London Borough of Ealing

By email to [localplan@ealing.gov.uk](mailto:localplan@ealing.gov.uk)

8 February 2023

Dear Sirs,

**Response to Ealing Local Plan Regulation 18 consultation**

CPRE London is a membership-based charity with 2,500 members across London concerned with the protection and improvement of London’s Green Belt and other important and protected green spaces within the city. We are also concerned with improving London’s environment more generally, for the benefit of Londoners health and wellbeing.

There is much to support in the draft Local Plan, however we are deeply concerned about proposals to change the designation of *all* Ealing’s Green Belt sites from Green Belt to MOL; to remove the protection entirely from one large Green Belt site; and most particularly to remove protection entirely from seven large MOL sites. We do not believe these changes are justified. We have commented on other key issues.

* ***Please also note our site specific comments set out in Appendix 2***

**Paragraph SP.2E – uses the words ‘using development as a potential enabler’. This policy should be deleted** as it contradicts local and London Plan policies designed to afford protection to green spaces and more generally because it allows for development on green spaces on a generalised basis and so is a blanket departure from other policies intended to protect green space.

**Policy G4: Open Space – the words “The size of development within green and open spaces and its impact upon visual openness must be kept to a minimum” should be deleted** as this statement is open to interpretation and directly allows building on designated green spaces (contradicting local and London policy). The policy should state that no building on green spaces will be supported except on any existing built footprint.

**No justification for changing designation of Green Belt sites (to MOL). All these sites should be retained as Green Belt.** The Council concludes all of its Green Belt should be changed to MOL. This is an extraordinary conclusion and we do not support it. The criteria used for assessment do not stand up to scrutiny (see more below: but the key problem is the council has created its own criteria which do not match NPFF or London Plan policy); and even a cursory look at each individual site on Google Satellite view shows all the sites are connected to wider Green Belt and meet the most significant Green Belt purposes. We have set out more detailed comments on what we regard as ***uncorroborated statements and inappropriate assessment methodology in the Green Belt/MOL Review – giving false justification for Green Belt and MOL de-designations* *in Appendix 1.***

**No justification for deleting the Green Belt site GB4.** We not believe the de-designation of this site is justified. It is clearly connected to wider Green Belt and should be retained as Green Belt. See further comments below in Appendix 2.

**No justification to remove MOL designation from 8 major MOL sites in the borough – these should all be retained as MOL.** We do not accept the justifications and question the assessments in the ‘review’ as set out. Some of the descriptions of the sites do not reflect reality for example at Grove Farm (MOL2) where the majority of the site remains open and hosts critical habitat. Our comments on each site are set out in Appendix 2. We strongly object to the removal of protections from these sites which are:

* MOL2 Former Kellogg Tower / Grove Farm / Ealing Northern Sports Centre
* MOL5 Greenford Cemetery & Windmill Lane Allotments
* MOL13 Trailfinders
* MOL18 Gunnersbury Sports Grounds/ Old Actonians
* MOL20 Hanger Hill Park & former Barclays Sports Ground
* MOL22 Twyford Abbey
* MOL23 Acton Park, Sports Grounds and Trinity Way
* MOL8 (Map 41) The council also proposes removing MOL protection from Norwood Green Play Park and the land north of Norwood Green Road

***See detailed comments on each of these sites in Appendix 2 below***

**We also strongly object to the Site Allocation NO02** (Mandeville Parkway – proposal to turn this green space into residential and green space) which should be deleted. This much loved and valued local green space should not be used to deliver housing which can be built on available brownfield land. Allocating green space for housing simply means it is lost and sites needing regeneration are neglected.

**The council should take the opportunity to introduce new MOL or Local Green Space designations for important parks**. It is disappointing that the opportunity is not taken to designate important parks and green spaces within the borough with stronger protections. This is a once in a generation opportunity to do so: we strongly urge the council to use this opportunity for all the major parks in the borough. We cannot see any proposals for designation smaller green sites as Local Green Space (unless we have missed this) and would argue that this should be an important introduction – that the borough should conduct a ‘call for sites’ to be designated as Local Green Space, asking local groups to help establish a case for each one.

**School MOL sites** should not have protected status removed. The protection should 'wash over' the buildt development to take full account of their location in a protected landscape and ensure any future development is done through adding (limited) floors above rather than spreading out into green space.

**Brent River Park** We would expect a park the size of Brent River Park to appear as an allocation to deliver improvements to e.g. provision for recreation and habitat. Ealing should take this opportunity to expand the park and underpin proposed improvements with an associated Action Plan developed with the Brent River Canal Society in time for the 50th anniversary of the creation of the park.

**Tower blocks adjacent to parks** – such as EA05 should be deleted as these have an unacceptable negative impact on the visual amenity of the open space. The tower proposed adjacent to Haven Green in Ealing is proposed at 73.5m is completely unacceptable and the site is only suitable for mid-rise buildings.

