



**Statement in connection with the
Independent Examination of Ealing Core Strategy DPD (DPD)**

Matter 9 – Protecting and Enhancing Ealing’s Green and Open Spaces

Submitted by Creffield Area Residents Association (CARA) - rep no.165

Introduction

1. The Creffield Area Residents Association (CARA) represents over 200 local residents of Acton and Ealing Common. CARA has been campaigning for a number of years to restore public access to the Twyford Avenue Sports Ground (TASG), a 24 acre area to the north of Twyford High School in Acton which is currently designated as Community Open Space. Most of TASG is owned and used by Wasps Rugby Club, while the rest comprises an adjoining 4 acre area with a pavilion, bowling green, cricket/football pitch and tennis courts.
2. CARA submitted its representations to the Ealing final draft DPD in November 2010 (rep no 165). A number of individual representations (from CARA members and others) were also submitted at this time. In total, over 100 of the 876 representations received in connection with the final draft DPD involved TASG¹ and all were broadly consistent with CARA's submissions. To CARA's knowledge, no contrary views regarding the future of TASG were submitted at any stage of the consultation process.
3. More recently, on 21 September 2011, CARA's representatives met Mr Ian Weake, the Council's Principal Planning Policy Officer, to establish specific areas of consensus and/or disagreement in relation to the latest version of the DPD.
4. CARA believes that policy 5.6 of the latest version of the DPD is unsound in a number of respects, in particular that it does not properly reflect the evidence base, and is not consistent with national policy.

General concerns

5. Based on the discussions at the meeting on 21 September, CARA is broadly supportive of policy 5.6 in so far as the borough's existing green spaces and outdoor playing fields will be protected and facilities improved in line with the sports "hub" and network concept set out in the DPD. For its part the Council recognises that some areas of deficiency need to be addressed, including the quantity of green and/or outdoor playing field space in Acton.

¹ See Submission Documents EAL 12(a) and 12(b) – Version 2, August 2011

6. However, CARA is deeply concerned that policy 5.6 (unlike eg policy 5.5) does not properly identify priorities for addressing the deficiencies in outdoor pitch space in Acton (which is a requirement of both PPG17² and Policy 2.18 section F, sub-paragraph b of the London Plan 2011).
7. CARA also believes that policy 5.6 focuses too much on the operational development of the sports “hub” facilities (and the potential contribution of developers), without acknowledging that the policy is not deliverable without proper protection for the borough’s green space and also greater community involvement in the management of the borough’s recreational activities.
8. The DPD covers the period up to 2026. While it is understandable that prominence is given to developments that are expected to take place in the reasonably near future, the document (and policy 5.6 in particular) must also ensure that longer-term opportunities are given appropriate priority. The London Plan 2011 requires that councils should “ensure that in and through DPD policies green infrastructure needs are planned and managed to realise the current and potential value of open space to communities” (emphasis added)³.
9. In short, CARA believes that policy 5.6 of the DPD does not currently reflect the significant strategic recreational opportunities that TASG offers to the local area (and the borough as a whole) and, by not providing for the continuation of SPD 6, undermines its future as a multi-sports outdoor facility, contrary to the Council’s stated intentions.

Evidence base

10. As a strategic document, the DPD should set a clear vision and objectives for the Borough’s future development⁴. As such, the document should be coherent and consistent, both in its own right and in the context of national and regional policy and the DPD’s supporting documents. Paragraph 4.20 of PPS 12 specifically requires the DPD to be transparent (so that decisions are made on the basis of clearly-stated facts and criteria). An effective consultation is fundamental to the process, so that the public is not simply given the opportunity to make objections but has its opinions integrated into the final document⁵. The draft National Planning Policy Framework reinforces this, stating for example that local plans “should empower local people to shape their surroundings” and “reflect the needs and priorities of their communities”⁶.
11. It is clear that there is a deficiency of green and outdoor playing pitch space in the Acton area. The Council’s draft Green Space Strategy states (beneath map 2) that “It is evident that some parts of the Borough have low provision of open space for residents. The east of the Borough, particularly Acton and Central Ealing has a very

² See eg paragraph 8 of PPG17

³ London Plan 2011, Policy 2.18 section F sub-paragraph c

⁴ PPS 12, paragraph 4.1

⁵ PPS 12, paragraph 2.2 provides succinctly that these strategic documents should “be based on the community’s views”

⁶ Draft National Planning Policy Framework, Introduction, paragraphs 3 and 5

low provision. Certain wards (Ealing Broadway and South Acton [*the ward in which TASG is situated*]) have extremely low provision of 0.5 hectares of open space per 1000 population. This equates to about one fifth of the NPFA standard of 2.4 hectares.”

