



Report for London Borough of Ealing

Gypsy & Traveller pitch provision

Site assessment – June 2023 – Final Report

Three Dragons



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EXECUTIVE SUMMARY

1. Three Dragons was commissioned by London Borough of Ealing (LB Ealing) in February 2023 to provide advice on the delivery of Gypsy and Travellers (G&T) pitches, in order to identify sites required to meet accommodation needs in the Borough. The work draws upon the needs assessment set out in the 2018 West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA). The identified 'planning' need within the plan period is for an additional 6 pitches, linked to accommodation requirements from the G&T community at Bashley Road. Consultation as part of this work and a recent court of appeal ruling suggests that not all need is captured in response to the 'planning' definition of G&T and therefore this issue is also considered.
2. The current G&T provision in Ealing is the public site of 24 pitches at Bashley Road. This site has no opportunity to increase capacity to accommodate the additional need.
3. At the outset of the study the council provided Three Dragons with a list of sites to be assessed drawn from the existing provision, land being made available for development by private landowners and land owned by LB Ealing.
4. The site assessments were undertaken in two stages and covered the tests for suitability, availability and whether they would be achievable as set out in the national guidance. Including the current provision at Bashley Road, 16 sites were considered as part of the assessment. Sites that had potential to accommodate new pitches were classified as either deliverable (within 5 years) or developable (i.e., could come forward beyond 5 years).
5. Through the assessment process two developable and three deliverable sites were identified:
 - The two **developable** sites (site 7 **Hanson's Timber Yard** and site 13 **Priors Field**) offer potential but not within the short term i.e. within 5 years and require either business re-location and on-site redevelopment (site 7) or large-scale neighbourhood regeneration (site 13) to be enable a future G&T use.
 - Two of the three **deliverable** sites (site 5a **West London Shooting Ground East** and site 11 **Northolt Driving Range**) will require negotiation (or CPO) to secure control of the site but subject to successful outcomes are considered to be available, suitable and achievable within 5 years. Site 9 **Marnhams Field** will not require CPO as it is already in council ownership but re-use for G&T provision will require the council to consider a planning balance between competing uses. All of these three sites can provide both the minimum requirement of 6 pitches and some future currently unmet need, should the council want to allocate sites for such use.

Alternatively, they could also meet any relocation requirements from Bashley Road either in part or fully.

6. Of the three deliverable sites, site 5a West London Shooting Ground East may be more achievable as progress is not dependent upon securing the other mixed uses for site 11 Northolt Driving Range or addressing competing uses for site 9 Marnhams Field. However, this report is a technical assessment of the options to meet G&T needs – it will be for LB Ealing to determine the weight of this evidence base with any other work informing their local plan review and come to a view as to which sites, if any they wish to take forward through the local plan preparation process.
7. The process of consultation as part of the study clearly indicated that it was not appropriate to co-locate permanent and transit pitches at the same location.
8. There is potential that currently unmet need may require new sites in the future. Therefore, it is **recommended that LB Ealing include positive planning policies** within their proposed suite of development management policies that will allow both public and private provision to come forward in the future.
9. It is **recommended that the council undertakes a Regulation 18 consultation** regarding the number of pitches identified at each location and whether there is a preference of one site over another. This further consultation can then be used to inform the identification of a site to address 'planning' need in the Regulation 19 version of the new local plan.

Chapter 1 Introduction

Introduction

- 1.1** Three Dragons was commissioned by London Borough of Ealing (LB Ealing) to provide advice on the delivery of pitches and plots, in order to identify sites required to meet the accommodation needs of Gypsy and Travellers¹ in LB Ealing local authority area, in line with national Government 'Planning policy for traveller sites' 2015. The objective of this study is to assess potential sites to determine if they are suitable, available and achievable.
- 1.2** The results of this study will inform the development of relevant policies and allocations in the emerging Local Plan and guide the consideration of future planning applications for Gypsy and Traveller sites.
- 1.3** The work draws upon the needs assessment prepared for LB Ealing and other boroughs within the West London Alliance. This is set out in the West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment, October 2018 (GTAA), undertaken by Opinion Research Services (ORS).

Background

- 1.4** Gypsy and Travellers (G&T) have lived in Britain for at least 500 years and probably longer. For the purposes of the planning system, Gypsy and Traveller means:

"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependents' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such." (Planning policy for traveller sites, CLG, August 2015).
- 1.5** Many Gypsy and Travellers continue to pursue an active itinerant lifestyle and are generally self-employed people. However, increasingly communities are becoming more settled, for reasons such as providing children with an education; health reasons; and/or by virtue of them being older members of the Gypsy and Travelling community. This is

¹ Please note that this assessment does not consider Travelling Showpeople or the more specific definition of the Roma communities as LB Ealing and London Gypsies and Travellers have advised that there are currently no existing sites or any site need that has been identified.

critical to the new definitions when identifying the needs of the Gypsy and Traveller community.

- 1.6** Gypsy and Travellers are not a uniform homogeneous community, but rather a group of communities which share some features but have their own histories and traditions. Even within each main group there is fragmentation between different families which emphasises the lack of a cohesive community and the need to avoid over generalisations. However, the main cultural groups include:
- Romany Gypsy
 - Irish Travellers
 - New Travellers
- 1.7** Romany Gypsy and Irish Travellers are recognised in law as distinct ethnic groups and are legally protected from discrimination under the Race Relations Acts.
- 1.8** In August 2015, Government republished the statement 'Planning policy for traveller sites' and changed the definition of Gypsy and Travellers and Travelling Showpeople. The original 2012 version included Gypsy and Travellers and Travelling Showpeople who had ceased travelling permanently. The 2015 definitions now exclude those people who have ceased to travel permanently.
- 1.9** Local planning authorities are currently required to identify a supply of specific sites to meet the needs of these groups (as per the 2015 definition) within their local plans. This means that when delivering sites consideration is required about which sites are available and suitable for different types of the travelling community.
- 1.10** Please note that we are aware that the needs assessment (as described in Chapter 3 of this report) was undertaken prior to the recent court of appeal ruling² regarding legal definitions of the G&T community and implications for decision making and needs assessments. The court of appeal ruling considered the exclusion of Gypsy and Travellers who are no longer nomadic from planning definitions was discrimination. Whilst it is unclear at present as to the impact of the court of appeal decision, the report will consider some of the potential implications and approaches for the council to review.

² Government's planning definition of Gypsy and Travellers unlawfully discriminatory – October 2022
<https://www.bailii.org/ew/cases/EWCA/Civ/2022/1391.html>

Chapter 2 Planning policy

National policy

- 2.1** National planning policy for traveller sites is contained within 'Planning policy for traveller sites'³, which was updated in 2015 (PPTS 2015).

Amendments

- 2.2** There are two main changes to national policy, which relate to plan making – firstly a revised definitions (Annex 1) of Gypsy and Travellers and Travelling Showpeople. The original 2012 version included Gypsy and Travellers and Travelling Showpeople who had ceased travelling permanently. The revised 2015 definitions now exclude those people who have ceased to travel permanently. The revised definitions are set out in Chapter 1 of this report. Secondly a new paragraph (2) has been inserted into Annex 1 of the PPTS 2015 for Gypsy and Traveller sites only, as set out below:

"In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life*
- b) the reasons for ceasing their nomadic habit of life*
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances."*

- 2.3** There is no guidance provided by Government on the definition of living a 'nomadic habit of life' or the suitable 'reasons for ceasing a nomadic habit of life'. It will be up to local authorities to establish which pitches/sites have people living a nomadic life and what reasons the occupiers of each pitch/site may have for ceasing to travel. This information should be collated during the needs assessment to establish the criteria set out above. This information needs to be collected for each household, i.e. for each pitch.

³ Planning policy for traveller sites, Communities and Local Government, August 2015
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

Review

- 2.4** National policy identifies three key criteria for identifying appropriate sites for delivery through the planning system. To be deliverable within five years, or developable within years 6-15, sites should be:
- suitable - the site should be in a suitable location for development
 - available - the site should be available now or there should be a reasonable prospect that the site is available at the point envisage
 - achievable - there is a realistic or reasonable prospect that housing could be viably developed at the point envisaged
- 2.5** Local planning authorities should identify sufficient deliverable sites to provide five years' worth of sites against their locally set targets. For years 6-10 and, where possible, for years 11-15, they should identify a supply of specific developable sites or broad locations for growth.
- 2.6** National policy recommends that criteria based policies should be developed irrespective of whether need is identified or not. If need is identified the policy should be used to guide the allocation of land, while if there is no identified need the policy should provide a basis for determining planning applications which may nevertheless come forward.
- 2.7** PPTS 2015 identifies a series of issues for criteria to address to ensure that traveller sites are sustainable economically, socially and environmentally. Specific policies set out the national approach towards using evidence to plan positively (Policy A), Planning for traveller sites (Policy B), travellers in Greenbelt (Policy E), mixed planning use traveller sites (Policy F) and determining planning applications (Policy H).

Local policy

- 2.8** The current Ealing Local Plan is made up of a number of documents, those referencing G&T within policy include:
- LB Ealing Development (Core) Strategy 2012⁴ – Policy 1.2n seeks to protect the existing provision at Bashley Road and to consider additional provision subject to local evidence of need

⁴ http://www.ealing.gov.uk/downloads/download/1322/adoption_of_the_development_or_core_strategy

- LB Ealing Development Management 2013⁵ – Policy 3B supports ‘special residential accommodation’ (this is defined to include G&T sites), if it meets an identified need of a local group and satisfies the amenity objectives of the plan

2.9 A part of LB Ealing towards the north east is also within the Old Oak and Park Royal Development Corporation (OPDC) area, a Mayoral Development Corporation, established by the Mayor of London that benefits from its own planning powers. The OPDC’s Local Plan⁶ was adopted in June 2022 and as with any Local Plan has considered G&T provision (Policy H8):

- OPDC will safeguard the existing Bashley Road site and enhance the site where required
- will consider future needs and secure sufficient supply to meet needs
- new sites should be accessible, capable of connection to utilities, provide safe access to road network and support health and wellbeing of occupiers

2.10 The explanatory text explains that the OPDC has carried out its own needs assessment and found no requirement to provide for additional pitches in its local plan area over its current plan period. However, this does not address the Ealing borough wide need which remains, as well as the responsibility of LB Ealing in terms of housing needs, which cover both the OPDC and the LB Ealing local plan areas.

2.11 In addition local planning policy the area is also subject to London-wide planning policy as set out by the Greater London Authority (GLA) in their London Plan 2021⁷. Policy H14 Gypsy and traveller accommodation states that:

- Boroughs should plan to meet identified need for permanent pitches - the required need is based on the 2008 assessment in Table 4.4 in the London Plan, unless a more up to date has been undertaken (please note that LB Ealing do have a more up to date needs assessment).
- Boroughs should undertake an audit of existing local authority provided pitches identifying areas of over crowding, potential capacity, requirements around refurbishment and enhancement – any arising issues should have a plan to address
- existing sites should be protected

⁵ https://www.ealing.gov.uk/download/downloads/id/7424/adopted_development_management_10_december_2013.pdf

⁶ https://www.london.gov.uk/sites/default/files/opdc_local_plan_2022_june_2022_including_appendix_0.pdf

⁷ https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

- there is no policy requirement to provide transit or short term sites but the explanatory text (4.14.4) does acknowledge that it is an important consideration and that they (GLA) are looking at options to meet such needs

Other policy and guidance

2.12 Other relevant considerations which should be taken into account include:

- national policy set out within the National Planning Policy Framework; and
- Communities and Local Government (CLG) Best Practice Guidance: Designing Gypsy and Traveller Sites (2008). This guidance has been cancelled by Government in August 2015. However, this document was not planning policy and for guidance purposes only. Therefore this document is still useful guidance for the design of Gypsy and Traveller sites.

2.13 These policy and guidance documents have been taken into consideration when developing the site criteria to assess potential sites.

Chapter 3 Existing provision and need

Need assessment

- 3.1** PPTS 2015 states that the overarching aim of Government is "to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community." (para 3).
- 3.2** The policy document sets out the way in which the site needs of Gypsy, Travellers and Travelling Showpeople are planned for, including a system of locally generated targets. Under this, local planning authorities are required to:
- Use a robust evidence base to establish accommodation needs;
 - Set pitch and plot targets to address the likely residential and transit site accommodation needs of Travellers in their area;
 - Identify and update annually a supply of specific deliverable sites to provide five years' worth of sites against their locally set targets;
 - Identify a supply of specific developable sites or broad locations for years six to ten and where possible for years 11-15; and
 - Set criteria based policies to meet identified need and/or provide a basis for decisions in case applications nevertheless come forward.
- 3.3** The West London Alliance commissioned ORS to undertake the Gypsy and Traveller Accommodation Assessment (GTAA) for the boroughs; the objective of that assessment being to provide a credible evidence base to aid the preparation and implementation of Development Plan policies and the provision of new plots for the London Plan period 2016 – 2041, with a split to 2033. It should be noted that the GTAA provides 'needs' figures that meet 'Planning policy for traveller sites' 2015 and the wider London Plan definitions. The Study provides evidence to address the first two requirements set out above. The GTAA splits the travelling status of households (pitches) and need into 3 categories, as set out below:

Table 3.1 Definition status and pitch provision – West London Alliance GTAA, 2018, ORS

Status	Pitch requirement for LB Ealing
Permanent	
Meets PPTS 2015 planning definition	6
Estimate of unknown need (arising from unconfirmed households that may meet PPTS 2015 definition)	0-2
Do not meet PPTS 2015 planning definition	23
Meets the London Plan definition ⁸	31
Transit	
Transit provision	0

3.4 This study identifies and assesses a pool of sites which has been identified by the Council and provided to Three Dragons for assessment. Three Dragons have assessed each site for 'travelling' Gypsy and Traveller development, as defined PPTS 2015. The objective is to provide evidence to support the Council to identify and allocate sites in the emerging Local Plan to meet the 'planning' need as identified in Table 3.1 – i.e. an additional 6 permanent pitches. The GTTAA identifies the need arising:

Table 3.2 Need that meets the PPTS definition by 5 year periods – West London Alliance GTAA, 2018, ORS

0-5 years 2018-23	6-10 years 2023-2028	11-15 years 2028-2033	16-20 years 2033-2038	21-23 years 2038-2041	Total
1	3	1	1	0	6

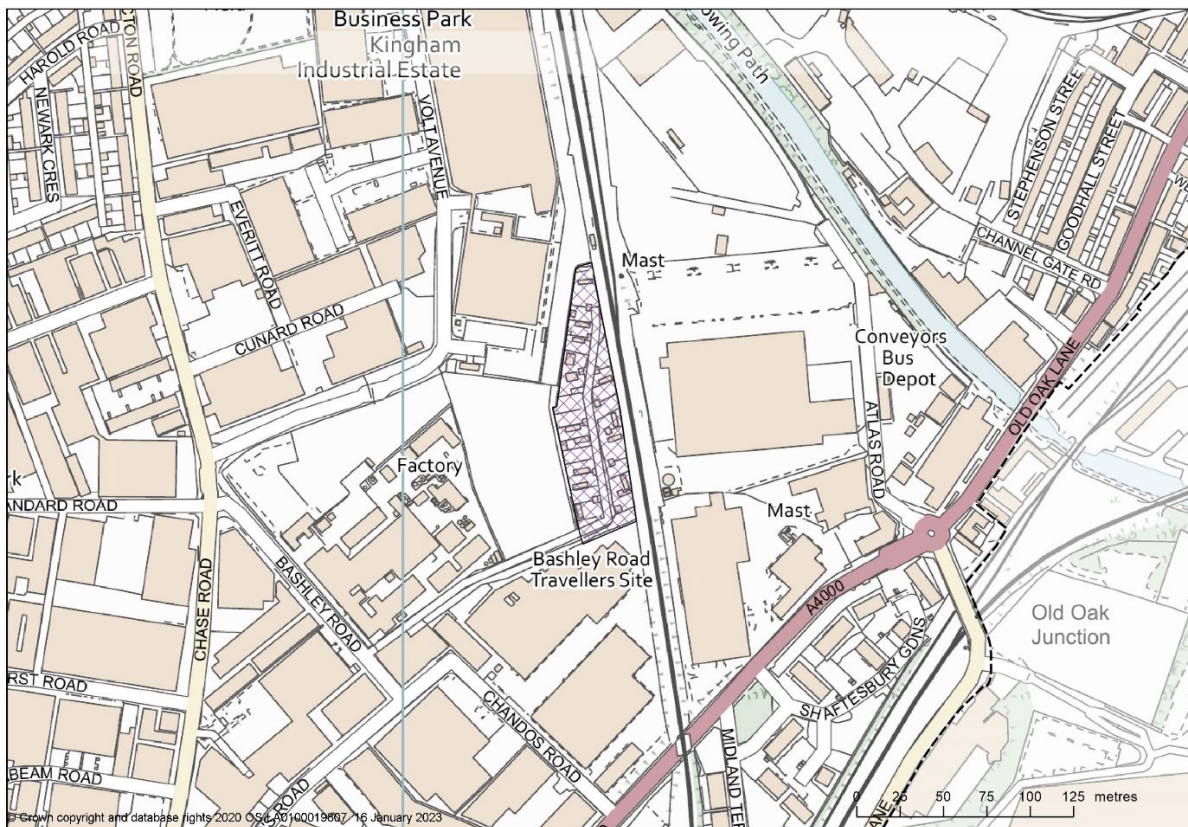
⁸ London Plan definition at the time of reporting in 2018

- 3.5** There is no known additional capacity since the GTTA was published, therefore in the first five years there is a requirement for 4 pitches, for six to 10 years a further pitch and for 11 to 15 years another further pitch. Although as it is unlikely the LB Ealing will allocate for single pitches, the approach to meeting the PPTS defined need is more likely the identification of a single site to meet all the need within 1-5 years timescale. However, consideration is also made around how LB Ealing could make provision for meeting the wider need, especially as there is potential for the national 'planning' definition to be widened. Therefore, the assessment will also consider how future pitch provision could be met, in relation to meeting the London Plan definition as set out in the GTTAA, as a proxy for the wider definition of the G&T community.
- 3.6** It is clear that the GTTAA identifies no requirement for a transit or short-term stopping area for LB Ealing and therefore this study has no 'planning' basis to seek a new transit site. However LB Ealing have asked that the matter is explored and recommendations made as to whether it would be appropriate to seek a transit site.

Current provision in Ealing
Bashley Road

- 3.7 Bashley Road is an existing G&T site for 24 pitches of just under 1 hectare in size (0.88h), equivalent to around 370 sqm per pitch (gross). It is understood that at the time of writing 22 of the pitches are in active use. The site was consented (10833/15) and established in 1985.
- 3.8 It is located in the north east of LB Ealing within the Park Royal industrial estate with access via Bashley Road (partly a quasi private road) onto Chase Road which directly joins the A40 a short distance away. The site is bordered by a mainly freight railway line to the east and industrial uses on the other boundaries. The nearest 'bricks and mortar' residential area in just over ½ km. (Wesley Estate). As can be seen in Figure 3.1 and Figure 3.2 the site is a self contained linear shape with plots either side of an access road. There is limited greenspace, no trees and therefore low or no ecological or biodiversity value. All plots have their own utility areas, often as a semi detached with the neighbouring plot.

Figure 3.1 Existing G&T site at Bashley Road (hatched area)



3.9 The site is within the Old Oak and Park Royal Development Corporation (OPDC) Local Plan area but is owned and managed by LB Ealing. The wider industrial area is considered as a Strategic Industrial Area (SIL), where new non-industrial uses would not generally be supported.