**Significant over-allocation of land for new housing.** There is a large mis-match between the rate of housebuilding proposed and reality of housing completions.The predicted housing need per annum (2,769 according to the London Plan) significantly outstrips what the market has actually been able to deliver in the recent past (average of 1,800 dwellings per year). While we do not seek to challenge the figures for need, we must point out the implications of ‘over-allocating’ land for housing which is very unlikely to be built. In particular, if and when Green Belt sites are allocated for housing, the high likelihood is that the Green Belt sites will be built on first – before the brownfield sites – undermining the brownfield first principle. More generally the over-allocation of land means a great deal of land which could be allocated for other important purposes will lie idle for up to 20 years.

* New homes need for Ealing: London Plan (excl OPDC) 2,157 per year (2,769 inc Old Oak Common)
* Highest number of completions in recent years ~1,800
* Average completions last 5 years 1,553

*Source: Table 122:* [*Live tables on housing supply: net additional dwellings - GOV.UK (www.gov.uk)*](https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing)

**Are there other sites which could have been considered for homes / other development?** Site allocations do not give an idea of the number of new homes for each site so it is difficult to judge their importance in relation to housing delivery. It may be that the borough has missed opportunities to assess, for example, the contribution that changing road layouts could contribute to releasing land for development. Yeading Lane, for example (pictured below), could be entirely re-modelled to create space. We note the White Hart roundabout is included as a site for development which we would support but there are even greater opportunities to recover space from motor traffic and put it to better use while also improving the environment for local people.

A road with cars on it

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*Yeading Lane, pictured, comprises three two-lane roads, what appears to be a bus lane; and two central grass verges: this over-allocation of road space could be considered for other more useful purposes (it is unnecessary to have two large multi-lane roads – Yeading lane and The Parkway – in such close proximity).*

**Kerbside space is a very significant proportion of the borough’s land and a policy addressing its future use for more useful and sustainable purposes should be included in the Local Plan**. Lambeth is the first borough, to our knowledge, to have estimated the land in the borough taken up by kerbside (i.e. the sides of roads usually used for car parking). Lambeth estimates it has kerbside space the size of 194 football pitches, 91% of which is given to car parking. It is proposing to re-allocate 25% of this for more sustainable uses. Space of this scale should not be ignored in Local Plans particularly because, if incrementally re-purposed, it can contribute to delivery of the London Mayor’s Transport Strategy and Environment Strategy targets. More generally, the Local Plan should support the delivery of these strategies.

**Heathrow:** Paragraph 1.13 states that the plan has used the February 2020 Heathrow Strategic Planning Group's non-statutory joint planning Framework. This was drawn up to support the delivery of a third runway which is now no longer government policy; however, reading through the draft Ealing Plan we believe the council is proceeding as if the third runway will go ahead. The quantum of related development therefore cannot be justified at this time and this makes the plan unsound. Additionally, there are a large number of logistical and industrial buildings in South West London which do not meet modern standards and are space inefficient being only one level, as well as vast areas of surface car park surrounding Heathrow Airport, which can accommodate any Heathrow-related development needs.

**There is a very serious lack of underpinning evidence on green spaces. Specifically, Green Infrastructure and Open Spaces Strategies should be prepared before the next consultation.**

* The plan is not underpinned by up to date green infrastructure or open spaces strategies. Given the lack of current evidence base, there is not sufficient evidence to have an informed consultation, especially when there are developments proposed on green and open spaces. The existing evidence on green and blue spaces is: 7 pages of the infrastructure topic paper; GB & MOL review; old SINC report from 2008; climate and ecological emergency strategy; the strategic flood risk assessment. The council has ignored their Biodiversity Action Plan adopted in 2022 and do not use it in the evidence base.
* The council proposes removing protection of MOL and GB but does not undertake a review of how all existing green and open spaces will be protected.
* There is no consideration for the network of green and open spaces as a whole and the importance of ensuring and enhancing connectivity between them. This is vital as the Local Nature Recovery Strategy should be focusing on how to create, bigger, better and more connected green spaces. There are also areas where opportunities are missed to strengthen the ecological network. Policies should be established to ensure connectivity between the green spaces is enhanced and openness is not compromised**.**
* **There are many development site allocations which impact on green spaces but without a clear strategy and evidence base these will pass through un-checked.**
* The Urban Greening Factor decisions should be underpinned by further work on these strategies.
* **Biodiversity Net Gain** The proposed level is low at 10%. It should be raised to 30% to compare with other boroughs like Richmond upon Thames (proposing 20%) and Kingston Upon Thames (30%).

**Back and front gardens – strong policy is needed to afford them protection and to reinstate permeable surface and planting wherever possible.** In some areas in Ealing, nearly all back gardens have been built over, for example as shown in the image below taken from Google Maps. Front gardens have also been lost to parking. The council should introduce policies to halt the loss of front and back garden space and ensure homes have appropriate outdoor space and to contribute to the need to manage rain water and air temperature; and to ensure space for nature is not lost further. The borough should also have a policy to promote the reinstating of garden space and set a maximum % for the proportion of a back garden which can be built over (but small gardens should be retained in totality) and a maximum for the amount of a front garden which can have a non-permeable surface (we proposed 20%).

