20

The following questions are closely related to each other. We give a common background which applies to each of the three questions, followed by shorter additional individual responses.

Matter 9 - Question 10 c, j, g: Boundaries and extent justified?, etc

Matter 9 - Question 40: Is the loss of MOL justified?

Matter 9 - Question 41: Is enabling development appropriate?

Background common to all questions. We raise the same points as were raised in Question 3, which we repeat for convenience because this is a separate Matter.

A-1. Exceptional circumstances must be demonstrated for any MOL de-designation, according to NPPF 2023. This is reconfirmed by S22d - GLA/Ealing Statement of Common Ground - Reference "GB/MOL: *"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."*

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A-4. By comparison, regarding MOL de-designation of Gurnell Leisure Centre, EB96 employs a 4-stage evidence-based Alternative Sites Assessment, including a Capacity Study, whose conclusion was: *The ASA demonstrated that there are no other sites or combination of sites within the borough that are more suitable to deliver a new leisure centre and / or the requisite enabling residential development*. However, no such study/evidence base was presented for MOL20. That is, **EB96 itself establishes a standard of proof of exceptional circumstances which is evidently not met regarding MOL20**.

A-5. Instead, the proposal to de-designate part of MOL20 which is the surrounding of the existing Clubhouse is exclusively driven by the notion of development on "grey belt". This is confirmed by the Council's response Council's response S21 - cell 146 - to Alice Roberts: *"The main boundary change is the removal of the MOL designation from the north-western corner of the site, which has been previously developed, and which falls under the government's "grey belt" category that should be considered for development."* However, EX2 confirms that examination is based on NPPF Dec 2023, which importantly has no reference to "grey belt", so **any "grey belt" argument alone is not compliant with regulations**.

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A-7. Reg 19 documents represented a significantly inflated necessary funding of **£55m** to deliver sports pitches on the site (see EB84 - Stage 2 Ealing Infrastructure Delivery Schedule Report - 5. Infrastructure Delivery Schedule table - Entry: New outdoor and indoor sports facilities at the former Barclays Bank Sports Ground). These numbers were successfully challenged by the public. At Reg 22 stage we have the new figure, **reduced 15-fold to £3m - £3.5m**, see the Council's response in S21 - cell 216 - to Mohammad Alrazad: *"The council ... have identified that the consultants produced these cost estimates used wrong assumptions in their calculations. Based on further work undertaken by the council, we believe a more realistic cost for a hockey facility (pitch(es) and pavilion) on the site is around £3m - £3.5m..."* Given the drastically reduced amount necessary funding, it becomes evident that alternative funding sources (not requiring enabling development / MOL de-designation) are possible. However, **alternative sources have not been examined or re-examined after the corrected estimates**, which means no exceptional circumstances have been demonstrated.

A-8. Council's response in S21 - cell 1571 - to Mike Straw says: *"In accordance with the New Local Plan's enabling development policy, any enabling development is proportional to the development being enabled"*. The project's cost was revised from £55m (pre-Reg 19 stage) to £3m - £3.5m (post - Reg19 stage), but the scope of enabling development / MOL loss has not been revised accordingly, **inconsistent with the policy**.

A-9. According to EB84 - Stage 2 Ealing Infrastructure Delivery Schedule Report - 5. Infrastructure Delivery Schedule (table), 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.

Our question-specific answers are:

Matter 9 - Question 10c: Boundaries and extent justified? No. The project's cost was revised from £55m (pre-Reg 19 stage) to £3m - £3.5m (post - Reg19 stage) but the de-designation of MOL / site scope was not revised accordingly, which inconsistent with the policy (see A-7, A-8). The site itself is not justified. (A-6, A-9).

Matter 9 - Question 40: Is the loss of MOL justified? No, not justified. Exceptional circumstances not demonstrated (A1-A9 above). Other brownfield sites and non-development funding alternatives have not been exhausted, especially given the 15x reduced costs (A6 - A9).

Matter 9 - Question 41: Is enabling development appropriate? No, not appropriate. The project's cost was revised from £55m (pre-Reg 19 stage) to £3m - £3.5m (post - Reg19 stage) but the appropriateness of enabling development has not been reassessed given the drastic cost reduction, and the fact that the revised lower costs could be funded by other means, see A-7,

A-8. Even without considering reduced costs, enabling development was not appropriate given the Council's low priority of the project (see A-9). No exceptional circumstances were demonstrated all of A1 - A9 above).

Required changes to make the Plan sound: Residential development on Site 21EA should be disallowed; the Council must explore alternative sources of funding the required £3m - £3.5m.

In EB84 - Stage 2 Ealing Infrastructure Delivery Schedule Report - 5. Infrastructure Delivery Schedule - Entry: New outdoor and indoor sports facilities at the former Barclays Bank Sports Ground - **estimated costs must be changed to the updated figure £3m - £3.5m** according to S21 - cell 216 - to Mohammad Alrazad.

We fully expect that the Planning Inspectors will agree. In the unlikely case they should not, we ask the following modifications to be added to the Local Plan, to keep the permanent loss from the de-designation of part of MOL20 to the minimum:

1. Only the footprint of the existing Clubhouse (not the surrounding area) on MOL20 must be allowed for de-designation and residential development on 21EA.
2. Any residential development on the site must be strictly limited in dimensions to the dimensions of the existing Clubhouse, in particular, not exceed 3 storeys, and this should be fixed in the Site EA21 description.
3. The third and the fourth bullet points in the Design Principles must be reverted to their original proposed form: *"Limit the quantum of residential development to the amount absolutely necessary to secure the delivery of replacement leisure centre and limit the amount of development on open space; Ensure that an optimised housing mix includes the maximum amount of affordable housing that is possible within scheme viability"*
4. Alternatively, site 21EA could be moved to the north-east corner of MOL20 where impact on MOL would be smaller due to proximity to North Circular Road, and the already existing high building in that location.

Matter 9 - Question 10 j. Building heights justification? No. Required changes to Site's Design Principles:

1. Any residential development on 21EA, if allowed (which we object to as being unsound) must be limited to the dimensions of the existing Clubhouse, in particular, to 3 storeys, see A7-A9.
2. The following must be added to Design Principles: "Any development must not affect southward views from Beechcroft House over Barclays Sports Ground", to protect MOL openness.
3. Alternatively, site 21EA could be moved to the north-east corner of MOL20 next to North Circular Road, where higher building height is more justified.

Matter 9 - Questions 10g. Technical constraints and mitigation? And o. viability and scale of development? Development of the allowed scale is excessive and (if allowed at all, which we object to as being unsound) must be kept within the dimensions of the existing Clubhouse. This is due to the reduced project costs (see A7-A8) and infrastructure constraints: local schools are oversubscribed; Park View Road has excessive traffic; which means only small-scale development is technically possible within infrastructure constraints. Required changes: Any residential development on 21EA, if allowed (which we object to as being unsound) must be limited to the dimensions of the existing Clubhouse, to ensure viability, and this must be recorded in the site's Design Principles.