

London Borough of Ealing

Ealing Green Belt and Metropolitan Open Land Review Stage 1 Report

November 2022



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1. Introduction

1.1. Defining the purpose and scope of the study

1.1.1. Ealing is recognised as being one of the greenest boroughs in London. The network of open space which exists in the borough forms a key structural component of the area, accounting for well over a quarter of the land area (excluding private garden areas which, if included, would significantly increase this figure further). This space adds considerably to the quality of the place, benefitting residents and visitors alike. The benefits of open space are numerous and well recognised and amongst others include:

- providing opportunities for recreation, which supports wellbeing and healthy lifestyles;
- providing a respite from the hustle and bustle of city life and contributing to a sense of tranquillity;
- where space is linked, supporting sustainable modes of transport;
- accommodating local food production;
- supporting tourism;
- supporting economic growth through the creation of an attractive environment for business growth and housebuilding;
- acting as carbon sinks and contributing to urban cooling;
- forming a natural flood plain;
- forming a habitat for wildlife;
- contributing to the historic environment; and
- acting as a break on urban sprawl and other patterns of unsustainable development, and in doing so focusing growth on previously developed land.

1.1.2. Recognising this valuable contribution, the planning system provides a framework for protecting such space and for securing improvements as necessary. Such protection is afforded through national, regional, and local planning policies. To a great extent, areas to be protected are defined at the local level through the Local Plan. Ealing's own Local Plan designates a network of Green Infrastructure and contains policies which seek to protect and enhance such space. Recognising the varying functions, character, and status of open space, a range of designations are applied in Ealing including: Green Belt; Metropolitan Open Land; Public Open Space; Community Open Space; Green Corridor; Blue Ribbon Network; Sites of Importance for Nature Conservation; and Heritage Land.

1.1.3. Of this network of spaces, the most significant in land take terms would be Metropolitan Open Land (MOL) and Green Belt (GB). Together, these account for approximately 22% of the borough's land area. As well as land coverage, the scale of such spaces is typically large and accordingly they are deemed to be significant to the structure of the borough. Their scale and relationship to the wider built area is also a defining characteristic and this is something which will be explored in greater detail through this assessment. Another defining feature of their designation is their permanence, and to this end most of the space has performed well.

1.1.4. The extent of GB/MOL in the borough has largely remained unchanged since it was first designated many years ago. That said, there have been several incursions over the years and there remains continued pressure to release/develop such land. This pressure is likely to grow as, notwithstanding the obvious planning issues, such sites are often seen to be less challenging to develop when

compared with the current supply of brownfield sites.

- 1.1.5. At a regional level, the evidence shows that the demand for housing continues to outstrip the supply of housing land. This remains the single most significant challenge for the next iteration of the London Plan. The Publication London Plan (December 2020) states that, just to meet demand, London needs to build tens of thousands of new homes every year.
- 1.1.6. Whilst efforts will continue to be made to better maximise brownfield land, such opportunities are becoming evermore challenging, and quite frequently involve a departure of some other kind. Where exceptions have been made permitting 'inappropriate development' on Green Belt and MOL such decisions have often had to be taken in isolation without the foresight of a strategic understanding of the network and the significance of individual parcels to the wider area. Clearly, this position is not ideal and such individual decisions have the potential to significantly undermine the strategic role of such spaces in forming a key structural component of the borough. It is crucial then, that any changes are undertaken through the Development Plan, informed by appropriate evidence, rather than through departure procedures.
- 1.1.7. Equally, a growing population also places pressure on existing green space, and such space has become even more valuable as a resource for the existing and new population. In this context then, it is crucial that all land (both greenfield and brownfield) is put to best use and is used effectively and efficiently. Whilst several partial reviews have been undertaken over the years, a comprehensive review of our Green Belt and MOL extents has not been undertaken since they were first defined many decades ago. As noted above, whilst this largely reflects their permanence, it is now appropriate to revisit these designations to better understand their status and role, particularly in the context of a growing population.
- 1.1.8. A key aim of this study will be to better understand how the green space contributes to the purposes of its respective designation as Green Belt or MOL, and its potential in meeting the needs of a growing population. This assessment will, in particular, seek to understand the relative significance of individual spaces, and ultimately it will allow us to distinguish between better and weaker performing sites. Crucially, this assessment will also seek to identify opportunities to enhance open space, including identifying amendments which strengthen the boundaries of existing areas.
- 1.1.9. This exercise and its output will serve a number of purposes including:
- 1.1.10. Forming key evidence for any future Local Plan review;
- 1.1.11. Providing evidence to inform our response to a future London Plan review; and
- 1.1.12. Informing the Council's own projects/investment decisions.

1.2. Report structure

- 1.2.1. Chapter 2 sets the context for this review, providing an overview of national, regional, and local policy. To understand the basis of the current designations and their purposes it is necessary to consider the historical origins of policy and how its evolution has given rise to current policies and geographical extents.
- 1.2.2. Chapter 3 provides an overview of the methodology, detailing the various stages of the assessment. Appendix 1 provides the Guidance Note for completing the assessment and Appendix 2 provides the blank Assessment Proforma template.
- 1.2.3. Chapter 4 presents the findings of the Stage 1 assessment. More detailed, site-specific findings are also contained in the pro-formas prepared for each individual site which are provided in Appendix 3.

1.2.4. Chapter 5 summarises the findings of the Stage 1 review and outlines next steps and recommendations.

2. Setting the context for review

2.1. Overview of national, regional, and local policy context

- 2.1.1. This section sets the context for this review, providing an overview of national, regional, and local policy. To understand the basis of current designations and their purposes it is necessary to review the historical origins of relevant policies to understand how their evolution has given rise to current policies and geographical extents. This is particularly important when reviewing GB and MOL as both are unique as policy tools given that they have largely remained constant over many decades.
- 2.1.2. Despite remaining largely fixed, other policy areas have been much more fluid responding to ever evolving pressures. Policies around accommodating housing growth for example have had to evolve more rapidly, and whether intentionally or not this has had implications for other policy areas such as Green Belt and MOL. This section will therefore explore how other policy areas might shape GB and MOL policy in the future, and whether locally this should inform our thinking around the role of GB and MOL in the borough, and therefore the approach to undertaking this assessment.

2.2. Green belt

- 2.2.1. GB and MOL share some common characteristics, such as their openness and permanence, and are therefore often viewed as one and the same when managing applications which affect them. However, their purposes and policy basis are quite distinct. The following section looks at their historical origins separately, although also acknowledges their common defining features.

National context

- 2.2.2. The idea of Green Belts was first born out of Ebenezer Howard's Garden Cities movement. The London County Council took the first steps towards implementing this vision with a proposal to create a London Green Belt which would comprise publicly accessible open spaces and recreational areas and would in physical terms act as a narrow girdle of open space around the city. It was not until the 1947 Town and Country Planning Act that provisions were formally passed for Green Belts.
- 2.2.3. At the point of its implementation in 1955 the concept of Green Belt had changed considerably from its original vision of creating publicly accessible open spaces for recreation purposes for the population of the city, to instead forming a significant barrier to the physical expansion of London. Green Belt was essentially intended to act as an urban containment zone. In fact, even at that time and in contrast to the original vision, it was recognised that such space in seeking to limit sprawl did not need to be of good quality or accessible to the public. These general principles have largely remained constant since 1955 and remain central to current national policy.

National Planning Policy Framework

- 2.2.4. The National Planning Policy Framework (NPPF, last updated 20 July 2021) states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belt are its openness and permanence. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.
- 2.2.5. The NPPF defines five purposes for Green Belt which logically flow from this aim as follows:
- to check the unrestricted sprawl of large built-up areas;

- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.2.6. Reflecting its overarching aim and consequential purposes the approach to defining/designating land as GB is principally a reflection of its geographical position, openness, and scale relative to its surroundings, as it is only these defining characteristics which have any bearing on its fundamental role. The consideration of other matters relating to the condition/status of the land such as landscape quality and recreation use are not determining factors. In fact, designated Green Belt might be unremarkable, unattractive, and inaccessible, yet against current national policy would warrant continued protection.

2.2.7. The NPPF does however advise that LPAs should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. These incidental purposes are, nonetheless, distinct from the primary purposes.

2.2.8. Once established, Green Belt boundaries should only be altered when there are fully evidenced exceptional circumstances. This should be done through the preparation or updating of plans. Before concluding that exceptional circumstances exist, planning authorities must demonstrate that they have considered all other reasonable options for meeting their need. These include:

- the use of suitable brownfield sites and underutilised land;
- optimising the density of development in line with the policies in chapter 11 of the NPPF; and
- discussing with neighbouring authorities whether they could accommodate some of the identified need for development.

2.2.9. The NPPF also states that when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Any changes should consider the consequences for sustainable development of channelling development towards urban areas inside the GB boundary. This is particularly pertinent as it implies that GB locations are generally isolated, and whilst this is true in places, much of the land within Ealing is reasonably accessible because of its location within an urban area.

2.2.10. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport. The impact of removing land from the Green Belt should be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

Sport England – Planning for sport guidance

2.2.11. The purpose of this guidance is to help the planning system provide formal and informal opportunities for all to take part in sport and be physically active. It presents twelve planning- for-sport principles, one of which is to “plan positively for sport and physical activity provision in designated landscapes and the Green Belt”.

2.2.12. The Green Belt and urban fringe land provide an, often, untapped resource for outdoor sport and physical activity near a substantial proportion of the population. In accordance with the NPPF, the

provision of appropriate facilities for outdoor sport and recreation and changes of use of land to outdoor sport and recreation are not inappropriate development in the Green Belt. Sport England defines ‘appropriate facilities’ as those that directly support participation in, and help to secure the long-term viability and sustainability of, outdoor sport and recreational activities so long as they preserve the openness of the Green Belt.

Regional context

London Plan

- 2.2.13. Regional policy in relation to Green Belt is set out in Policy G.2 of the London Plan (March 2021). The policy in the London Plan reflects much of the guidance within the NPPF, and states that the Mayor strongly supports the continued protection of London’s Green Belt, and its enhancement subject to national planning policy tests. Development proposals that would harm the Green Belt should be refused except where very special circumstances exist, and exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan.
- 2.2.14. The London Plan recognises that openness and permanence are essential characteristics of the Green Belt but, despite being open in character, some parts of the Green Belt do not currently provide significant benefits to Londoners as they have become derelict and unsightly. Even derelict sites, however, may be making positive contributions to biodiversity, flood prevention, and climate resilience. The London Plan states that the Mayor will work with boroughs and other strategic partners to enhance access to the Green Belt and to improve the quality of these areas in appropriate ways.
- 2.2.15. Despite clearly having regional significance as a policy designation through shaping the pattern of London’s development relative to its neighbours, the process of drawing up and reviewing boundaries has been left to the individual boroughs (presumably in consultation with the Mayor and adjoining boroughs, although this is not explicitly stated in the London Plan).

London First

- 2.2.16. In ‘The Green Belt: A place for Londoners?’¹, it is argued that continuing to protect London’s valuable green open spaces is wholly compatible with seeing how the Green Belt can play a small part in helping to accommodate the new homes that London needs. Therefore, London’s boroughs should be encouraged to review their Green Belt and consider how the land within it can be most effectively used and what the options are for redesignating a small fraction for new homes.
- 2.2.17. It argues that the starting point for any Green Belt review in London should be to consider only areas that are close to existing or future transport nodes, of poor environmental or civic value, and which could serve London’s needs better by supporting sustainable, well-designed residential development that incorporates truly accessible green space.

LB Hounslow

- 2.2.18. The Hounslow Green Belt review was undertaken in two stages. The Stage 1 report was published in April 2015 and the Stage 2 report in June 2019 (both studies were undertaken by Arup). Between these two pieces of work, Hounslow Council prepared its own Green Belt Review in 2017.

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4.¹ ‘The Green Belt: A place for Londoners?’, London First, Quod, and SERC, 2015

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- 2.2.19. The Stage 1 report reaffirms the importance of the Green Belt in maintaining on-going separation between London and settlements in Surrey. It emphasises that the Green Belt was initially created to check the growth or outward sprawl of London.
- 2.2.20. It states that a key issue in Hounslow is that, in many cases, the designation of Green Belt in the borough neither prevents the sprawl of London nor separates distinct 'towns', despite serving the important functions of breaking up continuous built-form, separating different character areas, and providing valuable green space. This is particularly the case in the north and centre of the borough, where Green Belt sites are described as being fragmented and isolated from the wider Green Belt, being under the influence of the urban area, and playing a limited role in preventing the sprawl and merging of settlements.
- 2.2.21. To the south and west of the borough, it identified areas of more substantial Green Belt land which are crucial to preventing the outward sprawl of London and the merging of Greater London with settlements in neighbouring Surrey, as well as retaining a particular 'countryside' character.
- 2.2.22. The Stage 1 assessment considered 25 strategic land parcels, referred to as 'General Areas', against the NPPF purposes for Green Belt. It recommended that:
- Five General Areas should be fully retained within the Green Belt;
 - 14 General Areas perform weakly against the NPPF Purposes and should be considered further by the Council as potential areas for release from the Green Belt; and
 - Six General Areas should be considered further for potential sub-division.
- 2.2.23. The 2017 Green Belt Review considered 21 areas comprising of:
- The 14 General Areas identified as performing weakly in their entirety;
 - The six General Areas recommended for potential sub-division; and
 - One of the General Areas recommended for retention that the Council thought merited additional consideration. The other four General Areas recommended for retention were not assessed further.
- 2.2.24. It concluded that:
- Six General Areas should be considered for release from the Green Belt, partially for development / Locally Significant Industrial Site designation, with the remainder re-designated as MOL;
 - Eight General Areas should be considered for release from the Green Belt and re-designated entirely as MOL;
 - One General Area should be considered for release from the Green Belt and re-designated as open space;
 - One General Area should be considered for partial release from the Green Belt with the remainder for development;
 - One General Area should be considered for partial release from the Green Belt, with the released part re-designated as open space;
 - Seven General Areas should be retained within the Green Belt; and
 - One General Area should be identified as Safeguarded Land.
- 2.2.25. The Stage 2 report provided a further assessment of GB areas, and also assessed whether Green Belt areas that scored poorly against NPPF criteria could be re-designated as MOL.

2.2.26. In terms of Green Belt, the Stage 2 report identified a total of 29 Green Belt areas that should be considered further for removal from the Green Belt:

- 16 areas were recommended for further consideration in isolation – if removed from the Green Belt, these areas would be unlikely to harm the performance of the wider Green Belt;
- Three areas were recommended for further consideration in combination – if removed from the Green Belt in combination, these areas would be unlikely to harm the performance of the wider Green Belt, but one of the constituent sub-areas could not be removed in isolation without resulting in harm; and
- 10 areas were recommended for further consideration as a strategic cluster – larger swathes of Green Belt for consideration by the Council which would be unlikely to harm the performance of the wider Green Belt if removed, and where there are opportunities to ameliorate harm.

2.2.27. In terms of re-designating any of the Green Belt as Metropolitan Open Land, it concluded that:

- Three areas should be considered further as MOL;
- Six areas were partially recommended for further consideration as MOL; and
- One area was not recommended for MOL.

2.2.28. The recommendations of the review, including which Green Belt parcels should be further considered for release, and which parcels should be further considered for change of designation to MOL are illustrated in Figure 1 below.