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Yours faithfully

Alice Roberts

CPRE London

**APPENDIX 1. Green Belt and Metropolitan Open Land Review: Uncorroborated statements and inappropriate assessment methodology – giving false justification for Green Belt and MOL de-designations**

The statement at 1.1.5 that ‘demand for housing continues to outstrip the supply of housing land’ is false and unsubstantiated and, in any event, need for housing alone cannot justify release of Green Belt or MOL.

The statement at 1.1.5 – that “Where exceptions have been made permitting ‘inappropriate development’ on Green Belt and MOL such decision have often had to be taken in isolation” is false and unsubstantiated – and in any event is not a justification for releasing Green Belt for housing.

The statement at 1.1.8 that the review seeks “to understand the relative significance of spaces .. to distinguish between ‘better and weaker performing sites” exposes a bias in the assessment such that some spaces are guaranteed to be identified as weaker than others, despite:

* their permanence and openness not being in doubt – and
* the critical fact that all the Green Belt spaces proposed for de-designation meet most or all the five purposes except ‘preserving the setting of historic towns’
* none of the Green Belt parcels have been assessed against the fifth purpose *(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land*. In fact, one of the reasons given is that *“It is also arguable whether Green Belt has any influence over this objective in the first place”* - an extraordinary and inappropriate denial of a critical reason for having Green Belts.)

The council correctly identified at 1.1.7 that the growing population will require more green space, particularly per person. At this stage it does not identify the important role these spaces now play in enabling London to tackle climate and nature crises, managing the heat island effect, absorbing rainwater and providing critical habitat (as per the London Plan).

Paragraphs 2.1.2 – sets out an entirely inappropriate critique of national policy. It is not the local authorities to assess national policy: it is to apply it locally.

The statement at 2.2.9 that NPPF policy ‘implies that Green Belt locations are generally isolated’ is supposition and clearly incorrect, since Green Belts surround towns and cities, there will always be parts which are directly on the border of the built up area: therefore the statement that much of Ealing Green Belt is ‘reasonably accessible’ may be true, but it does not follow that building on it will promote a ‘sustainable pattern of development’.

Quod: It is wholly inappropriate to cite the London First publication at paragraph 2.2.16 - by way of finding justification to build housing on Green Belt since this is not an independent study and supported by Quod who have an interest in house building.

Hounslow: It is entirely inappropriate for Ealing to cite the Hounslow Local Plan review analysis when the plan is not adopted; Planning Inspectors have already indicated that proposed re-designation from Green Belt to MOL is not justified (and Hounslow has indicated these proposals will be removed; and Inspectors have not issued concluded on removal of Green Belt designations i.e. the issues discussed in these paragraphs, starting at 2.2.18. Hounslow’s analysis is in fact highly controversial. For example, Ealing cites Hounslow borough as saying that Green Belt in the west of the borough does not prevent sprawl or stop towns from merging, and that it is ‘fragmented and isolated’ – all of which has been challenged extensively by local groups; been the subject of Issue and Questions raised by Inspectors at the Examination in Public; and is a matter which remains unresolved.

At paragraph 2.2.22 - 28, again the Hounslow proposals are cited as if these should have some kind of weight in Ealing’s considerations - despite at least one having been dropped already (the conversion of Green Belt to MOL) and despite all being highly contested.

The statement at 2.2.37, that Ealing’s Green Belt sites are ‘islands’ does not, in our view, reflect reality. Ealing’s Green Belt is entirely connected to other parts of Green Belt and, in particular, acts to separate towns from merging.

The statement at 2.2.39, that ‘it does little to contribute to its current purposes of preventing sprawl’ is a non-sequitur, in the sense that it is exactly its openness and permanence which has, for decades, prevented sprawl. Again, this appears to be presented as a justification to remove the designation – even though para 2.2.41 explicitly recongises ‘there was never a neat edge to London, and that outer London was made up of a series of settlements’.

Paragraph 2.2.41 (and under 2.4 and 2.5.5) inappropriately directly questions the policy and original designation of the Green Belt (indicating that it was *not* about separating towns in West London – which it quite clearly was) and inappropriately indicates the borough might have a ‘perspective’ other than to apply NPPF and London Plan policies. It also presents a tortuous argument that Green Belt would not exist in the same way in Inner London. (The argument about shares of Green Belt and MOL between boroughs seems particularly spurious given borough boundaries are not relevant to Green Belt and MOL designation). Even the word ‘belt’ is brought into play despite it being plainly clear that London’s Green Belt is not circular and was created as such.

Ignoring NPPF policy. Paragraph 2.4.9 states the review ‘has sought not to be constrained by the limitations of current policy’: it is ignoring NPPF and London Plan policy.

Para 2.4.11 states the review seeks to identify land for development (albeit as a secondary objective) and is not an exercise in establishing whether GB and MOL meet their purposes.