Figure 3.2 Existing G&T site at Bashley Rd showing the access road with plots either side



3.10 The last published assessment of site suitability, set out in the 2018 OPDC GTNA Addendum⁹ concluded that the site was unsuitable for additional G&T accommodation due to surrounding constraints and the linear shape limiting ability to reconfigure the site. The assessment also made the following points:

- the site has little ecological or biodiversity value
- limited number of historically significant buildings in the area and none within or adjacent to the site
- south and north of the site is predicted to be at risk of surface flooding and issues have been raised around poor drainage
- access is constrained and no potential for expansion
- there may be air quality and noise impacts for existing residents

⁹ Old Oak and Park Royal DC Local Plan - Gypsy and Travellers Needs Assessment – Addendum June 2018
https://www.london.gov.uk/sites/default/files/21_gypsy_and_traveller_assessment_addendum_2018.pdf

3.11 The site has had recent investment to alleviate flooding issues and a refurbishment of the utility blocks on each pitch. However, communal facilities are poor with no dedicated space for young people, such as a play area or any indoor facilities such as a community room. The site is at capacity and given that there is very little communal or open space could be thought as potentially overcrowded.

Figure 3.3 The refurbished utility blocks exterior and interior



3.12 Discussion with LB Ealing suggests that the site has been continuously occupied throughout its lifetime, generally at capacity and often with a waiting list for plots. The site community would broadly class itself as Irish Travellers, with many of those currently living there related.

3.13 Whilst there have been improvements to Bashley Road since the last assessment undertaken by OPDC, the conclusion remains the same that there is no potential to meet any further identified need on this site. Whilst not directly part of this study, which main aim is to identify options for meeting new need, there is clearly a case for OPDC and LB Ealing to consider potentially reducing the number of plots at Bashley Road to improve the overall living conditions, if suitable alternatives or new opportunities become available.

Other Gypsy and Travellers within settled community

3.14 Whilst there are no other public sites in LB Ealing and no known private sites it is likely that the G&T community is present in 'bricks and mortar' housing. The extent or needs of this community are unknown but anecdotally, as indicated by London Gypsies and Travellers organisation, survey work across London suggests that many do not state

ethnicity on census forms or other more general surveys making estimations difficult to establish.

3.15 Whilst there is limited data, experience from those undertaking surveys and from community representatives indicates that a significant proportion of those in permanent housing would prefer to be in accommodation that was more culturally appropriate. Whilst it is accepted that specific needs are hard to establish in terms of an evidence base it is important that the opportunities are provided through a positive planning approach to meeting needs.

Chapter 4 Site assessment methodology

Introduction

4.1 This section sets out the methodology Three Dragons have used to undertake the LB Ealing G&T site assessment study. The method has been developed in line with the revised Government's TTTS 2015 as well as good practice.

Part 1: Sources of sites

4.2 The council provided Three Dragons with a list of sites to be assessed within the Site Assessment Study. The source of sites is listed below:

- All existing G&T - including the consideration of (de)intensification and reduction/expansion of existing sites
- Pending and past planning applications for G&T
- Sites being made available for development by private landowners that LB Ealing consider should be reviewed for suitability for G&T use
- Sites put forward by LB Ealing on council owned land

4.3 The council has stated that the list of sites for this study has been compiled to provide a good cross section of site types, location and sizes. The council's initial selection has made use of the local knowledge and experience of council officers to include sites that may be suitable for G&T use.

4.4 As well as council-owned sites, the selection has included some privately owned sites that have been proposed for development. While the council prefers to engage with private landowners through negotiation, the council will use statutory powers including compulsory purchase powers where necessary for site assembly¹⁰. This approach has informed the study in relation to the assessment of availability.

4.5 LB Ealing has only one authorised site (Bashley Road) and currently no unauthorised plots or any past or pending planning applications for new pitches. The role of strategic urban extensions to deliver G&T sites was considered, but as a dense urban area, this

¹⁰ It is understood that the council has used CPO in the recent past and has developed the expertise and capacity to make use of this approach.

form of development is not coming forward and therefore this source was not considered within this assessment.

Part 2: Stakeholder engagement

4.6 To help identify the key criteria and provide recommendations as to priority sites to take forward into wider local plan consultation, it was considered that a range of engagement with different stakeholders was required – this includes:

- Discussion with Ealing housing and education outreach officers currently responsible for liaising with the current community at Bashley Road
- Consultation with Bashley Road community through structured interviews
- Advice from the London Gypsies and Travellers on good practice

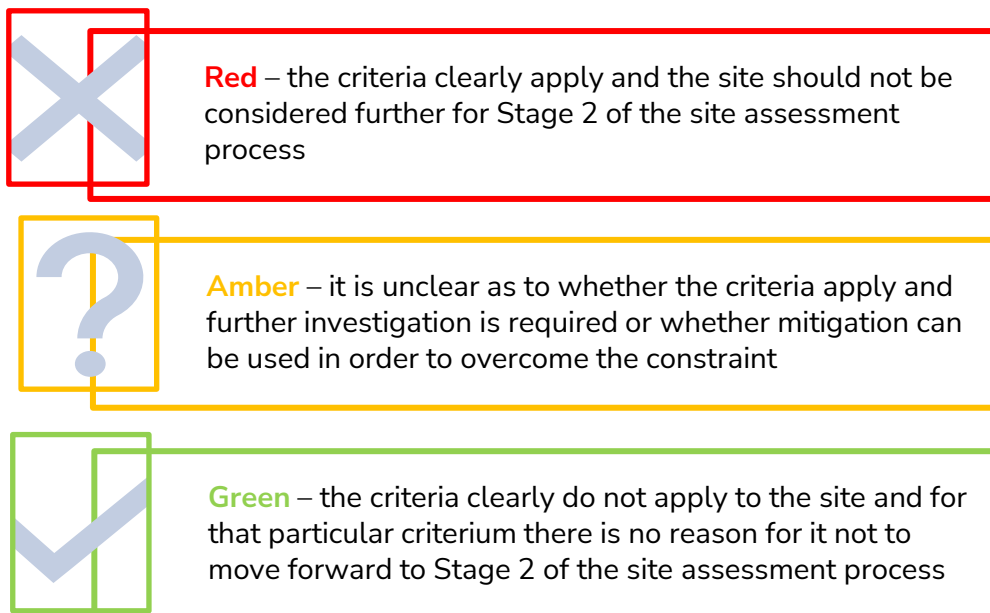
Part 3: Site assessment - Stage 1 (showstoppers criteria)

4.7 The next stage of the work is to sift the potential sites for any showstoppers that would mean that G&T use would be highly unlikely to be permitted or a desirable location to live. These include:

- Availability – the owner has confirmed or it has been indicated that the site is not available within the next 5 years
- Floodrisk – majority of the site is within flood zone 2, 3a or 3b¹¹
- Access – access to the site from the public road network is either not possible or highly unlikely due to ownership constraints through 3rd party land or would require unreasonably extensive works e.g. substantial new road
- (National) environmental designations – the site is covered by an (inter)national designation i.e. Special Protection Area, Special Area of Conservation, RAMSAR Site, Site of Special Scientific Interest, National Nature Reserve and other Biodiversity designations
- Historic environment – the site is likely to result in substantial harm to the significance of a Scheduled Monument, Grade 1 or Grade 2* Listed Building or a Grade 1 or Grade 2* Registered Park and Garden

4.8 The site ‘showstopper’ criteria for Stage 1 will be applied to each of the sites identified in Task 1, with a traffic light commentary that will explain as to whether the site is:

¹¹ Development of mobile homes or caravans for permanent use are not permitted in flood zone 3a/b and in flood zone 2 would require a sequential and exception test which is unlikely to be passed for the purpose of this type of assessment.



4.9 Stage 1 in the assessment process involved a desktop study and site visits undertaking the application of showstopper criteria. The availability of land is also recognised throughout both Stage 1 & Stage 2 as a key criterion. The application of showstopper criteria effectively sieves out sites which are likely to fail on the grounds of contravening major constraints, such as being within international/national environmental designations or within the boundaries of Scheduled Monuments. If any of the criteria are red, this is considered as a showstopper and the site is rejected at this stage of the assessment. Sites that have either amber or green against any of the criteria will have further assessment as part of stage 2.

4.10 It should be noted that ‘policy’ constraints such as greenbelt are not considered as a showstopper at stage 1 as the local plan process provides an opportunity to reconsider any policy designation. The stage 2 assessment will consider whether this is appropriate.

Part 4: Site assessments – Stage 2 (availability, suitability & achievability)

4.11 All sites (identified to be assessed at Stage 2) will be visited by the consultant team. These are then assessed for their availability, suitability, and achievability for G&T provision in detail, building on the stage 1 information. The PPTS 2015 states that this means that sites should be available now, offer a suitable location for development and be achievable with a realistic prospect of delivery within 5 years.

4.12 Availability - the Council has already indicated which sites are potentially available but further information will be sought on timeframe for site release - criteria will potentially include:

- Availability (1st 5 years) to travelling community groups
- Ownership (any issues around ransom strips, tenancies, operational requirements)
- Other 'planning use' identified and planning history

4.13 Suitability - each site will be assessed against an agreed criteria which cover policy requirements, physical constraints and potential impacts criteria will potentially include:

- Landform
- Land use within site and surroundings
- Amenity – proximity, overlooking, privacy
- Visual attributes of the site and surroundings (e.g. relationship of the site to other development; visibility to and from the site; degree of enclosure; and prominence.
- Noise
- Urban character
- Archaeological designations, contamination and unstable land
- Rights of Way
- Nature and condition of site boundaries
- Site access (Stage 1)
- Accessibility to facilities

4.14 At Stage 2 some of the criteria are a subjective assessment at the time of the visit, for example an initial assessment will be made on the noise and pollution impacts of neighbouring uses on potential G&T sites, such as the presence of existing employment uses, railways, roads and electricity pylons. The site assessments do not however include specific noise and air quality assessments or monitoring.

4.15 An accessibility assessment will also be undertaken looking at the proximity of each site to key services and facilities, including bus stops, train/underground stations, church, primary schools, shops and a General Practice surgery.

4.16 Achievability - we will identify potential policy/site constraints needing to be rectified which may affect viability and any potential alternative uses likely to affect deliverability.

- Notable features that may be affected by development (such as trees, streams, historic environment)
- Site capacity - an indication of potential capacity will also be provided using templates for different sizes of site provision (see appendix A).
- Realism of achieving delivery within first 5 years (we will also note 'developable' sites – i.e. those that show potential for G&T development post 5 years).

4.17 As with stage 1 a matrix will be provided which sets out the details for how each site performs against the availability, suitability and achievability. For each site a proforma providing more detailed information will be produced, including a site map and relevant images. Again a traffic light system will be used to refine the list of potential sites.

4.18 The best prospect Stage 2 sites were referred to the Council for comments from relevant officers, particularly highways and corporate property services. Officers were asked to comment on whether G&T development for each site would have any implications relating to their area of expertise. This includes whether there were any absolute constraints or whether there would be mitigation measures that would need to be considered to make sites suitable.

Part 5: Analysis and recommended sites

4.19 Using the criteria set out above, feedback from the local G&T community and in consultation with LB Ealing officers recommendations are made as to which sites will best meet the criteria and could be put forward for consultation through the Local Plan process.

4.20 It is anticipated that that at this stage there may not be the 'perfect' site and more information may be required to take any recommended sites forward but the sites put forward will be broadly realistic in terms of potential delivery.

Part 6: Policy and site options

4.21 As indicated in an earlier section, templates have been included within Appendix A to illustrate the land take and shape for typical G&T sites of varying sizes. This has helped inform the suitability assessment and can also be used as a basis for future sites. The templates are based on design guidance from a variety of sources including the National Policy Advisory Panel on Gypsy and Traveller Housing, CLG Design Guide, Welsh and Scottish Government and other local authority guides.

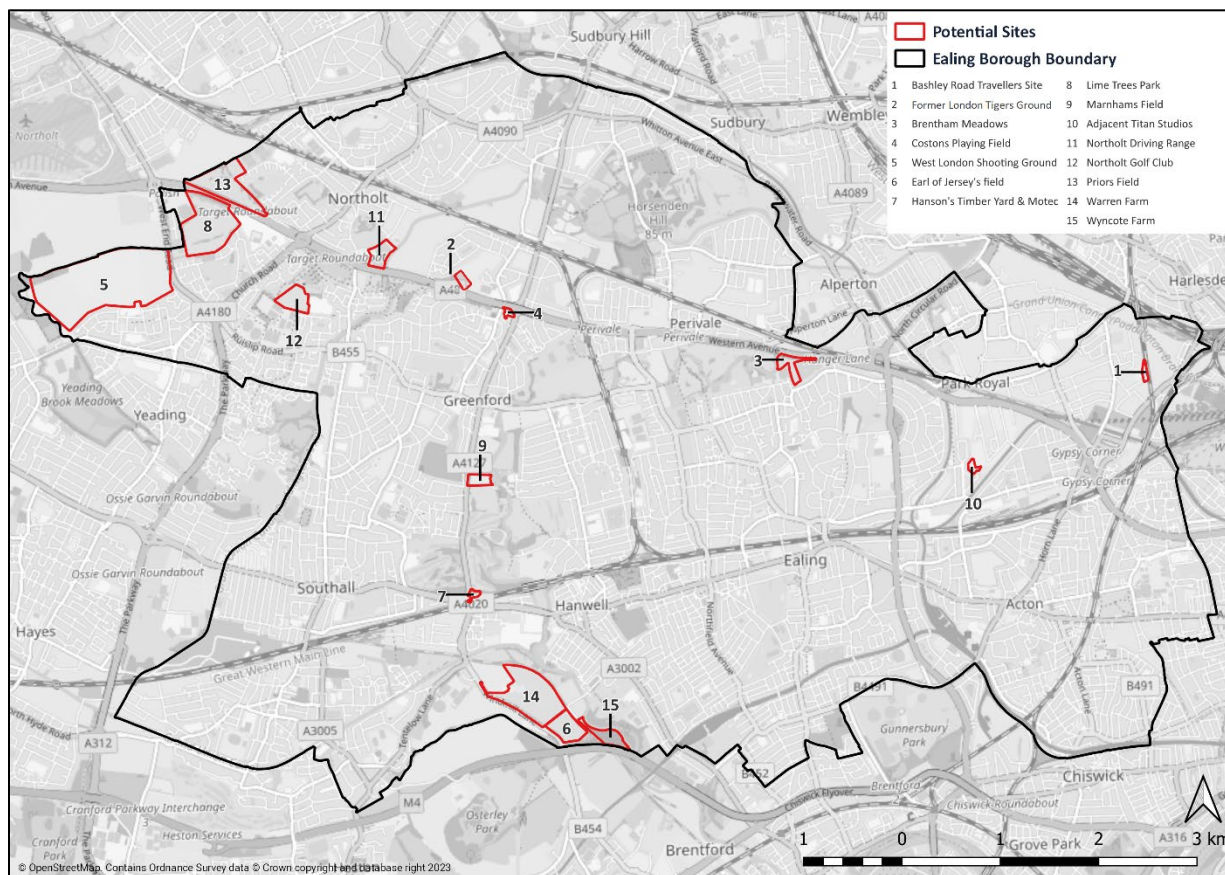
4.22 The final part of this report will provide recommendation on a policy options that will help decision makers if applications for sites come forward in the future outside of those being promoted through the Local Plan.

Chapter 5 Potential sites and consultation

Part 1 Sites assessed

- 5.1** A total of 15 sites were originally identified by LB Ealing to be assessed by Three Dragons for the 'Stage 1 assessment'. The source of sites included:
- All existing G&T - including the consideration of (de)intensification and reduction/expansion of existing sites (1 site)
 - Pending and past planning applications for G&T (0 sites)
 - Sites being made available for development by private landowners that LB Ealing consider should be reviewed for suitability for G&T use (6 sites)
 - Sites put forward by LB Ealing on council owned land (8 sites)
- 5.2** All sites were mapped onto GIS and put into a sites database. A map showing the distribution of sites subject to assessment is shown in Figure 5.1.

Figure 5.1 Location of original list of potential sites for G&T provision



5.3 These sites have been assessed for their capacity to accommodate residential uses for G&T sites. During the course of the assessment amendments have been made to the original list in terms of the sites and their source as information changed. Any changes are discussed as part of the individual site assessment in either Stage 1 or Stage 2.

Part 2 Stakeholder engagement

5.4 The method includes stakeholder engagement as part of the process to identify available, suitable and achievable site and policy options to meet G&T needs. The most important element of this is seeking views of the existing community through speaking directly to the community and its representatives.

Direct consultation with Bashley Road G&T community

5.5 In March 2023 consultation was undertaken with residents of the Bashley Road Travellers Site. Prior to the consultation, officers from LB Ealing had verbally advised residents that discussions about the site were planned for this time, in order to provide notice and allow people with views to be available.

5.6 Three Dragons, accompanied by council officers, had a series of semi-structured discussions with residents broadly based on a discussion guide that covered:

- Attitudes to Bashley Road (positive and negative)
- The importance of nearby facilities (shops, open space, schools, healthcare, transport etc)
- Preferred site sizes for any new G&T site
- On-site facilities for any new G&T site (security, space, play, community facilities etc.)
- Preferences about the character of surroundings for any new traveller site (e.g. proximity to commercial premises, settled communities, countryside et.)
- Views on transit pitches

5.7 A full note of the consultation is set out in Appendix B and in summary as follows:

- The exercise to locate land for a new site should focus on accommodating 30 pitches for permanent licenses (with no transit pitches), although two sites of approximately 15 pitches would be useful as an alternative.
- The site should maintain some distance from the settled community although adjacent to commercial locations may be suitable unless they contain bad neighbour uses. Access via a lane (such as at Bashley Road) helps to keep the site secure and children safe.
- A layout that includes a central children's play area overlooked by the pitches is important. Child safety should be a central consideration in site design.
- Good school/nursery access is very important although any new school would have to understand the specific needs of the traveller community.
- Nearby space for horses is important but does not affect all residents.
- Reasonable access to shops and nearby facilities would be welcomed.

Discussion with London Gypsies and Travellers

5.8 London Gypsies and Travellers is an organisation which challenges social exclusion and discrimination, working for change in partnership with Gypsies and Travellers. They work with the community and a range of trusted partners to contribute to the development of local, regional and national policy.

5.9 A representative of the organisation was invited to attend an open session with LB Ealing members and officers to discuss accommodation issues facing the G&T community in London. Three Dragons also attended the session and presented findings from the consultation work at Bashley Road. A further discussion was held between the London Gypsies and Travellers and Three Dragons on addressing needs, site design, type and location. The main points arising from these discussions were as follows:

- A combination of racism, discrimination, law and planning policies has eroded the ability for a nomadic culture in the UK
- Tighter definitions of the G&T community mean that less provision is made but that has led to more unauthorised stopping, which has been criminalised and therefore forcing the G&T community to settle permanently and therefore being outside the definition in planning terms, thus perpetuating the issue and ultimately forcing the G&T community to give up their traditional way of life
- It is likely that there could be a large G&T community within LB Ealing in culturally inappropriate bricks and mortar housing, however it is not possible to accurately assess as many do not formally identify as any of the nomadic ethnicities within the census or other official surveys
- Across London there are approximately 500 pitches on council run sites but many of these are over crowded – there are no transit sites or temporary stopping places. Those of the G&T community who own land struggle to get planning permission
- Rather than identify 1 or 2 large sites - preferable for LB Ealing to identify smaller sites to meet G&T provision. Large sites tend to attract more objections, risk community cohesion and less likely to be delivered. The desire of Bashley Road residents for a larger site may stem from safety in numbers approach
- Provision of transit sites or temporary stopping places is a London-wide issue and should be coordinated by the GLA. Inclusion of these types of sites as part of or next to permanent site provision is unlikely to work
- London wide negotiated stopping should be put in place – opportunity with public sector owned land in suitable locations to be identified with an agreed stopping period and waste disposal and basic temporary facilities provided for the duration – understood that this is due to be trialled

- Specific G&T policy and labelling (including on planning applications) can perpetuate a racist and discriminative response – positive policy supporting G&T uses should be contained within the same policies that would apply to brick and mortar housing.