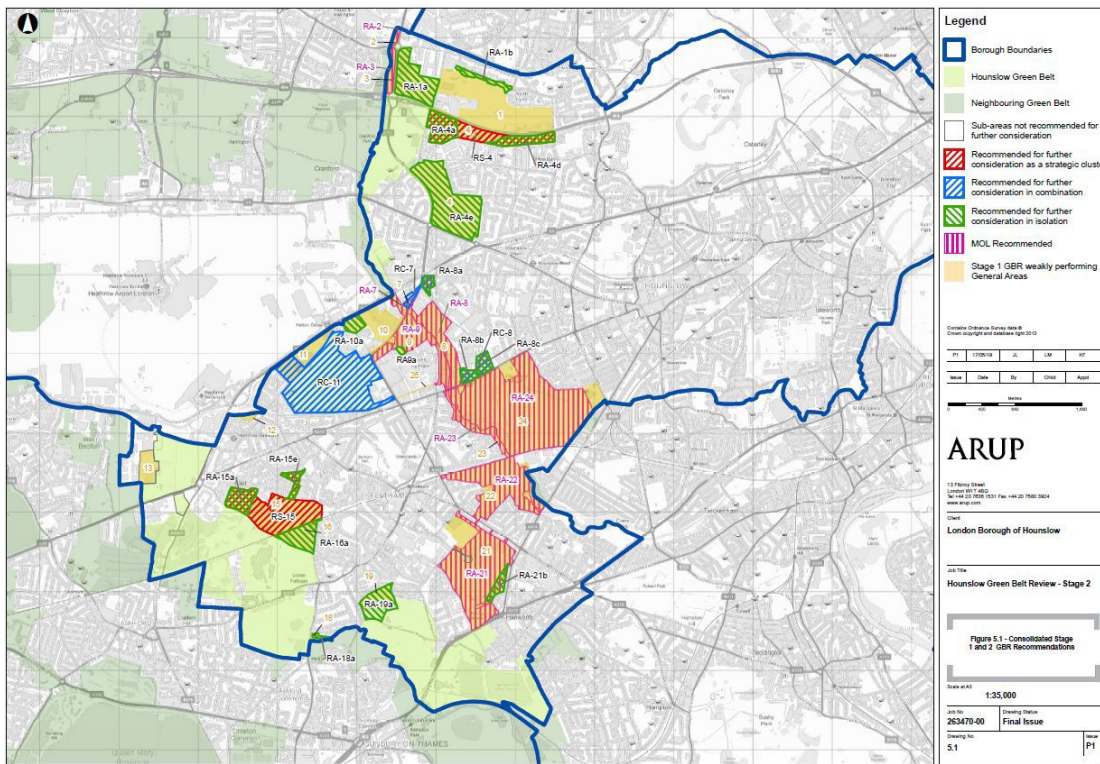


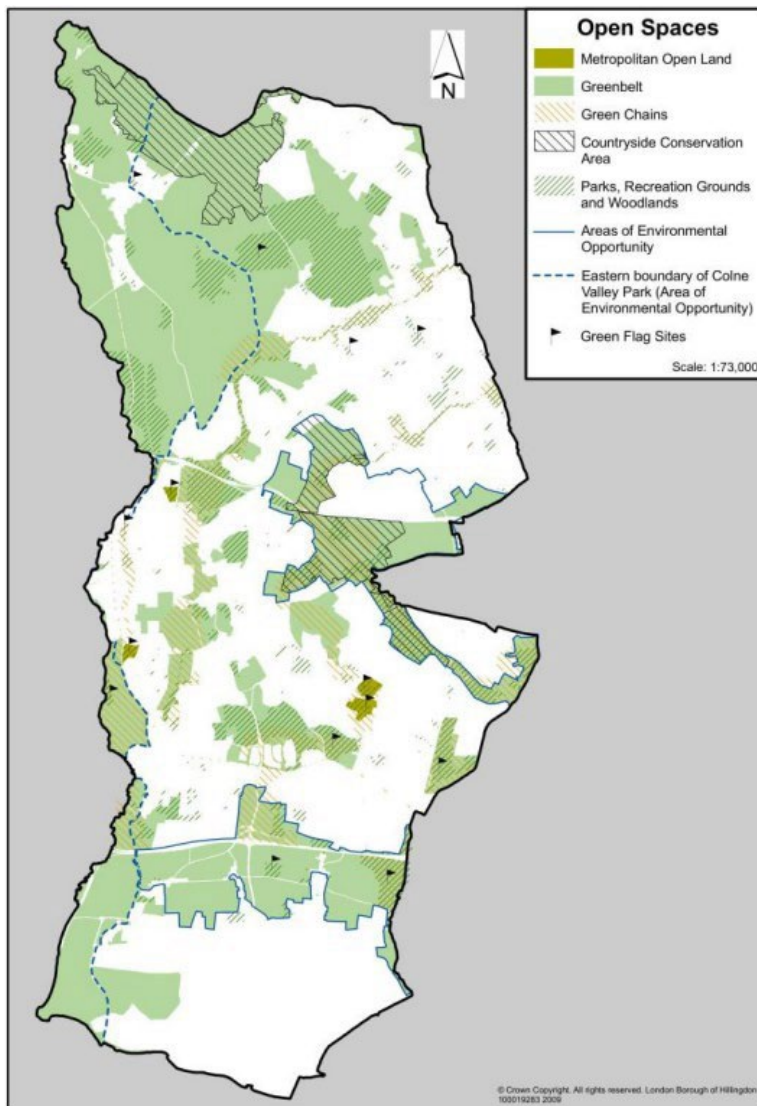
Figure 1 – Hounslow Green Belt Review recommendations map

Source: Hounslow Green Belt Review, Arup

LB Hillingdon

- 2.2.29. Hillingdon's Local Plan Part 1 Strategic Policies document (adopted November 2012) states that Hillingdon includes 4,970 hectares of Green Belt. It states that the Green Belt around London is the largest in the United Kingdom, and in physical and perceptual terms the borough is the western edge and gateway to London. It therefore links Hillingdon's geographical location on the edge of London with the importance of protecting these open areas from urban sprawl.
- 2.2.30. It states that the Green Belt's role is to help strictly control development in the open countryside. The use of the term countryside by Hillingdon is important in distinguishing the nature of its Green Belt from that found in London boroughs not on the edge of London, such as Ealing.
- 2.2.31. Hillingdon's Local Plan Part 1 Strategic Policies document also states that the borough contains ten areas designated as Metropolitan Open Land. It states that this designation is given to areas of open land that have a London-wide significance.
- 2.2.32. The document states that Hillingdon Council does not consider that major adjustments to Green Belt boundaries are necessary to accommodate growth over the period covered by the Hillingdon Local Plan: Part 1- Strategic Policies.
- 2.2.33. In September 2013, Hillingdon published its Green Belt Assessment Update. It starts by making it clear that it does not seek to undertake a major review of Green Belt in the borough or identify significant changes to Green Belt boundaries. Instead, minor adjustments are proposed where sites do not meet the purposes of including land within the Green Belt. In its conclusions, it recommends the removal of three Green Belt sites and the addition of two new Green Belt sites.

Figure 2 – Hillingdon Open Spaces map



Source: Hillingdon Local Plan: Part 1 - Strategic Policies (Adopted November 2012)

- 2.2.34. The Green Belt Assessment Update does not consider Metropolitan Open Land. Instead, it refers to Hillingdon’s Metropolitan Open Land and Green Chains review undertaken in 2004 as still being the main source of evidence.
- 2.2.35. Hillingdon’s Local Plan Part 2 Site Allocations and Designations Adoption Version (January 2020) repeats many of the statements from the Part 1 document relating to Green Belt. It includes proposals for a number of changes which are mainly minor and site-specific. These include:
- Minor Green Belt deletions;
 - Green Belt extensions;
 - Metropolitan Open Land upgraded to Green Belt;
 - Areas forming links in Green Chain to be included in Green Belt; and
 - Areas forming links in Green Chain to be included in Metropolitan Open Land.

Local context

- 2.2.36. Ealing's Green Belt takes the form of green wedges (or "lungs") that extend well into the built area. These are concentrated in the western part of the borough, and spatially connect to Green Belt spaces in the neighbouring borough of Hillingdon.
- 2.2.37. While in neighbouring Hillingdon it might be argued that these GB extents separate established settlements, with some exceptions (e.g. Harefield), by and large such settlements (particularly those areas west of Ealing) do not sit within a band of GB, but rather the reverse is more true, with the open space largely forming islands within these established built settlements.
- 2.2.38. Even where such parcels are linked, such connections are often narrow and weak. Viewing the area west of Ealing, significantly more of this area constitutes built form than open space. Our perception of whether land functions as GB or not can also vary considerably dependent on the vantage point and the scale at which it is judged. Travelling along the A40 it might be argued that the countryside extends in as far as Priors Field/Farm. A short distance from this corridor however, the perception is different still, with the urban area starting much further west. Judging it at a human scale, however, has its limitations, as it is not possible to fully appreciate the relationship between the green space and settlements. This can only be fully appreciated at a strategic scale.
- 2.2.39. Whilst this arrangement clearly has merit, in that with varying success it brings the countryside into the urban area, and perhaps more closely follows the ideals of the original GB concept, it does little to contribute to its current purposes of preventing urban sprawl. The concept of green webs, for example, is strongly supported, although whether such land needs to be designated as GB/MOL is debatable.
- 2.2.40. Going back to the origins of the Green Belt, we need to consider that there was never a neat edge to London, and that outer London was made up of a series of settlements. The extent to which these benefit from being separated now though, is perhaps debatable. It is also necessary to consider its spatial extent beyond London itself, as over 90% of the Green Belt containing London is located outside of London's administrative boundaries. Ebenezer Howard envisaged a narrow girdle of open space and yet the GB as it exists now extends to some three times the size of the city itself. We ought to be asking whether this is essential to its effectiveness.
- 2.2.41. A key consideration when reviewing Ealing's Green Belt (or, indeed, any Green belt that is not in a borough on the edge of London) is whether the principal objective of Green Belt is to prevent the outwards expansion of London and its merging with neighbouring cities and towns, or to separate different areas within London. From Ealing's perspective, it is the former. If it was the latter, then there would be a case for having Green Belt designations throughout London, even in inner London boroughs. Such a prospect would clearly not make sense.
- 2.2.42. Within Ealing the current extent of Green Belt is illustrated on its policies map which accompanies the Local Plan documents. As noted earlier, the geographical extent of Green Belt in the borough has largely remained the same for many decades now. Whilst it has not been possible to source a copy of the Middlesex Initial Development Plan, the first available published record of GB is illustrated in the 1986 Borough Plan. The extents shown here have largely been carried forward intact through each subsequent iteration of the development plan, including the 1995 UDP, the 2004 UDP, and now the current Local Plan adopted in 2012/13.

- 2.2.43. The only notable changes were the removal from Ealing's jurisdiction (although remaining as GB) of some land at Minet Country Park following an administrative borough boundary change. More recently, as part of the adoption of the Core Strategy in 2013, a parcel on the eastern edge of our GB extent, encompassing the former GSK Sports Ground, the London Marathon Playing Fields, Birchwood and Greenford Lagoons was reclassified from Green Belt to MOL. The impetus for this review arose in part from the proposal to site a new high school on the site which had raised questions about its status as GB. The first opportunity to revisit this designation was as part of the preparation of the Core Strategy in 2011. Upon revisiting its designation, it was determined that this parcel, because of its situation and character, resembled more closely MOL than Green Belt. Accordingly, this change was recommended and supported by the Inspector examining the Plan.
- 2.2.44. It should be noted that whilst several other minor changes were made, and also to MOL parcels too, that the review carried out for the current local plan did not represent a comprehensive review of major open areas in the borough. This current review therefore represents the first comprehensive and strategic review of GB/MOL within the borough carried out for several decades.

2.3. Metropolitan Open Land

- 2.3.1. Although it is afforded the same level of protection as GB, its policy basis is distinct deriving instead from the regional spatial strategy for London, i.e. the London Plan, and its status as a planning designation is unique to London only. Its historical origins are not as old as GB's, although it, too, has largely remained constant as a planning instrument.
- 2.3.2. The Greater London Council (GLC) first introduced the concept of Metropolitan Open Land when preparing the Greater London Development Plan (GLDP). The GLC described the nature and role of MOL as consisting of open land which forms part of the main structural divisions between settlement areas. It stated that its protection will enable London to maintain and develop its variety and local characteristics in the face of pressures for development.
- 2.3.3. The GLDP (1976) described MOL as areas of open land that 'are of significance for Greater London as a whole'. MOL was meant to be a protective designation for strategically important open land within the urban area which helped shape development and distinctive communities and provided recreational opportunities. It was recommended that a range of open land including parks, woodlands, golf courses, nursery gardens, cemeteries should receive this designation to protect them from the risk of development.²
- 2.3.4. MOL can provide useful and attractive breaks in the built areas but is not appropriately situated for incorporation in the Green Belt. MOL often forms islands embedded in the urban fabric or penetrate deeply into the urban areas as green wedges. The latter is of particular significance when considering the current geography of GB in London, and in Ealing in particular.
- 2.3.5. The GLDP provided no statutory policy guidance on MOL and called on boroughs to define the boundaries in their Local Plans. Consequently, there was considerable variation between boroughs in how boundaries were defined. The differentiation between GB and MOL was frequently blurred and, in fact, this is still very much evident today.

² London's 'protected' land: The extent, location and character of designated Green Belt and Metropolitan Open Land in Greater London, CPRE London, August 2018.

2.3.6. Within Ealing, MOL was first defined in the adopted 1986 Borough Plan. Much like GB, the extent of MOL in the borough as defined in 1986 has largely remained intact in the latest iteration of the policies map (2013 read alongside the Atlas of Changes accompanying the Schools DPD) accompanying the current local plan.

2.3.7. As with GB a comprehensive and strategic review of MOL has not been undertaken since it was first defined. However, a number of changes/amendments (primarily of a minor nature) have been made over the years. Some of the more notable changes made include:

- During the preparation of the 1995 UDP
 - The removal (although remaining as MOL) of land at Wormwood Scrubs from Ealing's jurisdiction following an administrative borough boundary change.
 - Amendments to the boundary of Guinness Mounds
 - The inclusion of the rear gardens of properties at Grove Avenue (this addition was subsequently removed in 2013).
- During the preparation of the 2004 UDP, amendments to the boundary of MOL land at Paradise Fields following the development of West Way Cross Shopping Centre.
- During the preparation of the 2012/13 Local plan:
 - The reclassification of the former GSK Sports ground, Greenford Lagoons, and Birchwood from GB to MOL as noted above.
 - Redrawing the MOL boundaries to remove garden land to the rear of Grove Avenue, a change first introduced in the 1995 UDP.
 - Amending boundaries around St Margaret's Road Open Space to exclude the extent of the recent residential development (Hanwell Locks). It should be noted that the extent of the area de-designated was in fact smaller than the area originally recommended for removal by the Inspector examining the 2004 UDP.
 - Correcting MOL boundaries to remove properties at Billets Hart Close and land adjoining at no.2 Fox Villas.
 - At Tentelow Lane Depot MOL boundaries were redrawn to exclude the extent of the residential development.
 - At Glade Lane Open Space various additions and deletions were made to the MOL designation including the addition of the scrub land to the north west of the site, parkland adjoining Cookham Close to the north and east, and the removal of land south of Cookham Close which was already built on.
 - A minor expansion of the MOL area at Windmill Lane Open Space to include the full extent of the road verge.
 - The removal of the footpath and forecourt area of the pub at the northern edge of Ealing Green.
 - Realignment of MOL boundaries at Elthorne Park.

2.3.8. A series of further changes have now also been implemented following the adoption of the Planning for Schools DPD in May 2016 as follows:

- Redrawing the MOL boundary at Acton Park to exclude the extent of Acton Park Depot, to allow the site to accommodate a primary school.

- The de-designation of the south east corner of Barclays Sports Ground to accommodate the siting of a new secondary school.
- The removal of the pavilion, associated hardstanding, and vehicle access at Eversheds Sports Ground to support the siting of a new school accommodation.

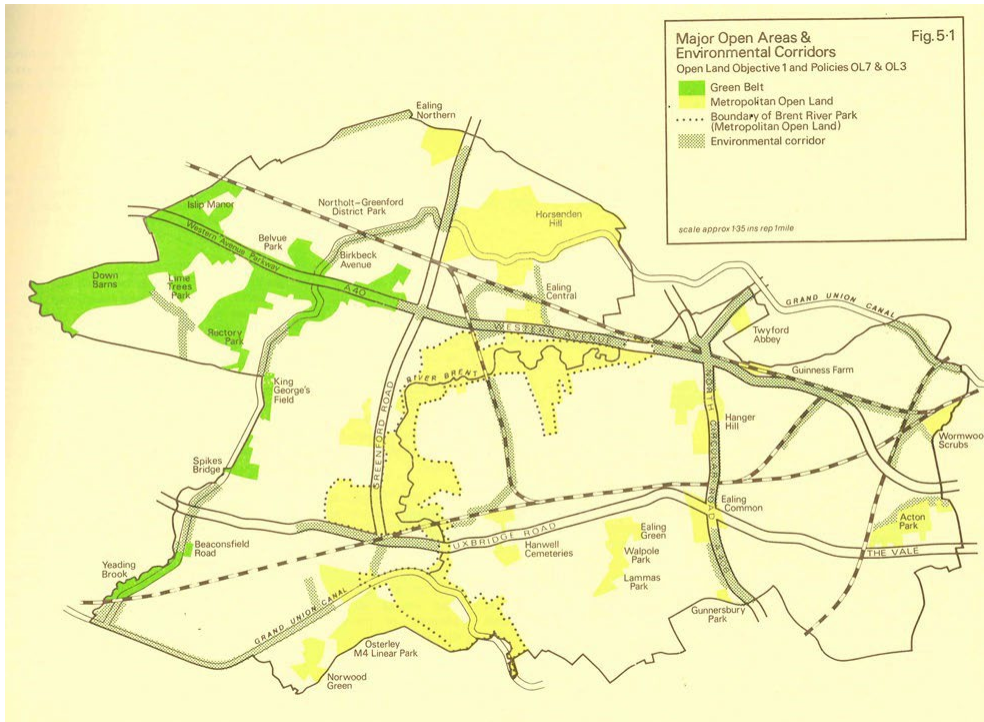


Figure 3 - Green Belt/MOL extents as defined in the 1986 Borough Plan

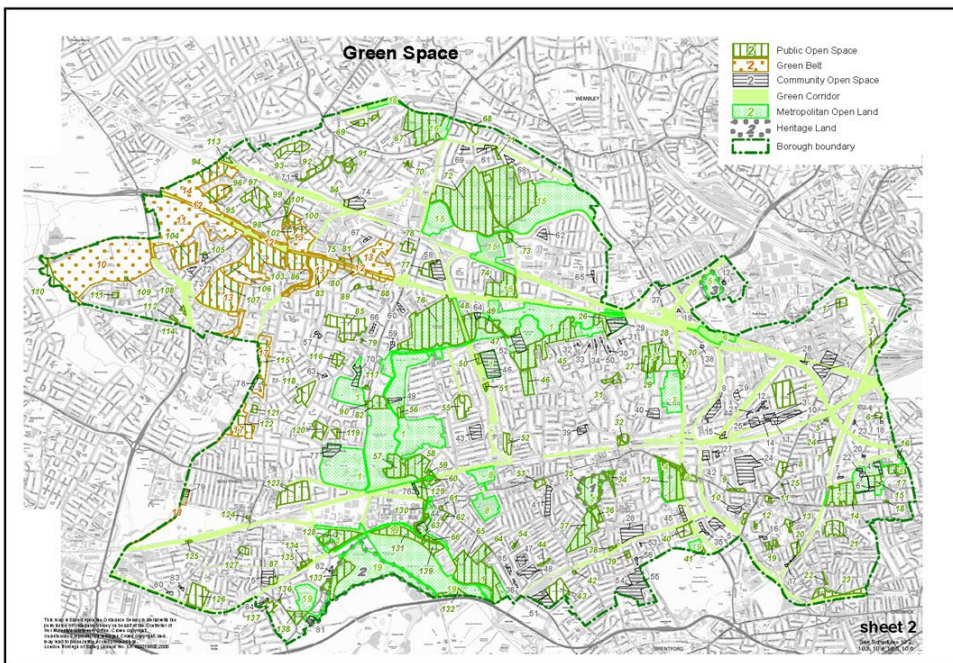
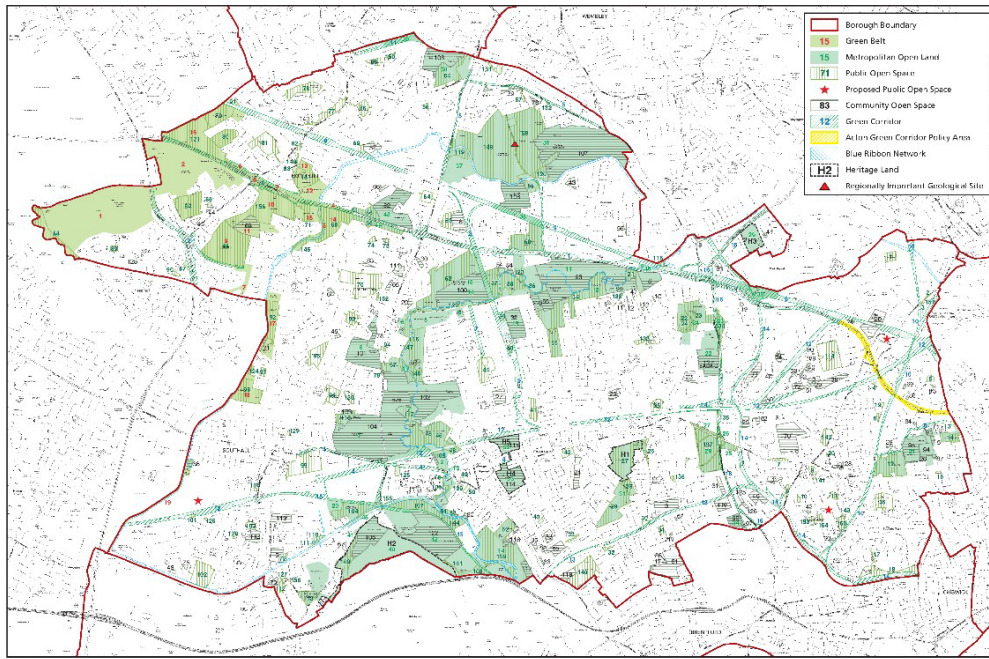