MOL. Para 2.5.10 implies that there is only one option for land which does not ‘draw visitors from several boroughs’ – indicating ‘it maybe more appropriate to assign it other designations – but there is a clear option (not analysed her) to ensure the space is managed in such a way that it does draw visitors. This is not an appropriate justification for ‘correcting’ the designation.

At 3.2.3 the identification of parcels has been driven by roads and railways though these often predate designations and are not relevant as boundaries and so this is inappropriate. (Also, identifying these as ‘borders’ or ‘boundaries’ would be a precedent for nearly every site of Green Belt or MOL.)

Under MOL criteria – 3.5 there is much in here which is extremely worrying.

* For example, under (B), it states that a piece of land is ‘Not important / does not contribute’ if ‘the site is vacant and accommodates no such activities and is of limited priority for investment’. But this would mean that a site which has been deliberately bought by a developer and neglected with a view to applying for planning permission at a later date (but which could and ought to be offering important recreational facilities and/or e.g. habitat) would be regarded as having no purpose. This is not an unrealistic concern – it is reality@ CPRE London has identified large numbers of protected MOL and GB sites which are being land banked in this way for their ‘hope’ value. This cannot be used as a reason to remove their designation as this would clearly provide a strong incentive for this to be replicated, undermining both Green Belt and MOL designation London-wide.
* Under (C ) land would be regarded as ‘not important / does not contribute’ if it contains none of the stated features or landscapes despite it being perfectly possible to create recreational and biodiversity features and landscapes (and despite there being an urgent need to do so in many instances).

Incredibly, at 4.3.1 the conclusion is drawn that ‘none of Ealing’s sites appear to serve the purposes of Green Belt’. It is very hard to see how this conclusion can have been reached: even a cursory look at the sites on Google Satellite view shows clear open land connected to / contiguous with wider areas of Green Belt. The distance from the ‘edge of London’ criterion stated here is irrelevant and arbitrary.

The conclusion at 4.3.2 that they are closer to MOL than Green Belt because they separate towns does not make sense: it is Green Belt policy which exists to ‘stop prevent towns from merging’.

4.5.5. King George’s Fields is described as being ‘not well maintained’. Why not? – why has the borough not engaged to ensure this incredibly important facility is better maintained and well-used? Why was a ‘significant amount of rubbish observed’? This is not a reason to conclude it’s protected status is unjustified.

**Lack of consideration of how MOLs and GB sites link with others in neighbouring boroughs.** This is seen in

* MOL2 assessment which disregards the fact that it plays an important link into Harrow and the green spaces around Harrow on the Hill
* GB7 assessment: it is true the canal path along Ealing’s side is not green but just across the canal there is a large green space in the neighbouring borough and Ealing is missing an opportunity to improve its side and the potential for connectivity between green spaces by greening the canal
* GB5 - there is an inverted Y shape that Ealing is proposing to de-designate: it is a green space which connects the rest of GB5 to another green space in Hillingdon

**APPENDIX 2. Green Belt, MOL and site allocations – Site specific comments**

**Green Belt sites – site specific comments**

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| GB1/2 | Both of these are clearly part of a wider section of Green Belt, connected to / contiguous with it. Removing Green Belt designation from either of these clearly compromises the neighbouring areas of Green Belt. They prevent towns from merging. |
| GB3 | Clearly connected with GB1 and GB2, this is also connected to the wider Green Belt and its de-designation would compromise the neighbouring areas of Green Belt. The existence of a road does not mean the sites are separated: many areas of Green Belt and MOL have major roads and railways which even pre-date the designation. It |
| GB4 | (No MOL protection proposed). This site is clearly connected to other Green Belt at GB5. The appearance of a disconnect is created by an area on Kensington Road being used as a depot / storage (possibly unenforced inappropriate use). This is not a reason to see the sites as separate or separated in any way. Likewise the existence of a road is not an argument which is appropriate to use to argue sites are not connected. This proposed deletion also includes a critical strip of land which comprises part of the connection between two large sections of Green Belt and which is part of an important green corridor / green chain and this – as well as the rest of the site, should remain protected Green Belt. |
| GB5 | This is a large extent of Green Belt connected at the north west corner to wider section of Green Belt, preventing towns from merging. There is an inverted Y shape that Ealing is proposing to de-designate however this green space connects the rest of GB5 to another green space in Hillingdon. |
| GB6 | This is clearly connected to other Green Belt and preventing towns from merging. Extraordinarily, this is even regarded as ‘not scoring well against MOL criteria’ despite being playing fields. |
| GB7 | This site should remain protected. Though it is true the canal path along Ealing’s side is not green, just across the canal there is a large green space in the neighbouring borough and Ealing is missing an opportunity to improve its side and the potential for connectivity between green spaces by greening the canal. |
| **Small maps** | |
| ***Map 6 - GB2 – Removal of Alec Reed Academy***  ***Map 12A - GB3 – Removal of A40 and slip road***  ***Map 12B - GB3 – Removal of A40 and slip road***  ***Map 19 - GB5 – Removal of A40/Western Avenue***  These proposed deletions are extremely problematic for the adjoining Green Belt because they completely disconnect larger Green Belt sites from another. Despite the presence of the road, these areas are green sites which provide a critical green link / green chain between the two sites which it is vital to retain to ensure wildlife has an active corridor and to retain the integrity of the Green Belt. There could be a smaller deletion to cover the Academy *only* and so ensure the other sites remain connected and intact. Or the GB designation could wash over the Academy. | |
| ***Map 17 - GB5 – Removal of houses and gardens south of the Grand Union Canal towing path***  We do not support this deletion. Though it is small, it is adjacent to the river and would leave it open to development. It is not clear why the gardens, disconnected as they are from the houses, are in this position, however it is important to protect the site from development even if it is in private ownership. | |
| **Map 18 - GB5 – Removal of Ruislip Road and land to the south**  This is also a problematic deletion. While it is small, it is connected to the wider Green Belt, appears to have been left in place to prevent urban areas from merging, and it creates an important green corridor which would otherwise be vulnerable to development. | |
| (*Map 20 - GB6 – Removal of the canal and towpath south of Spikes Bridge Park*  This deletion seems unnecessary given its connection to GB6 however its deletion would not compromise the larger section.) | |