Discussion with London Borough of Ealing Housing

- 5.10** Discussion with housing staff at the Council focussed on Bashley Road and confirmed that the site is within the authority's ownership and managed as part of the Neighbourhood Housing team.
- 5.11** The management of the site is through the Neighbourhood Team Leader, with a new site manager recently employed by the Council. A youth outreach worker also works with the Bashley Road community. It is understood that relations between the Council staff and the community are generally positive, and the community consultation process (summarised above) seemed to confirm this.
- 5.12** Residents have a pitch license rather than the standard tenancy agreements used for bricks and mortar housing. The pitch rents are tied to changes in the bricks and mortar social rents (to maintain affordability) and include electricity and water charges.
- 5.13** Recent investments by the Council have included work to alleviate flooding as well as refurbishment of the utility rooms (laundry and shower/toilet) on each pitch and improved mail delivery arrangements.
- 5.14** It is understood that London Borough of Ealing has the right to relocate the site but does not have the intention to do so.

Engagement conclusions and considerations for site assessments and policies

- 5.15** The engagement undertaken as part of this work has highlighted the need for new sites within LB Ealing and a positive approach within planning policy. While the existing provision and its community are well established there are clear short comings with the Bashley site and no room to expand to meet the identified need.
- 5.16** However, while there is a case for considering the relocation of Bashley Road to address its problems, the Council's clear responsibility in planning terms is to meet the GTAA identified need for six additional pitches and the site selection process in this study should ensure that this objective can be met. The most secure method of delivering this outcome is to identify and allocate appropriate site(s) of sufficient size to meet this need for six pitches.

- 5.17** The engagement also suggests that the GTAA may have underestimated G&T housing need, with the likelihood that there are additional G&T members in culturally inappropriate bricks and mortar housing in the Borough. Meeting this undefined need is best achieved through identifying or allowing additional smaller sites to come forward, separately from provision to meet housing needs stemming from Bashley Road. Given the level of uncertainty about the scale of this separate need it may be most appropriate to use criteria-based policies to facilitate delivery.
- 5.18** The engagement has suggested that there may be advantages in identifying a site (or sites in reasonable proximity) to facilitate the relocation of existing Bashley Road community coupled with the additional need generated from within this community. The opportunity for wholesale relocation would help to maintain existing community bonds and support networks. However, it is also recognised that the desire to move together may stem from their current circumstance as a fairly isolated community, so an on-mass move may not be necessary. While there is no clear planning responsibility for the Council to facilitate full or partial relocation at this time, it may choose to do so as part of a wider desire to provide a better living environment to the occupants. If the Council chose to pursue full or partial relocation, it will need sites with potential capacity for up to 30 pitches (i.e. 24 existing and 6 additional pitches). This would be an upper limit as it is possible that not all of the Bashley road community may wish to move together or from the existing site. The site selection process therefore includes some larger scale provision as a secondary consideration in the site selection process.
- 5.19** The engagement has made it clear that co-location of transit and permanent pitches is not possible. It also suggests that transit pitches may be best addressed at a pan-London rather than Borough level.

Chapter 6 Stage 1 & Stage 2 assessment

Part 3 – Stage 1 assessment

- 6.1** The first stage in the assessment process involved the application of broad suitability criteria, including absolute constraints, together with an initial investigation of likely availability.
- 6.2** The initial assessment of site suitability and availability is summarised in a matrix, which is set out below. A traffic light approach has been utilised, to identify where sites do not satisfy criteria in red, where criteria may be capable of being satisfied in yellow and where criteria are satisfied in green. The full assessments for Stage 1 and Stage 2 are found in Appendix C. For a description of the criteria please see Chapter 4 Methodology, para 4.6.

Table 6.1 Stage 1 Summary assessment

Site name	Availability	Floodrisk	Access	Environment designation	Historic environment	Potential
1. Bashley Road	✓	✓	✓	✓	✓	✓
2. Former London Tigers ground	?	✗	?	✓	✓	✗
3. Brentham Meadow	✓	✗	✗	✓	✓	✗
4. Costons Playing Field	✓	✗	?	✓	✓	✗
5. West London Shooting Ground*	?	✓	✓	?	?	?
6. Earl of Jerseys Fields	?	✓	✓	?	?	?

7. Hanson Timber Yard	?	✓	✓	?	?	?
8. Lime Trees Park	✗	✓	?	?	✓	✗
9. Marnhams Field	✓	✓	✓	?	✓	✓
10. Masons Green Lane	?	✓	✗	?	✓	✗
11. Northolt Driving Range	✓	✓	✓	✓	✓	✓
12. Northolt Golf Club	?	✓	✗	?	✓	✗
13. Priors Field	✓	✓	?	?	✓	✓
14. Warren Farm	✓	✓	✓	?	?	?
15. Wyncote Farm	✗	?	✓	?	?	✗

6.3 Informed by site visits it was found that *Site 5. West London Shooting Ground should be split into two sites (now Site 5a - East and Site 5b - West) and assessed separately at Stage 2 due to the site characteristics.

6.4 Sites identified as red will not be put forward as potential sites to meet G&T needs. There are 8 sites rejected at Stage 1 including sites 2, 3, 4, 8, 10, 12 and 15. The sites still under consideration include sites 1, 5a, 5b, 6, 7, 9, 11, 13 and 14.

Part 4 Stage 2 assessment

6.5 At Stage 2, a total of nine sites have been identified for a more detailed review. The Stage 2 review involved a more detailed assessment of availability and suitability; and an examination of achievability issues (i.e. whether the site is *deliverable*).

6.6 The PPTS 2015 states that planning authorities should, in producing their Local Plan - a) identify a supply of specific **deliverable** sites sufficient to provide 5 years' worth of sites against their locally set targets; b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15. It goes on to define 'deliverable':

- sites should be available now,
- offer a suitable location for development, and
- be achievable with a realistic prospect that development will be delivered on the site within five years.

6.7 The criteria that have informed this assessment of availability, suitability and achievability are set out in the method statement in Chapter 4. A summary of the site assessments is set out below in table 6.2 and Appendix C sets out the detailed site assessment proformas.

Table 6.2 Stage 2 Summary assessment

Site name	Availability	Suitability	Achievability	Potential
1. Bashley Road	Site is owned by LB Ealing, its 'planning' use is for G&T provision and is currently available for G&T community.	The surrounding area is being redeveloped with potentially unsuitable uses (noise, built form) for a residential area – amenity, especially in relation to areas for children is poor.	The redevelopment in the wider area is already underway so opportunity to improve site surrounds are limited. Onsite amenity could be improved but this would require a reduction in the number of pitches	Recommendation: No There is no opportunity for further pitch provision within 5 years. Pitch provision – reduce.

			available to G&T community.	
5 West London Shooting Ground	Following the site visit it was considered that this site should be considered in two parts as the site has two distinct areas and characteristics that merit separate consideration.			
5a. West London Shooting Ground East	Site is in private ownership and currently identified as Greenbelt with a proposed change to MOL. Reg18 consultation Local Plan suggests an 'open space-led' use.	The most suitable part of the site for G&T provision is the south west field, which is bounded by hedgerows, with residential uses to the south/east and generally open space to the north/west. Potential access could be via Old Ruislip Lane and the junction with the A1480.	The site has no physical barriers to development and could be developed within 5 years. However, the council would need to amend the proposed MOL designation in the relevant area and pursue negotiations with the landowner.	<p>Recommendation: Yes</p> <p>There is potential for pitch provision within 5 years – subject to landowner agreement.</p> <p>Pitch provision – 6 to 50 plus pitches</p>
5b. West London Shooting Ground West	Site is in private ownership and currently identified as Greenbelt with a proposed change to MOL. Reg18 consultation	Whilst the residential area to the south offers built form, it is buffered by trees and hedgerows, leading to a	Despite the proximity to the residential uses to the south the site's openness does not lend itself to small scale development, especially given the need to improve	<p>Recommendation: No</p> <p>There is limited or no opportunity for pitch provision within 5 years.</p>

	Local Plan suggests an 'open space-led' use. Site should only be considered available if no other more suitable/achievable alternatives exists.	sense of openness. Although access is possible it would require significant improvement along a c1km track and a potential new road, depending on which part of the site was bought forward.	access, which may lead to urbanising of the area. There could also be a viability issue in respect of improving the access.	
6. Earl of Jerseys Fields	Site in private ownership and following the initial assessment LBE have indicated that the site would not be made available for G&T use.	n/a	n/a	Recommendation: No There is limited or no opportunity for pitch provision within 5 years
7. Hanson Timber Yard	Site is in private ownership with active businesses on site. Whilst the site may be available for longer term development, it is unlikely that this could be done within 5 years.	In terms of location and surrounding area the site is suitable. However extensive redevelopment would be required and there are potential	Given the current active uses and the indication from the Reg 18 consultation that pushes any development of this site beyond 5 years, the site is not considered achievable but it could be developable.	Recommendation: No There is limited or no opportunity for pitch provision within 5 years but could be developable longer term.

		contamination constraints.		
9. Marnhams Field	Site is within council ownership and potentially available for G&T use.	The site is considered a suitable option for G&T provision in terms of location, character and surrounding uses. The most suitable part of the site for G&T provision is adjacent to the depot.	Reg 18 consultation suggests that site is part of a wider greenspace network and may also form part of proposals for improved strategic green space provision in conjunction with adjacent green space uses – thus a competing use that will require resolution through the consultation. Further work required to establish ground conditions and suitable access.	<p>Recommendation: Yes</p> <p>There is opportunity for pitch provision within 5 years – subject to agreement for reduction in area of competing use.</p> <p>Pitch provision – 6 to 40 pitches</p>
11. Northolt Driving Range	Site is within council ownership although subject to a long lease to a third party.	The site is considered a suitable option for G&T provision in terms of location, character and surrounding uses. The most suitable part of the site for G&T provision is along the western and southern boundary, with	Reg 18 consultation has identified an employment led mixed use scheme, within which G&T provision would be an appropriate component of the mixed uses. However, any G&T provision would need to be master planned along with the other mixed uses before securing the site from the	<p>Recommendation: Yes</p> <p>There is opportunity for pitch provision within 5 years – subject to ownership agreements.</p> <p>Pitch provision – 6 to 50 plus pitches</p>

		access via the existing gym access.	current leaseholders. Access to be agreed.	
13. Priors Field	Site is within council ownership and considered available for G&T use	Site is suitable but only as part of a wider regeneration of Islip Estate.	Site not available within 5 years but could be developable longer term.	Recommendation: No There is limited or no opportunity for pitch provision within 5 years but could be developable longer term.
14. Warren Farm	Whilst site is council owned it is unlikely to be made available for G&T uses.	Whilst site is partially suitable, its openness and lack of boundaries would mean any G&T provision would not be in keeping, unless part of a wider development.	As there is limited prospect of wider development at the site, provision of G&T uses are not considered achievable or developable.	Recommendation: No There is limited or no opportunity for pitch provision within 5 years.

Part 5 Analysis and recommended sites

6.8 The Stage 1 and Stage 2 assessments have shown of the total 16 sites reviewed:

- 11 are considered as not deliverable or developable (sites 1, 2, 3, 4, 5b, 6, 8, 10, 12, 14 and 15)
- 2 are considered to be potentially developable (sites 7 and 13)
- 3 are considered to be potentially deliverable (sites 5a, 9 and 11)

6.9 Of those rejected, the reasons were around flood risk, access, openness/containment, availability and delivery.

- The two developable sites (site 7 Hansons Timber Yard and site 13 Priors Field) offer potential but not within the short term i.e. within 5 years and require either business re-location and on-site redevelopment (site 7) or large-scale neighbourhood regeneration (site 13) to be enable a future G&T use.
- Two of the three deliverable sites (site 5a West London Shooting Ground East and site 11 Northolt Driving Range) will require negotiation (or CPO) to secure control of the site but subject to successful outcomes are considered to be available, suitable and achievable within 5 years. Site 9 Marnhams Field will not require CPO as it is already in council ownership but re-use for G&T provision will require the council to consider a planning balance between competing uses. All of these three sites can provide both the minimum requirement of 6 pitches and some future currently unmet need, should the council want to allocate sites for such use. Alternatively, they could also meet any relocation requirements from Bashley Road either in part or fully.
- Of the three developable sites, site 5a West London Shooting Ground East may be more achievable as progress is not dependent upon securing the other mixed uses for site 11 Northolt Driving Range or addressing competing uses for site 9 Marnhams Field. However, this report is a technical assessment of the options to meet G&T needs - it will be for LB Ealing to determine the weight of this evidence base with any other work informing their local plan review and come to a view as to which sites, if any they wish to take forward through the local plan preparation process.

Chapter 7 Options and conclusions

Part 6: Policy and site delivery options

Site delivery

- 7.1** In Chapter 6 the location of potential sites to meet both need (as specified by the 'planning' definition) and other needs (if the council wishes to allocate for unmet need beyond the 'planning' definition or relocation) have been identified. Mindful of the need to meet the 'planning' definition need of 6 pitches within 5yrs the study also considers delivery of these sites should any or all be successfully allocated through the local plan process.
- 7.2** In terms of the land take and form of development two templates showing a site of 6 pitches and a site of 15 pitches are set out in Appendix A. Each template includes play space, open space, a community room/site office, bit storage and suitable access and internal roads for movement of caravans and mobile homes. Each individual plot includes a shed/utility area with enough space for a kitchen, bathroom, storage, and social areas, space for caravans and vehicles and a mobile home at the maximum size allowable to be classed as a mobile home. Sufficient distances are allowed between mobile homes and boundaries to meet fire regulations.
- 7.3** These templates are based on various design guidance as set out in para 4.2 in this report. Whilst these will not specifically fit individual sites they provide some guidance to the council as to potential site sizes and expectations in terms of spec for a new site.
- 7.4** There will clearly be a cost in both land and construction in bringing forward a new site. For two of the sites the land is within council ownership and therefore land cost should not be an issue. However, it is acknowledged that 1 of the sites is within private ownership and therefore there would be a cost to purchase the land either for the council if it was to be a public site or for whoever wants to bring the site forward. Any price agreed for this land should be on the basis of its current use and limited potential for other uses. There may also be costs involved in the process of securing control of sites in private ownership or with long leases.
- 7.5** The costs of constructing the site will depend on the spec and site conditions but as an indication it is noted a recent Sutton committee (21st March 2023) considered the costs of an extension and redevelopment of The Pastures Gypsy and Traveller Site in Sutton. The project is to redevelop a current G&T site with 15 pitches and extend it by a further 8 pitches to include in total 23 new pitches as well as amenity blocks, community hall,

community amenity space with facilities, additional planting, new service media and an access road.

- 7.6** The total cost was originally anticipated at £4.83m but due to inflation, unforeseen abnormalities, BNG and 'greener' standards the cost has risen to £7.78m (c£340k/pitch). It is understood from the committee report that just over half the funding was available from GLA (including from Mayor of London's Homes for Londoners Affordable Homes programme of £1.68m and a further amount from GLA for G&T provision of £2.53m) with the remainder funded by Sutton. A bid was also made to DLUHC but this was unsuccessful.

Policy approach

- 7.7** Whilst it is anticipated that LB Ealing will meet its 'planning' needs through site allocation(s) it is considered that the council should also include positive policies towards provision of sites to meet currently unmet needs (those that arise outside of the 'planning' definition). These would apply to both the provision of public sites but also allow the G&T community to bring forward their own sites. This will also assist the council in meeting need should the 'planning' definition change either during the preparation of the local plan or thereafter.
- 7.8** The traditional approach to criteria based G&T policies is that there is often a single specific policy and that it is often prepared negatively with reasoning as to why a G&T site is not suitable. Whilst a more positive criteria can be used, it would still be a separately distinct policy that has potential to present a different position than other policies aimed at other types of residential accommodation. The consultation suggests that rather than have a separate dedicated policy it would be more positive and equitable to include policies and criteria that allow for G&T provision within other policies that guide other residential development.
- 7.9** Whilst the policies set out in the Reg18 consultation are not fully formed, a list has been compiled as to those policies that could include G&T provision within their wording:

Table 7.2 Reg 18 policy review for inclusion of positive G&T policies

Policy Number	Policy Name	Potential for G&T positive
SP 3.1	Tackling crime and inequality	It is noted that the policy already includes reference to investment in a new G&T site (as well as a transit site). Policy wording could be extended to include the principle of being blind

		to G&T occupation when considering applications for residential development.
SP 4.3	Genuinely affordable homes	Extend B (or E) to include G&T provision.
DAA	Design & amenity	Extend to take account of specific characteristics of specialist development such as G&T sites.
HOU	Affordable housing	Clarity about the inclusion of G&T accommodation as affordable housing.
SSC	Small sites contribution	Role of new small G&T sites in providing affordable housing.
G5	Urban greening	Currently applies to all development – amend to take account of specific characteristics of specialist development such as G&T sites.
ENA	Enabling development	Extend exceptions to take account of specific requirements for G&T sites.
Town Plans	Sites schedules	Include clarity that sites with proposed residential uses do not <i>exclude</i> G&T.

Conclusion

Potential sites to meet 'planning' need

- 7.10** As identified in the GTAA and set out in Chapter 3, there is a requirement to identify 6 additional pitches to meet need arising from Bashley Road G&T site within 5 years. There is no capacity at Bashley Road for further intensification to increase the number of pitches nor can the site be expanded.
- 7.11** Through a review of 16 sites provided by LB Ealing, using a criteria approach to assessing availability, suitability and achievability of sites, it has been found that sites **5a West London Shooting Ground East, 9 Marnhams Field and 11 Northolt Driving Range are potentially deliverable**. A further 2 sites (site 7 Hansons Timber Yard and site 13 Priors Field) have been identified as developable should the council want to identify any further sites to meet a wider definition of G&T needs in the future.
- 7.12** The number of pitches identified at each location and whether there is a preference of one site over another should be considered through the local plan process. It is important that this is subject to a full consultation process as this is about identifying a site that meets the needs of the community both in terms of size and location. **Therefore it is recommended that LB Ealing undertake a Reg 18 consultation** so that these questions can be posed and responses considered before the preferred site and size is identified and taken through Reg19 and Examination.

Transit sites

- 7.13** There are currently no operational public transit sites in LB Ealing or across Greater London (as advised by the consultation). The GTAA has not identified a need for transit provision due to the very low numbers of encampments. But it has suggested that the situation should be closely monitored, which should include gathering information from residents on the reasons for their stay in the local area, whether they have a permanent base or where they have travelled from and whether they have any need or preference to settle permanently in the local area. This can be used to help inform future decision making and plan making.
- 7.14** In the absence of transit provision the GTAA and the consultation has suggested the use of management-based arrangements for dealing with unauthorised encampments and in particular consider the use of negotiated stopping agreements. Negotiated stopping is short term provision to be sited on suitable specific pieces of land (normally in public ownership) for an agreed but limited period of time, with the provision of limited services such as water, waste disposal and toilets – the agreement is between the council and the G&T community regarding expectations for both parties.
- 7.15** Whilst it is recommended that LB Ealing consider setting up a process for negotiated stopping, the lack of current provision is London-wide and therefore should be coordinated and led by GLA to ensure a consistent approach, as well as access to a large public sector land portfolio.