Figure 4 - Green Belt/MOL extents as defined in 2004 UDP

Figure 5 - Current Green Belt/MOL extents as defined in 2012/13 (not including adopted amendments arising from schools DPD)



- 2.3.9. Current policy on Metropolitan Open Land is contained in the London Plan and in the Council's own Local Plan document. Policy G3 of the London Plan (March 2021) states that MOL is afforded the same status and level of protection as Green Belt. According to the London Plan, MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt, and boroughs should work with partners to enhance the quality and range of uses of MOL.
- 2.3.10. In terms of making alterations to the boundary of MOL, any such changes should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL as set out above.
- 2.3.11. The need for a collaborative process is welcomed, although in practice most reviews of MOL have been initiated by individual boroughs rather than as any sub regional or pan London assessment. Perhaps more curious is the fact that such a requirement is also absent from the respective GB policy, where clearly a more than borough level review is needed.
- 2.3.12. The London Plan supports the extension of MOL designations where appropriate. It states that boroughs should designate MOL by establishing that the land meets at least one of the following criteria:
- It contributes to the physical structure of London by being clearly distinguishable from the built-up area;
 - It includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;
 - It contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value; and
 - It forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

- 2.3.13. These defining criteria and the approach to managing development affecting MOL land have largely been carried forward from earlier iterations of the London Plan and its precursor RPG 3. RPG 3, however, recognised that there was a need for greater consistency between boroughs in the designation of MOL land. It provided further advice around the scale of MOL areas and the distinction between MOL and GB, which unfortunately is absent from current London Plan Policy. In the case of MOL it noted that: ‘The designation of too small or more locally significant areas of land, for example, will devalue the strength of designation as a whole. If the land does not serve a catchment area of strategic significance or draw visitors from several boroughs, it may be more appropriate to propose and justify other designations.’
- 2.3.14. With regard to the distinction between MOL and GB land, it noted that ‘where isolated pockets of Green Belt exist that are not part of a continuous pattern of open land surrounding London, authorities should consider whether it would be more appropriate to designate the land as MOL in recognition of its location and use, having regard to the guidance on MOL below.’
- 2.3.15. Whilst the commentary above provides an overview of how the designated extent of GB and MOL has changed, it does not provide a complete picture of all incursions that have taken place or have been permitted on GB and MOL over the years. The current boundaries for example do not necessarily reflect more recent consents which have yet to be implemented. Moreover, in certain circumstances it has been appropriate to retain the MOL/GB designations despite such development, as their siting has not undermined the integrity of the wider parcel.

2.4. Is Green Belt/MOL policy in its current form still fit for purpose?

- 2.4.1. At the London level the supply of housing has failed to keep pace with demand. Whilst priority has been placed on reusing brownfield sites, and it is right for this to be exhausted as a first priority, the identified housing capacity still falls short of projected demand. Whilst efforts are being made to densify development in town centres and in opportunity areas, and this will continue to remain a central part of any strategy, this alone is unlikely to fulfil need and without careful management it might also bring with it unwelcome consequences.
- 2.4.2. The London Plan sets Ealing a challenging target of providing 21,570 dwellings over the period 2019/20 - 2028/29. Other London boroughs also face similarly challenging housing delivery targets.
- 2.4.3. Given these housing pressures, and the scarcity of land for development, it is important to consider all the possible ways of meeting housing need. This includes considering the possibility of Green Belt/MOL providing land for development to a limited extent. Any such consideration would need to review the actual role and status of green space in and around our cities and particularly in the context of a growing population.
- 2.4.4. For example, are all GB parcels currently functioning as defined and intended in national policy? As detailed above, current policy in defining the purposes of GB principally focuses on its openness and its positioning relative to established settlements. It has little regard for other defining characteristics such as the quality of the space, its accessibility, and its recreational role.
- 2.4.5. Beyond housing, London faces a series of other challenges than require additional land. For example, London has lost a significant amount of employment land over the past two decades. This threatens the balance between population and economic growth and could lead to sustainability issues by causing people to commute further distances. Changes in people’s shopping preferences and the continued growth of online shopping (with the corresponding need for more distribution centres near where people live) means that some of the locations currently designated as GB / MOL could be ideal for such logistics uses. Related to this, it could be argued that having distribution centres that serve London outside London defeats the purpose of the Green Belt by generating lengthier delivery vehicle movements.

- 2.4.6. According to the London Industrial Land Demand (October 2017), the greater the reduction in London's industrial land supply, the more strategic warehousing development serving London shifts outwards, beyond the Green Belt. This shift leads to multiple economic, environmental, and transport costs. It states that the alternatives are either to plan for more strategic warehousing in London or to allow such development in selected locations in the Green Belt.
- 2.4.7. In addition to housing and employment land need, London also faces significant social infrastructure challenges. Given the location of MOL, in particular, some of these parcels of land could potentially be a good fit for schools, hospitals or recreation uses.
- 2.4.8. In a growing city, where pressure on our existing spaces continues to rise, particularly for recreational purposes, and where land is both scarce for recreation and development, the need to utilise space effectively and efficiently is crucial. In this context, the limitations imposed by the current nationally defined purposes may not reflect the current role and use of the Green Belt. In fact, they may well hinder opportunities to enhance such space for the benefit of the existing and future population.
- 2.4.9. There is clearly value, then, in re-examining the purposes of Green Belt/MOL and this study, whilst representing a local review only, has sought not to be constrained by the limitations of current policy. In this regard whilst an assessment has been made against the defined purposes/criteria set out in the NPPF and the London Plan respectively, additional assessment criteria have been identified which seek to assess the value of these spaces against a broader, and arguably, a more relevant set of roles and criteria. The approach to undertaking this assessment is detailed in Chapter 3.
- 2.4.10. The driver for undertaking such a review will vary from one authority to another, with many initiating a review in order to identify new land to accommodate unmet housing need. Whilst Ealing will also need to plan for such growth, the evidence of this need locally has not yet been established. As this position becomes clearer however it is acknowledged that the recommendations of this study will need to be updated as necessary to reflect this position.
- 2.4.11. As noted above, GB and MOL can vary considerably in quality and in terms of their recreational value. Such spaces do not, at present, always fulfil their potential in meeting the needs of a growing population. A key focus of this review, then, is to explore how this space benefits and meets the needs of the population, and how its value in this respect can be enhanced. The emphasis is therefore placed on identifying and exploring opportunities for improvements, in the first instance, perhaps enabled by some development. Approaching the review in this way is crucial as it will ensure that our space works better to meet the needs of our population. In that context, the identification of space for development is viewed as a secondary objective, although it is still an important one.

2.5. Understanding Ealing's perspective

- 2.5.1. According to data from Greenspace Information for Greater London (GIGL, August 2018), Ealing has 868ha of MOL and 309ha of GB.
- 2.5.2. In terms of Green Belt, it is worth mentioning that other outer London boroughs with similar geographic position to Ealing (i.e. not on the outer edge of London) such as Brent and Merton have no Green Belt.
- 2.5.3. In terms of MOL, Ealing has the third highest amount of MOL land out of the twenty outer London boroughs, and the fourth highest out of all 33 London boroughs.
- 2.5.4. The above facts are important in terms of considering the following two questions.

Should London boroughs that are not on the edge of London have GB designations?

- 2.5.5. Brent and Merton which have a similar geographic position to Ealing do not have any GB, while Haringey has 61ha of GB compared to Ealing's 309ha. Barking and Dagenham has a substantial amount of GB (531ha) but a relatively small amount of MOL (137ha compared to Ealing's 868ha). There is therefore an inconsistent approach to how outer London boroughs that are not on the edge of London treat Green Belt. But, with the exception of Barking and Dagenham, all others have much less GB than Ealing or none at all.
- 2.5.6. According to the NPPF, two key purposes of the Green Belt are to check the unrestricted sprawl of large built-up areas and to prevent neighbouring towns merging into one another. But we need to consider what this means in the London context. Is the intention of Green Belt to provide artificial breaks between London areas that are no longer particularly distinguishable or physically separated, or to prevent London as a whole from expanding outwards and merging with nearby towns and cities? If we believe it to be the latter, then it would make sense to have minimal to no GB designations in boroughs like Ealing.
- 2.5.7. Even the use of the term "belt" supports the above argument. The word belt refers to something circular in nature that surrounds something else, like a belt we wear surrounds our waist.
- 2.5.8. The London Plan states that MOL designation offers, for all intent and purposes, the same level of protection as GB designation. It is therefore not a question of removing protection from important sites that warrant it, but ensuring that they have the correct designation that appropriately reflects their geography and role.

Is all of Ealing's MOL fit for purpose?

- 2.5.9. Ealing has the fourth highest amount of MOL (in hectares) out of the 33 London boroughs. While Ealing is a large and green borough, the above statistic may suggest that a disproportionately high amount of green open space in Ealing has been designated as MOL. While all green open space is valuable to local people, the MOL designation is meant to distinguish and offer special protection to those sites that have special characteristics that set them apart from other local green open spaces.
- 2.5.10. As discussed in 2.3.13, the designation of too small or more locally significant areas of land, can devalue the strength of the MOL designation as a whole. If the land does not serve a catchment area of strategic significance or draw visitors from several boroughs, it may be more appropriate to assign it other designations. As with Green Belt, the starting point is that green open spaces are valuable and need to be protected. Therefore, potentially removing MOL designation for sites that do not meet the MOL criteria does not mean that these sites are not locally important and should not be protected and enhanced. It is, rather, a case of assigning the correct designation that reflects their role and characteristics.
- 2.5.11. The methodology outlined in Section 3 seeks to answer these questions, assessing GB and MOL sites in a consistent and systematic way based on a range of clearly defined criteria.

3. Stage 1 methodology

3.1. Introduction

3.1.1. This review sets out to achieve the following objectives:

- To assess the relative contribution of GB and MOL land in fulfilling GB and MOL purposes, and its potential in meeting the needs of a growing population;
- To verify the current extent of our GB and MOL network to ensure that its boundaries are correct, robust, and defensible; and
- To identify opportunities to enhance open space.

3.1.2. The methodology employed can be broken down into a number of discreet parts (discussed below) and three main stages. Stage 1 (this report) provides a baseline review of GB and MOL sites and an assessment of their contribution towards the criteria / objectives of their designation. It also considers appropriate boundary changes and potential designation changes based on the findings of this assessment.

3.1.3. Stage 2 (which will follow after the completion of Stage 1) will consider opportunities for enhancing GB/MOL sites. Stage 3 will consider what limited enabling development may be required to enhance sites and whether there is evidence of any exceptional circumstances that would justify the limited release of GB/MOL to meet unmet need – firstly for recreation uses, but also potentially for housing, employment land, social infrastructure, or Gypsy and Traveller accommodation.

3.1.4. Whilst national and regional policy identify the defining purposes and functions of Green Belt and MOL, there has never been any guidance around interpreting these purposes or on how to approach a GB/MOL review. It is, therefore, left to the individual authority to determine how best to undertake this.

3.1.5. In November 2014, the Planning Advisory Service published a paper on Green Belt³, and more specifically the correct interpretation of national planning policy in relation to GB and the exceptional circumstances that would warrant GB boundary changes. This considered a number of legal cases relating to Green Belt. It concluded that, while the correct interpretation of national planning policy is a matter for the courts, there was extensive scope for the application of planning judgement, provided that the decision-maker correctly informed themselves in respect of the policy. In terms of whether a shortfall in housing land supply is considered to provide “special circumstances” for changing GB boundaries, one of the considerations to be reflected should be the actual scale of any such shortfall.

3.1.6. In 2020, Landmark Chambers delivered a webinar titled ‘Developing in the Green Belt’, which also considered the findings of various legal cases. It reinforced the point that before concluding that exceptional circumstances exist, strategic plan-making authorities should be able to demonstrate that they had fully considered all other reasonable options for meeting development need. These include the reuse of previously developed land; intensification of use to achieve greater densities; and possible substitution in co-operation with neighbouring local authorities. It is, therefore, important to demonstrate that need is supported by other factors which could also include housing affordability and the provision of sustainable forms of development.

³ Planning Advisory Service, Plan-Making Case Law Update, Main Issue 4: Green Belt, November 2014

- 3.1.7. Central to the review is an assessment of the space against the objectives/purposes of GB and MOL defined in national and regional policy, and accordingly this has shaped the assessment criteria. Whilst it is necessary to assess parcels against the currently defined criteria, as noted earlier in this report, these are considered to be too narrowly defined. It is, therefore, possible to think beyond this framework and additional criteria have been identified.
- 3.1.8. In particular, it is important to assess the sites in the Ealing context. For example, Ealing is not on the edge of London, and therefore we have taken a local view of the role of Green Belt in containing the expansion of London as a whole and keeping it distinct from neighbouring cities and towns, as opposed to separating different areas of London. This leads us to consider whether boroughs such as Ealing, which are not on the edge of London and which have GB sites as far as nine kilometres away from the edge of London should have GB designations or whether MOL would be a more appropriate designation (provided such sites meet MOL criteria).
- 3.1.9. In marked contrast to reviews undertaken previously in Ealing, this review was also intended to be comprehensive rather than being piecemeal or selective. Moreover, a decision was taken early on to cover both GB and MOL in a single review. Partly, this was because they are afforded the same protection, but also because they share certain characteristics, i.e. their openness and strategic scale. Therefore, their designations might in certain cases be interchangeable.
- 3.1.10. Finally, it is important that the assessment is consistent across all sites (hence the assessment against a common set of criteria), but we also consider it appropriate to take local circumstances into account. For example, green open spaces become fewer and smaller as we move towards the east of the borough, reflecting the more urban and densely developed character of the area. Such sites may score less well against the defined criteria but their importance may be enhanced by the scarcity of open green spaces in their area.

3.2. Identifying land parcels

- 3.2.1. The first stage of the assessment has involved defining land parcels. Getting this right is particularly important as the extent of a given parcel and how they are split will likely have a bearing on the assessment results.
- 3.2.2. As a starting point, those sites already designated as Green Belt and MOL were identified. Whilst the majority of the parcels have strong and recognisable boundaries and common functions and landscape characteristics, it has been necessary to break up some of the largest parcels to ensure that the assessment process is manageable and the results meaningful.
- 3.2.3. The existing extents have been subdivided into parcels based on broad landscape characteristics, recognisable boundaries, and in relation to MOL only – functional use. This was largely undertaken as a desktop exercise with reference made to OS maps and aerial images. Boundaries were delineated based on recognisable and largely permanent features. These features might be man-made or natural and include, for example, strategic roads, railway lines etc. Watercourses such as rivers and canals were not used however, as they were not deemed to provide a significant boundary in this instance. Similarly, hedgerows, tree lines, and wooded areas were typically not determined to represent a boundary. This is because, whilst clearly recognisable, such features are less permanent and they do not, by themselves, necessarily represent a significant barrier.
- 3.2.4. The Brent River Park, in particular, is a linear open space with variations in its functions, characteristics and quality throughout. Accordingly, this parcel has been broken down into more manageable sections. Although the assessment considers each section separately, the analysis also considers its function relative to the wider network. The same can also be said of other parcels too (GB01-GB03 in particular) which, whilst can be viewed as discrete parcels, at a strategic level they can also be assessed as a whole.

