

Planning application for demolition of East Lodge, Lammas Park, and construction of six story block of flats (250344FUL)

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Ealing Fields Residents' Association (EFRA) is a large residents' association with about 450 members in the Northfields/South Ealing area of the London Borough of Ealing representing some 2,000 households. It has been in existence since 1974. Our members live in properties in the area that stretches from Windermere Road in the north to Ealing Park Gardens/Lawrence Road in the south, and between Blondin Park/Northfield Avenue in the west and Weymouth Avenue in the east. Our members enjoy the amenities offered by Lammas Park which lies just to the north of our area. EFRA is formally recognised by Ealing Council when we engage with the local authority on issues that affect our local community.

EFRA strongly OBJECTS to this highly speculative planning application on the following grounds:

- 1) Lammas Park has long served as a cherished public space, offering residents a vital area for recreation, leisure, etc. A private development within this park constitutes an encroachment on land that has been enjoyed as a public space by local residents for generations.
- 2) **Contravention of Local, Regional and National Planning Policies:**
 - a. The proposed development should be refused because it does not accord with the Local Plan as, at six storeys high, the flats would conflict with the Council's own tall buildings policy. The site is in Tall Building Area E6 of Ealing's draft new Local Plan and is not designated as suitable for tall buildings. As explained on Page 5 of the Council's tall building strategy buildings, six storeys or higher are treated as tall buildings in area E6 and the development should not be permitted.
 - b. Ealing Council's Local Plan and the London Plan emphasise the protection of green spaces and conservation areas. This development contradicts policies that seek to maintain public open spaces and preserve the historic character of the borough. Specifically, Policy 7.17 of the London Plan states that "the strongest protection should be given to London's green spaces" and that inappropriate development should be refused.
 - c. The site is on Metropolitan Open Land and protected by Policy G3 of the London Plan. There is nothing in the recent revisions to the National Planning Policy Framework that justifies inappropriate development of this nature on MOL.
 - d. The planned development has already elicited substantial opposition. The scale and design of the proposed development are incongruent with the existing character of the area, which is predominantly composed of low-rise residential buildings and open green spaces. Introducing a structure of this magnitude would disrupt the aesthetic harmony of the neighbourhood.
- 3) **Loss of historic asset:** The demolition of the park lodge would mean a major loss of part of Ealing's historic character. Charles Jones, Ealing's celebrated Victorian architect, created Lammas Park and was proud to include the two characterful lodges in the park. Jones promised that the park, of which the lodges form part, would be

'retained in perpetuity for the recreation of the people.' EFRA was concerned to learn that this building is not locally listed. It should be listed as soon as possible to help protect the site from future speculative development proposals. It is understood that the existing property has been recommended for inclusion in the Ealing Green Conservation Area on the basis that is "of special architectural or historic interest that is desirable to preserve or enhance". If approved, this would afford the property additional protection from development.

- 4) **Environmental and Ecological Concerns:** The proposal involves the removal of a Category B Yew tree and there would be potential impacts on the London Plane tree on-site as well. While the applicant proposes some biodiversity enhancements, such as a green roof and bird boxes, there will be an overall loss of green space, contradicting the objectives of the London Plan's policies on urban greening and biodiversity net gain. Recent initiatives in Lammas Park have focused on sustainable urban drainage systems (SuDS) to mitigate flood risks. This development could exacerbate these issues by increasing impermeable surfaces, thereby undermining the effectiveness of existing flood control measures and potentially leading to further environmental degradation.
- 5) **Parking and Traffic Issues:** The site has a PTAL rating of 2, which is considered 'poor' in terms of public transport accessibility. The proposal includes an increase in residential units without sufficient on-site parking provision. Although the application suggests that on-street parking permits will be provided, this will exacerbate existing parking pressures in an area already subject to Controlled Parking Zone (CPZ) regulations. Increased vehicular movements may also contribute to congestion and road safety concerns along Church Lane and South Ealing Road.
- 6) **Loss of social housing:** The Lodge has been used as social housing for some years. There is no provision of social housing under the proposal. This is another reason why the application should be thrown out.
- 7) **Precedent for Further Development:** Allowing a six-storey residential development within a public park could lead to similar applications, which would irreversibly change the nature of Ealing's treasured green spaces.
- 8) **Land ownership:** There appear to be questions over the ownership of the site Ealing Council planning officers need to establish clear documentary information on the true ownership of this site and on what agreements the owners have made regarding this proposal.
- 9) **Conclusion:** In light of these concerns, EFRA urges the Council to reject the proposed development within Lammas Park. It is imperative to protect our public land, preserve our historical structures and ensure that any changes to our community spaces are made with full transparency and active public participation.

Roger Jarman, Chair, EFRA