12. In terms of outdoor pitch provision, Appendix 1 of the Playing Pitch and Outdoor Sports Strategy Plan 2007 (document BS8 in the Examination library) indicates that Acton has only 0.63 hectares of outdoor playing pitches per 1,000 of population, some 25% below the current borough average of 0.85 hectares.
13. Given the expected growth in population in Ealing (from 322,384 currently to 348,899 in 2026⁷) even with a target level of 0.82 hectares of outdoor playing pitch per 1,000 population, the area of outdoor playing pitches across the borough has to increase over the period covered by the DPD⁸. This is recognised in both the original Playing Pitch and Outdoor Sports Strategy Plan 2007⁹ and the latest March 2011 draft of the Outdoor Sports Facility Strategy¹⁰. However policy 5.6 is completely silent on this increase in space and the reality is that the policy is only deliverable if the existing amount of outdoor space is properly protected and/or access to it improved and incremental additions made. Although the Council acknowledges this (see paragraph 23 below), policy 5.6 as currently drafted only seeks to protect those sites of “strategic and local importance”. This contrasts with policy 3.5 of the current UDP which states clearly that “The Council will protect green space needed for playing fields and other recreational activities”. There is no reason why the DPD should not be equally unambiguous.
14. CARA believes that the decision to reduce Ealing’s outdoor playing pitch targets to below their existing levels is not just woefully unambitious but it is also inconsistent with the general strategy of the London Plan to “protect, promote, expand and manage London’s network of green infrastructure” (emphasis added)¹¹.
15. Moreover, while the new target is obviously easier to achieve than the NAPF standard, it does nothing to fulfil the Council’s obligations under the PPG 17 and the London Plan (as referred to in paragraph 6 above) to address the deficiencies identified.
16. In the previous draft of the DPD, specific reference was included to addressing deficiencies in certain areas of the borough, in particular, Acton and Southall¹². These references were omitted from the final draft of the DPD and despite CARA’s previous representations the Council has not (yet) considered it appropriate to reinstate the previous wording. The Council has also failed to provide any explanation in its response to CARA’s representations as to why these references were deleted.

⁷ Figures taken from Table 2 of the Council’s draft Green Space Strategy

⁸ Multiplying the current borough population of 322,384 by the current average of 0.85 hectares per 1,000 population gives a total of 274 hectares. Taking the estimated 2026 population of 348,899 and multiplying by the proposed level of 0.82 hectares per 1,000 population gives a total of 286 hectares

⁹ See eg page 13 identifying a deficit of 7.4 cricket pitches in the borough by 2017

¹⁰ This document identifies, for example, a potential shortfall of 25 football pitches and 6 rugby pitches by 2021

¹¹ See Policy 2.18 para A of the London Plan 2011

¹² See page 49 of the Development Strategy, Initial Proposals (September 2009)

17. One significant way to help address the deficiency of outdoor playing pitch strategy in Acton would be to include TASG on the list of strategic playing field sites which is set out on page 61 of the DPD. This list reflects the list of “strategic multi sport multi pitch priority sites” contained in the March 2011 draft of the Outdoor Sports Facility Strategy. While including this list in the DPD would tend to imply that the sites have all been fully (and finally) assessed, in the Outdoor Sports Facility Strategy the list is only expressed to represent a “possible designation” of sites and does not appear to have involved any public consultation. CARA does not believe that the 2010 update document referred to in policy 5.6 (which is where the list apparently first appeared) was ever published by the Council.
18. In its response to CARA’s (and others’) representations, the Council erroneously stated that TASG should not be included on the list of strategic sites as it was not considered a multi-sports site¹³. This statement ignores the long tradition of multi-sport use at TASG, the facilities available on the site, and contradicts the Council’s own March 2011 draft of the Outdoor Sports Facility Strategy which contains a list of “local multi sport multi pitch priority sites”, specifically including the 4 acre section of TASG.
19. At the meeting on 21 September, Mr Weake stated that he would subsequently clarify the basis on which these lists had been compiled but as yet CARA has heard nothing further on this.
20. CARA believes that the omission of the TASG site from the list of strategic sites on page 61 of the Core DPD document is unsound and unwarranted. Taken as a whole, TASG is one of the largest outdoor playing field areas in the borough, with a long tradition of multi-sports use. The Wasps club itself is nationally renowned, giving TASG (perhaps more than any other outdoor sporting site in the borough) a user catchment that extends across the wider West London area¹⁴. Wasps’ involvement also offers the Council a strong “anchor” club to promote sporting activity¹⁵ and, potentially, to deal with many of the maintenance and upkeep issues for the site. The site is well-served by public transport links and also has some archaeological and heritage value (given the length of time that the site has been used as a multi-sports recreational area and the teams that are, and historically have been, based there). CARA cannot see any consistent distinguishing features between TASG and the list of strategic sites currently set out in the DPD and, as noted above, the explanations previously given by the Council for not including TASG on this list are simply inaccurate.
21. And while the Council’s apparent justification for excluding TASG from the list of strategic sites is, at best, tenuous, the failure to explicitly extend SPD 6 as part of the DPD positively diminishes TASG’s position, contrary to the Council’s stated intention

¹³ See Council response to Representation 656 in Submission Document EAL 12(b)

¹⁴ The Planning Statement for strategic multi-sport priority sites contained in the March 2011 draft of the Outdoor Sports Strategy appears to make this the main criteria to differentiate these sites from local multi-sport priority sites.