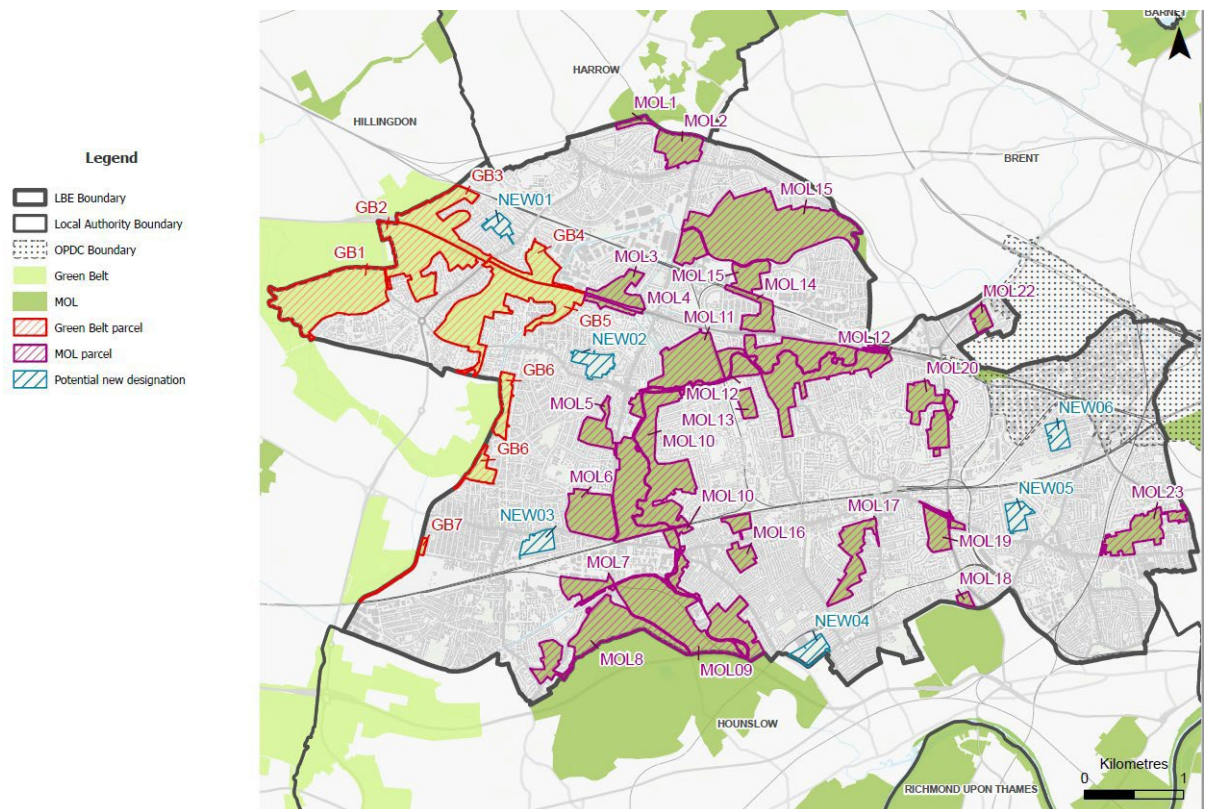
3.2.5. As well as looking at existing sites, consideration was also given to the inclusion of a number of new potential parcels. Of those, six sites were explored further. These were typically sites of a more substantial size.

3.2.6. A total of 36 parcels were identified/defined, comprising:

- Seven Green Belt parcels;
- 23 Metropolitan Open Land parcels⁴; and
- Six new parcels.

3.2.7. **Figure 6** illustrates the parcels defined for the purpose of this assessment.

Figure 6 – GB, MOL, and potential new MOL sites



3.3. Defining assessment criteria

3.3.1. Having identified land parcels, the next step involved defining the assessment criteria. Central to any GB and MOL review is the need to consider to what extent the land contributes to the achievement of the GB purposes and MOL criteria as defined through national and regional policy respectively. This assessment stage formed Part A of the review process. Whilst these purposes/criteria are set out in the NPPF and London Plan respectively, there is no guidance on their interpretation.

⁴ MOL21 falls within the OPDC area. Therefore, while it is recognised as an MOL site in Ealing, it is excluded from the assessment.

3.3.2. To assist reviewers in determining the relative significance of a parcel against the defining purposes/criteria, a scoring system was developed, which has been designed around five categories of significance as follows:

- **Critical importance** to Green Belt/MOL purposes;
- **Major importance** to Green Belt/MOL purposes;
- **Moderate importance** to Green Belt/MOL purposes;
- **Slight/negligible importance** to Green Belt/MOL purposes; and
- **No importance** to Green Belt/MOL purposes.

3.3.3. For each of the five scoring categories, defining characteristics have been identified to assist in determining where a parcel might sit against the relative scoring categories. These defining characteristics have also been developed for each of the purposes/criteria tested for GB and MOL respectively. These are intended to act as a guide, and it is not expected that all parcels will trigger the specific characteristics. Moreover, in some cases, parcels might reflect the characteristics in one category, but they might also share characteristics with another category.

3.3.4. In defining these characteristics, we have also posed certain questions which seek to understand and measure the value of that space in achieving such purposes. For example, whilst it might be established that the parcel provides a clear break, as this is a relative assessment it is also necessary to understand how essential that gap is. It is not merely sufficient, then, to ask whether a parcel forms a gap but, instead, the assessment must also consider the value of that gap in achieving sustainable patterns of development.

3.3.5. These characteristics aim to ensure that the criteria can be objectively assessed and, so far as is possible, avoid the need to make subjective judgements. Ultimately though, the nature of some of the criteria will require a judgement call.

3.3.6. As GB and MOL serve different purposes, and are subject to different defining criteria, it has been necessary to keep the assessment criteria separate, although the same scoring system is employed. In the first instance, sites are assessed in relation to their current designation. Where site performance has been poor against its original designation, it has been appropriate to test the parcels against the alternative designation.

3.3.7. Further commentary on the defining criteria/characteristics is detailed in the guidance note prepared to assist reviewers (provided at Appendix 1 of this report) and summarised below.

3.4. Green Belt assessment criteria

3.4.1. For Green Belt, the assessment criteria have been developed around its purposes as defined through the NPPF. The NPPF defines 5 purposes for Green Belt, although only the first 3 are measurable here, as outlined in the table below. The 'purposes' are highlighted in green in the table below.

Table 1 – Green Belt assessment criteria

Purpose 1: To check unrestricted sprawl of large built-up areas

Significance / contribution / score	Defining characteristics
Critical importance	<ul style="list-style-type: none"> - Land is contiguous with a large built-up area. - Land provides a barrier to a large built-up area, which is weakly bordered. The urban area may lack prominent features. The open area in contrast may have a clearly defined edge, defined by landscape features.
Major importance	<ul style="list-style-type: none"> - Land is contiguous with or connected to a large built up area. - Land provides a barrier to a large built-up area, which has some boundary features, but these are limited and lack permanence
Moderate importance	<ul style="list-style-type: none"> - Land is contiguous with or connected to a large built up area - Land provides an additional barrier to a large built up area, which already contains some prominent boundary features
Slight / negligible importance	<ul style="list-style-type: none"> - Land is connected to a built area, although is of low density and the built form is fairly dispersed. - Land provides an additional barrier to a large built up area, which contains many prominent boundary features (i.e. railway line/waterway)
Not important / does not contribute	<ul style="list-style-type: none"> - Land is not connected/contiguous with a large built area, or - The urban land already contains prominent and permanent boundary features.

Purpose 2: To prevent neighbouring towns from merging into one another

Significance / contribution / score	Defining characteristics
Critical importance	<ul style="list-style-type: none"> - The land forms a gap between the edge of London and settlements outside. - The land forms an essential gap where its loss to development would significantly visually or physically reduce the perceived or actual distances between settlements/character areas. Any reduction in extent would result in physical coalescence, or a perception of merging that would erode the distinct separate identity and character of either/both settlements.
Major importance	<ul style="list-style-type: none"> - The land forms a gap between the edge of London and settlements outside.
Moderate importance	<ul style="list-style-type: none"> - The land forms a gap between smaller local settlements/character areas.
	<ul style="list-style-type: none"> - Some limited development may be possible without causing merging or perception of merging, although the area is unlikely to accommodate a strategic level of development.
Slight / negligible importance	<ul style="list-style-type: none"> - The land forms a gap between smaller local settlements/character areas. - The land forms a less essential gap, which is of sufficient scale and character that well planned development is unlikely to cause merging between settlements/character areas.
Not important / does not contribute	<ul style="list-style-type: none"> - The gap does not separate defined settlements.

Purpose 3: To assist in safeguarding the countryside from encroachment

Significance / contribution / score	Defining characteristics
Critical importance	<ul style="list-style-type: none"> - The land possesses a strong, unspoilt rural character which the GB designation protects. The land has an absence of built development (less than 10%) and is characterised by rural land uses including agriculture.
Major importance	<ul style="list-style-type: none"> - The land possesses a predominantly rural character, with a general absence of built development (less than 20%), largely characterised by rural land uses including agriculture, but with some sporadic development and man-made structures.
Moderate importance	<ul style="list-style-type: none"> - The land possesses a semi-urban character, which contains a mix of urban and rural land use. Built form constitutes between 20-30%.
Slight / negligible importance	<ul style="list-style-type: none"> - The land possesses a semi-urban character, which contains a mix of urban and rural land use. Built form constitutes between 30-40%.
Not important / does not contribute	<ul style="list-style-type: none"> - The land possesses an urban character which is predominately characterised by urban land uses, including physical developments such as residential or commercial, or urban managed parks. Contains more than 50% built form.

- 3.4.2. In terms of Purposes 1 and 2, as discussed earlier, consideration needs to be given to- whether their aim is to prevent the uncontrolled outwards expansion of London as a whole and its merging with neighbouring cities and towns, or to separate different areas within London. If we assume it is the latter, then we would expect to see GB all across London (including inner London boroughs). If it is the former, we would expect to see GB primarily on the edges of London.
- 3.4.3. When assessing alignment to Purpose 3, it is useful to consider what is countryside. Is countryside defined solely by the character of the space or does geographic location play a part in this definition? The Collins dictionary definition is that it is land away from towns and cities. The Oxford dictionary describes it as the land and scenery of a rural area. If a site possesses a rural character does this alone make it countryside? Probably not, as there are areas of open space in the borough (e.g. Osterley) which have strong countryside characteristics and yet are set well within the urban fabric, and accordingly are correctly designated as MOL.
- 3.4.4. Purpose 4 relates to preserving the setting and special character of historic towns. This is generally taken to apply to towns or cities which are recognised in their entirety to be historic. Whilst Ealing and the smaller settlements which now comprise it contain important heritage assets, having regard to the intention of this purpose the borough is not viewed as a 'historic town', and accordingly this

purpose is omitted from the assessment. It should be noted however that Part 2 of the assessment does consider the significance of each parcel in heritage terms, and in particular the significance of heritage in defining its landscape.

- 3.4.5. Purpose 5 seeks to measure how the parcel assists in urban regeneration by encouraging the recycling of derelict and other urban land. In attempting to measure the relative contribution of each parcel against this objective, it is virtually impossible to distinguish between the parcels, and in fact their influence on such matters is collective. As each parcel would effectively contribute equally, we believe it is appropriate to omit this purpose from the assessment. It is also arguable whether Green Belt has any influence over this objective in the first place.

3.5. MOL assessment criteria

- 3.5.1. Similar assessment criteria have been developed for Metropolitan Open Land. As with Green Belt, this has been organised around the defining criteria, of which there are four, as outlined in the London Plan.

Table 2 – MOL assessment criteria

A – It contributes to the physical structure of London by being clearly distinguishable from the built-up area

Applicability / significance	Defining characteristics
Crucial	<ul style="list-style-type: none"> - The land forms an essential and substantial gap in the built form. - The space serves as a boundary between different localities in the borough and assists in emphasising the separate identity of these areas. - The land is of a sufficient scale providing tranquillity to users from the built area. - The boundary of the open area is clearly defined and distinguishable from the neighbouring built-up area. - The open area is visible from public vantage points. - The land is predominantly open with less than 10% built form.
Major importance	<ul style="list-style-type: none"> - The land forms a substantial gap in the built form, and the boundary of the area is clearly defined and distinguishable from the neighbouring area. - The land is predominately open with less than 20% built form.

Applicability / significance	Defining characteristics
Moderate importance	<ul style="list-style-type: none"> - The land forms a break in the urban form, although its scale is less significant at a strategic level. - The boundary of the open area is reasonably well defined. - Less than 30% of the land is built on.
Slight / negligible importance	<ul style="list-style-type: none"> - The land forms a less obvious gap in the urban form.
Not important / does not contribute	<ul style="list-style-type: none"> - The land does not form a gap and is not distinguishable from the built up area.

B – It includes open air facilities, especially for leisure, recreation sports, arts, and cultural activities, which serve either the whole or significant parts of London

Applicability / significance	Defining characteristics
Crucial	<ul style="list-style-type: none"> - The land accommodates multiple activities of strategic significance or a single activity which could serve the whole of London or beyond, whose delivery would be affected by all development (apart from ancillary development).
Major importance	<ul style="list-style-type: none"> - The land accommodates activities of strategic significance serving significant part of London.
Moderate importance	<ul style="list-style-type: none"> - The site presently only accommodates activities of local importance although has the potential to be enhanced to a level whereby it could serve a wider catchment. - Enabling development of an acceptable scale could be accommodated without significantly undermining this function(s).
Slight / negligible importance	<ul style="list-style-type: none"> - The site previously accommodated such activities, but is now unused or underutilised, although it has potential to be enhanced. - Enabling development of an acceptable scale could be accommodated without significantly undermining this function(s).

Applicability / significance	Defining characteristics
Not important / does not contribute	- The site is vacant and accommodates no such activities and is of limited priority for investment.

C – It contains features or landscapes (historic, recreational, biodiversity) of national or metropolitan value

Applicability / significance	Defining characteristics
Crucial	- The land contains features or landscape of national value, e.g. a Registered Park or Garden, SAC, SPA, Ramsar or SSSI.
Major importance	- The land contains features or landscape of regional value e.g. Heritage Land, SMI or RIGS.
Moderate importance	- The land contains features or landscapes of a national or metropolitan value, although these occupy and have a bearing on only a small section of the site.
Slight / negligible importance	- The site presently only accommodates features or landscape of local importance although has the potential to be enhanced. - Enabling development of an acceptable scale could be accommodated without significantly undermining its status.
Not important / does not contribute	- The site contains no such features / landscape.

D – It forms part of a green chain or link in the network of green infrastructure and meets one of the above criteria

Applicability / significance	Defining characteristics
Crucial	- The land is contiguous with other MOL/Green Belt or designated green links which are established and largely unbroken from built form. - It is integral to the function/performance of a wider network of open space/green web.

Applicability / significance	Defining characteristics
Major importance	- The land adjoins other MOL/Green Belt or designated green links which are established, although may be broken in part by some built form (roads, railway lines, fragmented but small-scale built development).
Moderate importance	- The land adjoins designated green links (Green Corridor / Blue Ribbon Network), although these green links are not fully established or publicly accessible.
Slight / negligible importance	- The land does not presently form part of a green link, although potential exists to establish such a link.
Not important / does not contribute	- The site is isolated from other green space / infrastructure.

- 3.5.2. Neither the NPPF or the London Plan differentiate between the purposes/criteria in terms of their significance and accordingly no weighting is attached to the scoring. In order to avoid unintentional weighting of any single purpose, the minimum and maximum scores for any purpose are the same. Moreover, in relation to the GB purposes the NPPF does not require that these are met simultaneously. For example, there will be parcels which only fulfil one purpose, but yet, whose contribution against this purpose is very significant. Other parcels in contrast might fulfil multiple purposes, but their contribution against each of these may be considered to be less significant.
- 3.5.3. The same is also true of the MOL criteria defined in the London Plan, although the one exception here is with regard to criterion 'D', which only applies where the land meets one of the other three criteria. That said it might be argued that openness is a precursor for the other criteria, or at least essential.
- 3.5.4. The finalised assessment criteria have been incorporated into a pro-forma which was completed by the reviewing officers. A blank pro-forma is provided at Appendix 2 for reference. Guidance notes for completing this form were also prepared and these are also provided at Appendix 1 for reference.
- 3.5.5. All parcels were visited to check their performance against the assessment criteria, and to collate current information about their status. The survey sought to gather information about the sites to enable an objective evaluation of the land. Survey work was carried out in teams and typically in pairs. Prior to visiting the sites, the survey team collated some basic background information around the status of the sites.
- 3.5.6. Typically, the survey entailed a walk around the perimeter of the parcel to understand its relationship with the wider area. Sites were also viewed from further afield where they were visible from other public vantage points, as this was crucial in understanding their relationship with the wider built setting, and in some cases their scale could only be appreciated from further afield. Where sites benefited from public access, the survey team walked through and across the parcel.

- 3.5.7. Throughout the visit, photos were taken of the parcel to provide a record of the status of the open space at that time. Post fieldwork, additional desktop analysis was undertaken to collate further information, as necessary, to supplement the site survey findings. The findings were recorded in the pro-forma.
- 3.5.8. As noted above, parcels were first assessed against their original designation, or in the case of new sites, the most appropriate designation (i.e. MOL or GB) determined by its siting and character. Where parcels were assessed against their original designation and did not perform well, we considered whether the site more closely resembles the characteristics of the other designation. For example, where a site is presently designated as Green Belt, but performs poorly against this designation but shares characteristics (typically locational) common with MOL land, the site should be assessed against the MOL designation.
- 3.5.9. In judging the performance of a parcel against the assessment criteria, it has also been necessary to consider whether the boundaries of the parcel as currently defined are appropriate. A key objective of this review is, therefore, to consider whether any boundary adjustments should be made to strengthen and improve the defensibility and resilience of the designation.
- 3.5.10. In collating information about the status and performance of a parcel, the survey team has also engaged with colleagues in other departments (including Sports, Parks, and Leisure) who hold important information.

3.6. Part A: Traffic light assessment

- 3.6.1. The assessment of each site against GB and/or MOL criteria led to a traffic light hierarchy where:
- “Green” sites are fit for their current designation and should continue under this designation (technical boundary adjustments may still be appropriate).
 - “Red” sites do not meet the criteria of their current designation and a change of designation is considered appropriate (including, potentially, from GB to MOL).
 - “Amber” sites fall between the “green” and “red” categories and are considered further in the Part B assessment before deciding whether their designation should be retained or changed.

3.7. Part B: Assessment of amber sites

- 3.7.1. Sites identified as amber in the Part A assessment (whether originally designated as GB or MOL) are considered further in the Part B assessment. This provides a more detailed consideration of the sites, discussing the reasons for and against retaining or changing their designation.

4. Assessment findings

4.1. Introduction

- 4.1.1. This chapter provides a commentary on the overall findings of the review. It should be noted that this review essentially forms a living assessment and the findings presented here will continue to evolve as and when new evidence emerges around the use of the land and spatial priorities. This analysis reviews the space from various levels, covering both the strategic picture and site-specific results. More detailed site-specific findings are also contained in the pro-formas for each individual site which are provided in Appendix 3.