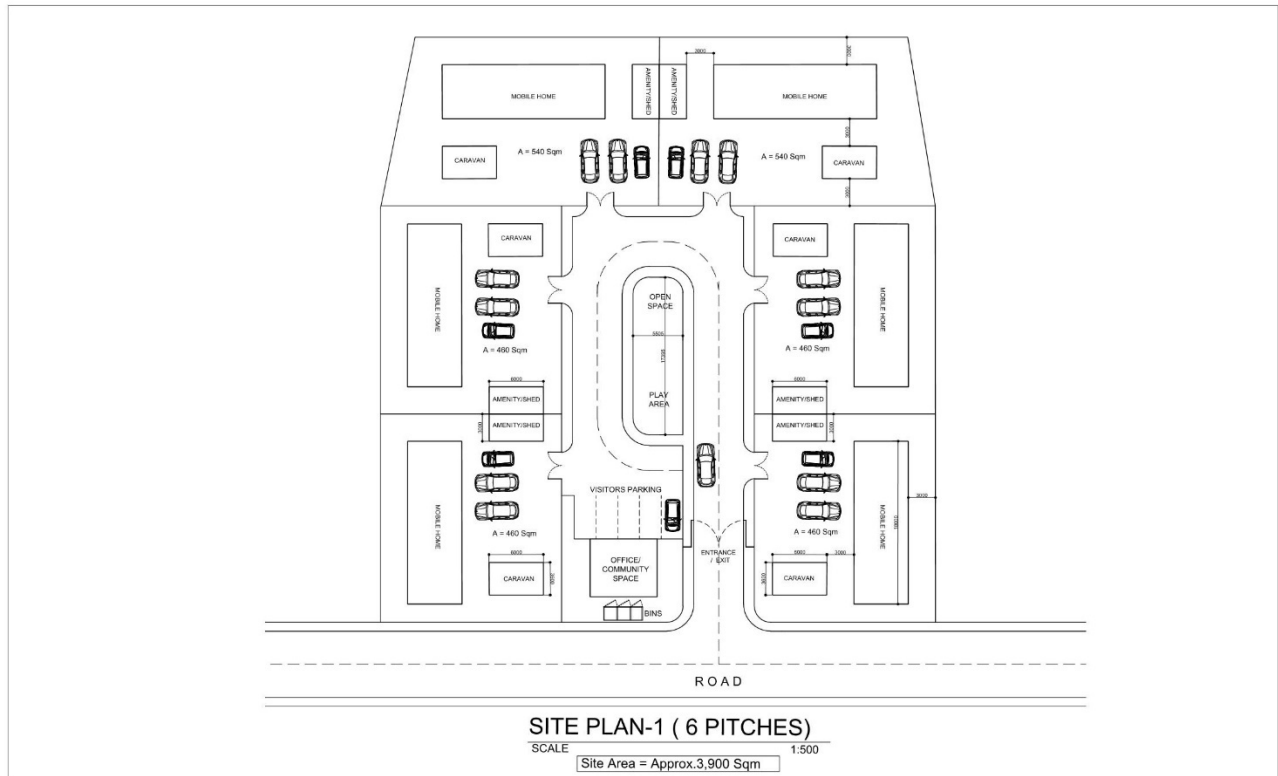
Meeting other Gypsy and Traveller needs

- 7.16** The GTAA identified a number of 'Non-Travelling' Gypsy and Traveller and Travelling Showpeople households, and surveyed the need for 'Non-Travelling' pitches/plots for LB Ealing.
- 7.17** The needs of these households to live within caravans do still need to be recognised as they are ethnic Gypsy and Travellers. There is no law or guidance that sets out how the needs of these households should be addressed. However, as previously stated the 'planning' definition may change as a result of the court of appeal decision. There was also suggestion from the consultation that further needs may not have been captured from the G&T community that is currently in culturally inappropriate accommodation.
- 7.18** There is also potential in the future for all or some of the Bashley Road residents to want to move, given the current site circumstances. However this would likely require alternative accommodation to be provided/found.

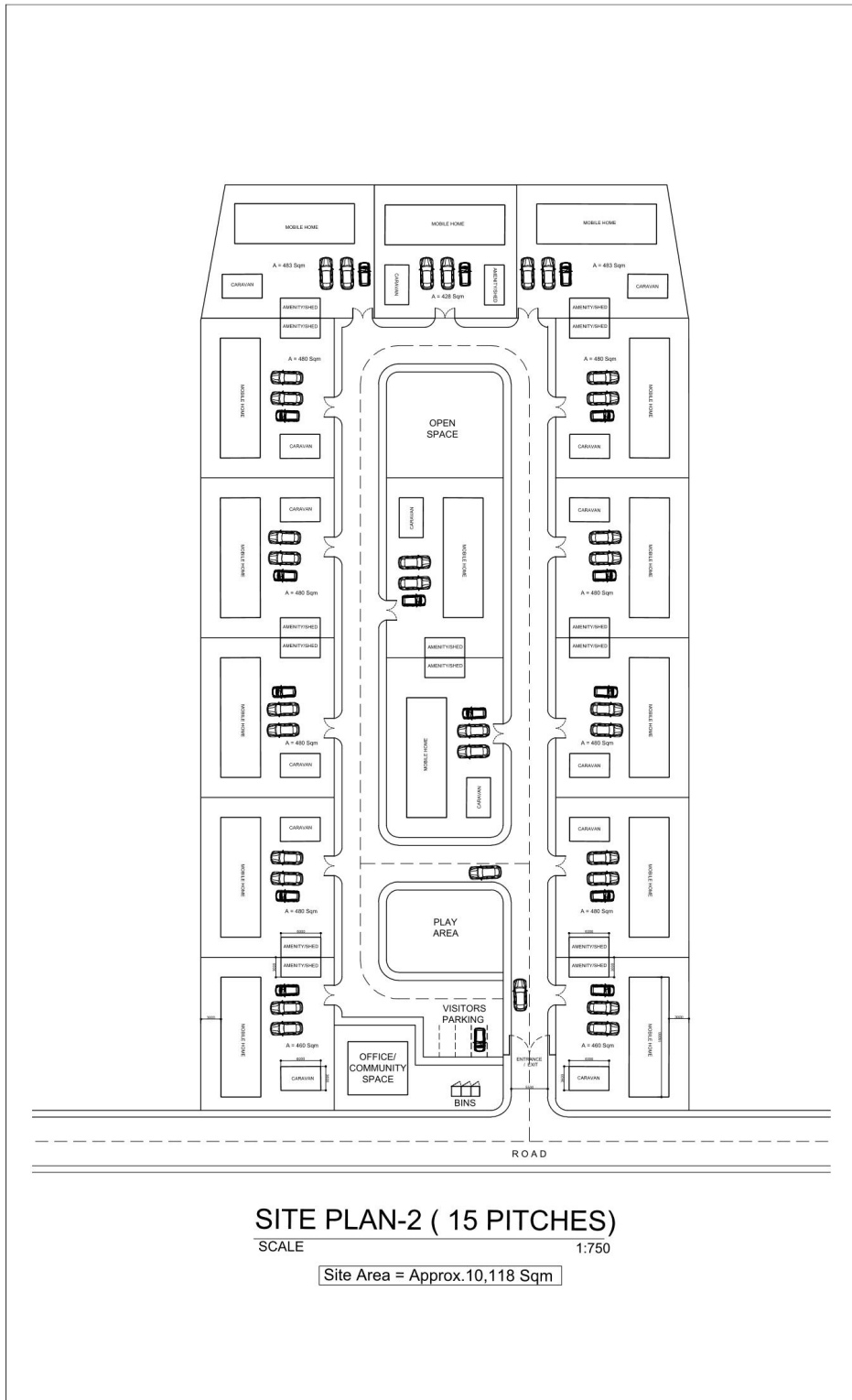
7.19 Whilst the potential site identification process may provide some additional capacity beyond the 'planning' need, it is important that LB Ealing also include planning policies within their Local Plan that positively support the development of different sizes and locations of sites, should these come forward over the plan period – both public and private provision.

Appendix A – Site templates based on best practice/guides

A sample template site for 6 pitches



A sample template site for 15 pitches



Appendix B – Bashley Road consultation

Approach

1. On the 20th of March 2023 consultation was undertaken with residents of the Bashley Road Travellers Site. Prior to the consultation, officers from LB Ealing had verbally advised residents that discussions about the site were planned for this date, in order to provide notice and allow people with views to be available.
2. Officers from LB Ealing and Three Dragons had a series of semi-structured discussions with residents broadly based on a discussion guide that covered:
 - Attitudes to Bashley Road (positive and negative)
 - The importance of nearby facilities (shops, open space, schools, healthcare, transport etc)
 - Preferred site sizes for any new traveller site
 - On-site facilities for any new traveller site (security, space, play, community facilities etc.)
 - Preferences about the character of surroundings for any new traveller site (e.g. proximity to commercial premises, settled communities, countryside et.)
 - Views on transit pitches
3. Officers from LB Ealing were clear to residents that there is no current proposal to oblige residents to move from the site, and that the objective of the consultation was to inform the process of providing additional traveller site capacity within the borough, based around the figure of six additional pitches to meet the accommodation needs of the community's young people.
4. Residents of 17 of the 24 pitches (71%) at Bashley Road took part in consultation exercise.

Attitude to Bashley Road site

5. Overall, residents were positive about the current site at Bashley Road. Typical references related to the length of time that people had lived at this location, along with their familiarity and general positive relationships with their neighbours and the nearby John Perryn primary school. It was clear that part of resident's positive view of the Bashley Road site was the strength of the established traveller community and the broadly positive relationships within it.

6. However, residents were also able to illustrate some of the problems with living in this location. Important short term issues were the current building works on two sites adjacent to the Bashley Road site, which had produced considerable noise, vibration and dust, as well as some reported damage to caravans from objects blown from the construction site during high winds. It was reported that the construction noise and activity started very early in the morning and finished late at night (beyond the 'standard' 8am to 5pm working day) and residents reported loss of sleep, difficulties with keeping the site and caravans clean, and links with serious health issues. Residents were aware that the two adjacent construction projects may lead to loss of sunlight on the site and that further noise and vibration may arise from the HS2 spoil conveyor belt running alongside the adjacent railway.
7. Longer term issues related to congestion in the surrounding area, a lack of safe walking routes to school and some reported lawlessness and anti-social behaviour in the surrounding area. The length of the lane to the site was considered useful in providing some protection. Some aspects of the site itself were not considered satisfactory, such as drainage, the size, location, heating and electrical supply for the utility rooms, size and shape of some pitches and provision of speed bumps. There were also views about the Council's management of the site and the speed and effectiveness of repairs and renovations. However, it was clear the residents generally welcomed the support of the Council staff that had day-to-day involvement with the site residents.
8. Although there was some focus on current construction disturbance, it was clear that some of the former commercial uses had also created noise and dust, with the previous glass factory mentioned as causing issues in the past.
9. The availability of space for horses (as well as trotting gigs) at Bashley Road was seen as important, and although a minority of the residents had horses at the site, others emphasised the role of horses within the community's culture and some expressed plans to have horses in the future.

Site size for a new travellers site

10. The discussion about the preferred size for a new site were strongly linked to the family linkages making up the traveller community at Bashley Road. It was apparent that a new stand alone site for six pitches was not considered suitable as traditionally, families would seek to stay together. A larger new site that could contain the existing residents at Bashley Road plus space for new pitches was considered a possibility although there was a strongly held view across most people that individual communities could not be mixed with people from other traveller communities. The consultation responses showed

that people recognised that the current 24-pitch site was large by traveller standards and that there could be management problems with an even larger site, although no specific issues with scale were put forward.

11. There was some suggestion that new provision could be provided as two sites of say 15 pitches each, although this would be most workable if these sites were located close together (a mile) so that the existing strong family and community linkages could be maintained.
12. A minority of residents suggested that the funding that may be required by the Council for a relocated or new site should be given to residents instead so that they could acquire land and establish a site themselves. However, it was not clear that there were any tangible plans to implement this, nor that there was widespread support across the community for this approach.
13. The discussion about the site size for a new facility illuminated the basic issue about whether the Council should be seeking a location for a new, large site capable of accommodating most if not all of the existing residents plus some room for growth; or whether a smaller facility would be sufficient. On balance, the prevailing view was that in the right circumstances the community would consider wholesale relocation to another location that was suitable to accommodate the additional pitches needed, and that this was partly prompted by the current construction work around Bashley Road. However, it is clear that this is not necessarily a firm fixed view, nor that all members of the community share the same view. As a result, there is some danger that a relocation may fracture the existing strong and generally supportive relationships within the community, and this issue should be considered as part of planning for new locations(s).

On-site facilities for a new travellers site

14. The on-site facilities most commonly mentioned by residents related to better utility rooms, and this was mainly by comparison with the existing provision at Bashley Road. The current utility rooms at Bashley Road contain a utility area and a bathroom, and many residents suggested that larger facilities that could accommodate more kitchen and eating space would be welcomed. For a minority of residents, the location of the utility rooms reduced the flexibility to accommodate caravans on the plots.
15. Vehicles and child safety was brought up by a number of residents, and it was reported that some of the families had installed speed bumps to slow delivery vehicles coming into the site.
16. Grazing and stable space for horses was generally sought.

17. When prompted, on-site recreation areas for children and young people were considered good, although this would depend on the area being visible from the caravans and safe. The travellers site at West Drayton was cited as an example of good practice, with pitches arranged in a horseshoe around an area of children's play.
18. There was no desire for gates although there was a need for some measures to reduce unwanted visitors to the site. The relatively long lane at Bashley Road was considered to generally fulfil this function while not impeding legitimate access. Suitable site lighting was sought.
19. When questioned about facilities such as community space and site office, residents agreed that these would be good although these aspects were not the most important issues for most. However, there was a suggestion for a women-only space to strengthen community linkages.
20. Although the pitches on Bashley Road vary in size, there was little suggestion that a new provision would need to be substantially larger. Where there were views, the pitch size would need to accommodate a large unit (e.g. a static van) as well as a travelling van and other vehicles, plus some on pitch storage space; which in most cases was the situation at Bashley Road.
21. The role of a site warden was raised and this was considered important to smooth running of a site as well as providing an enabling role to some residents.

Nearby facilities for a new travellers site

22. Access to a suitable school and nursery was considered to be important to most of the residents spoken to. As well as the physical availability of a school it would be necessary to ensure that a school would be able to take all the children from a site and that it had an understanding of the cultural differences between traveller and the settled communities. This would reduce the risk of bullying and avoid conflict between the school and the traveller community about absences for fairs etc. Access to a school bus would be valued and help to ensure attendance.
23. Access to the road network was also important although respondents seemed to assume that most site locations would be reasonably accessible. Although some residents did not drive, it was explained that culturally the traveller community was prepared to drive to access facilities. Generally people with access to vehicles would assist those without, although it was preferable to have walking access to reduce dependency on others. In particular, people explained that they would drive to access healthcare from the practices

or hospitals that they were used to and that they would continue to use these even if they lived elsewhere. This also applied to church attendance.

24. Access to convenience shops was also considered important, with residents not wishing to be isolated from everyday necessities. There was no clear view about the importance of public transport links.

Surrounding area for a new travellers site

25. There was no single location type of area for any new traveller site although some residents had the view that they were not welcomed by the settled community and that some separation from general residential areas was a good thing.
26. The consultation suggested that prior to the recent construction disturbance at Bashley Road, the commercial character of the area had been generally suitable as a location for a traveller site and that lower intensity uses may be suitable neighbours – subject to avoiding bad neighbour uses.
27. The attractiveness of more peaceful countryside locations was commented upon by a minority of residents.

Transit pitches

28. The consultation discussions made it clear that co-location of transit pitches was not welcomed as a suggestion. It was considered that transit pitches would lead to conflict and disturbance as generally different traveller communities do not mix.

Summary

29. The key points from the consultation are that:
- The exercise to locate land for a new site should focus on accommodating 30 pitches for permanent licenses (with no transit pitches), although two sites of approximately 15 pitches would be useful as an alternative.
 - The site should maintain some distance from the settled community although adjacent to commercial locations may be suitable unless they contain bad neighbour uses. Access via a lane (such as at Bashley Road) helps to keep the site secure and children safe.
 - A layout that includes a central children's play area overlooked by the pitches is important. Child safety should be a central consideration in site design.

- Good school/nursery access is very important although any new school would have to understand the specific needs of the traveller community.
- Nearby space for horses is important but does not affect all residents.
- Reasonable access to shops and nearby facilities would be welcomed.

30. The process of any new provision and/or relocation has the risk of disrupting the strong community bonds that were regularly mentioned during the consultation, and this aspect should be considered throughout the process.

Appendix C – Site assessments Stage 1 & Stage 2

Site Details	
Site Number	1
Site Name	Bashley Road
Address	Wimpole House, 1 Bashley Rd, London NW10 6TE
Post code	NW10 6TE
Site Size (Gross ha)	0.88
Potential Capacity	n/a
Ownership	Council
Landowner details	n/a
Site Description	Bashley Rd is an existing G&T site for 24 pitches and is 0.88 hectares in size. It is located within the Park Royal industrial estate, located to the very east of the Borough.

Red line Boundary

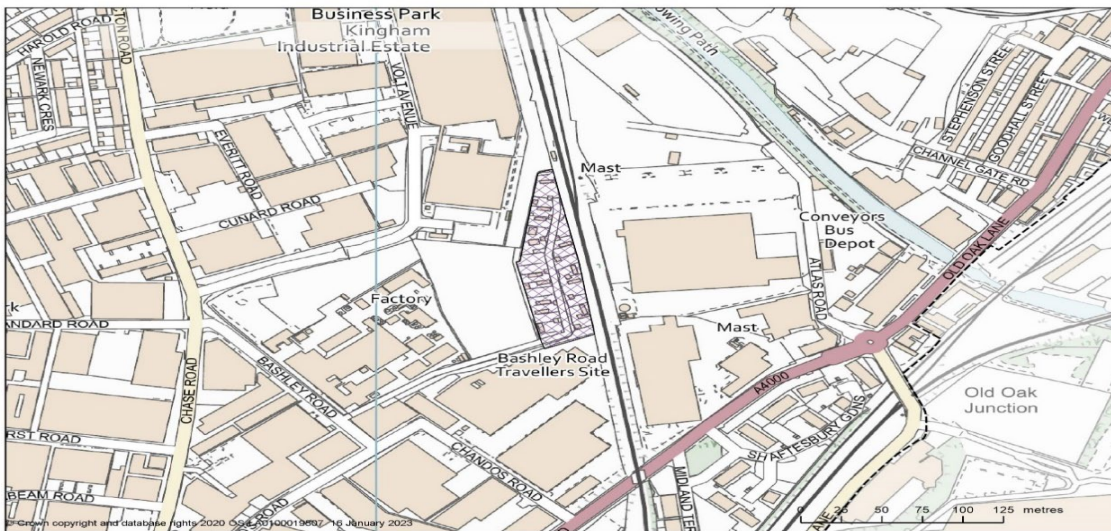


Photo of site



Stage 1: Site Assessment	
Site Availability	The site is currently owned by the council and leased to Irish Travellers. However, the land around the site is largely in private ownership with many of the parcels currently in redevelopment. While the site itself is considered as 'available' it is acknowledged that the site is densely populated, and there is no land available either within the site to develop or around the site to provide additional pitches.
Flood Zone	Site is in Flood Zone 1, and therefore has a low probability of flooding.
Access to/from site	The site benefits from a suitable access to the site already.
Environmental and/or planning designations	The entire site is located with the Old Oak and Park Royal Development Corporation designated. The entire site is also located within an area designated as Park Deficiency The site is identified as a Strategic Industrial Location.
Historic Environment	There do not appear to be historic monuments directly on or impacting the site
Stage 1 - conclusion	There are no known absolute constraints and therefore site should be taken forward to Stage 2
Stage 2: Site Assessment	
Availability in next 5 Years	
Other potential planning uses	No known alternative uses
Planning History	No relevant Planning history on site
Suitability	
Landform	Bashley Rd is a long, narrow site with plots arranged either side of a main through road that. There is a further thin strip of land to the south that is used as access, which is dog legged to join the site with the surrounding area. The site is relatively flat.
Land use within site surroundings	The site is located within the Royal Park industrial estate. The site is bordered by a mainly freight railway line to the east and industrial uses on the other boundaries.
Residential amenity	The nearest 'bricks and mortar' residential area is just over ½ km. (Wesley Estate) and therefore impact on residential amenity is not considered a significant factor on this site.