**MOL sites – site specific comments**

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| MOL2  (Grove Farm) | **We disagree with the assessment that this should be de-designated. This should remain as MOL. The assessment criteria used are flawed (see Appendix 1) and we disagree with the council’s assessment in any event:**  The fact that the site ‘changes character’ is not relevant to the assessment. We disagree that it is ‘fragmented’ or that the differing nature of various sections should impact on its designation: this is a common feature of other areas of MOL elsewhere in London. The David Lloyd does not constitute ‘significant built development’ in particular because most of the site is car parking / hardstanding – and this cannot be described as ‘built development’ since hardstanding is specifically excluded from the PDL (previously developed land) definition. In any event, the car parking provision should be removed or reduced over time, in favour of sustainable transport, to support the Mayor’s Transprot Strategy targets. The existence of David Lloyds on MOL across London is a problem, there is no doubt. This happened, but should not now be used as a reason for removing the designation from whole sections of MOL. There should now be an agreement that the MOL designation ‘washes over’ the built areas and no further building allowed, and they should remain recreational / leisure facilities and not replaced with other uses.  MOL2 ‘review’ assessment disregards the fact that it plays an important link into Harrow and the green spaces around Harrow on the Hill. |
| MOL5 | **We disagree with the assessment that this should be de-designated. This should remain as MOL. The assessment criteria used are flawed (see Appendix 1) and we disagree with the council’s assessment in any event:**  This is a large open green space which contributes to the physical structure of London by being clearly distinguishable from the built-up area. The cemetery, allotments and playing fields perform important recreational and biodiversity functions. It includes open air facilities, especially for leisure, recreation and sport, which serve significant parts of London. Removing the designation would leave it exceptionally vulnerable to development. |
| MOL13 | **We disagree with the assessment that this should be de-designated. This should remain as MOL. The assessment criteria used are flawed (see Appendix 1) and we disagree with the council’s assessment in any event:**  This is a large open green space which contributes to the physical structure of London by being clearly distinguishable from the built-up area. It includes open air facilities, especially for sport, which serve London and national needs. It is incorrect to say a facility of this size primarily meets ‘local’ need. This is ill-defined and local need can still serve ‘significant parts of London’. Removing the designation would leave it exceptionally vulnerable to development and we strongly object to removing the MOL designation.   * The assessment for MOL13 states *“Although located within close proximity of the Brent River Park (MOL12), a much larger area of MOL, the site is nonetheless disconnected from this open space, both physically and visually. The presence of various residential blocks on the Gurnell Estate breaks views between the parcels, and a physical separation of 180m weakens this connection further.”* This is **incorrect**. It is actually connected to MOL12, with a narrow green corridor adjacent to the train tracks. * The open green spaces next to MOL13 are green corridors and would make it an even larger space. Between MOL13 and the train tracks are more high value open spaces; grass playing fields and a strip of green park (with a public trail and many trees). ***The green corridors and adjacent open green spaces should be added to MOL13 and protected because they provide the connection to MOL12.*** * Trailfinders host rugby games with national teams.’ There is a Rugby Academy for women and men. It is incorrect to say a facility of this size primarily meets ‘local’ need. |
| MOL18 | **We disagree with the assessment that this should be de-designated. This should remain as MOL. The assessment criteria used are flawed (see Appendix 1) and we disagree with the council’s assessment in any event:**  This assessment is based on the proposition that “the relationship of MOL18 to Gunnersbury Park is weak” however the Old Actonians Rugby Football Club plus other sports grounds are clearly connected to Gunnersbury Park at the south east corner and also therefore form part of a green chain. This forms a large open green space which contributes to the physical structure of London by being clearly distinguishable from the built-up area. It includes open air facilities, especially for sport, which serve significant parts of London and removing its designation would leave it exceptionally vulnerable to development. |