4.2. General points and limitations

- 4.2.1. As discussed earlier in this report, the GB and MOL criteria (in the NPPF and London Plan respectively) are largely qualitative and subjective. In undertaking this assessment, officers have used their professional judgment and knowledge of Ealing's context to provide a clear rationale for each site.
- 4.2.2. When considering the accessibility of sites, there are limitations in the use of PTAL to inform this assessment. The vast majority of sites will have low PTALs, and even when located near to a station, given the scale of some of the parcels, the PTAL will drop off as you move into the site. Whilst it is right that accessibility informs the location of any new enabling development, and it has factored in this assessment, it would be wrong to automatically exclude sites which enjoy low levels of accessibility. Even these locations, subject to other considerations, might be able to support some enabling development although, clearly, the scale of such development would need to be commensurate. Within a borough which does not sit at the edge of London it is argued that such development need not represent an unsustainable pattern of development.
- 4.2.3. In terms of the role and function of GB in the borough, it should be noted that the purpose of GB is not to bring recreational areas into the city and current policy prevents us from putting this space into beneficial use.

4.3. Green Belt sites

- 4.3.1. At a strategic level, none of Ealing's GB sites appear to serve the purposes of Green Belt. They are all located far from the edge of London. The closest (GB01) is approximately five kilometres away, and the farthest (GB05) is approximately nine kilometres away. They all have substantial London urban areas further west. They therefore play no role in containing the outward expansion of London or preventing it from merging with neighbouring cities or towns.
- 4.3.2. Many of them contribute to the physical structure of London by being clearly distinguishable from the built-up area and they help separate and/or distinguish between different areas of London. That, however, is closer to the purposes of MOL rather than GB.
- 4.3.3. In terms of the GB purpose of safeguarding the countryside from encroachment, the definition of "countryside" according to the Cambridge Dictionary is "*land not in towns, cities, or industrial areas, that is either used for farming or left in its natural condition*". Therefore, we consider it inappropriate to describe as "countryside" green open spaces which are many kilometres inside a major city like London.
- 4.3.4. The above points have informed the assessment of all GB sites. In this context, none of them are considered to function as GB. All GB sites have subsequently been assessed against MOL criteria.

4.4. Green Belt sites - Part A assessment

4.4.1. The GB Part A assessment identifies each GB site as green, amber, or red based on how they score against the NPPF GB criteria. Sites that are identified as red (i.e. not fit for GB designation) are then assessed against the London MOL criteria also using a green / amber / red system. Any sites identified as amber, are considered further in the GB Part B assessment.

Table 3 – Green Belt sites Part A assessment

Site reference	Site name	GB assessment	MOL assessment	Comments
GB1	Yeading Brook, Shooting Grounds, and Down Barns			<p>GB assessment: Given its location (its centre is approximately 6 kms from the edge of London) and with substantial urban areas further west in Hillingdon, the site functions more as MOL than GB.</p> <p>MOL assessment: The site scores well against MOL criteria. It forms a substantial gap in the built form, separating the residential areas of Northolt from the Airport and South Ruislip.</p> <p>Boundary changes: One minor boundary adjustment along Old Ruislip Road.</p> <p>Consider enhancements as part of Stage 2: Yes. In particular, a number of seemingly inappropriate uses are found along Sharvel Lane on the northern part of the site.</p>

Site reference	Site name	GB assessment	MOL assessment	Comments
GB2	Lime Tree Park, Golf Course. and Alec Reed Academy			<p>GB assessment: The centre of the site is approximately 7 kms from the edge of London. The site is within a triangle formed by busy roads (A40, Church Road, and Ruislip/West End Road). Approximately half of this triangle is already developed, with residential areas forming several wedges into the site. The Alec Reed Academy takes a significant portion of the site and is inappropriate development in a GB site. Lime Tree Park feels disconnected from the rest of the site and is an ordinary park of moderate size, no more significant than non-designated parks such as Southall Park or Ravenor Park. Overall, the site does not feel or function as a GB site.</p> <p>MOL assessment: The site scores moderately against MOL criteria. The main justification for MOL designation is that it forms a clear break/island in the urban form serving residential properties on all sides.</p> <p>Boundary changes: Remove Alec Reed Academy.</p>
				<p>Consider enhancements as part of Stage 2: Yes. In particular, the north-western part of the site.</p>

Site reference	Site name	GB assessment	MOL assessment	Comments
GB3	Prior Fields and Lord Halsbury's Playing Fields			<p>GB assessment: The centre of the site is approximately 7 kms from the edge of London. It includes a part of the A40 and some of its slip roads. Designating a major, busy A road as GB is inappropriate.</p> <p>Overall, the site does not feel or function as a GB site.</p> <p>MOL assessment: The site scores moderately well against MOL criteria. It contributes to the physical structure of the area by helping distinguish Northolt and South Ruislip. Furthermore, the site is designated as a site of Metropolitan Importance for Nature Conservation, and is recognised to be one of the richest grassland sites in London, with both wet and dry pastures and a wealth of plant life.</p> <p>Boundary changes: A number of small boundary adjustments around Prior Fields and removal of the A40 and its slip roads.</p> <p>Consider enhancements as part of Stage 2: Yes. In particular, opportunities to re-configure / enhance the park on the eastern part of the site.</p>

Site reference	Site name	GB assessment	MOL assessment	Comments
GB4	Belvue Park, Golf Range and green verge along Western Avenue			<p>GB assessment: The centre of the site is more than 8 kms from the edge of London. The entire parcel is designated as GB, however, the land parcel is fragmented with significant differences from one part of the site to the next. It includes a part of the A40 and some of its slip roads, which is inappropriate. The part south of Rowdell Road, in particular, does not feel or function like GB. It includes several buildings and hardstanding including a private gym with car park, and a school.</p> <p>MOL assessment: The site does not score well against MOL criteria. The A40 and its slip roads should not have MOL designation, land south of Rowdell Road contains several buildings and hardstanding, and the former golf driving range is derelict. The only part of this site that could be considered for MOL status is Belvue Park, which contains the Grade I listed St. Mary's Church.</p> <p>However, given Belvue Park's moderate size and overall performance against MOL criteria, designating it as MOL would be inconsistent with the lack of designation of bigger and better-used parks / green open spaces elsewhere in the borough.</p>
				<p>Boundary changes: De-designate the whole site.</p> <p>Consider enhancements as part of Stage 2: Yes. In particular, consider opportunities for the former golf driving range.</p>

Site reference	Site name	GB assessment	MOL assessment	Comments
GB5	Northala Fields - Rectory Park -Marnham Fields – Smith’s Farm			<p>GB assessment: The centre of the site is approximately 8 kms from the edge of London. The parcel consists broadly of four parts: Northala Fields and Rectory Park (west of Kensington Road) and Marnham Fields and Smith’s Farm (east of Kensington Road). The link between the western and eastern parts of the site is weakened by the inappropriate employment uses on Smith’s Farm along Kensington Road.</p> <p>Given its location, the site does not feel or function like a GB site but more like an MOL site.</p> <p>MOL assessment: The site scores very well in terms of MOL criteria. It is of considerable size and contributes to the physical structure of London by being clearly distinguishable from the built up area. Northalla Fields and its landmark landscape attract people from beyond the borough, as do the football facilities in Rectory Park.</p> <p>Boundary changes: Removal of the southern edge of the site south of Ruislip Road (along Broadmead Road). Removal of rear gardens on Ferrymead Road. Removal of A40. A number of other small boundary adjustments.</p> <p>Consider enhancements as part of Stage 2: Yes. In particular, consider opportunities to enhance the western part of Smith’s Farm, and the links between the western and eastern parts of the parcel (either side of Kensington Road).</p>

Site reference	Site name	GB assessment	MOL assessment	Comments
GB6	King George's Field - Spikes Bridge Park			<p>GB assessment: The centre of the site is approximately 8 kms from the edge of London. The parcel consists of two sites: King George's Field to the north and Spikes Bridge Park to the south. The two parts are not connected, there is a gap of approximately 160 metres between them. They also have distinctly different characters.</p> <p>Given the location, size, and function of this parcel it does not score well as a GB designation.</p> <p>MOL assessment: Overall, the site does not score very well against MOL criteria. There are two factors, however, that need to be considered further: i) the role of the sports facilities in Spikes Bridge Park in attracting people from a wide catchment area that extends beyond Ealing; and ii) the site being viewed as an extension of the Green Belt site on the Hillingdon side, west of the canal. As the site is assessed as amber, it is further considered in the Part B assessment.</p>

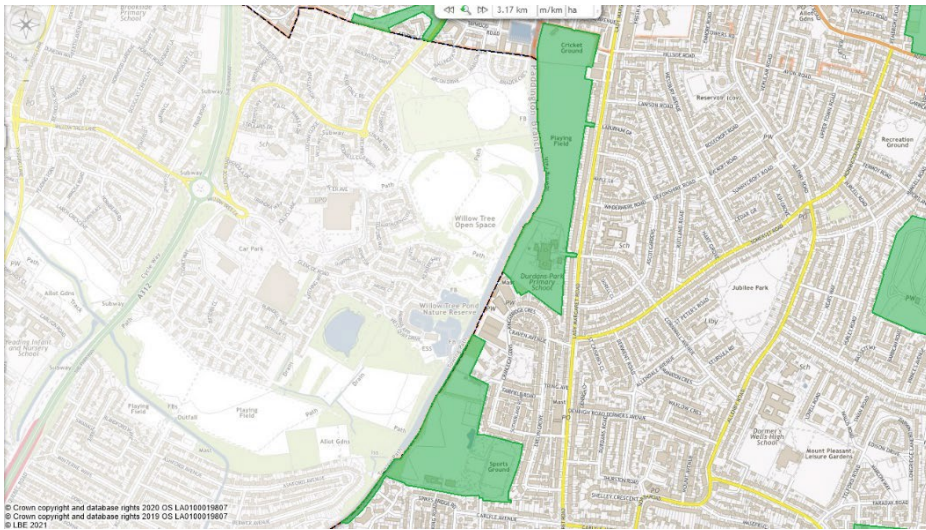
Site reference	Site name	GB assessment	MOL assessment	Comments
GB7	Blair Peach Primary School and Hayes Bridge Allotments			<p>GB assessment: The site is approximately 6.5 kms from the edge of London. It includes Blair Peach Primary School and its playing grounds, which are covered in hardstanding, with Hayes Bridge allotments adjoining the parcel to the north of the school grounds. The parcel also includes the Grand Union Canal tow path from the railway line at the south-west to the school/allotments at the north. The different parts of the parcel appear to be fragmented from one another. The towing path is of a very different character to the school and the allotments. Together these form an odd GB parcel, which does not score well as a GB designation.</p> <p>MOL assessment: The site does not score well against any of the MOL criteria.</p> <p>Boundary changes: None.</p> <p>Consider enhancements as part of Stage 2: No.</p>

4.5. Green Belt sites - Part B assessment

GB06 - King George's Field / Spikes Bridge Park

- 4.5.1. This is the only GB site that was assessed as amber in the Part A assessment. It is, therefore, considered further in the Part B assessment.
- 4.5.2. This parcel is located on the western part of the borough at its boundary with Hillingdon. The boundary is delineated by Grand Union Canal which dissects the two boroughs from north to south, acting as a natural boundary. The parcel itself is split into northern and southern parts: King George's Field and Spikes Bridge Park respectively.
- 4.5.3. Both parts of the parcel are bounded by the tow path along their western boundary. They are separated by a gap of approximately 160 metres. The gap includes residential buildings, employment uses, and a temple.

Figure 7 GB06 - King George's Field / Spikes Bridge Park



4.5.4. The two parts of the site have distinctly different characters and functions. The southern part (Spikes Bridge Park) has cricket and football grounds, a large playground, running track, and play area. It is well maintained and well used by local people.

Figure 8 Spikes Bridge Park – southern entrance



Figure 9 Spikes Bridge Park - playground



Figure 10 Spikes Bridge Park – playing fields



4.5.5. The northern part (King George's Field) is just green open space. It is not as well maintained, with a significant amount of rubbish observed during the site visit. Based on the evidence of the site visit, the site does not attract as many visitors as Spikes Bridge Park.

Figure 11 King George's Field – eastern entrance



Figure 12 King George's Field – central part



Figure 13 King George's Field – southern entrance



Figure 14 Tow path along Grand Union Canal and Hillingdon GB site across the canal



4.5.6. Assessing the site against the MOL criteria, it scores moderately in terms of contributing to the physical structure of London by being clearly distinguishable from the built-up area. As mentioned earlier, there is a gap with several types of development between the two parts of the site. Individually, each of the two parts is of similar size to non-MOL parks such as Ravenor Park or

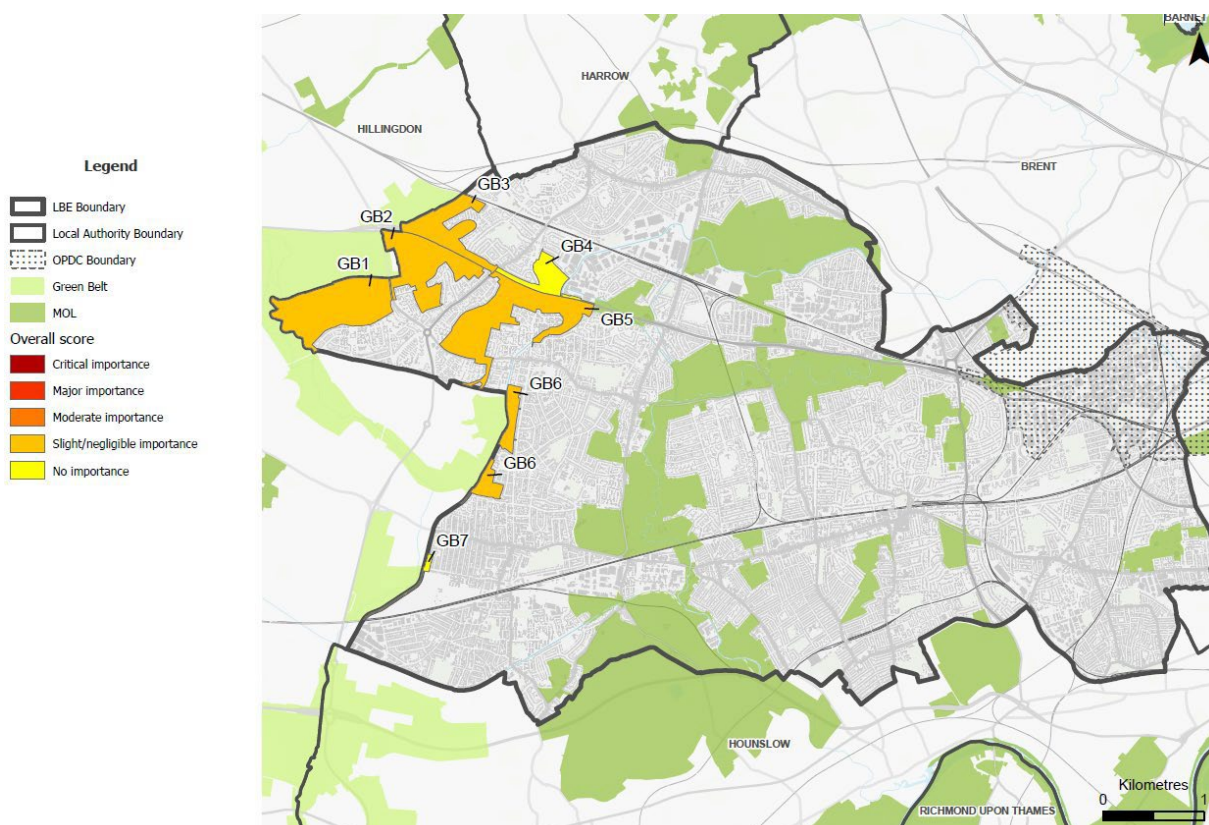
Southall Park.

- 4.5.7. There are two factors supporting an MOL designation, however. The first is that Spikes Bridge Park (formerly Southall Municipal Sports Ground) serves the sporting needs of not only Southall, but a wider catchment area. It is currently home to London Tigers, a London wide organisation running activities in Ealing and other London boroughs. Visiting teams come from across London to compete.
- 4.5.8. The second factor is that the site could be considered to be a continuation of the green open space on Hillingdon's side, which is currently designated as Green Belt. Even though, we do not consider that the site should be Green Belt, when viewed as being the continuation of a much bigger green open space, then it satisfies the criteria of contributing to the physical structure of London by being clearly distinguishable from the built up area, and being part of a green chain or link in the network of green infrastructure.
- 4.5.9. For the above reasons it is recommended that the site reverts to MOL designation.