Visual attributes of the site and surroundings (e.g. relationship of the site to other development; visibility to and from the site; degree of enclosure; and prominence)	<p>The site is afforded considerable enclosure from neighbouring uses. This is in part due to the dogleg shape of the access road from Bashley Rd. The access to the site is relatively concealed, and the site itself is some distance along access road and therefore provides some separation from the neighbouring industrial and road network.</p> <p>The site itself is located in an area undergoing intensification of surrounding uses. As these uses are intensified from their current use of low rise industrial warehousing to higher density uses such as multi-storey offices, then the amenity of the residents of the site is likely to diminish.</p>
Noise issues	<p>The site has considerable noise issues resulting from the construction of surrounding uses and the freight railway line to the east.</p> <p>As well as noise, residents of the site also noted other impacts such as vibration and dust; the latter resulting from construction activity of nearby parcels of land.</p>
Urban character	<p>The uses in the immediate vicinity are industrial and employment buildings. The immediate area is undergoing intensification, meaning that surrounding development is at various heights. This also means that there is not a single, dominant character of the urban environment in this location.</p>
Accessibility / proximity to existing facilities	<p>Consultation with residents at Bashley Road indicated that there was a good level of accessibility with educational, medical and retail facilities in the area, although traffic at peak times was a difficulty particularly during school runs.</p>
Archaeological designation, contamination or unstable land issues	<p>No known issues. Several surrounding areas fall into areas that are within designations such as Ealing's Contaminated Land registry and Site of importance for nature conservation but the site itself does not.</p>
Rights of Way	<p>There are no public rights of way throughout the site.</p>
Nature and condition of site boundaries	<p>The site boundaries are clearly defined.</p>
Achievability	
Site Size	<p>The site is 0.88 hectares and has 24 pitches on site (at the time of writing it was understood that 22 were in active use).</p>
Notable features that may be affected by development (such as	<p>The site has limited greenspace, and no notable features that would likely be lost through intensification at the site.</p>

trees, streams, historic environment)	
Achievability with realistic prospect of delivery	The site is densely populated, with limited land available either within the site to develop or around the site to provide additional pitches. Further intensification is therefore deemed unachievable.
Verdict	No (Stage 2) - not suitable for additional provision at the site

Site Details	
Site Number	2
Site Name	Former London Tigers ground
Address	111 Olympic Way, Greenford UB6 8NJ
Post code	UB6 8NJ
Site Size (Gross ha)	c. 1 hectare
Potential Capacity	6 - 15 pitches
Ownership	Private
Landowner details	n/a
Site Description	Former London Tigers ground is a disused football pitch located between Greenford and Northolt. It lies immediately east of Birch Wood and of the A40.

Red line Boundary

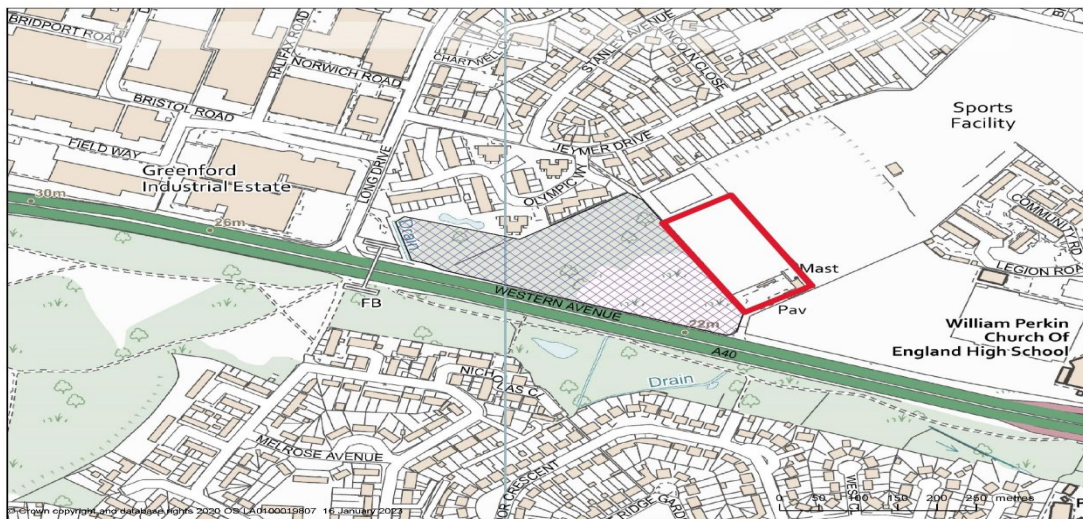


Photo of site



Stage 1: Site Assessment	
Site Availability	Understood to be privately owned with unknown availability.
Flood Zone	Most of the site is in Flood Zone 2. Approximately one quarter of the site lies within Flood Zone 3. Only approximately 20% of the site is not within either flood zone 2 or 3.
Access to/from site	Access would need to be established to the site. Site visit suggests the most likely would be by reopening the access onto the A40 to the south. There are other potential routes to access the site from either Birkbeck Avenue to the very north of the site or via Legion Road immediately east, however neither would be straightforward. The former would involve the loss of numerous sports pitches and a shared access with the nursery & sports pavilion to the north of the site. The latter would likely involve the clearance and redevelopment of a number of car garages.
Environmental and/or planning designations	The entirety of the site is designated as Metropolitan Open Land
Historic Environment	There do not appear to be historic monuments directly on or impacting the site
Stage 1 - conclusion	Only a small portion of the site falls outside of Flood Zone 2 or 3, meaning that the scope for delivery of pitches at the site would be restricted to less than 5. Given the complexities in developing an access to the site, then this site is deemed an unachievable prospect. The site is therefore not being taken through to Stage 2.
Verdict	No (Stage 1) - not suitable (flood risk and access)

Site Details	
Site Number	3
Site Name	Brentham Meadow
Address	Brunswick Rd, London W5 1BB
Post code	W5 1BB
Site Size (Gross ha)	3.817
Potential Capacity	10 - 20 pitches
Ownership	Council
Landowner details	n/a
Site Description	Brentham Meadow is a T-shaped green field site comprised of 3.8 hectares, that fit around allotments to the east and sports fields to the west. It is located in Brentham Garden Suburb, to the south of the A40 roundabout and less than 500 metres short west of the Hangar Lane Gyratory.

Red line Boundary

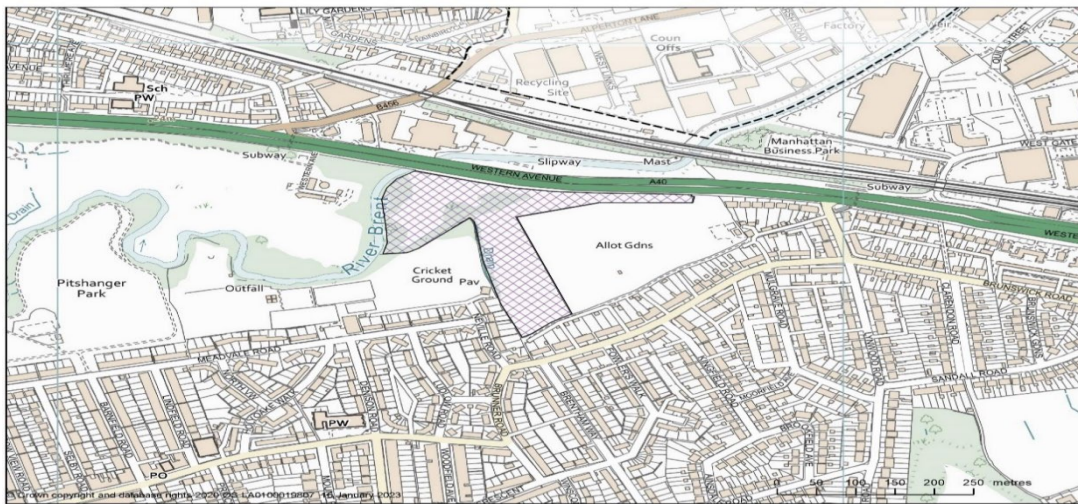


Photo of site



Stage 1: Site Assessment	
Site Availability	Understood to be council owned and whilst currently undeveloped access and flood risk issues would likely mean it is not available for G&T uses.
Flood Zone	Most of the site sits within Flood Zone 3. This includes the northern most part of the site.
Access to/from site	<p>Site would require new access to be made for the site. One possibility is that this could be via the same access to Brentham Allotments, however this would require extensive works although it is presumed that this is council owned land which would assist its delivery. This access is currently gated and there would be questions as to how the two occupiers would be able to use/secure the two uses.</p> <p>An alternative access would be via the cricket ground, however this require extensive remodelling of the cricket ground and pavilion and therefore unlikely to be deliverable. In either circumstance access would be through residential roads which may not be suitable for large caravans etc.</p>
Environmental and/or planning designations	<p>The entirety of the site is designated as a site of importance for nature conservation</p> <p>Almost all the site (82%) is designated as Public Open Space, and some (12%) is designated as Community Open Space</p> <p>The entirety of the site is designated as Metropolitan Open Land</p>
Historic Environment	There do not appear to be historic monuments directly on the site
Stage 1 - conclusion	A large portion of the site is within Flood Zone 3, which would severely restrict the land that could be developed at this location and no obvious access. The site is therefore not being taken through to Stage 2.
Verdict	No (Stage 1) - not suitable (flood risk and access)

Site Details	
Site Number	4
Site Name	Costons Playing Fields
Address	Costons Playing Field, Greenford UB6 8SR
Post code	UB6 8SR
Site Size (Gross ha)	0.734
Potential Capacity	0 - 10 pitches
Ownership	Council
Landowner details	n/a
Site Description	Coston Playing fields is a relatively small site (0.7 hectares) currently used as a playing field associated with the nearby school (Springhallow Post-16). The site is located in close proximity to the Greenford Roundabout, and a range of other uses including residential, community uses and the road network.

Red line Boundary

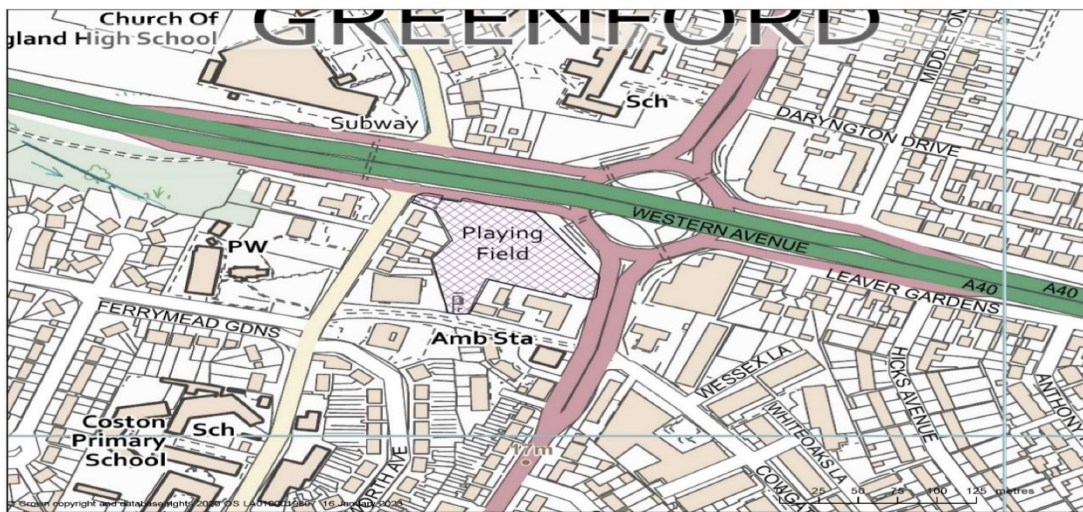


Photo of site



Stage 1: Site Assessment	
Site Availability	Understood to be council owned and whilst currently undeveloped access and flood risk issues would likely mean it is not available for G&T uses.
Flood Zone	Roughly one third (western side) of the site is in Flood Zone 3, the remainder is in Flood Zone 2.
Access to/from site	<p>There is a gate at the western edge that would lead to the road network, however it is likely that this would be unsuitable as it positioned so close to the existing junction and would be across the Flood Zone.</p> <p>An alternative could be the very northern edge, where a layby is currently situated. However, this is a busy slip road for the A40, and it is also close to the roundabout and only limited areas to avoid areas of flood risk - any access here would require traffic calming and the removal of the layby for safe turning. The boundary joins Cow Lane to the south but this is an active travel route linked to the primary school and therefore unlikely to be suitable for regular vehicular access.</p>
Environmental and/or planning designations	Half of the site is designated within a Green Corridor
Historic Environment	There do not appear to be historic monuments directly on the site
Stage 1 - conclusion	All of the site is within Flood zone 2 or 3 and therefore unsuitable for development and not taken forward to stage 2.
Verdict	No (Stage 1) - not suitable (flood risk)

Site Details	
Site Number	5
Site Name	Down Barn Farm & West London Shooting Range
Address	Sharvel Ln, W End Rd, Northolt UB5 6RA
Post code	UB5 6RA
Site Size (Gross ha)	c14h
Potential Capacity	50 plus pitches
Ownership	Private
Landowner details	TBA
Site Description	<p>Note: The site was provided to Three Dragons as a large 73 hectare site. Following our site investigation it is understood that the middle section of the site (West London Shooting Range) was likely to be unavailable for redevelopment. Therefore the site has been split into two sections.</p> <p>Appraisal 5a considers the eastern section of the site, including Down Barns farm (pictured).</p>

Red line Boundary

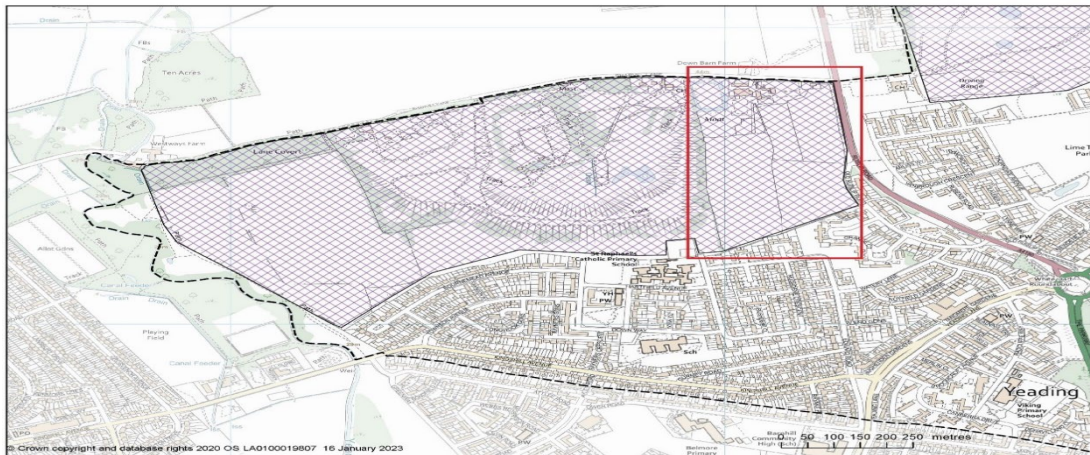


Photo of site



Stage 1: Site Assessment	
Site Availability	Understood to be privately owned, therefore further investigations required as to its availability. The site includes Down Barn Farm and an industrial workshop building for tool provision and vehicle repairs & storage. Both uses appeared to be active during our site visit, and further investigation would be needed to determine whether this part of the site would be available. Should the industrial workshop require relocation, then this would likely represent a significant cost. However this is a large site and there would be potential at for G&T provision on the southern parcel of land.
Flood Zone	Site is in Flood Zone 1, and therefore has a low probability of flooding.
Access to/from site	The site currently has vehicular access to the site for the two uses (farm and industrial workshop) to the north of the site. Should the site require access further south (from the Ruislip Road or Old Ruislip Road) then a new access would be required.
Environmental and/or planning designations	The entirety of the site is currently within the Greenbelt with a proposed change to MOL
Historic Environment	Downs Barns Moat is located between the shooting range and the industrial units on the northern edge. It is a Scheduled Ancient Monument, understood to be a medieval manor house (no longer there) in existence in the 14th century. There may also be evidence of a medieval village and field systems.
Stage 1 - conclusion	There are no known absolute constraints and therefore site should be taken forward to Stage 2
Stage 2: Site Assessment	
Availability in next 5 Years	
Other potential planning uses	Reg 19 consultation suggests an 'open space' led use. However, whilst the site is identified as potential MOL land there is an opportunity to amend this designation on all or part of the site.
Planning History	No relevant Planning history on site
Suitability	
Landform	The site is broadly rectangular in shape and has a gradual slope from the north to the south of the site.
Land use within site surroundings	Sharvel Rd, which is the current access to the site bounds it to the north. Further north lies a cleared greenfield site. The Western edge is bound by the existing Shooting Lodge and the eastern edge is road network (Ruislip Road).

	South of the site lies a large residential estate.
Residential amenity	There are some homes to the very south of the site. Given the size of the site, and its existing access to the North, it is possible that the site could be designed in such a way that leaves sufficient space to mitigate impacts on residential amenity
Visual attributes of the site and surroundings (e.g. relationship of the site to other development; visibility to and from the site; degree of enclosure; and prominence)	The site is bound on the eastern edge by the A1480, and it is possible that the site could be seen from the roadside. However, the site is located away from residential uses and has its own enclosure that would likely be a positive for a prospective G&T community.
Noise issues	The site is located away from major road and rail network, and therefore noise impact in that instance may be lower than other sites. However, consideration should be made to the relatively close proximity (c. 1km) from RAF Northolt which may have some impact.
Urban character	The residential area to the south is largely 2 storey semi-detached properties. The residential estate to the east comprises of mainly terraced properties. That said, the site covers a large area, and it is though that the design should be able to mitigate its impact on residential amenity. If the site was brought forward as part of a wider residential scheme residential amenity could be considered as part of a potential design.
Accessibility / proximity to existing facilities	The site is relatively less accessible than other sites. The nearest primary school, secondary school and doctors is approximately 0.5, 1 and 0.8 kilometers away respectively. The nearest underground station is under 2km though the road network is easily accessible from the site.
Archaeological designation, contamination or unstable land issues	Site includes a protected Scheduled Ancient Monument and is located in a designated Archaeological Interest area. The site has high potential for significant archaeological remains which may need to be preserved in situ. For any further development a significant amount of pre-determination evaluation trenching would need to take place to support a planning application. Though the site is not located in the Contamination Register, part of the site is industrial workshops and is more likely to have

	contaminants present than greenfield sites. All these areas could be avoided with a partial development of the site.
Rights of Way	There do not appear to be public rights of way throughout the site.
Nature and condition of site boundaries	Boundaries on the eastern edge are clearly defined with a row of trees. Depending on how the site is subdivided, new boundaries may be required in other parts of the site.
Achievability	
Site Size	Whilst this site is approximately 14h, the preferred parcel of land in the south east is approximately 2.6h and could therefore accommodate up to a maximum of 40 pitches.
Notable features that may be affected by development (such as trees, streams, historic environment)	If a smaller part of the site is selected then most features can be avoided, however there will need to be some clearance to allow for an access point.
Achievability with realistic prospect of delivery	Potential to be deliverable within 5 years, however this would require the removal of the proposed MOL designation and a willing landowner. Therefore at this stage it considered as a potential site.
Verdict	Yes - available, suitable & achievable

Site Details	
Site Number	5
Site Name	Down Barn Farm & West London Shooting Range
Address	Sharvel Ln, W End Rd, Northolt UB5 6RA
Post code	UB5 6RA
Site Size (Gross ha)	c33h
Potential Capacity	50 plus pitches
Ownership	Private
Landowner details	TBA
Site Description	Note: The site was provided to Three Dragons as a long 73 hectare site. Following our site investigation it is understood that the middle section of the site (West London Shooting Range) was likely to be unavailable for redevelopment. Therefore the site has been split into two sections. The site is located at the very west of the borough of Ealing. Appraisal 5b considers the western section of the site (pictured).