| MOL20 | **We disagree with the assessment that this should be de-designated. This should remain as MOL. The assessment criteria used are flawed (see Appendix 1) and we disagree with the council’s assessment in any event:**  A series of connected, large open spaces used as parks and for recreation /sports, this forms a large open green space which contributes to the physical structure of London by being clearly distinguishable from the built-up area. It includes open air facilities, especially for sport, which serve significant parts of London and removing its designation would leave it wide open to development, given that part of this site (the very southern bit) is also allocated for built development (Site Allocation EA31), and directly lead to loss of protected green space currently in use as cricket pitches. The statement “Hanger Hill Park by itself does not contribute towards MOL objectives any more than other non-MOL parks such as Southall Park or Ravenor Park” is a non sequitur, given it could equally imply that Southall or Ravenor Parks would be benefit from MOL designation. Either way, no proposal is made for introducing Local Green Space protection and so the removal of the MOL designation would leave the entire space vulnerable to development.   * The ‘review’ of MOL20 states it has ‘negligible importance’ in criteria a, b and c but this is factually **incorrect**. Ealing’s own SINC 2016 report shows that MOL20 has 2 out of 6 ancient woodland sites in the borough with exceptional biodiversity. This is not acknowledged in the MOL20 report, even though all other sites with ancient woodland are classified as of ‘major importance’ and proposed for retention as MOL. * Residential development on Barclays Sports Ground (site EA31) is inappropriate on MOL and the site is needed for park and sports facilities for all borough residents. * Barclays Sports Ground has metropolitan value potential for parks and green space, and MOL20 already has huge recreational value thanks to the sports clubs. * West Acton as well as the Barclays Sports Ground area suffer from district and local park deficiency, and having a large area with the qualities of a district park is essential to address that. Retaining the MOL status is the safest way to realise this potential. |
| MOL22 | **We disagree with the assessment that this should be de-designated. This should remain as MOL. The assessment criteria used are flawed (see Appendix 1) and we disagree with the council’s assessment in any event:**  This site, Twyford Abbey, is subject to a planning application which we have objected to on the basis that it is inappropriate development on MOL and that the site is a very important habitat for nature. This should be designated as SINC or LNR and remain MOL. The presence of buildings on the site is not relevant to the assessment: the building was there prior to it being designated. The removal of the designation will leave the entire site, and its vital habitat, open to being lost. |
| MOL23 | **We disagree with the assessment that this should be de-designated. This should remain as MOL. The assessment criteria used are flawed (see Appendix 1) and we disagree with the council’s assessment in any event:**  Parks and playing fields + David Lloyd (see comments made in MOL2 above), this is a large open green space which contributes to the physical structure of London by being clearly distinguishable from the built-up area. It includes open air facilities, esp for recreation and sport, which serve significant parts of London. Removing the designation would leave it exceptionally vulnerable to development. The area to the east (Trinity Way Open Space) is somewhat disconnected however the sites could be reconnected (e.g. by rearranging the road space around an island building on Bromyard Avenue) so creating a green chain across the road. In any event are enough trees and green elements between the two sites to be able to say they form a green chain. Retaining the MOL status for both will ensure the sites are well protected, that there is an incentive to improve the green chain link; and that it can provide important MOL benefits into the future. This de-designation appears to be connected with site allocation AC10 which seeks development of the section of MOL at Trinity Way Open Space – green space associated with high density housing blocks. This land should be retained as open land / MOL to ensure there is sufficient space for major housing developments at East Acton Land and Trinity Way (old and new).   * This area of Acton is a green oasis in a very built-up area that has many blocks of flats, both old and new, all lacking gardens. The 3 sections form a hub of open space that is knitted together by avenues of ancient trees around its periphery, along the 2 intersecting roads and all through the grassy expanses. There are some buildings but they are a small percentage of the space and provide essential sports and leisure facilities, a tea room, cricket pavilion and arts facilities for youth workers etc. * The whole area hosts numerous sports and leisure facilities from two top-class cricket clubs to weekend football for local kids. There are very popular children’s playgrounds in the parks, free open air adult gym equipment, tennis courts, mini-golf, a skate board park, a basketball court, table tennis and a place for people to jog. People come from all over London to participate in sports facilities that are not available elsewhere. The local authority manage the parks. The sports clubs and the allotment holders take care of the maintenance of their land, to a high standard. The Shepherds Bush Cricket Club has been on site for over 140 years. * There are 130 allotment plots that are managed by Acton Gardening Association and 90 people on the waiting list indicating more, not less space needs to be protected for allotments. The association supports neighbouring East Acton Primary School with their vegetable garden and outdoor classroom, part of the Club des Sports. * MOL23 is a centre for biodiversity. It acts as a corridor for wildlife travelling back and forth from Wormwood Scrubs to Ravenscourt Park and the river. An army of dogwalkers use both Trinity Way Park (known locally as the Dog Park) and Acton Park. |