4.6. Green Belt assessment conclusion

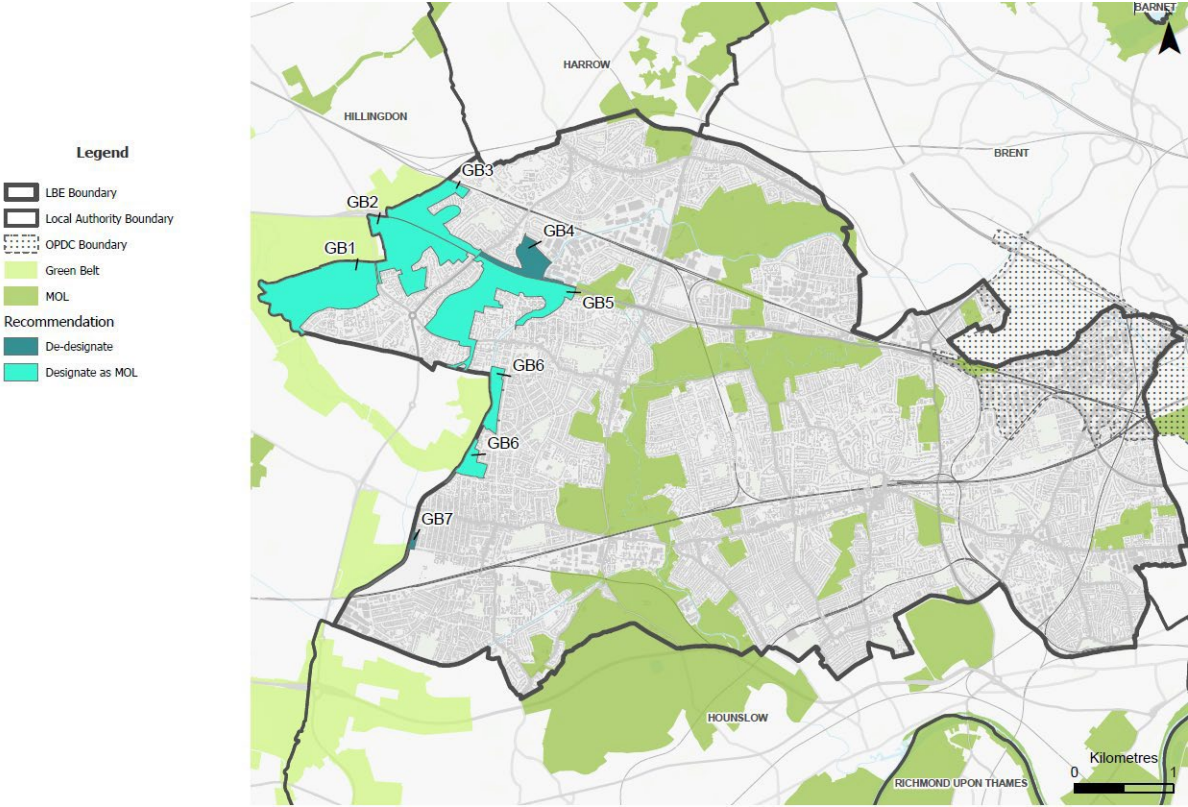
- 4.6.1. The assessment of Ealing's seven current Green Belt sites shows that none of the sites score well against Green Belt objectives / criteria (**Figure 15**).

Figure 15 Green Belt assessment overall score map



- 4.6.2. Consequently, it is recommended that the Green Belt designations are removed from all seven sites. It should be stressed that removing the Green Belt designation from a site does not mean it has no value as a green open space but, rather, that other designations are more appropriate. Five of the sites score sufficiently well against MOL criteria and these are recommended for MOL designation (**Figure 16**). MOL designation provides a similar level of protection to GB designation while better reflecting the location and function of these sites.

Figure 16 Current Green Belt sites recommendations



4.7. Metropolitan Open Land sites - Part A assessment

4.7.1. The MOL Part A assessment identifies each MOL site as green, amber, or red based on how they score against the London Plan MOL criteria. Any sites identified as amber, are considered further in the MOL Part B assessment.

Table 4 – MOL sites Part A assessment

Site reference	Site name	MOL assessment	Comments
MOL1	Railway cutting at Harrow border (Halsbury Road)		<p>MOL assessment: Viewed in isolation, the site does not score well against MOL criteria. The extent of the parcel which lies in Ealing is small, and if viewed in isolation (given its scale) it would not represent a strategic break. This parcel, however, forms part of a larger area of MOL which extends north and east through Harrow, encompassing Roxeth Recreation ground and allotments to the north and the cricket ground to the east. This is the main reason for retaining its MOL designation. The part of the site which falls within Ealing essentially forms a railway cutting and green embankment. The railway cutting extends east into Harrow, where it too is also designated as MOL, further supporting the case for retention as MOL.</p> <p>Boundary changes: None.</p> <p>Consider enhancements as part of Stage 2: No.</p>
MOL2	Former Kellogg Tower / Grove Farm / Ealing Northern Sports Centre		<p>MOL assessment: The site does not score well against any of the MOL criteria. It is fragmented, with the character of the site changing considerably from one end to the other. The eastern part of the site has substantial residential development. The western part of the site (Ealing Northern Sports Centre) is not in use and is currently inaccessible, with evidence of fly-tipping. In the central part of the site, there is a David Lloyd gym which constitutes a significant built development with substantial areas of hardstanding. Grove farm on the southern part of the site is the only part of the site that resembles MOL but it is relatively small by itself, and it does not</p>

Site reference	Site name	MOL assessment	Comments
			<p>score highly against MOL criteria.</p> <p>Boundary changes: De-designate the whole site.</p> <p>Consider enhancements as part of Stage 2: Yes, in particular make better use of the western part of the site (Ealing Northern Sports Centre).</p>
MOL3	Greenford Birch Wood / London Marathon Fields / William Perkin High School		<p>MOL assessment: This parcel reverted to MOL from GB following the adoption of the Core Strategy in 2012. It contains William Perkin High School on its eastern part, playing grounds on the northern part, Avenue Park Stadium (the derelict former home of London Tigers FC) in the central part, and Greenford Birch Wood on the western part.</p> <p>The site does not score particularly well against any of the MOL criteria. Given its history, it is considered further in the Part B assessment.</p> <p>Boundary changes: Remove the school footprint and some other minor boundary adjustments (please refer to Appendix 3).</p> <p>Consider enhancements as part of Stage 2: Yes. In particular, opportunities to make better use of derelict Avenue Park Stadium.</p>
MOL4	Greenford Lagoons		<p>MOL assessment: This parcel was previously designated as Green Belt and reverted to MOL following the adoption of the Development Strategy in 2012. When viewed in isolation, this site is small and does not score well against MOL criteria. It is, however, contiguous with GB5 (Marnham Fields) to the west, and whilst they are presently covered by separate designations, they function as linked spaces which form a significant break in the urban area. Following the assessment of parcels GB4 and GB5 it is recommended that these now also</p>

Site reference	Site name	MOL assessment	Comments
			<p>revert to MOL and thus ensures consistency between these parcels.</p> <p>Boundary changes: Two minor boundary adjustments (please refer to Appendix 3).</p> <p>Consider enhancements as part of Stage 2: No</p>
MOL5	Greenford Cemetery & Windmill Lane Allotments		<p>MOL assessment: The site consists of a cemetery to the south and allotments / playing fields to the north. It does not score strongly against any of the MOL criteria. The main argument for maintaining its MOL designation would be as an extension of MOL10 to the east. However, that link is weakened by Greenford Road and Windmill Lane, and the stonemasons business / yard between Greenford Road and Windmill Lane. Other designations apply including of Public Open Space (POS) and a Site for Importance of Nature Conservation (SINC).</p> <p>Boundary changes: De-designate the whole site.</p> <p>Consider enhancements as part of Stage 2: No.</p>
MOL6	Dormers Wells		<p>MOL assessment: When viewed in isolation, the site does not score well against MOL criteria. However, given its functional link to MOL10 (West Middlesex Golf Course), it is considered to pass the threshold for retention as MOL.</p> <p>Boundary changes: Remove the petrol station on the southern part of the site along Uxbridge Road (please refer to Appendix 3).</p> <p>Consider enhancements as part of Stage 2: No.</p>

Site reference	Site name	MOL assessment	Comments
MOL7	Glade Lane Canalside Park		<p>MOL assessment: When viewed in isolation, the site does not score well against MOL criteria. However, it is significant as a linked area of open space connecting to MOL9 and beyond. MOL7 and MOL9 connect at Three Bridges with the canal and railway line providing this open link. Whilst this narrow link forms a pinchpoint in the network, and the bridges visually disrupt views between the parcels they are nonetheless connected as open space.</p> <p>Boundary changes: Addition of the Grand Union Canal, removal of land south of the canal and several other minor boundary adjustments (please refer to Appendix 3).</p> <p>Consider enhancements as part of Stage 2: Yes. The site needs to be utilised better, particularly as there is not much green space in that corner of the borough.</p>
MOL8	Norwood Green and Osterley & Tentelow Lane open space		<p>MOL assessment: As well as being fairly substantial in itself, the parcel forms part of a much larger area of MOL which extends north encompassing MOL9 and the rest of the Brent River Park, and south incorporating Osterley Park and Boston Manor Park located in Hounslow. Combined, these parcels form one of the largest single (non-linear) areas of MOL within West London. Given its scale, this open space provides a substantial gap in the built form separating the neighbourhoods of Hanwell/Boston Manor, Southall/Norwood Green, Osterley, and Brentford End/Brentford.</p> <p>Boundary changes: Remove the southwestern part of the site which includes Norwood Green Park, St. Mary's church, St. Mary's Primary School, Norwood Hall, Khalsa Primary School, and the playing</p>

Site reference	Site name	MOL assessment	Comments
			<p>fields to the north. Several other minor boundary adjustments (please refer to Appendix 3).</p> <p>Consider enhancements as part of Stage 2: No.</p>
MOL9	Warren Farm, Long Wood, Jubilee Meadows, Elthorne Waterside & Park		<p>MOL assessment: This parcel forms a continuation from Brent River Valley and MOL12, MOL11 and MOL10 at the north and north-east. It is therefore part of a significant green and blue corridor within the Borough. It scores well against MOL criteria and should retain its MOL designation.</p> <p>Boundary changes: A number of boundary adjustments are proposed, most of them in the northern part of the site (please refer to Appendix 3).</p> <p>Consider enhancements as part of Stage 2: Yes, in particular consider opportunities to enhance / better utilise Warren Farm.</p>
MOL10	Brent River Park – south of Ruislip Road East		<p>MOL assessment: This is a large land parcel (approximately 66 hectares) which occupies land at either side of the river Brent. The land separates the built-up areas of Southall, Hanwell, and Greenford, and is therefore an important contributor to the physical structure of London. It forms part of a significant green chain, linking to MOL11 in the north, and MOL9 in the south. It scores well against MOL criteria and should retain its MOL designation.</p> <p>Boundary changes: Several boundary adjustments are recommended (please see Appendix 3), none of which would affect the significance or function of the overall site. These include removing the southwestern edge of the site which includes a restaurant and employment</p>

Site reference	Site name	MOL assessment	Comments
			<p>uses; small boundary adjustment at the back of Church Road; and adjusting the boundaries behind Our Lady of the Visitation and Cardinal Wiseman schools on the western part of the site.</p> <p>Consider enhancements as part of Stage 2: No.</p>
MOL11	Perivale Park Sports Ground		<p>MOL assessment: The site covers land to the north of Ruislip Road East, including Perivale Park and Golf Course and encompassing River Brent. An open-air running track is located in the north-eastern corner of the site. As part of the Brent River Park (Valley), the parcel substantially contributes to a sense of place in the borough, and forms part of a significant green chain. This is the main factor for retaining its MOL designation.</p> <p>Boundary changes: Several small boundary adjustments are proposed (please refer to Appendix 3).</p> <p>Consider enhancements as part of Stage 2: No.</p>
MOL12	Brent River Park - north of Ruislip Road East		<p>MOL assessment: MOL12 is one of the largest and best scoring MOLs in the borough. Brent River Park as a whole is one of the most important green space determinants in the urban structure of Ealing. Historically, it had the role of delineating Ealing and Hanwell from Southall, Greenford, and Perivale. The predominant uses are public open space and community open space, with active recreation making up the bulk of the area.</p> <p>Boundary changes: Removal of the residential units (Peel Gardens) at the corner of Ruislip Road East and Argyle Road. Removal of the Enterprise Lodge (Stockdove Way). Removal of the hotel site between Perivale Lane and A40 / Western Avenue. Please refer to</p>

Site reference	Site name	MOL assessment	Comments
			<p>Appendix 3 for all proposed changes.</p> <p>Consider enhancements as part of Stage 2: Yes, in particular the current Hanwell Town FC ground.</p>
MOL13	Trailfinders		<p>MOL assessment: The site has high-quality sports facilities. However, these primarily meet a local need. The site is relatively small compared to other MOL sites and is not linked to any others. Overall, the site scores poorly against MOL criteria. The existing community open space designation is more appropriate.</p> <p>Boundary changes: De-designate the whole site.</p> <p>Consider enhancements as part of Stage 2: No.</p>
MOL14	Ealing Central Sports Ground		<p>MOL assessment: The site scores moderately against MOL criteria. Viewed in isolation, it is relatively small, and has rather weak links to MOL15 to the north or MOL12 to the south. It is used primarily for sports, and also houses Perivale Residents' Association and Impact Community Arts Centre. The main argument for retaining its MOL designation is that its sports and cultural activities serve the needs of a wider catchment.</p> <p>This is considered further in Stage 2.</p> <p>Boundary changes: Two small boundary adjustments are shown in Appendix 3.</p> <p>Consider enhancements as part of Stage 2: No.</p>

Site reference	Site name	MOL assessment	Comments
MOL15	Horsenden Hill		<p>MOL assessment: The site forms one of the single largest (non- linear) parcels of open space in the borough. Unlike other comparably sized open spaces, the site does not just form an island within the surrounding built area, but it dominates the landscape of the borough (and further afield) thanks to its height at 85m above sea level (the highest point in the borough). This parcel is considered to be one of the strongest performing MOL sites within the borough, and its value in relation to biodiversity, geodiversity, and heritage is equally important. Accordingly, its retention as MOL is strongly recommended.</p> <p>Boundary changes: Remove Westway Shopping Centre and its car park at the south-western corner of the site, and a few other small boundary changes shown in Appendix 3.</p> <p>Consider enhancements as part of Stage 2: Yes, in particular opportunities to enhance the canal wharf depot.</p>
MOL16	Westminster and Kensington & Chelsea cemeteries		<p>MOL assessment: This site consists of essentially two detached parcels, which are situated on opposite sides of Uxbridge Road. The functional use of these sites as cemeteries defines their landscape. The site does not link to other MOL parcels. Its contribution in forming a break in the built area is most effective when viewing the two cemeteries as a single parcel. It should be noted, however, that the sites are not contiguous and as well as being separated by the road (which is not MOL), their frontages are off-set from one another. Whether viewed individually or collectively the parcel(s) are nonetheless small, and accordingly their role in forming a break needs to be carefully considered. Despite their small size, their siting between the centres of</p>

Site reference	Site name	MOL assessment	Comments
			<p>Hanwell and West Ealing is significant, as is their historic interest. This is further considered in the Part B assessment.</p> <p>Boundary changes: None.</p> <p>Consider enhancements as part of Stage 2: No.</p>
MOL17	Walpole Park and Lammas Park		<p>MOL assessment: The site consists of three parts, which are separated by Culmington Road and Lammas Park Gardens. While it could be argued that Walpole Park (the northern part of the site) is more closely aligned to MOL criteria than the other two parts (Lammas Park and Lammas Park Enclosure / Tennis Courts), the three parts are clearly linked and form a significant green chain in the heart of Ealing. The site is heavily used and enjoyed by both local people and visitors. Ealing is classified as a Metropolitan town centre in the London Plan and attracts people from across the borough as well as further away. This further reinforces the appropriateness of MOL status.</p> <p>Boundary changes: Two small boundary changes are shown in Appendix 3.</p> <p>Consider enhancements as part of Stage 2: No.</p>
MOL17	Walpole Park and Lammas Park		<p>MOL assessment: The site consists of three parts, which are separated by Culmington Road and Lammas Park Gardens. While it could be argued that Walpole Park (the northern part of the site) is more closely aligned to MOL criteria than the other two parts (Lammas Park and Lammas Park Enclosure / Tennis Courts), the three parts are clearly linked and form a significant green chain in the heart of Ealing. The site is heavily used and enjoyed by both local people and</p>

Site reference	Site name	MOL assessment	Comments
			<p>visitors. Ealing is classified as a Metropolitan town centre in the London Plan and attracts people from across the borough as well as further away. This further reinforces the appropriateness of MOL status.</p> <p>Boundary changes: Two small boundary changes are shown in Appendix 3.</p> <p>Consider enhancements as part of Stage 2: No.</p>
MOL18	Gunnery Sports Grounds/ Old Actonians		<p>MOL assessment: This is a small site, used for sporting activities. Its original designation as MOL reflects its location adjacent to Gunnersbury Park, a large expanse of MOL within Hounslow. Whilst the status of Gunnersbury Park as MOL is not disputed, the relationship of MOL18 to Gunnersbury Park is weak. Situated to the north of Gunnersbury Park, MOL18 is separated by Pope's Lane, a fairly busy road, which creates a break between the two parcels. The frontage of both parcels as they adjoin Pope's Lane are not particularly open either. At the point where the two sites meet, Gunnersbury Park to the south is bounded by residential properties in part and a brick boundary wall. Views across and into the open space are</p> <p>therefore very limited when viewed from Pope's Lane and MOL19 opposite. Similarly, the frontage of MOL19 is also built up in part. Although largely ancillary buildings, these are located towards the southern edge of the site, and together with the existing boundary fence, these screen views across the wider open space. The only part of the site which is obviously open from Pope's Lane or from the entrance of Gunnersbury Park opposite is a small section of the south east corner of the parcel (Baron's Pond). Given the break created by the road and the presence of various built structure</p>

Site reference	Site name	MOL assessment	Comments
			<p>including the boundaries of the parcels, the spaces do not feel connected.</p> <p>Overall, the site does not score highly against any of the MOL criteria and the existing Community Open Space designation is considered to be more appropriate. Removing MOL designation from this site should have no impact on Gunnersbury Park itself.</p> <p>Boundary changes: De-designate the whole site.</p> <p>Consider enhancements as part of Stage 2: No.</p>
MOL19	Ealing Common		<p>MOL assessment: This is a relatively small MOL parcel compared to others within the Borough. It is entirely open and accessible, with views through from all directions and grass verging defining the boundaries, rather than fencing or hedging. The site is designated as Ealing Common Conservation Area, as well as MOL. Part of the site is also a SINCA and an Area of Archaeological Interest. Despite its small scale, the parcel symbolises Ealing as a place, representing and embodying its leafy character, with mature trees contributing to the leafy character of the common.</p> <p>In addition to being one of Ealing’s most iconic green spaces, it provides an island of green openness in an otherwise densely built area. It could also be considered to form a break between Acton (to the east) and Ealing (to the west) - although its moderate size means this is more in a symbolic rather than a physical sense.</p> <p>Boundary changes: Proposed small boundary changes are shown in Appendix 3.</p> <p>Consider enhancements as part of Stage 2: No.</p>

Site reference	Site name	MOL assessment	Comments
MOL20	Hanger Hill Park & former Barclays Sports Ground		<p>MOL assessment: This parcel consists of a series of adjacent open spaces comprising the former Barclays Sports Grounds, St Augustine’s School and grounds, Ealing Reservoir, Fox Wood, Hanger Hill Park, and Chatsworth Wood.</p> <p>The parcel is isolated from other MOL parcels. Whilst elements of the parcel are or have been used for active recreation, the facilities provided meet a local need only. The southern part contains two major schools and other buildings. The southern edge/square is disconnected from the rest of the site and</p> <p>should be removed. The eastern part is disconnected from the rest of the site by the North Circular and is of modest size. 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.</p> <p>Overall, the site does not score well against MOL criteria. Alternative designations such as public / community open space are considered more appropriate.</p> <p>Boundary changes: De-designate the whole site.</p> <p>Consider enhancements as part of Stage 2: Yes</p>
MOL21	Guinness Mounds	N/A	The site falls within the OPDC area and is therefore not assessed as part of this review.