Red line Boundary

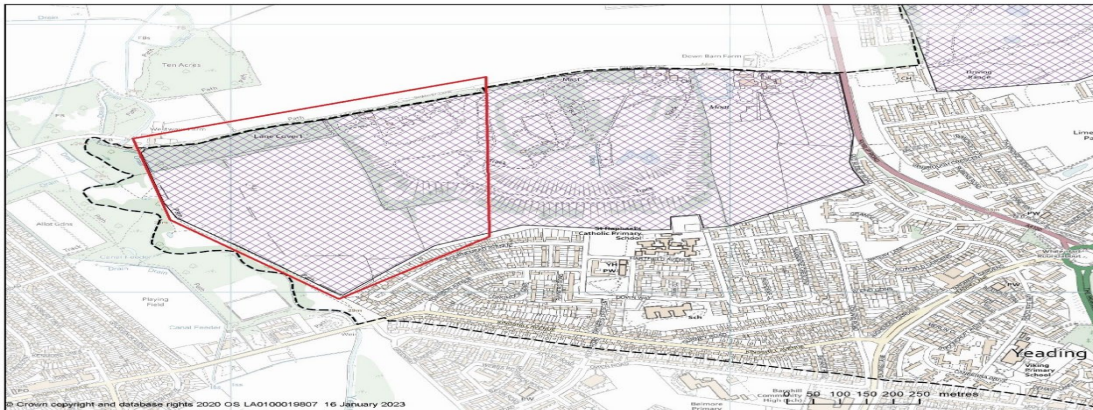


Photo of site



Stage 1: Site Assessment	
Site Availability	Understood to be privately owned, therefore further investigations required as to its availability. Part of the site includes a pet crematorium and should this be required then would likely represent a cost for relocating for the council.
Flood Zone	Site is in Flood Zone 1, and therefore has a low probability of flooding.
Access to/from site	The site currently has vehicular access to the site for the different uses although this is smaller at this end of the site and would require work to develop further.
Environmental and/or planning designations	The entirety of the site is designated as a site of importance for nature conservation The entirety of the site is currently within the Greenbelt with a proposed change to MOL Part priority habitat - grassland and deciduous woodland
Historic Environment	Downs Barns Moat is located between the shooting range and the industrial units on the northern edge. It is a Scheduled Ancient Monument, understood to be part of a 14th century medieval manor house (no longer there).
Stage 1 - conclusion	There are no known absolute constraints and therefore site should be taken forward to Stage 2
Stage 2: Site Assessment	
Availability in next 5 Years	
Other potential planning uses	Reg 19 consultation suggests an 'open space' led use. However, whilst the site is identified as potential MOL land there is an opportunity to amend this designation on all or part of the site.
Planning History	No relevant Planning history on site
Suitability	
Landform	This portion of the site is a regular shape and has a gradual slope from the north to the south of the site.
Land use within site surroundings	Sharvel Rd, which is the current access to the site bounds it to the north. Further north lies a cleared greenfield site. The western edge is bound by woodland (Michael Frost Park) and the eastern edge is the exiting Shooting Park. South of the site lies a large residential estate.
Residential amenity	The only adjacent dwellings are along the southern boundary, so given the size of the site there would be opportunity to avoid or mitigate.

Visual attributes of the site and surroundings (e.g. relationship of the site to other development; visibility to and from the site; degree of enclosure; and prominence)	At present the site is set back from the existing residential uses through wooded areas. It is envisaged that some of this could be kept maintaining a similar sense of enclosed and separation. Given the site size, if site was brought forward as part of a wider residential site any issues could be a consideration at the design stage on how to best address the uses.
Noise issues	The site is located away from major road and rail network, and therefore noise impact in that instance may be lower than other sites. However, consideration should be made to the relatively close proximity (c. 1km) from RAF Northolt which may have some impact.
Urban character	The residential area to the south is largely 2 storey semi-detached properties. The residential estate to the east comprises of mainly terraced properties. That said, the site covers a large area, and it is thought that the design should be able to mitigate its impact on residential amenity. It is envisaged that the site could be brought forward as part of a wider residential scheme, and therefore residential amenity could be considered as part of a potential design.
Accessibility / proximity to existing facilities	The site is relatively less accessible than other sites. The nearest primary school, secondary school and doctors is approximately 0.5, 1 and 0.8 kilometers away respectively. The nearest underground station is under 2km although the road network is accessible from the site.
Archaeological designation, contamination or unstable land issues	Site includes a protected Scheduled Ancient Monument and is located in a designated Archaeological Interest area. The site has high potential for significant archaeological remains which may need to be preserved in situ. For any further development a significant amount of pre-determination evaluation trenching would need to take place to support a planning application. Part of the site is listed under the contaminated land register.
Rights of Way	There do not appear to be public rights of way throughout the site.
Nature and condition of site boundaries	Boundaries on the eastern edge are clearly defined with a row of trees.
Achievability	
Site Size	The site is c33h but with no obvious parcels for sub division, it would not be conducive just a G&T provision.

Notable features that may be affected by development (such as trees, streams, historic environment)	The feature of this site is its sense of openness, therefore any provision for G&T would need to create artificial boundaries, taking away the sense of openness.
Achievability with realistic prospect of delivery	Despite the proximity to the residential uses to the south the site's openness does not lend itself to small scale development, especially given the need to improve access, which may lead to urbanising of the area. There could also be a viability issue in respect of improving the access.
Verdict	No (Stage 2) - not suitable (access, openness)

Site Details	
Site Number	6
Site Name	Earl of Jerseys Fields
Address	5PR, Windmill Ln, Isleworth TW7 5PR
Post code	TW7 5PR
Site Size (Gross ha)	7.607
Potential Capacity	50 plus pitches
Ownership	Private
Landowner details	TBA
Site Description	Earl of Jerseys fields is a 7.6 ha greenfield site located at the very south of the Borough, south of Hanwell.

Red line Boundary

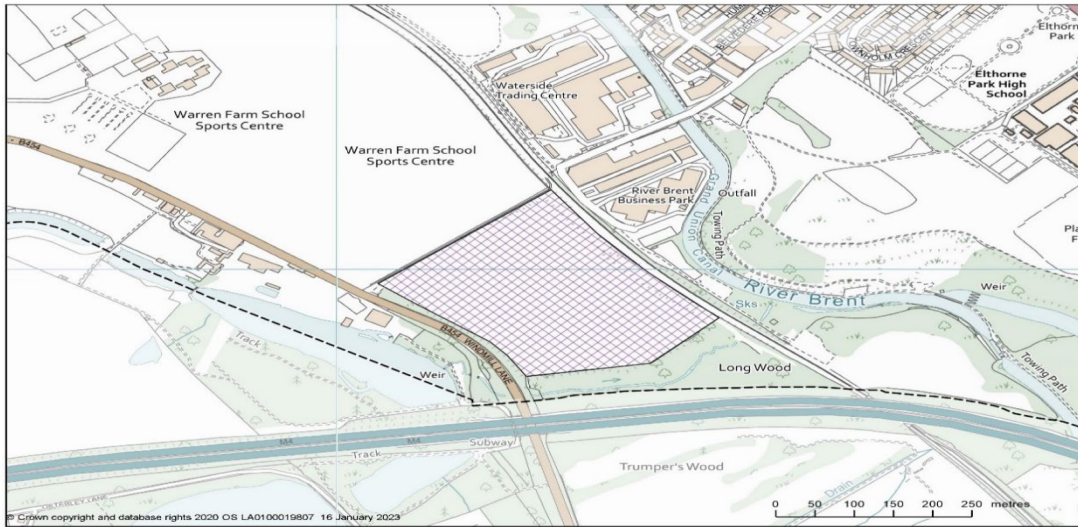


Photo of site



Stage 1: Site Assessment	
Site Availability	Understood to be privately owned, therefore further investigations required as to its availability.
Flood Zone	Site is in Flood Zone 1, and therefore has a low probability of flooding.
Access to/from site	A new access would be required for the site. The most likely place for this would be from Windmill Hill which is at the southwestern edge of the site boundary.
Environmental and/or planning designations	The entirety of the site is designated as a site of importance for nature conservation with no changes currently proposed The entirety of the site is designated as Metropolitan Open Land with no changes currently proposed
Historic Environment	There do not appear to be historic monuments directly on the site although there may be evidence of early field systems and possibly prehistoric barrows.
Stage 1 - conclusion	There are no known absolute constraints and therefore site should be taken forward to Stage 2
Stage 2: Site Assessment	
Availability in next 5 Years	
Other potential planning uses	Site currently used as a paddock and it is understood that the owner is not seeking an alternative use for the site
Planning History	No relevant Planning history on site
Suitability	
Landform	The site is broadly diamond shaped. Given the regular shape of the site and its size, an appropriate design / arrangement of pitches and access would be relatively straightforward to achieve.
Land use within site surroundings	The southwest edge is bound by the existing network, and the northwest edge is bound by Warren Hill Farm which is another potential allocation site (Site 14) The majority of the eastern edge is bound by a rail network. The site is bound to the southeast by existing woodland. Away from the immediate vicinity, the motorway is found to the south of the site, and the River Brent Industrial estate is across the rail track to the north, and accessible by foot bridge.
Residential amenity	There are no adjacent dwellings and therefore no impact on residential amenity.

Visual attributes of the site and surroundings (e.g. relationship of the site to other development; visibility to and from the site; degree of enclosure; and prominence)	There are only a few houses near the site, and therefore the site would have a high degree of enclosure away from surrounding development. The site is located along a relatively quiet/smaller road network, and its prominence would be relatively low. Depending on any subsequent design, the site would therefore potentially be prominent from only a few locations such as users of Warren Farm in the north, River Brent Industrial Park, and the motorway to the south.
Noise issues	Noise impact is expected to be limited as the site is located away from the larger road network. A train line bounds the site on the north/western edge however it is unclear as to whether this part of the track is in use. The M4 lies a short distance to the south of the site. The M4 is raised above the site, however Long Wood lies between the motorway and the south of the site which may help mitigate this impact.
Urban character	There is no particular urban character in this location, considering the lack of residential units in the vicinity.
Accessibility / proximity to existing facilities	The nearest primary school, secondary school and doctors is approximately 1, 0.8 and 1.2 kilometers away respectively. The nearest underground station is approximately 1.2 kilometers away.
Archaeological designation, contamination or unstable land issues	Site is located with a designated Archaeological Interest area and an application would require aerial photographs of cropmarks. Part of the site is listed under the contaminated land register. The site is relatively flat.
Rights of Way	There are public rights of way around the sites, and a public woodland (Long Wood) to the south of the site. The site itself is privately owned and there did not appear to be any rights of way through the site during the site visit.
Nature and condition of site boundaries	The site boundaries are clearly defined. Since provision of pitches would likely only comprise part of the site, the site would require subdivision and appropriate boundaries redrawn.
Achievability	
Site Size	The site is understood to be in the region of 7.6 hectares. Aside from access, it is thought that much of this would be developable land. This is to say that it would therefore be more than sufficient in size to meet and current and future need for G&T provision
Notable features that may be affected by	There are some trees and hedges that align the perimeter; however, it is possible that there may not be too much lost as part

<p>development (such as trees, streams, historic environment)</p>	<p>of this redevelopment given that there are relatively few in the centre of the site. The site has a sense of openness, therefore any provision for G&T within part of the site would need to create some artificial boundaries, taking away the sense of openness.</p>
<p>Achievability with realistic prospect of delivery</p>	<p>The lack of boundaries and sense of openness and as the council has advised that the owner is unlikely to support a G&T use the site is not considered suitable or achievable.</p>
<p>Verdict</p>	<p>No (Stage 2) - not suitable or achievable (openness and not available)</p>

Site Details	
Site Number	7
Site Name	Hanson Timber Yard & Motec
Address	Uxbridge Road (entrance, Greenford Rd, Southall UB1 3EQ
Post code	UB1 3EQ
Site Size (Gross ha)	0.844
Potential Capacity	6-13 pitches
Ownership	Private
Landowner details	Unknown
Site Description	The site is 0.8ha located on the outskirts of Southall near the A4020 (Uxbridge Rd). The site is currently in use as a Timber Yard, and a smaller portion as a vehicle repair.

Red line Boundary

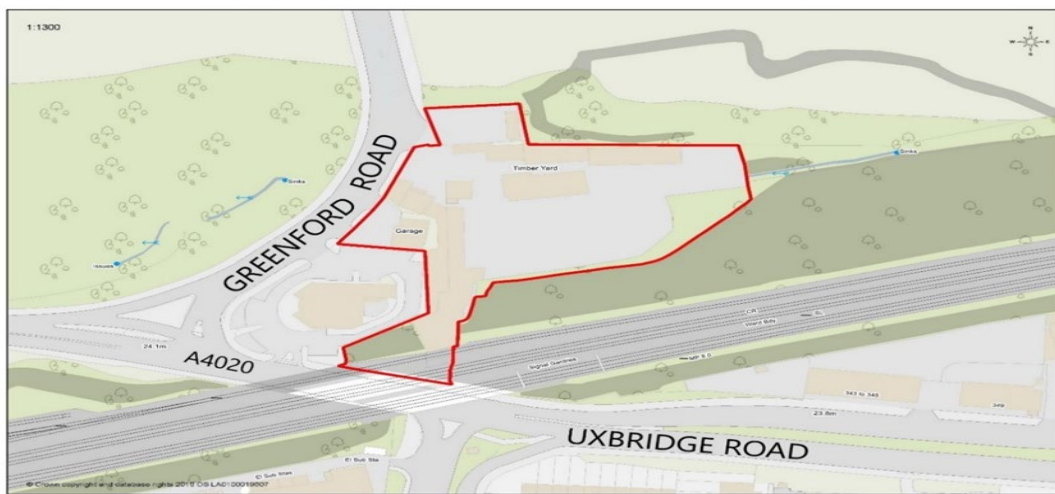


Photo of site



Stage 1: Site Assessment	
Site Availability	The site is currently in use as a business. Further investigation required as to whether the owner would be willing to make the land available; what compensation they would require or to what timescale.
Flood Zone	Site is in Flood Zone 1, and therefore has a low probability of flooding.
Access to/from site	The site currently benefits from access in its current form. This current business is likely to have larger vehicles accessing the site, and therefore the existing access would be assumed to be capable to accommodate pitches.
Environmental and/or planning designations	Almost one third of the site is designated within a Green Corridor with no changes currently proposed Two-thirds of the site is listed as Community Open Space, though given this is a private land with limited open space this may be historic/incorrect. Almost the entirety (97%) of the site is designated as Metropolitan Open Land with no changes currently proposed Priority Habitat - deciduous woodland (part)
Historic Environment	There do not appear to be historic monuments directly on the site although the alluvium of the natural flood plain is potentially an important source of information on the prehistoric environment.
Stage 1 - conclusion	There are no known absolute constraints and therefore site should be taken forward to Stage 2
Stage 2: Site Assessment	
Availability in next 5 Years	
Other potential planning uses	Reg 18 consultation suggests 'residential, employment and community open space', although it would also retain its MOL designation. Therefore potentially G&T uses could be part of this mix. However the Reg18 consultation also anticipates any change as beyond 5 years.
Planning History	No relevant Planning history on site
Suitability	
Landform	Site is an irregular shape as it is currently in use as a business and the redline boundary contains incidental space associated with the business.
Land use within site surroundings	The site is bound to the north by Middlesex Golf course and woodland to the east. Existing road network bounds the site to the west and the south. The immediate vicinity also includes a

	<p>McDonalds Drive-thru.</p> <p>The rural characteristics in the north and west, along with the road network in the south and west mean that the site is enclosed and shielded from the uses in the wider area.</p>
Residential amenity	There are no adjacent dwellings and therefore no impact on residential amenity.
Visual attributes of the site and surroundings (e.g. relationship of the site to other development; visibility to and from the site; degree of enclosure; and prominence)	<p>The site has the potential for significant enclosure given the placement of the road network and the greenspace to the north.</p> <p>There are no residential properties in the immediate vicinity. The current business is fenced and (presumably) offers a level of security that could be continued/replicated for this site.</p>
Noise issues	<p>A noise assessment is likely to be required.</p> <p>The rail network is likely to contribute to noise impact, particularly as it is raised, and crosses part of the site in the south. There are numerous rows of trees between the rail network and the site, although a design could mitigate some of these concerns.</p> <p>The road immediately outside does not appear particularly noisy, however the A4020 to the south appears busier. The A4020 travels over part of the southern side of the site and would likely be noisy for uses located underneath it.</p> <p>The McDonalds drive-thru to the south of the site appears to be open 24 hours, and therefore might create both a noise and visual impact during both daylight and night-time hours which also require consideration.</p>
Urban character	<p>Urban character is not a significant consideration in this location.</p> <p>The only property near the site is a McDonalds drive-thru, which appears to be a converted pub and relatively minor visual merit.</p>
Accessibility / proximity to existing facilities	<p>The nearest primary school, secondary school and doctors is approximately 0.8, 1.3 and 0.9 kilometers away respectively.</p> <p>The nearest underground station is approximately 1.1 kilometers away. The site is located near the A4020 and close to the existing road network. There is a bus stop immediately outside the site, connecting it with wider public transport.</p>
Archaeological designation, contamination or	<p>The site visit indicated that the topography was broadly flat.</p> <p>Almost half (47%) of the site is located with a designated Archaeological Interest area - the alluvium of the natural flood</p>

unstable land issues	plain is potentially an important source of information on the prehistoric environment and may preserve organic waterlogged deposits. The site is listed under the contaminated land register.
Rights of Way	The site is operating as a business. No public rights of way are understood to be onsite.
Nature and condition of site boundaries	The site boundaries are clearly defined, and there is a wall that follows the perimeter of the site. Should the whole site not be brought forward (i.e., if the vehicle repair garage is retained) then these boundaries would likely be reviewed.
Achievability	
Site Size	The site is 0.84 hectares. There are parts of the site that are located immediately behind McDonalds, underneath the A4020 that may not be suitable for pitches given the proximity to these uses (i.e., noise). The developable area may therefore be approximately 75% of this initial figure. The capacity would likely be no more than 10 pitches and could be a lot less if a mixed development was proposed.
Notable features that may be affected by development (such as trees, streams, historic environment)	There are no trees, streams etc. within the redline boundary. Some woodland is located to the east of the boundary, which could be kept or removed depending on the design of the layout. Part of the site is located under a rail-track and would be a design consideration for the placement of pitches.
Achievability with realistic prospect of delivery	Given the current active uses and the indication from the Reg 18 consultation that pushes any development of this site beyond 5 years, it is therefore the site is not considered achievable.
Verdict	No (Stage 2) - not achievable (within 5 years) - maybe developable

Site Details	
Site Number	8
Site Name	Lime Trees Park
Address	Ruislip Rd, Northolt UB5 6QZ
Post code	UB5 6QZ
Site Size (Gross ha)	25.604
Potential Capacity	30-40 pitches
Ownership	Private
Landowner details	Unknown
Site Description	Lime Trees Park is a 25.6 hectare site in the Northolt area of the borough. The site is privately owned and in use as a golf course. The site is located at the very west of the borough of Ealing.

Red line Boundary

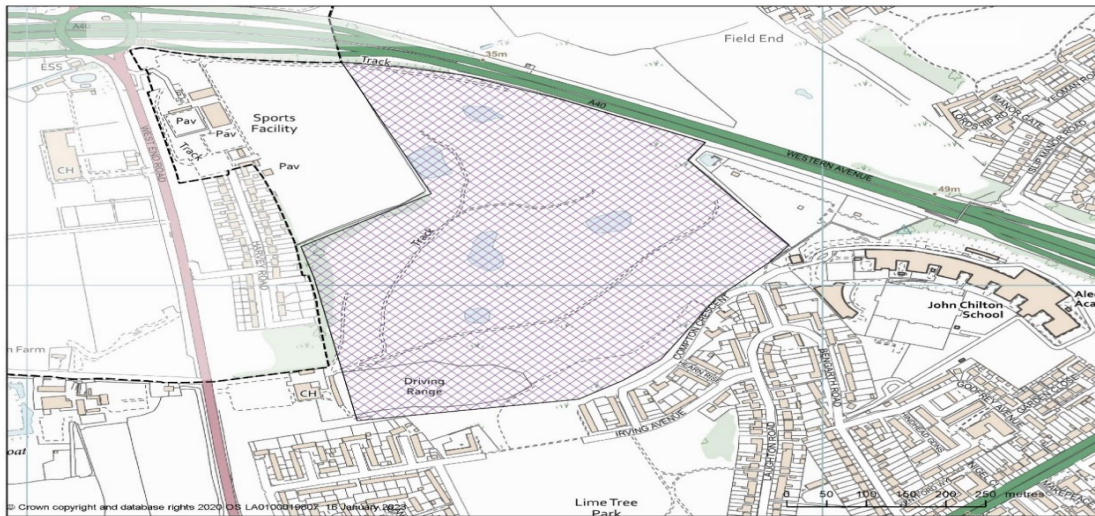


Photo of site



Stage 1: Site Assessment	
Site Availability	<p>The site is in use as a golf course and was thought to be owned by the council. During our site it was indicated that the site was privately owned, having transferred ownership some years previously.</p> <p>Discussions also indicated that the site is preferred to be kept in use as a golf course and therefore is understood to be unavailable.</p>
Flood Zone	Site is in Flood Zone 1, and therefore has a low probability of flooding.
Access to/from site	<p>The site is a golf course and therefore has vehicular access to the site, but not throughout the site.</p> <p>Any further access required is dependent upon how the scheme is delivered, for instance, should the site be brought forward as part of a wider scheme then there is likely to be a requirement for a number of points of access. The existing residential areas could provide some assistance here with linkages from Harvey Rd in the west, Vanbrough Crescent in the south and Compton Crescent in the east.</p> <p>Should a smaller portion of the site be developed for the use of G&T pitches then access will depend on where the pitches are likely to be sited.</p>
Environmental and/or planning designations	<p>The entirety of the site is designated as a site of importance for nature conservation with no proposed changes</p> <p>The entirety of the site is currently within the Greenbelt with a proposed change to MOL</p>
Historic Environment	There do not appear to be historic monuments directly on the site
Stage 1 - conclusion	Further consultation revealed this to be in private ownership with no prospect of it being available for development for G&T
Verdict	No (Stage 1) - not available

Site Details	
Site Number	9
Site Name	Marnham's Field
Address	39 Greenford Rd, Greenford UB6 9AY
Post code	UB6 9AY
Site Size (Gross ha)	c3h (inc extended area)
Potential Capacity	6 - 40 pitches
Ownership	Council
Landowner details	n/a
Site Description	Marnham's Field is a rectangular site of 2.6 hectares that fronts on to A4127 (Greenford Rd). The site is greenfield open space, and surrounded by a mix of uses including residential, a golf course and a waste recycling centre.