| **Small maps** | |
| ***Map 23 - MOL3 – Removal of William Perkin CoE High School***  The deletion of the school building footprint is understandable however the playing field areas should retain their MOL status to avoid them being built on in future. | |
| ***Map 27 - MOL6 – Removal of petrol station along Uxbridge Road***  This site should not be de-designated. It is not entirely built on and only one section has the buildings associated with the petrol station. This should be retained as MOL to ensure no further development, in particular for the integrity of the much bigger section of protected land around the triangle. | |
| ***Maps 28, 32, 33***  These maps show narrow strips of deletions next to narrow strips of additions. It is not clear why the deletions are needed. | |
| ***Map 41 - MOL8 – Removal of Norwood Green Play Park and land north of Norwood Green Road***  This removes protection from parks and a site which could (and should) be brought back into use to provide playing pitches (rather than using Warren Farm, for example, which needs to be designated as a nature reserve / SINC). If the MOL designation is removed from these sites, they will be directly vulnerable to development. | |
| ***Map 51 - MOL9 – Removal of land southeast of Ealing Hospital***  This should definitely not be deleted as it is clearly distinct from the hospital site and forms part of the Capital Ring and an important green chain. | |
| ***Map 52 - MOL9 – Removal of land south of River Brent Business Park***  This is undeveloped land adjacent to the River Brent and should be retained as MOL and re-wilded to provide habitat close to the river and to protect the river habitat in this location. | |
| ***Map 53 - MOL9 – Removal of land on either side of Walker Close and behind St Mark’s Primary School***  The deletion should only comprise the building footprint. This is also (as Map 52) undeveloped land adjacent to the River Brent (adjacent also to the Capital Ring / important green corridor) and should be retained as MOL and rewilded to provide habitat close to the river and to protect the river habitat in this location. | |
| ***Map 55 - MOL9 – Removal of land behind residential properties on Green Lane (62 Green Lane)***  This deletion should only cover the built footprint and not the open space. | |
| ***Maps 57 A, B, C***  It is not clear why these deletions are required. If they are a open land connected to MOL9 they should be retained. | |
| ***IMPORTANT. Map 62 MOL10 – does not show the site described as “Removal of buildings and tarmacked area/car park at entrance to Brent Valley Golf & Fitness Centre”***  This site should not be deleted if it is the site in the description i.e. the car park area. Hardstanding is not ‘built development’ (it is specifically excluded from the definition of previously developed land). | |
| ***Map 63 - MOL10 – Removal of land at Our Lady of the Visitation RC Primary School***  This deletion should be for the built footprint only, not the areas of open space or hardstanding | |
| ***Map 65 - MOL10 – Removal of developed land with commercial use at the southwestern corner of MOL10***  This site should not be removed from MOL as it will compromise the areas of MOL around it . | |
| ***Map 66 - MOL10 – Removal of road exiting Lidl super-market car park***  This deletion is unnecessary | |
| ***Map 68 - MOL10 – Removal of buildings and gardens north of Church Road***  This deletion should only follow the footprint of the buildings on the site | |
| ***Map 74 - MOL12 – Removal of Enterprise Lodge site south of Stockdove Way***  This deletion is unnecessarily large and should only follow the footprint of the existing buildings | |
| ***Map 75 - MOL12 – Removal of residential properties at the intersection of Ruislip Road East and Argyle Road***  This deletion is unnecessarily large and should only follow the footprint of the existing buildings | |
| ***Map 76 - MOL12 – Removal of land north of A40/Western Avenue***  These should not be deleted as they are directly adjacent to the River Brent and should be adapted to enhance the river habitat and remain open. | |
| ***Map 77 - MOL12 – Removal of hotel site between Perivale Lane and A40/Western Avenue***  This deletion should only follow the footprint of the buildings on the site to avoid further incremental development into this major area of protected land. | |
| ***Map 83 - MOL15 – Removal of Westway Shopping Centre and car park***  This is an example of how car parks are introduced onto protected land thereafter leading to development. However, in this case, given the location and positioning of the site, we would be comfortable with the deletion on the basis that the site is used for mixed use, car-free development including appropriate levels of affordable housing. | |