¹⁵ Identifying “anchor” clubs is one of the key targets set out on page 5 of the Playing Pitch and Outdoor Sport Strategy Plan 2007

(based on discussions at the 21 September meeting) and all public representations on the issue.

22. TASG is the subject of SPD 6, which has been incorporated into the current UDP by reference in policies 3.4 and 3.5. SPD 6 sets out a long-term strategy for improving public access to the whole 24 acres of TASG and, as such, has the enthusiastic support of CARA and others. CARA understands that in the course of the consultation process no-one – including the Council – has suggested that the policies set out in SPD 6 should be amended, let alone abandoned.
23. The Council indicated in its response to CARA's representations on the final draft DPD in November 2010 that the Council's strategy for redressing "an as yet unmet demand for certain sports over the plan period ...is largely to focus on existing facilities and their management, rather than a need to create new space."¹⁶ SPD 6 is entirely consistent with this strategy and indeed the Council stated in its recently published response to CARA's representations that the continued operation of SPD 6 was "likely"¹⁷.
24. At the initial pre-hearing on 15 September 2011, the Inspector asked the Council to confirm which of the current SPG's and SPD's were intended to be carried forward. CARA is not aware of any clarification having been given on this but can see no reason why SPD6, in particular, should not be explicitly carried forward in the DPD.
25. An explicit continuation of SPD 6 would be entirely consistent with the longer-term aspirations of the DPD. CARA does not expect the issues that currently limit public use of the site (and the 4 acre section in particular) to be resolved in the immediate future. However by clearly signalling its goal in the DPD, the Council would (at no cost) provide significant impetus to these ongoing efforts. Over time (certainly within the 15 year period covered by the DPD), there is no reason why public access to the whole of the TASG could not be restored – and with the involvement of the owners, local schools, residents and others, a dedicated plan for the ongoing management of the site and its facilities can be put in place.
26. Conversely, if SPD 6 is not carried forward, the Council will be perceived as accepting the current impasse thereby encouraging the owners of the 4 acre section of TASG to continue to restrict access and to allow the facilities to deteriorate, contrary to the Council's stated strategy for the promotion and protection of such sites. Ambiguity (or leaving the issue to subsequent DPD's) is not an option – paragraph 4.5 of PPS 12 specifically requires the DPD to give "strong direction" so that "decisions on planning applications can be given a clear steer immediately".

¹⁶ See Council response to Representation 658 in Submission Document EAL 12(b)
¹⁷ Ibid

Proposed changes to policy 5.6

27. For the reasons set out above, CARA believes that current wording of policy 5.6 should be replaced with the following:

5.6 The council will:

- (a) expand the network of sports grounds and other active recreation areas in the borough. Existing outdoor sports pitches and facilities will be protected and promoted primarily for this function. Opportunities to extend the network and/or public access to facilities (as envisaged, for example, in SPD 6) will be identified and pursued, especially in areas of deficiency such as Acton and Southall;
- (b) develop a sports hub as part of this network, with a range of sports provision adjoining Gurnell Pool and the development of 'satellite sites' located strategically to serve communities across the borough; and
- (c) seek to develop partnerships with developers, local organisations and others to provide assistance with the funding, operation and management of outdoor sporting facilities.

28. Also, as mentioned above, Twyford Avenue Sports Ground should be added to the list of strategic sites on page 61 of the DPD (and marked as such on the Proposals Map).
29. One further small amendment is proposed to wording of the first explanatory paragraph of policy 5.6: the replacement of the words "...and updates (2010)..." with the words "..., as subsequently updated,...".

Attendance at the hearing

30. CARA confirms that it will attend the proposed hearing on 15 November 2011 which has been scheduled to deal with Matter 9 and the questions relevant to it. One or more of Robin Springall, Peter Gallagher, Enrico Bassi and Tom Parkinson will attend this hearing on CARA's behalf. Although policy 5.6 is not currently included in the list of issues and questions, CARA requests that sufficient time be set aside at the hearing for consideration of this vital issue.
31. In the meantime, CARA would be happy to provide any additional supporting information or clarification required in respect of any of the matters raised in this statement.



JR Springall
Chairman
9 October 2011