Red line Boundary

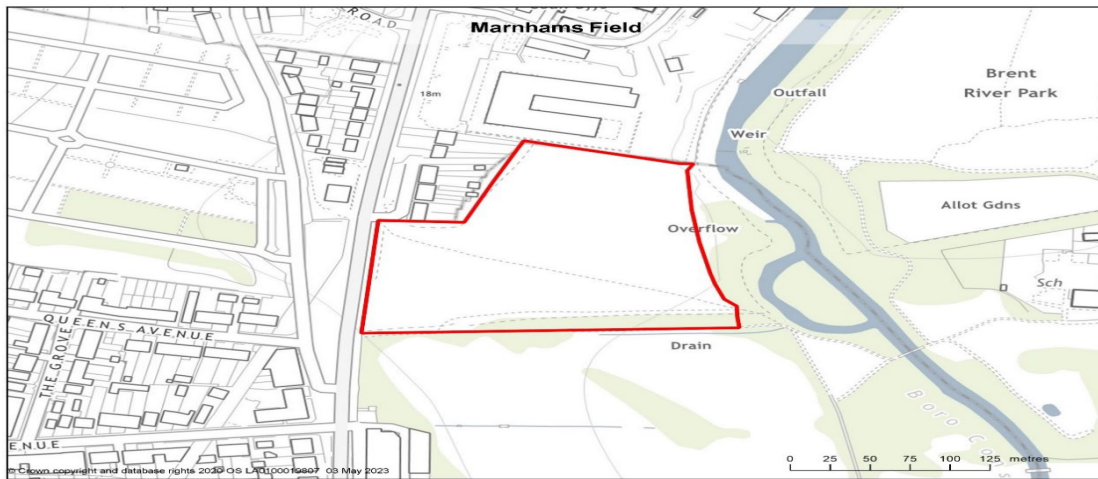


Photo of site



Stage 1: Site Assessment	
Site Availability	Understood to be council owned and currently undeveloped, therefore assumed to be available. Suggested that boundary is revised to incorporate the area adjacent to the LB Ealing depot as this is also within council ownership and has no physical boundary with wider site (plan above includes the extended area).
Flood Zone	Site is in Flood Zone 1, and therefore has a low probability of flooding. The rear of the site, and the sites south-eastern corner adjoins Flood Zone 3.
Access to/from site	The site is open space with no formal road access but it does share a boundary on east side with Greenford Road as well as opportunity (if site is extended as described above) to connect via the council depot.
Environmental and/or planning designations	The entirety of the site is currently designated as a site of importance for nature conservation with no current proposal to amend The entirety of the site is currently designated as Public Open Space with no current proposal to amend The entirety of the site is currently designated as Metropolitan Open Land with no proposal to amend
Historic Environment	There do not appear to be historic monuments directly on the site and it is unlikely to have archaeological potential
Stage 1 - conclusion	There are no known absolute constraints and therefore site should be taken forward to Stage 2
Stage 2: Site Assessment	
Availability in next 5 Years	
Other potential planning uses	Following the site visit the site area has been extended to include the south of the depot. The site is currently identified as MOL but this has potential to be changed through the local plan process if G&T provision is considered appropriate. The current use is informal recreation. Reg 18 consultation identifies the whole area as part of a wider green space network and there is potential for improvement to contribute further to open space provision in the borough.
Planning History	No relevant Planning history on site
Suitability	
Landform	The site provided to us by the council is rectangular in shape. There 'extension' parcel of land is directly behind the six detached properties to the north of the site. Overall the land is flat, and

	slightly below the level of Greenford Road to the west and the development to the north.
Land use within site surroundings	The site is bound to the west by the existing road network (Greenford Rd), and to the south by West Middlesex Golf course. To the east there is woodland, and the River Brent. To the north there is some open greenspace and some residential units. Beyond that are some industrial units, including a recycling centre.
Residential amenity	Impact on residential amenity may be a consideration for this site. The site lies adjacent to a row of 3 blocks of four terraced properties to the north and there is a residential estate almost directly across Greenford road to the west of the site. A site design should consider amenity, and the site is large enough to allow some separation between the residential units.
Visual attributes of the site and surroundings (e.g. relationship of the site to other development; visibility to and from the site; degree of enclosure; and prominence)	Given the proximity of residential units both directly north and opposite the site, the site is fairly prominent. The site is of sufficient size that some impacts could be mitigated, particularly if the pitches are set away from the roadside and the existing residential units. Trees enclose the site around the perimeter, and these could be retained to provide some degree of enclosure.
Noise issues	The road network includes the site on the western edge, but it is not assumed that this is a particularly busy road and a design could set pitches away from the roadside to mitigate noise impact. An assessment may be required to assess the noise and odour impacts from the recycling and waste centre immediately north of the site, and is a factor that should be considered in a potential site design.
Urban character	The site lies adjacent to three sets of four terraced houses. These are two storey and do not necessarily have a particularly prominent character to preserve. The residential units are set back from the road, and shielded with trees that separate the units from the roadside, and indeed to the south to the border of the site. This treeline could be kept maintaining a separation from the site. To the south of the site lies a row of retail units. These have a mock Tudor design and offer some aesthetic merit, although this tempered by the presence of a parking facility for one of the units

	in the property closest to the site. Similarly, there is tree cover between these units and the site to maintain separation and enclosure.
Accessibility / proximity to existing facilities	The site has a good level of accessibility to educational and medical uses with nearest facilities within 0.7 kilometers. The nearest underground station is 1.3 kilometers from the site. However, the road network is easily accessible from the site and the site is situated on a bus route, connecting it with the wider public transport network.
Archaeological designation, contamination or unstable land issues	Most of the site is located with a designated Archaeological Interest area although it is understood that it has low archaeological potential. The site is a mid-20th century waste disposal site and the majority of the site is listed under the contaminated land register. Further consideration of this will be required if the site is identified.
Rights of Way	The site is open space and used by pedestrians and dog walkers. A formal right of way is located along the southern boundary and separates the scheme from the golf course.
Nature and condition of site boundaries	The boundary on the southern and northern edge has a clear definition with rows of trees separating it from the golf course and the river respectively. The northern side of the site is bound by the depot with the road and terrace housing on the west.
Achievability	
Site Size	The site is 3ha (including the extended area). It is thought that most of the land (aside from access provision) would be developable. The capacity would be for between 6 and 40 pitches. However, given the use as informal open space the preference would be a smaller site adjacent to the council depot with access through the depot if this is possible.
Notable features that may be affected by development (such as trees, streams, historic environment)	Trees and hedges align the perimeter of the site, and it is envisaged there would be some loss to develop an access to the site. Depending on the size of the site and location on the site in terms of access there will be some loss of public open space, although this could be minimised through design.
Achievability with realistic prospect of delivery	The site is council owned and potentially available for G&T uses. Whilst there are no physical constraints, other than securing appropriate access, preferably via the depot, there are potentially competing uses for the site, so the council will have to take a view on the planning balance between the alternative uses. The site is

	currently considered achievable.
Verdict	Yes - available, suitable & achievable

Site Details	
Site Number	10
Site Name	Masons Green Lane
Address	44 Kendal Ave, London W3 0XA
Post code	W3 0XA
Site Size (Gross ha)	0.995
Potential Capacity	0-10 pitches
Ownership	Private
Landowner details	TBA
Site Description	Mason's Green Lane is a crescent shaped site of almost 1 hectare located at the rear of residential units in the west and industrial units in the east.

Red line Boundary

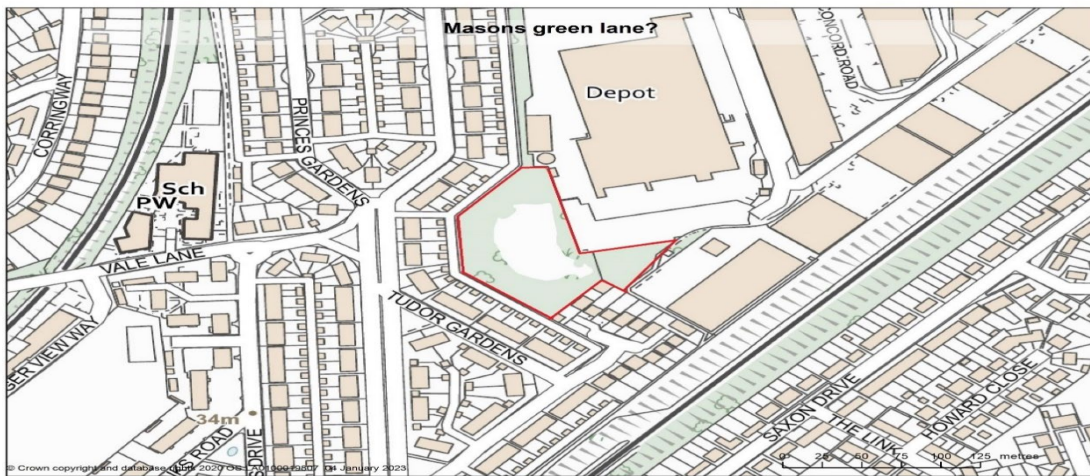


Photo of site



Stage 1: Site Assessment	
Site Availability	Understood to be privately owned, therefore further investigations required as to its availability.
Flood Zone	Site is in Flood Zone 1, and therefore has a low probability of flooding.
Access to/from site	There is no obvious access to the site. There appears to be some smaller driveways at the rear of the residential properties, though it is unlikely these are large enough to accommodate vehicle access. The driveways are all privately owned. An alternative access could potentially be made via the industrial land to the east of the site; however, the ownership arrangements of the land are unclear and could represent a difficulty for the site's delivery.
Environmental and/or planning designations	The entirety of the site is currently designated as a site of importance for nature conservation The majority (87%) of the site is currently designated as a Community Open Space (potentially an historic designation no longer relevant) Priority Habitat - deciduous woodland (part)
Historic Environment	There do not appear to be historic monuments directly on the site
Stage 1 - conclusion	Access is an issue with no clear opportunities to implement.
Verdict	No (Stage 1) - not suitable (access)

Site Details	
Site Number	11
Site Name	Northolt Driving Range
Address	8 Rowdell Rd, Northolt UB5 6AG
Post code	UB5 6AG
Site Size (Gross ha)	4.579
Potential Capacity	50 plus pitches
Ownership	Council
Landowner details	n/a
Site Description	Northolt Driving Range is a site located in Northolt. The red line boundary (pictured) includes a building understood to be a Gym which would likely be retained. Therefore the effective site area would be slightly lower than the 4.6 hectares indicated by the council. The site is owned by the council, and not currently in use as a driving range. The site is amongst a mix of used including religious, recreational and industrial floorspace.

Red line Boundary

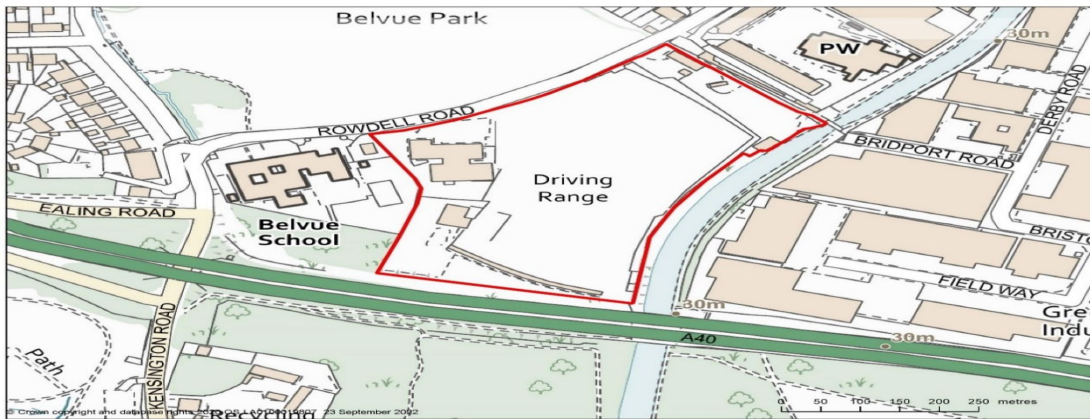


Photo of site



Stage 1: Site Assessment	
Site Availability	Understood to be council owned and therefore assumed to be available. Although there are some leasing arrangements on parts of the site which may require further consideration. There are former sports related structures and buildings on the western side of the site which may be cleared but as these are one storey it is considered that this should not pose any major problems (subject to detailed survey).
Flood Zone	Site is in Flood Zone 1, and therefore has a low probability of flooding.
Access to/from site	The site currently has access onto Rowdell Road to the north of the site but most of the northern boundary adjoins the same road, so access would be relatively easy to achieve if the existing access is not suitable or available. Alternatively development on the west side could be accessed through the current gym car park, subject to leasing arrangements.
Environmental and/or planning designations	The entirety of the site is currently within the greenbelt but is subject to a proposed change to remove the greenbelt designation.
Historic Environment	There do not appear to be historic monuments directly on the site
Stage 1 - conclusion	There are no known absolute constraints and therefore site should be taken forward to Stage 2
Stage 2: Site Assessment	
Availability in next 5 Years	
Other potential planning uses	Reg 19 consultation suggests 'employment-led mixed use scheme' beyond 5 years - however the time period relates to the employment provision - no evidence to suggest that a G&T use may not be provided as an initial phase, within 5 years, of the wider mixed use employment led phases. Current Greenbelt policy is proposed to be removed from this site.
Planning History	No relevant Planning history on site
Suitability	
Landform	The land is broadly rectangular and of sufficient size to enable a range of designs. The site is complicated slightly by the assumed retention of Pure Gym on the western edge, but this is unlikely to hinder a potential design too much and offers an initial access point prior to more extensive redevelopment.
Land use within site surroundings	The site is bound on the northern edge by Rowdell Rd and would be the most likely location for access to the site -particularly since

	<p>there is access to the site from this road already. Beyond this is Belvue Park, a large open space with a church.</p> <p>The A40 bounds the site to the south, and there is a strip of leftover greenspace that separates the site from the A40.</p> <p>The eastern edge is bound by a canal, and the High Line Yachting marina in the southeast. The northeast section of the site adjoins a thin strip of hardstanding which currently houses a boxing club and some storage units.</p> <p>To the west of the site is Pure Gym and carparking facilities, although this is currently within the red line boundary. Beyond this is Belvue High School.</p>
Residential amenity	There are no adjacent dwellings and therefore no impact on residential amenity.
Visual attributes of the site and surroundings (e.g. relationship of the site to other development; visibility to and from the site; degree of enclosure; and prominence)	The surrounding uses are a mix of community and industrial, with residential units located some distance from the site. The surrounding uses are also low rise. The site size is sufficient to allow for a range of options including setting pitches away from the roadside. For these reasons, though the site is among a range of uses and would have some degree of prominence, the site could allow for a degree of enclosure and separation.
Noise issues	Noise impact assessment would be required, given the proximity to the A40 directly south of the site, though a design could mitigate some of the impacts. The road network encloses the site on the northern edge, but it is not assumed that this is a particularly busy road.
Urban character	There are a mix of uses in the immediate vicinity including residential, community, industrial and religious buildings. This means that there is not a single, dominant character of the urban environment in this location. The units tend to be three stories and less in height.
Accessibility / proximity to existing facilities	The nearest primary school, secondary school and doctors is approximately 0.9, 1.2 and 1.1 kilometers away respectively. The nearest underground station is approximately 0.8 kilometers away. The site is located near the A40 providing connectivity with the wider road network. There is a bus stop immediately outside the site, connecting it with the wider public transport network.

Archaeological designation, contamination or unstable land issues	The site is a former sewage works which it is assumed has been filled / levelled with unknown material. The material could be inert or could contain contamination, and the majority of the site is listed under the contaminated land register. Whilst research/site investigation would be required, the nature of G&T provision is that it doesn't require substantial foundations so any impact would be limited. The site is relatively flat.
Rights of Way	There is a public rights of way on the north east boundary of the site.
Nature and condition of site boundaries	The red line boundary includes the Gym which is understood to be kept. Any development would therefore be required to establish a clear boundary with the Gym.
Achievability	
Site Size	The site size is understood to be just over 4.5 hectares; however, this includes the Gym on the western edge of the site which is understood to be kept along with associated parking. Therefore, the land to be developed is likely to be much lower. That said, the site is still of sufficient size to account for the total and future need of pitches along with design and access considerations. The area on the adjacent to the western and southern boundary, utilising the existing gym access would be the most appropriate part of the site to bring forward.
Notable features that may be affected by development (such as trees, streams, historic environment)	The site does not appear to have any notable features through the site. The site is understood to be a driving range, though not in use. The top half of the site was used instead for car parking for neighbouring uses, and a design could allow retention of some land for car parking as part of its redeveloped should this be an issue. Though not in use as a driving range during the site visit, further investigation is required to determine whether this provision would need to be offset elsewhere.
Achievability with realistic prospect of delivery	The site is council owned and known to be available for G&T uses. The site is of sufficient size to allow for a range of design options; which could include the redevelopment along with other uses. Redevelopment would likely require the demolition and/or relocation of existing buildings on site and investment in developing the current access or a new one. The site is considered achievable.
Verdict	Yes - available, suitable & achievable

Site Details	
Site Number	12
Site Name	Northolt Golf Club
Address	277 Rectory Park Ave, Northolt UB5 6SE
Post code	UB5 6SE
Site Size (Gross ha)	6.178
Potential Capacity	30-40 pitches
Ownership	Council
Landowner details	n/a
Site Description	The site is a 6.2 hectare site council owned site. Much of the site is a golf course, although it is understood that the land is not currently in use. The site is located to the south of Northolt and is located amongst a number of public open spaces and parks including Northala Fields.