**Site allocations – site specific comments**

AC10 – this is a large area of open space adjacent to several high-density housing blocks, old and new. This is Metropolitan Open Land and the proposed development is inappropriate on MOL. This land should be retained as open land / MOL to ensure there is sufficient space for major housing developments at East Acton Land and Trinity Way (old and new).

EA28 – Gurnell Leisure Centre: EA28 should not be deleted. It should not be listed as a potential development site given its protected status and flawed assessment. This allocation contradicts MOL12 policy which states it will be retained as MOL. Further, we do not support enabling development on this space which would be inappropriate development on MOL and which the allocation clearly states has many site constraints: *Flood Zone 2, 3a & 3b (fluvial and tidal), Flood Zone 3a (surface water), Metropolitan Open Land, Site of Borough Importance for Nature Conservation and priority habitat, Site of Local Importance for Nature Conservation (nearby), Strategic Area for Regeneration, Archaeological Interest Area.*

* This site is listed as a site for a proposed enabling housing development – an active project seeking to build up to 500 homes on this site. This site sits within MOL12 which in the report states “MOL12 is one of the largest and best scoring MOLs in the borough. Brent River Park is one of the most important green space determinants in the urban 46 Site reference Site name MOL assessment Comments structure of Ealing. The ‘Very Special Circumstances’ for allowing a housing development on MOL in the 2021 planning application 201695FUL did not apply here and the application was refused.
* Apart from the proposed site breaching planning policies, the assessment for EA28 is flawed. Important information is missing and several of the criteria used to assess the site are inaccurate. For example, the criterion ‘’Impact on Green Belt or Metropolitan Open Land’’ is blank. If all the criteria were assessed correctly, the conclusion would clearly show this site is not appropriate for development.

EA30 – see comments on MOL22 above.

EA31 – This allocation is also part of MOL20, the whole of which his proposed for de-designation – something we strongly object to (see above). This allocation will directly lead to loss of protected green space. This allocation should be deleted.

HA02 – strongly object to this allocation. This site is an incredibly important link / green connection between south and northerly sections of the Brent River Park and should be incorporated into the park and developed as a way to enable nature to connect. This is inappropriate development on MOL. The allocation also lists constraints: *Flood Zone 2, 3a and 3b (fluvial and tidal), St Mark’s Church and Canal Conservation Area, Grade II Listed Bridge (adjacent), locally listed building (nearby), Metropolitan Open Land, Site of Borough Importance for Nature Conservation, priority habitat, Green Corridor (nearby), existing industrial use (non-designated), Hanwell District Centre, Archaeological Interest Area*

SO19 – strongly object to this site being allocated for sports. This should be allocated for nature only. It is a site which has rewilded and now supports a large number of rare (including red-list) and diverse species. It should be designated as a Local Nature Reserve with additional appropriate SINC status.

SO12 – this site, including Havelock Estate, Bixley Field Allotments, Canalway Park and Hilary Road, proposes a residential-led, mixed-use scheme which clearly puts the valued green spaces directly at risk. The allotments and green space should be retained as they are and the red line re-drawn around the existing estate only.

SO21 – this site is MOL and inappropriate for development as such. However we are also concerned that the development on this site may have happened without permission or enforcement and that it is an unsustainable site for development, being away from the main urban area, and indeed more clearly being a part of the park. It appears to be inappropriate encroachment which often leads to further encroachment. This site should be left as protected land and only appropriate uses planned.

GR10 – strongly object to this allocation. It is clearly inappropriate development on Green Belt and the development of this particular site would compromise the surrounding areas. We are aware this site is proposed for de-designation however we do not accept there is a case for removing the designation.

NO04 – this site is Green Belt so this constitutes inappropriate development. We are also concerned this encroachment will compromise the wider Green Belt boundaries will be secure into the future. This proposes development on Islip Manor LNR which is also a SINC of borough importance and could potentially lead to the destruction of woodland.

NO06 – this is Green Belt so this constitutes inappropriate development. See our comments also on the proposal to remove the designation from this site GB4 – we do not agree that this site should be de-designated as Green Belt. Other site constraints include this being a SINC. Developing this site would remove the last connection from the remaining Green Belt, cutting off Belvue Park which, together with this site, act to prevent urban areas from merging. This has potential to disconnect Northolt Manor LNR from the wider ecological network. It is currently the only way this nature reserve can link in as the Golf Range links to the canal and then into Smith's Farm and Marnham Fields.

GR03 – this is linked to MOL5 and proposes building on a playing field which we do not support as playing fields are needed for sports provision as per the Playing Pitch Strategy.

PE04 – this is suggested on MOL12 and we do not support the proposals to de-designate this site, which we do not believe is justified, and so we do not support building on this site as it is inappropriate development on MOL.

SO12 – Havelock estate – open space including Bixley fields allotments, canal way park and Hilary Road - proposed residential led, mixed use scheme, reprovision of allotments and green space. May lead the green space to be cut off from the canal where it is currently.

NO02 – we do not support the proposed allocation of Mandeville Parkway for housing. This is a much love and valued local green space and housing can be accommodated on brownfield land: if green space is allocated for housing, previously developed sites elsewhere in the borough in need of regeneration will lie neglected.

NO01A – we do not support this allocation because it will remove the green corridor from Northolt station railway line. Corridors such as this, rich in habitat such as woodland, are hugely valuable to wildlife and extremely difficult to recreate once gone. This railway line provides an important green corridor allowing wildlife to travel between spaces. Nature sites should be bigger, better and more connected and losing this site will mean loss of a wildlife rich area containing woodland and loss of connection.