Site reference	Site name	MOL assessment	Comments
MOL22	Twyford Abbey		<p>MOL assessment: As with MOL 21 this parcel originally formed part of a larger area of MOL which straddled both Ealing and Brent encompassing this site, the sports grounds of the former Guinness factory and the Guinness Mounds. The de- designation and development in part of the central section of the site has now isolated this space from the wider network. In terms of size, the site is smaller than the majority of MOL parcels.</p> <p>The parcel also contains a number of buildings. Within the centre of the site is Twyford Abbey itself, whose grounds make up the majority of the open space. The building is currently unused and deteriorating but it well hidden in the site and on the whole it serves to enhance the open setting. In contrast, West Twyford Primary School (whose footprint has increased following redevelopment in recent years), and the adjoining day nursery are visible from the edge of the site and detract from the open setting. The forecourt area for the car dealership located to the north east corner of the site also extends into the parcel and this space is neither open nor contributes to the open setting of the wider parcel.</p> <p>Overall, the site does not score well against MOL criteria. It is of moderate size, disconnected from other MOL sites, and it includes a school and day nursery. Twyford Abbey itself has been derelict for many years and is not currently accessible to the public.</p> <p>Boundary changes: De-designate the whole site.</p> <p>Consider enhancements as part of Stage 2: Yes.</p>

Site reference	Site name	MOL assessment	Comments
MOL23	Acton Park, Sports Grounds and Trinity Way		<p>MOL assessment: The site consists of three parts: Acton Park (west), sports grounds and allotments (centre), and Trinity Way park (east).</p> <p>The eastern part is disconnected from the rest of the site, of small size and lacking any MOL characteristics. It scores poorly against MOL criteria and should be removed.</p>
			<p>The central section of the parcel is primarily in use for active recreation. Whilst the facilities offered here are of good quality and its location towards the edge of the borough will draw users from outside of the borough, it still predominately serves a local catchment, with many other similar facilities existing throughout London. It should also be noted that the site includes considerable built development, including a two-storey sports centre / private gym.</p> <p>The western part is a well-used and well-maintained local park. It is, no doubt, a valuable park for local people, especially as there are fewer green open spaces in this part of the borough. The park is of modest size, however, and does not meet MOL criteria any more than non-MOL parks such as Ravenor Park or Southall Park.</p> <p>The site is further considered in the Part B assessment.</p> <p>Boundary changes: None.</p> <p>Consider enhancements as part of Stage 2: Yes.</p>

4.8. MOL sites Part B assessment

MOL03 - Greenford Birch Wood, London Marathon Fields, William Perkin High School

4.8.1. At approximately 17 hectares, this is a medium sized parcel relative to other MOL parcels in the borough. The site was previously designated as Green Belt until its designation was changed to MOL through the adoption of Ealing's Core Strategy in 2012.

Figure 17 - MOL03: Greenford Birch Wood, London Marathon Fields, William Perkin High School

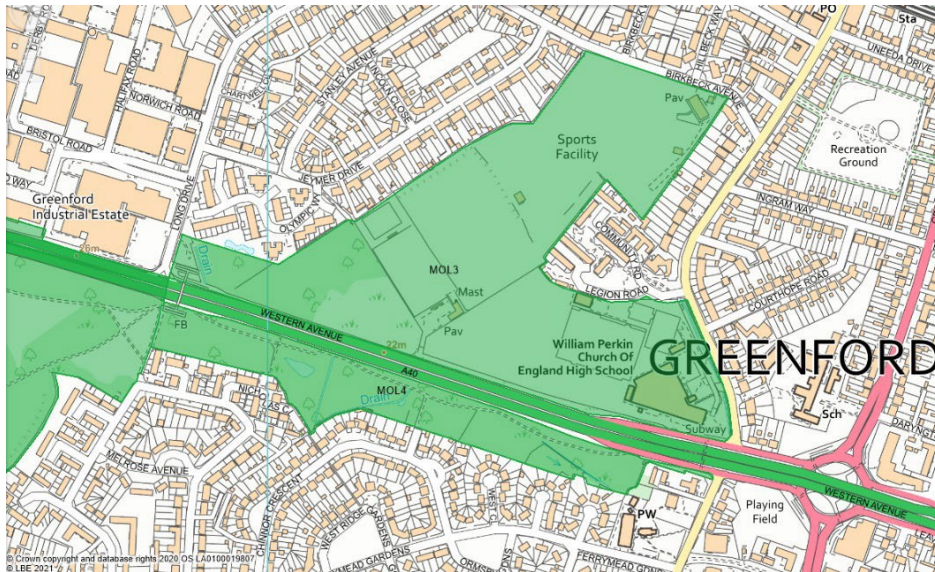


Figure 18 - MOL03: William Perkin CoE High School



- 4.8.2. In 2013, a new secondary school, William Perkin CoE High School, opened on the eastern part of the site to meet the significant unmet demand in that part of the borough.
- 4.8.3. Whilst schools can sometimes exist within an MOL/Green Belt setting without significantly undermining the wider open character of a parcel, in this instance the school is particularly prominent being four storeys tall and located at the edge of the parcel. As the use is incompatible with the site's open space designation, it is recommended that the school buildings and associated areas of hardstanding are removed from the MOL designation. However, the playing fields at the back of the school are open and contiguous with the rest of the parcel, and, accordingly, it is recommended they are retained as MOL.
- 4.8.4. The northern part of the site includes London Marathon Playing Field (LMPF) which is identified as a Strategic Site in the Council's Sports Facility Strategy. It provides football and cricket pitches for many clubs across West London as well as being the home to West London RFC.
- 4.8.5. London Marathon Playing Field is part of the London Playing Fields Federation's (LPFF) portfolio of seven grounds across six London boroughs. The LPFF is a charity that seeks to protect, provide, and promote playing fields in London. In total, LMPF provides four adult football pitches, one junior football pitch, three cricket pitches, and one rugby pitch. the Greenford ground services clubs from all over West London. LMPF is an important ground for sports clubs in the wider West London area, and traditionally it has been the home ground for clubs from outside the borough. It can therefore be argued that it serves the needs of a wider, rather than local, catchment area.
- 4.8.6. The central part of the site includes Avenue Park Stadium, the former home of London Tigers. The stadium is currently out of use and derelict. It provides a significant opportunity for enhancement and re-use.

Figure 19 - MOL03: Former entrance to now derelict Avenue Park Stadium



4.8.7. This ground was severely damaged by travellers approximately four years ago. The subsequent lengthy insurance process, and then the pandemic, slowed down efforts to secure external funding and progress the redevelopment of the site. The LPFF, LBE, and local football clubs are keen to redevelop the ground into a stadia facility as it is one of only a handful of venues in Ealing that can achieve that and be able to accommodate step level football. This level of football attracts teams from all over London and the South.

Figure 20 - MOL03: Derelict Avenue Park Stadium



4.8.8. The western part of the site includes Birch Wood which is the most significant part of the site in terms of landscape value. It is managed for nature and is designated as a SINCS, although it is of borough importance only.

Figure 21 - MOL03: Birch Wood



- 4.8.9. The site as a whole could be considered to be part of the wider green chain that includes MOL04 and GB05. That link is weakened, however, by the A40 that separates the site from the sites to the south.
- 4.8.10. On balance, we consider that the site's importance as a provider of open-air sports facilities that serve more than a local need pushes the site above the threshold for maintaining MOL designation. As discussed earlier, there are further opportunities to enhance the open-air sports facilities by re-developing the derelict Avenue Park Stadium and this will be considered further in Stage 2. The school buildings and associated areas of hardstanding should be removed from the MOL designation.

MOL14 - Ealing Central Sports Ground

- 4.8.11 Viewed in isolation this parcel is relatively small (approximately 29 hectares). Whilst the site provides a clear break between the residential areas adjoining to the east and west, these neighbouring areas are not obviously distinguishable or sufficiently separated. To the south of the parcel is the A40, which provides a clear break between this parcel and land to the south including the open space forming part of the Brent River Park. On paper at least the northern edge of the parcel is contiguous with MOL15 (Horsenden Hill/Perivale Wood), as the parcel also includes the railway track and embankment. When viewed on the ground, however, it is noted that the parcels are visually separated by the presence of the elevated railway track. Although this is unlikely to prevent the movement of wildlife between the two parcels, visually the parcels feel separate.

Figure 22 - MOL14: Ealing Central Sports Ground



- 4.8.12. The parcel is principally used and managed for pitch sports. The site is identified as a Strategic Site for outdoor sports in LBE's Sports Facility Strategy. It is Ealing Council's biggest outdoor sports venue currently in use and provides high quality sports pitches which are used year-round by teams from across West and Central London for football, rugby, and hockey. In 2021 the site underwent major work to regrade the land to improve drainage and usage with the facilities temporarily not in use.

Figure 23 - MOL14: Works to regrade the land to improve drainage and usage



4.8.13. In addition to its open space sports facilities, the site is home to the Perivale Residents Association Sports & Social Club and the Impact Community Arts Centre. The Impact Theatre group is a registered charity aiming to promote a positive image of disability and to develop communication and self-confidence, through participation in performing and creative arts and other supporting activities. The Impact Community Arts Centre serves a greater than local need.

Figure 24 - MOL14: Impact Community Arts Centre

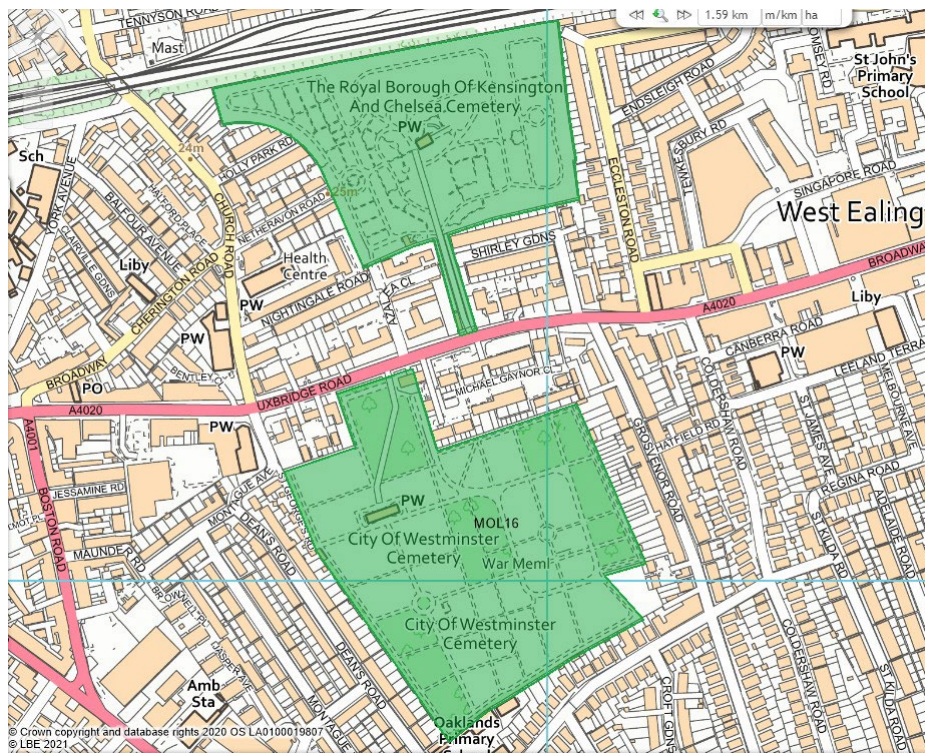


4.8.14. On balance, the site's sports and community facilities are considered to serve a wider than local catchment and of being important to Londoners beyond the local level. It is Ealing Council's biggest outdoor sports venue, and there has been significant recent investment in improving the quality of the land. It is therefore recommended that the site maintains its MOL designation. It is also recommended that the grass verge on the eastern edge of the site (outside of the hedgerow boundary and outside of the ownership of the Council) which is currently omitted should be added to the main MOL parcel, as this grass verge is open and contiguous with the rest of the parcel.

MOL16 - Westminster and Kensington & Chelsea cemeteries

4.8.15. MOL16 consists essentially of two detached parcels, which are situated on opposite sides of Uxbridge Road. Their contribution in forming a break in the built area is most effective when read as a single parcel, and so for the purpose of this assessment they are dealt with as a single entity. It should be noted however that the sites are not contiguous and as well as being broken by the road (which is not MOL), their frontages are off-set from one another.

Figure 25 - MOL16: Westminster and Kensington & Chelsea cemeteries



4.8.16. Whether viewed individually or collectively the parcel(s) are nonetheless small (approximately 6.3 hectares combined), and accordingly their role in forming a break needs to be carefully considered. Despite their small size, their siting between the centres of Hanwell and West Ealing is significant. Travelling between the two centres along the Uxbridge Road, the transition between the centres is marked and greener. Partly this is because of the existence of an avenue of mature street trees, the cemeteries however also contribute to this overall feel.

4.8.17. The Westminster Cemetery to the south of Uxbridge Road, has a longer frontage, and accordingly its role as a break is of greater significance when perceived from the road. In contrast, the Kensington and Chelsea Cemetery to the north has a much smaller frontage (limited to a narrow access only)

and, accordingly, its contribution is less significant when viewed from the Uxbridge Road. When viewed collectively, however, their overall effect is important.

Figure 26 - MOL16: Entrance to Kensington & Chelsea cemetery



Figure 27 - MOL16: Westminster cemetery



4.8.18. Moreover, the Kensington and Chelsea Cemetery is also open on its northern edge and accordingly is particularly visible from passing trains. The number of mature trees dispersed across both sites is also significant in enhancing the overall openness as these often screen neighbouring buildings and,

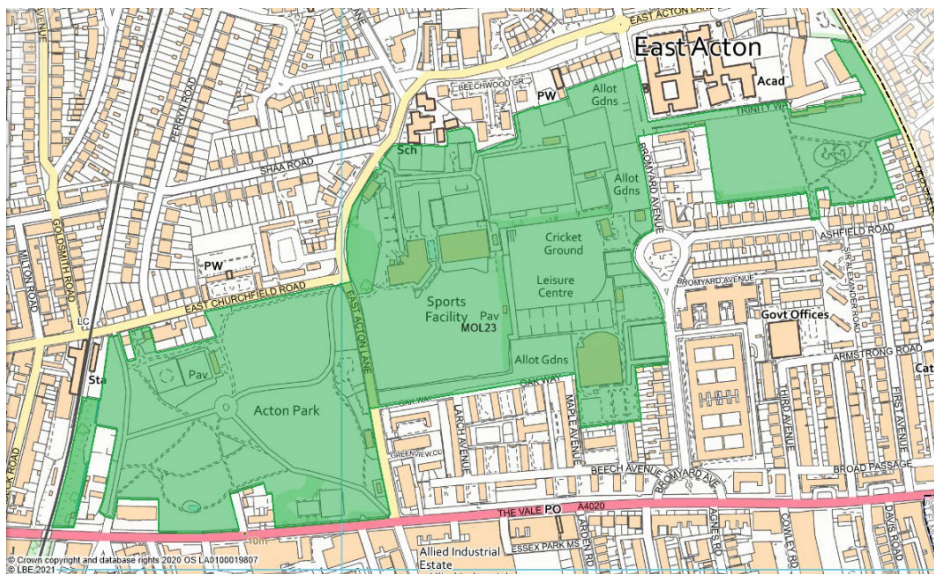
in doing so, create the impression of much larger parcels of open space. Except for a small number of ancillary buildings (lodge, chapels, toilets, office, maintenance storage areas etc.) both parcels are predominately open.

- 4.8.19. Both cemeteries are recorded on the Register of Historic Parks and Gardens for their special historic interest (designated at Grade II). Both cemeteries were developed in the middle of the 19th century and are some of the earliest public cemeteries opened after the Metropolitan Interment Act of 1850. Their layouts and structures largely survive intact and include the largest cemetery lodge in London.
- 4.8.20. It is this historic importance (supported by the site's role in distinguishing the urban areas of Hanwell and West Ealing) that is the main factor for recommending maintaining the MOL designation of the site.

MOL23 - Acton Park, Sports Grounds, and Trinity Way

- 4.8.21. The parcel is located in the eastern edge of the borough and consists of three sites with very different characters. None of the three parts of the site are substantive enough in size to warrant designation as MOL, and so considering their individual characteristics and the relationship between these sections is crucial.

Figure 28 - MOL23: Acton Park, Sports Grounds, and Trinity Way



- 4.8.22. On the western part of the parcel is Acton Park. It is the most significant part of the parcel in terms of landscape quality. It is a well-maintained park, benefitting from extensive tree coverage. Although in parts it feels secluded, towards its boundaries it is more exposed to neighbouring activities including road traffic. Conversely, its open edge creates a stronger impression of openness when viewed from outside of the park.
- 4.8.23. Overall, Acton Park's size and characteristics are similar to other locally important non-MOL parks such as Ravenor Park and Southall Park.

Figure 29 - MOL23: Acton Park



4.8.24. The middle part of the parcel is separated from Acton Park by East Acton Lane. This is a well- used road, although its limited width softens its effect as a barrier between the two sites.