Red line Boundary

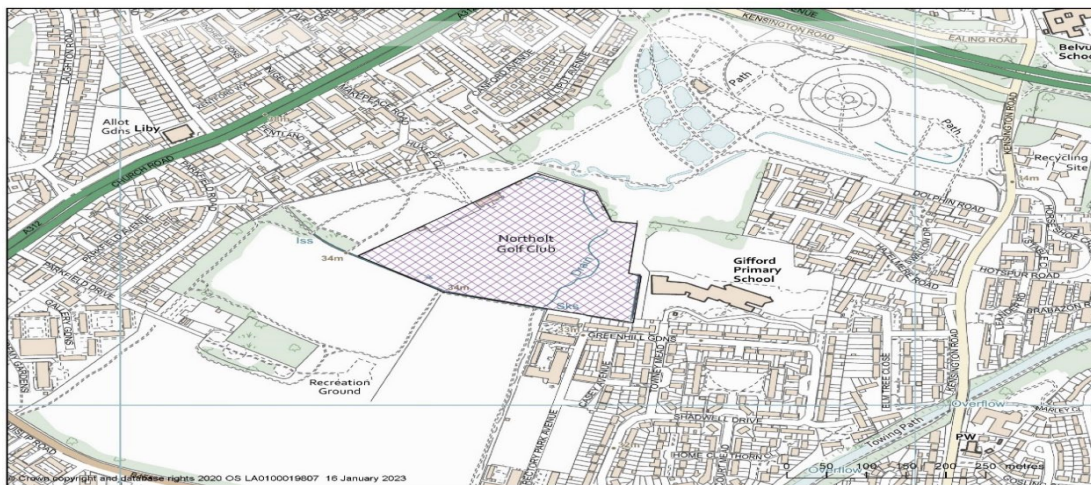


Photo of site



Stage 1: Site Assessment	
Site Availability	Understood to be council owned but subject to a long lease. Some site clearance would be required if certain buildings are being removed which may mean that the site is not as immediately available as other sites.
Flood Zone	It is understood that the site is leased to an occupant on a long-term lease. Further investigation required to determine the cost or compensation involved in ending this lease.
Access to/from site	Site is in Flood Zone 1, and therefore has a low probability of flooding.
Environmental and/or planning designations	There is existing access to the site via a residential area to the west (Makepeace Rd.) Access in this location is narrow, and it is unlikely whether these would be suitable for larger vehicles or caravans. From walking the perimeter on our site visit, there does not appear an obvious alternative access. An assessment would be required to determine whether access could be achieved by extending Dolphin Rd, which is to the east of the site, however significant work would be required here along with the use of some land taken up by Northala Fields & Northolt Fishing Ponds to the north. Whilst it may be possible, it is questionable whether the extent of work required is realistic relative to the scale of the proposal.
Historic Environment	The entirety of the site is designated as a site of importance for nature conservation with no proposed changes
Stage 1 - conclusion	The entirety of the site is currently within the greenbelt with a proposed change to MOL
Verdict	No (Stage 1) - not suitable (flood access)

Site Details	
Site Number	13
Site Name	Priors Field
Address	Ruislip Rd, Northolt UB5 6QZ
Post code	UB5 6QZ
Site Size (Gross ha)	17.905
Potential Capacity	50 plus pitches
Ownership	Council
Landowner details	n/a
Site Description	Priors Fields is a large meadow land that sits between Islip Manor estate to the north and the A40 to the south. The site is located at the very west of the Borough of Ealing.

Red line Boundary

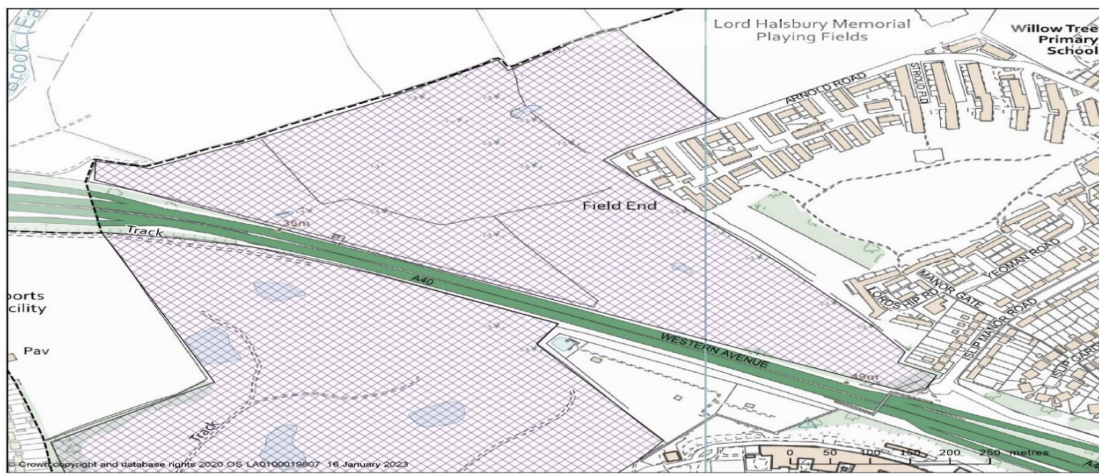


Photo of site



Stage 1: Site Assessment	
Site Availability	Understood to be council owned and therefore assumed to be available. However, the site is likely to be part of a comprehensive redevelopment of the neighbouring estate, and therefore may not be able to be redeveloped immediately.
Flood Zone	Site is in Flood Zone 1, and therefore has a low probability of flooding. The western edge adjoins Flood Zone 2, and a design would need to be mindful of this.
Access to/from site	The site currently does not currently have access, although this could be achieved from the existing residential areas on Arnold Rd. Should the council wish to develop a smaller portion of the land, then it the most likely destination might be at the very east of the site and therefore access would be required from either Lordship Rd or Islip Manor. Though not impossible, this could be harder to develop than access from the west (Arnold Rd). However, any access would be through a residential area.
Environmental and/or planning designations	The entirety of the site is designated as a site of importance for nature conservation with no proposed changes The entirety of the site is designated as Public Open Space with no proposed changes The entirety of the site is currently within the greenbelt but proposed to change to MOL The site is a Local Nature Reserve Priority Habitat - lowland meadows and deciduous woodland (part)
Historic Environment	There do not appear to be historic monuments directly on the site
Stage 1 - conclusion	There are no known absolute constraints and therefore site should be taken forward to Stage 2
Stage 2: Site Assessment	
Availability in next 5 Years	
Other potential planning uses	The site is adjacent and related to the Islip Estate - the Reg 18 consultation identifies the estate for 'residential' and notes Priors Field commenting that there is an opportunity to reconfigure the greenspace. Redevelopment of Islip Estate is post 5 years and it is considered that if GRT provision was included as part of this redevelopment then it would be within the same timeframe.
Planning History	No relevant Planning history on site
Suitability	
Landform	The site is a large, broadly triangular greenfield meadow site that sits between the Islip Manor estate and the A40.

Land use within site surroundings	The site itself is the Islip Manor meadows and is a substantial greenfield site, with numerous trees and hedgerows that is currently used as open space. It is bound fully on its south side by the A40 and on its north-western edge by fields. The north-eastern side of its triangular shape is met by the Islip Manor Housing estate, which is a horseshoe of residential properties of a mix of two- to four-storey homes around a large open space and play area. Further north of this is a primary school and recreation pitches.
Residential amenity	Given the size of the site, there are few areas that are immediately next to residential properties such as those on Lordship Road and Islip Manor Road. Should development be located within the eastern most location of the site it is likely there would be some amenity impact and overlooking from properties on those two streets, particularly from the Lordship Road which has several 3 storey buildings.
Visual attributes of the site and surroundings (e.g., relationship of the site to other development; visibility to and from the site; degree of enclosure; and prominence)	It is envisaged that most designs for the site would be prominently visible to the residential units to the northeast, and the A40 to the south. Development at the western side of the site would give the greatest degree of enclosure since there is more open land and it being further away from the Islip Manor Estate. That said, access would still likely be required through the estate, which may not be preferred by the prospective G&T community. Development at the east of the site could allow for the community to have their own separate access to the site, but development at this location would likely be closer in location to the residential units.
Noise issues	Noise impacts from the A40 were significant during our site visit, particularly in the southeast of the site where development is most likely. While there is a large road network (A40) to the south of the site, the site is sufficient in size that a design might be able to mitigate these impacts. The site is in relatively proximity (c. 1km) from RAF Northolt which could have an impact.
Urban character	The Islip Manor estate urban character is generally of relatively low merit.
Accessibility / proximity to existing facilities	The nearest primary school, secondary school and doctors is approximately 0.7, 0.5 and 1.6 kilometers away respectively.

	The nearest underground station is 1.2 kilometers. The site is located near the A40 providing connectivity with the wider road network. There is a bus stop immediately outside the site, connecting it with the wider public transport network.
Archaeological designation, contamination or unstable land issues	No known contamination or archaeological issues. The site had a gradual slope downwards from east to west, which may necessitate groundwork in order to ready the site.
Rights of Way	The site is open meadow land open to the public, and popular with walkers and dog owners.
Nature and condition of site boundaries	The site boundaries are clearly defined.
Achievability	
Site Size	The site is understood to be almost 18 hectares in size and would therefore be more than sufficient in size to meet current and future need for G&T provision. This would therefore imply that a small portion of the site is developed, or that the provision of pitches is included as part of the larger redevelopment of Islip Estate.
Notable features that may be affected by development (such as trees, streams, historic environment)	Given the size of the site, there are various trees and hedgerows across the site. The impact of this will of course depend on the proportion of the land used for development and how it relates to the development of the Islip Estate.
Achievability with realistic prospect of delivery	Suitability of this site for G&T relates to the redevelopment of the Islip Estate - it is indicated in the Reg18 consultation that this is not going to take place within 5 years and therefore whilst the site has potential for G&T provision and thus 'developable, it is not achievable.
Verdict	No (Stage 2) - not achievable (within 5 years) - maybe developable

Site Details	
Site Number	14
Site Name	Warren farm
Address	Warren Farm, Southall UB2 4NE
Post code	UB2 4NE
Site Size (Gross ha)	24.704
Potential Capacity	50 plus pitches
Ownership	Council
Landowner details	n/a
Site Description	Warren Farm is a 24.7 ha site located at the very south of the Borough, south of Hanwell. It is a predominantly greenfield site, except a former sports centre which has fallen into disrepair and associated car parking.

Red line Boundary

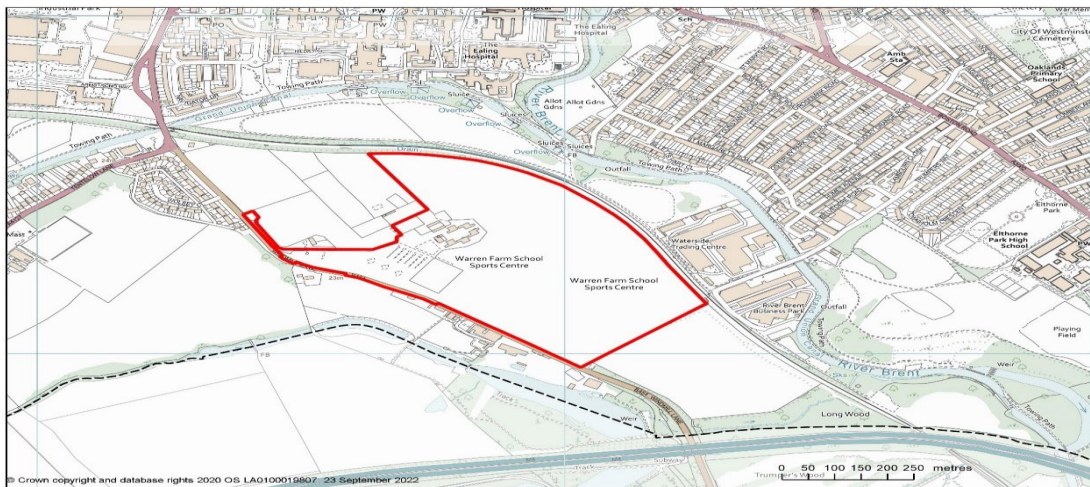


Photo of site



Stage 1: Site Assessment	
Site Availability	Understood to be council owned and therefore assumed to be available. Some site clearance required if certain buildings are being removed which would mean that the site is not as immediately available as other sites.
Flood Zone	Site is in Flood Zone 1, and therefore has a low probability of flooding.
Access to/from site	The site benefits from a suitable access to the site already given its previous use as a sports centre
Environmental and/or planning designations	A small portion (c.9%) of the site is designated as a site of importance for nature conservation The entirety of the site is designated as Metropolitan Open Land with no proposed change
Historic Environment	There do not appear to be historic monuments directly on the site although this area has cropmark evidence for early field systems and possible prehistoric barrows, and there are prehistoric and Saxon finds in the area.
Stage 1 - conclusion	There are no known absolute constraints and therefore site should be taken forward to Stage 2
Stage 2: Site Assessment	
Availability in next 5 Years	
Other potential planning uses	Reg 19 consultation suggests 'sports facilities and Local Nature Reserve', and it would also retain its MOL designation. The site does benefit from a planning permission for football training facilities (see below), but it is thought this permission has now lapsed.
Planning History	The site has been granted planning permission for the redevelopment of the full site area for the demolition of existing buildings and the provision of a new first team and academy training centre for Queens Park Rangers Football Club. This includes a 2-storey training centre, three storey operations centre, 3 first team pitches, eight academy pitches and community facilities / indoor hall. The site was granted permission in 2013. A scaled down version was granted in 2015. In 2016 Hanwell Community Forum sought a judicial review and in 2017 the High Court uphold Ealing Council's decision. Objectors lodged an appeal in 2018 and the supreme Court reject that appeal. In May 2020 Hanwell Nature secure a further judicial review and QPR decide to look for an alternative site. They have since started construction on a site in LB Hounslow.

Suitability	
Landform	<p>The site is an irregular shape, given the boundary of the fields, and the access to the west of the site.</p> <p>Much of the site is a large green, open space. A smaller part of the site, towards the northwest of the site, is previously developed and understood to be Warren Farm School Sports centre. This includes several dilapidated buildings that are a particular eyesore given their state of disrepair (graffiti, partly demolished walls, refuse etc.). Finally, the site also includes a couple of tarmacked area, which presumably provided vehicular parking for the sports club.</p>
Land use within site surroundings	<p>The immediate area is relatively rural with fields bounding the site to the north and south of the site; the south being another potential site in this study (Site 6: Earl of Jerseys Field). Windmill Hill Lane (B454) bounds the site in the west and beyond this are more green, open spaces. There is a small collection of residential buildings along Windmill Hill Lane to the north and south.</p> <p>A rail track bounds the site to the east, which includes several industrial units at Waterside Trading Centre.</p>
Residential amenity	<p>There are no adjacent dwellings and therefore no impact on residential amenity.</p>
Visual attributes of the site and surroundings (e.g., relationship of the site to other development; visibility to and from the site; degree of enclosure; and prominence)	<p>The site is set away from the roadside and could be relatively enclosed from the very few residential properties in the vicinity. It is unlikely that the whole site would be required for redevelopment of G&T provision and could be part of a comprehensive redevelopment of the area. Alternatively, the site could retain the nature reserve and solely redevelop the dilapidated sports centre section of the site (and tarmac areas) to the north of the site. The latter would likely mean that the site would be prominent by those using the nature reserve. This is particularly given the low rise (fields) nature of the neighbouring uses and given the location of the sports centre being towards the centre of these fields.</p>
Noise issues	<p>Noise impact is expected to be limited as the site is located away from the larger road network. A train line bounds the site on the north/western edge however it is unclear as to whether this part of the track is in use.</p>

Urban character	There is no particular urban character in this location, considering the lack of residential units in the vicinity.
Accessibility / proximity to existing facilities	The site is relatively less accessible than other sites. The nearest primary school, secondary school and doctors are approximately 0.8, 1.1 and 1.2 kilometers away respectively. The nearest underground station is 1.3 kilometers.
Archaeological designation, contamination or unstable land issues	A Ground Investigation and Remediation Strategy has been prepared by Buro Happold was prepared to accompany a previous application for use of the site as a new Queens Park Rangers Football Club training ground. The investigation concluded that there is no evidence of significant historical contaminative activities or current point sources of contamination identified on site. Additionally, the site is located with a designated Archaeological Interest area. However, an Archaeology Report has been prepared by EDP, which found there to be no designated heritage assets situated within the Application Site.
Rights of Way	The site is not fenced and open to the public and popular with walkers and dog owners.
Nature and condition of site boundaries	Should the site be considered on solely the brownfield area of the site (the disused community facility and car park) then the site would require clear boundaries to separate it with the greenfield uses surrounding it.
Achievability	
Site Size	The site is understood to be almost 25 hectares in size and would therefore be more than sufficient in size to meet current and future need for G&T provision. This would therefore imply that a small portion of the site is developed, or the provision of pitches is included as part of the larger development of the site.
Notable features that may be affected by development (such as trees, streams, historic environment)	There are several trees and hedgerows around the perimeter of the site, but relatively few in the centre of the site.
Achievability with realistic prospect of delivery	Whilst the site does have some potential for G&T uses this would need to be part of a wider development of the site given its current openness and lack of boundaries for smaller parcels of development. As wider development of the site is not proposed through the Local Plan there is little prospect of the site being either available, suitable or achievable.

Verdict	No (Stage 2) - not achievable (site openness and requires wider development)
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Site Details	
Site Number	15
Site Name	Wyncote Farm
Address	William Hobbayne centre, St Dunstan's Rd, London W7 2HB
Post code	W7 2HB
Site Size (Gross ha)	4.655
Potential Capacity	20-30 pitches
Ownership	Private
Landowner details	TBA
Site Description	Wyncote Farm is a 4.6 hectare site located at the end of Waterside Trading Centre (south of Hanwell, near the southernmost edge of the borough). The site is bound by road and rail networks and has an irregular shape as it follows the form of the River Brent on its eastern edge.

Red line Boundary

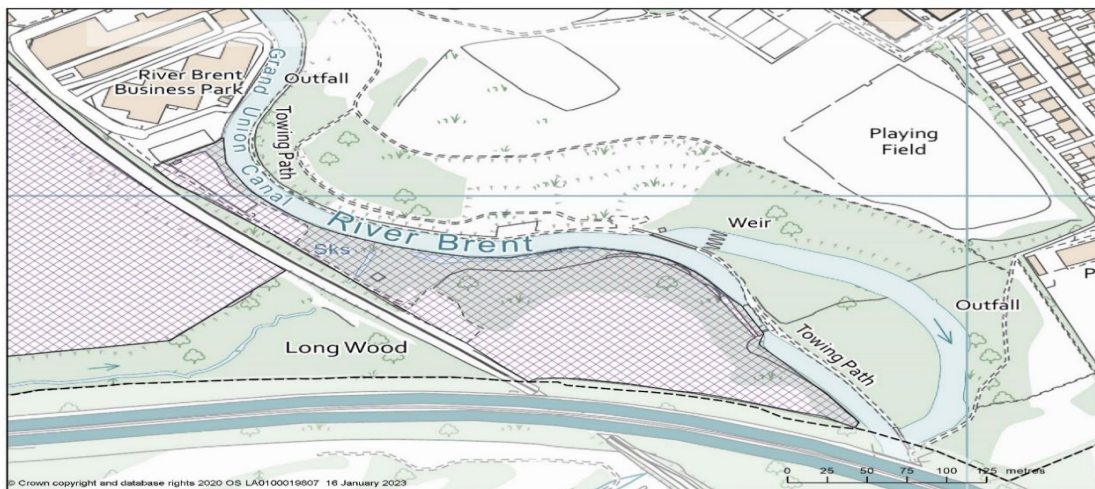


Photo of site



Stage 1: Site Assessment	
Site Availability	Understood to be privately owned, further investigations suggest that the owner is unlikely to be interested in developing for a GRT site.
Flood Zone	Site is in Flood Zone 1. However, the western perimeter is within Flood Zone 3 and therefore suitable mitigation would likely be required.
Access to/from site	Access to the site appears to be restricted behind a barrier that serves the uses of the nearby trading estate. There is, therefore, a question as to how this access could be allowed for the two purposes.
Environmental and/or planning designations	A large portion (c.90%) of the site is designated as a site of importance for nature conservation with no proposed changes The entirety of the site is designated as Metropolitan Open Land with no proposed changes Site is located within a designated Archaeological Interest area The site is listed as Community Open Space.
Historic Environment	There do not appear to be historic monuments directly on the site although the site has potential to contain former channels of the River Brent, which pre-date the construction of the canal; and there is potential for geoarchaeological remains to be preserved on the site which could contain prehistoric environmental evidence.
Stage 1 - conclusion	Council has indicated that the site is not available.
Verdict	No (Stage 1) - not available