Figure 30 - MOL23: East Acton Lane separating the western and central parts of the parcel



- 4.8.25. The middle part of the parcel feels more fragmented and less open. It contains a mix of uses including open sports grounds, a multi-storey leisure centre, and allotments. It contains a number of substantial buildings and areas of hardstanding, which are dispersed throughout the site. These include a club house for the Park Club, a seasonal air dome, a two-storey sports centre managed by W3 Club (which has been closed for the past year), a pavilion managed by Shepherds Bush Cricket Club, multiple hard surfaced tennis courts, multi-use game areas, and extensive hard surfaced car parks.
- 4.8.26. Many of these built elements have been added over the last 10-15 years, and accordingly the character of this section of the parcel has changed considerably. In MOL terms, this development (which has come forward in a piecemeal fashion) has had a detrimental impact on the site's openness.

Figure 31 - MOL23: Central part: allotments and multi-storey sports and leisure centre



- 4.8.27. The eastern part of the parcel consists of Trinity Way Open Space. It is a small neighbourhood park located approximately 90 metres to the east of the central section. The central and eastern parts of the parcel are presently linked by a narrow strip of MOL land following the route of Trinity Way.
- 4.8.28. This is very much an artificial link, though, as there is little justification for designating Trinity Way as MOL. Whilst the park itself is largely open (the inclusion of the residential blocks at Haddon Court being the exception), the scale of this open area is not considered to be sufficiently large enough to form a structural break in the urban form.

Figure 32 - MOL23: Intersection of Bromyard Avenue and Trinity Way currently designated as MOL



Figure 33 - MOL23: Trinity Way currently designated as MOL



- 4.8.29. Based on the above, it is recommended that Trinity Way Open Space has its MOL designation removed. It does not meet any of the MOL criteria, and its link to the rest of the parcel is artificial. This leaves the central and western parts of the parcel to consider further.

Figure 34 - MOL23: Trinity Way Open Space



- 4.8.30. Acton Park is a valuable local park which is well used by local people. The fact that there are few large green open spaces in this densely built part of the borough further highlights its importance and the need to safeguard it. However, it does not score well against any of the MOL criteria and its MOL designation is inconsistent when considered alongside other similar non-MOL parks in the borough.
- 4.8.31. The central part of the site contains a range of inappropriate uses for an MOL site, including the large, multi-storey indoor sports and leisure centre. It does not score well against MOL criteria, and it is physically separated from Acton Park by East Acton Lane.
- 4.8.32. There is no doubt that Acton Park and the sports facilities in the central site are valuable to local people. Other designations (such as Public Open Space and Community Open Space) are more appropriate than MOL, however, and better reflect the characteristics and use of the sites.
- 4.8.33. Based on the above considerations, it is recommended that the MOL designation is removed from the site.

4.9. Potential new Metropolitan Open Land designations

- 4.9.1. In addition to assessing existing designations, as part of this review we have also considered the possibility of designating additional sites as MOL. Table 5 below summarises the assessment of six green open spaces in the borough and whether they meet the criteria for MOL designation. The details of these assessments are provided in Appendix 3.

Table 5 – Assessment of potential new MOL designations

Site reference	Site name	MOL assessment	Comments
NEW1	Islip Manor Park		MOL assessment: This is a locally valuable park but it is too small to have a strategic function and it does not score well against any MOL criteria.
NEW2	Ravenor Park		MOL assessment: This is a well maintained medium-sized park that is well used by local people. It contains a range of open-air sports facilities including basketball and tennis courts and a small open-air gym. These only serve a local catchment, however, and the site does not score well against MOL criteria.
NEW3	Southall Park		MOL assessment: As with sites NEW1 and NEW2, this is a local park that serves a local catchment. It is not part of a green link or has any features of metropolitan importance. As a result, it does not score well against MOL criteria.
NEW4	Blondin Park		MOL assessment: The parcel is relatively small and isolated from other areas of open space. It essentially forms an island site which is locked in by adjoining residential properties. Whilst the parcel does form a gap in the urban form, the scale of this break is not considered to be significant at a strategic level. Overall, the site does not score well against MOL criteria.
NEW5	Twyford Avenue Sports Ground		MOL assessment: This is a relatively small site that is not connected to any other green infrastructure. It is primarily used for sports (rugby) but serves a mostly local catchment. It does not score well against MOL criteria.
NEW6	North Acton Playing Fields		MOL assessment: This green open space consists of a local park and playing fields and is locally valuable given the relative lack of green open spaces in this area. It does not score well against MOL criteria, however.

4.9.2. None of the assessed sites score well against MOL criteria and therefore no new MOL designations are proposed. In most cases, the assessed sites perform a valuable local function but none of them have features or functions that serve a metropolitan need.

4.10. Metropolitan Open Land assessment conclusion

4.10.1. The findings of the assessment of Ealing’s existing MOL sites, current GB designations, and potential new designations against MOL criteria are shown in **Figure 35** below. In summary, the vast majority of current MOL sites score sufficiently well to maintain their MOL designation.

4.10.2. In addition, five current GB sites score sufficiently well against MOL criteria to be recommended for MOL designation. None of the potential new sites score well against MOL criteria, with most of them playing an important local role but lacking the size or wider catchment to qualify for MOL designation (**Figure 36**).

Figure 35 Metropolitan Open Land assessment overall score map

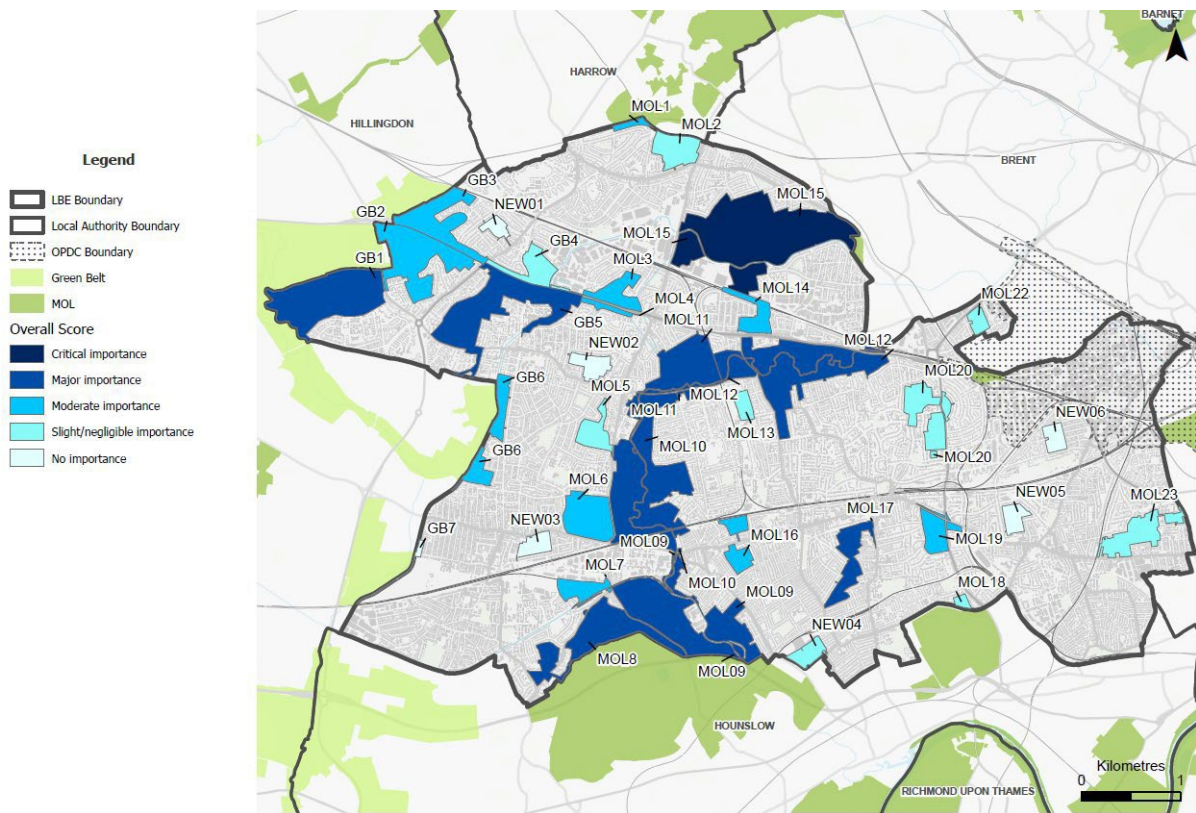
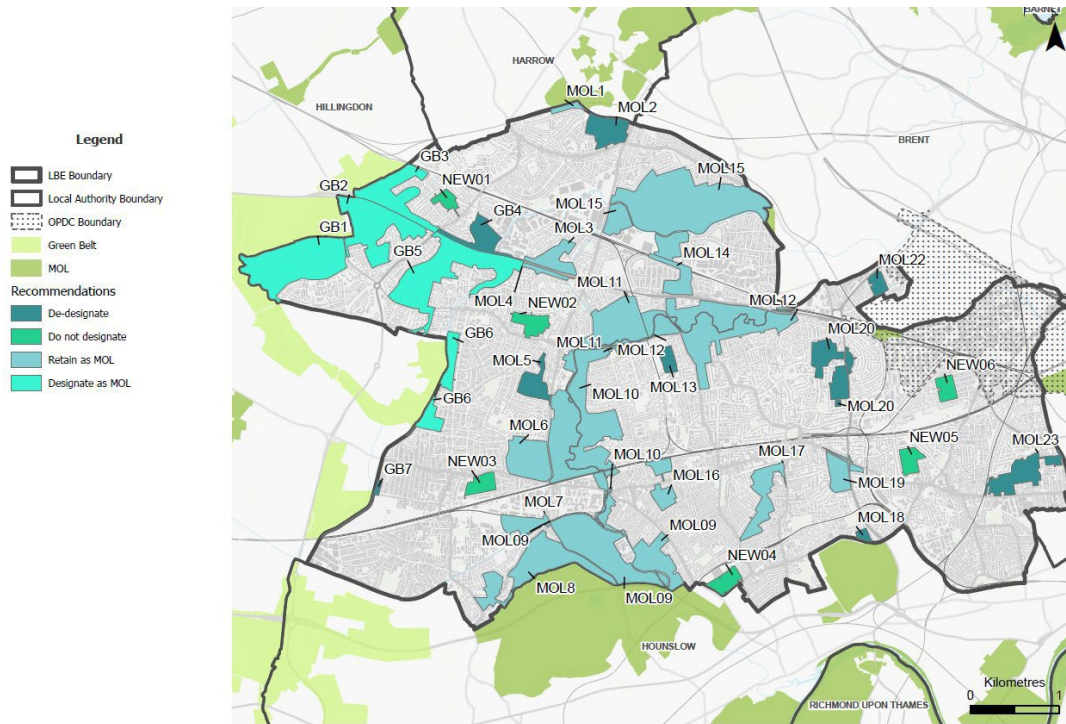


Figure 36 MOL recommendations



5. Conclusions and next steps

5.1. Summary of main findings

- 5.1.1. The Stage 1 review has assessed all of Ealing’s GB and MOL sites⁵ against the NPPF and London Plan criteria respectively. This review has sought to not only provide an objective, criteria- based assessment that reflects the geography, character, and current use of each site, but to also ensure there is consistency in how sites across the borough are designated. Having correct site designations is crucial to preparing a robust new Local Plan and for efficient strategic planning.
- 5.1.2. The Stage 1 review concludes that none of Ealing’s seven GB sites meet the criteria for this designation. The sites were subsequently assessed against MOL criteria, and it was concluded that five of them should revert to MOL, with the remaining two sites not meeting MOL criteria.
- 5.1.3. In terms of MOL sites, the assessment concludes that 15 sites should maintain their MOL designations, while seven sites do not meet MOL criteria.
- 5.1.4. Six further sites were also considered for possible MOL designation. None of them were found to satisfy MOL criteria.
- 5.1.5. The Stage 1 findings are summarised in Table 6 below.

Table 6 – Stage 1 summary findings

Green Belt sites

Site reference	Site name	GB assessment	MOL assessment
GB01	Yeading Brook, Shooting Grounds, and Downe Barns		
GB02	Lime Tree Park, Golf Course, Alec Reed Academy		
GB03	Prior Fields and Lord Halsbury's Playing Fields		
GB04	Belvue Park, Golf Range, and green verge along Western Avenue		
GB05	Northala Fields / Rectory Park / Marnham Fields / Smith's Farm		
GB06	King George's Field / Spikes Bridge		
GB07	Blair Peach Primary School and Hayes Bridge Allotments		

Metropolitan Open Land sites

Site reference	Site name	GB assessment	MOL assessment
MOL01	Railway cutting at Harrow border (Halsbury Road)	N/A	
MOL02	Former Kellogg Tower / Grove Farm / Ealing Northern Sports Centre	N/A	
MOL03	Greenford Birch Wood / London Marathon Fields / William Perkin High School	N/A	
MOL04	Greenford Lagoons	N/A	
MOL05	Greenford Cemetery & Windmill Lane Allotments	N/A	
MOL06	Dormers Wells	N/A	
MOL07	Glade Lane Canalside Park	N/A	

Site reference	Site name	GB assessment	MOL assessment
MOL08	Norwood Green and Osterley & Tentelow Lane open space	N/A	
MOL09	Warren Farm / Long Wood / Jubilee Meadows / Elthorne Waterside & Park	N/A	
MOL10	Brent River Park – south of Ruislip Road East	N/A	
MOL11	Perivale Park Sports Ground	N/A	
MOL12	Brent River Park - north of Ruislip Road East	N/A	
MOL13	Trailfinders	N/A	
MOL14	Ealing Central Sports Ground	N/A	
MOL15	Horsenden Hill	N/A	
MOL16	Westminster and Kensington & Chelsea cemeteries	N/A	
MOL17	Walpole Park and Lammas Park	N/A	
MOL18	Gunnersbury Sports Grounds/ Old Actonians	N/A	
MOL19	Ealing Common	N/A	
MOL20	Hanger Hill Park & former Barclays Sports Ground	N/A	
MOL21	Guinness Mounds	N/A	
MOL22	Twyford Abbey	N/A	
MOL23	Acton Park, Sports Grounds and Trinity Way	N/A	

⁵ With the exception of MOL21 which falls within the OPDC area.

Potential new MOL designations

Site reference	Site name	GB assessment	MOL assessment
NEW01	Islip Manor Park		
NEW02	Ravenor Park		
NEW03	Southall Park		
NEW04	Blondin Park		
NEW05	Twyford Avenue Sports Ground		
NEW06	North Acton Playing Fields		

- 5.1.6. In addition, the review has identified a number of recommended boundary changes to several of these sites. These are detailed in Appendix 3.
- 5.1.7. It should be restated that sites that do not meet the criteria for GB or MOL designation are not sites without local value. In most cases, they are locally important green open spaces and alternative designations that protect these sites already apply to them or should apply following the removal of GB/MOL designation.

5.2. Recommendations on future GB/MOL reviews

- 5.2.1. This review has highlighted two important issues. First, the need to revisit the role of London's green belt. We view the primary role of the Metropolitan Green Belt as restricting London from further growing outwards and eventually merging with nearby cities and towns, rather than providing artificial breaks between London areas that are no longer particularly distinguishable or physically separated. Ealing is not on the edge of London and therefore the existence of GB designations in the borough do not contribute to the above objective.
- 5.2.2. The second point is that there appear to be significant inconsistencies in how London boroughs interpret and apply GB and MOL designations. Whilst the NPPF and the London Plan define criteria for designating GB and MOL, these are fairly open, undeveloped, lacking in detail and, accordingly, could be interpreted in different ways.
- 5.2.3. Furthermore, London's green belt has unique characteristics compared to green belts elsewhere in the country. There is a clear need, therefore, for bespoke guidance around the methodology for reviewing and defining GB and MOL in London. This could be akin, for example, to the guidance which already exists for reviewing and defining SINC sites.
- 5.2.4. Such guidance should also seek to define the characteristics of MOL which make it distinct from GB. This will be crucial to ensure that the appropriate designation is used. The definition of MOL criteria should not be constrained by the broad principles underpinning the definition of GB, which at present disregards matters such as landscape quality and accessibility. It is argued that these should also factor in any review.
- 5.2.5. Furthermore, the current MOL criteria are largely qualitative. We would recommend considering the merits of defining broad size thresholds as a guide, based on character areas, when defining

MOL land. Within an urban setting, for example, a smaller size threshold might be used. Conversely, in suburban settings the break may need to be more pronounced and its scale therefore larger for it to be significant at a strategic level.

- 5.2.6. We would also recommend a London-wide review of GB extents, as at the moment there is no formal requirement for a joined-up approach. This can result in lack of strategic thinking and variations in approach. Whilst the NPPF leaves Green Belt review to the boroughs, and only the individual boroughs have the power to implement/adopt changes, we believe that the Mayor should oversee a strategic review. Separately, it would be beneficial if the Mayor could also provide advice on a standard and consistent methodology for undertaking such a review.

5.3. Next steps

- 5.3.1. The NPPF requires any changes to the Green Belt to be made through the Local Plan process. It states that any changes should be fully evidenced and justified through the preparation or updating of plans. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.
- 5.3.2. In accordance with the NPPF requirements, LBE is undertaking this three-stage review as part of the preparation of its new Local Plan. The GB and MOL Review will form part of a suite of Local Plan evidence, which will be used to inform the plan-making process.
- 5.3.3. Therefore, the findings of this review should not be viewed in isolation. Ultimately, decisions should only be taken once the full picture and corresponding evidence is known. This study will, therefore, complement other studies/evidence on other issues such as housing capacity and need.
- 5.3.4. In particular, the findings of the first phase of this review will inform the preparation of a new Green Space Strategy. In turn, the Green Space Strategy will inform the subsequent phases of the review, identifying which sites would most benefit from enhancement, and considering what opportunities and funding already exists to assist with unlocking such improvements.
- 5.3.5. Stage 2 of this review will explore opportunities for enhancing some of the borough's key green open spaces while Stage 3 will consider what limited development may be necessary in order to enable the Stage 2 enhancements or to contribute towards unmet need (e.g. for housing, employment, or social infrastructure) that cannot be met elsewhere in the borough.