

London Borough of Ealing

Ealing Green Belt and Metropolitan Open Land Review Stage 2

February 2024



1.	Introduction	2
1.1.	Purpose	2
1.1.	Stage 2 scope.....	3
2.	Proposed Green Belt / MOL boundary changes	4
2.1.	Introduction	4
2.2.	Establishing exceptional circumstances.....	4
1.2.	Boundary corrections – non-development sites	8
2.	Boundary changes – development sites	11
2.1.	Introduction	11
2.2.	Gurnell Leisure Centre (Ealing)	11
2.3.	Former Barclays Sports Ground (Ealing).....	14
2.4.	Old Actonians Sports Ground (Ealing).....	16
2.5.	Westway Cross (Greenford).....	18
2.6.	Smith’s Farm (Greenford).....	19
2.7.	Northolt Driving Range (Northolt).....	21
1.1.	Kingdom Workshop, Sharvel Road (Northolt)	23

1. Introduction

1.1. Purpose

- 1.1.1. Stage 1 of the Ealing Green Belt and Metropolitan Open Land Review was published in November 2022. It provided an assessment of the borough's currently designated Green Belt (GB) and Metropolitan Open Land (MOL) sites against National Planning Policy Framework (NPPF) and London Plan criteria respectively. It made recommendations on the appropriate policy designation of each site and any necessary boundary adjustments.
- 1.1.2. The purpose of this exercise was to assess if the green open spaces have the appropriate designations and there is consistency in how these designations are applied across the borough. Ealing Council had not previously undertaken a comprehensive assessment of its GB and MOL sites since they were originally designated four decades ago¹.
- 1.1.3. The council considers that the preparation of the new Local Plan is the appropriate time to undertake such a review, to ensure all sites have correct and consistent planning policy designations that accurately reflect their location, size, and function.
- 1.1.4. The results of the Regulation 18 Local Plan consultation showed that many respondents were strongly opposed to the recommendations of the Stage 1 GB/MOL Review, concerned that the approach would lead to a weakening of protection of local parks / allotments, even though the aim was to ensure the correct protections were in place. The GLA also opposed the recommendations of the Stage 1 GB/MOL Review as a matter of principle.
- 1.1.5. Since then, the government has made changes to the NPPF, including section 13 which covers Green Belt policies. It now states that there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. The amended NPPF states that: "*Once established, there is no requirement for green belt boundaries to be reviewed or changed when plans are being prepared or updated*". While there is a transitional period for these NPPF changes, it clearly sets out the government's view on green belt boundaries.
- 1.1.6. The process of assessing all of Ealing's Green Belt and MOL designations has ensured that there is a clear understanding of these sites and how they are functioning. This has also provided evidence for a number of boundary adjustments, de-designations, and site allocations. The feedback at Regulation 18 stage, however, highlights the challenges faced by a London borough undertaking a review of its strategic green open space policy designations in the current context, even when undertaken as part of a Local Plan review.
- 1.1.7. Given the above, the council has decided not to proceed with its recommendations regarding changes to GB and MOL designations. Instead,

¹ The first available published record of Ealing's GB is illustrated in the 1986 Borough Plan. Ealing's MOL was also first defined in the adopted 1986 Borough Plan.

we will only proceed with our recommendations for specific GB and/or MOL boundary corrections to ensure GB and MOL boundaries are up-to-date, correct, and defensible, and for a small number of sites (or parts of sites) that do not contribute towards Green Belt/MOL objectives, and which could be used to meet identified development needs and thus are identified for change in designation, demonstrating the corresponding exceptional circumstances.

- 1.1.8. This approach is consistent with the latest version of the NPPF which states that: *“Authorities may choose to review and alter green belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.”*

1.1. Stage 2 scope

- 1.1.1. The revised scope of the Stage 2 Green Belt and Metropolitan Open Land Review is to outline the proposed GB/MOL boundary corrections. These boundary corrections reflect the current reality and use of sites. Ensuring GB and MOL sites have correct, up-to-date, and defensible boundaries is important as incorrect boundaries can undermine the integrity of the wider GB or MOL parcel.
- 1.1.2. In addition, a small number of Green Belt and MOL boundary changes are proposed where a site has been identified for development and allocated in the new Local Plan. In these cases, the exceptional circumstances necessitating the change in designation are presented.
- 1.1.3. Stage 2 also considers opportunities to enhance and make better use of GB and MOL sites for the benefit of Ealing residents and visitors. Such enhancements could be functional (e.g., in terms of how a site is used and how many people use it) or they could relate to improving the quality of the landscape or the accessibility of the site. Several of Ealing’s major green open spaces are currently underutilised. Some of them are currently not used or maintained at all. Other sites could benefit from improved landscaping or accessibility. Given the scale of development envisaged in the new Local Plan, it is important to ensure that we have functional and fit for purpose open space to support the development and growth of the borough.
- 1.1.4. In the current economic climate, it is recognised that it would not be possible to deliver the desired green infrastructure improvements alongside the significant investment required in other key infrastructure areas such as health, education, and transport. Ealing’s Infrastructure Delivery Plan (IDP) provides a comprehensive assessment of the borough’s infrastructure needs and the limited finances to deliver them.
- 1.1.5. In this context, limited enabling development may be required to deliver green open space enhancements, in accordance with the new Local Plan’s ‘Policy ENA: Enabling Development’. This is something that will also be considered as part of this document.

2. Proposed Green Belt / MOL boundary changes

2.1. Introduction

2.1.1. The proposed boundary changes fall into two categories:

- Boundary corrections to accurately reflect the current reality and use of sites – the purpose of these corrections is to ensure GB and MOL sites have correct, up-to-date, consistent, and defensible boundaries, to minimise the risk of inappropriate development.
- Boundary changes where a site has been identified for development and allocated in the new Local Plan - there are a small number of sites (or parts of sites) that do not contribute towards Green Belt/MOL objectives and which could be used to meet identified development needs and thus are identified for change in designation, demonstrating the corresponding exceptional circumstances.

2.1.2. Boundary changes include several additions of land to existing GB and MOL sites, to better define their boundaries. All the boundary corrections and changes are presented in the 'Atlas of Change' document that accompanies the new Local Plan.

2.2. Establishing exceptional circumstances

National Planning Policy Framework

2.2.1. Paragraph 145 of the NPPF states that:

“Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”

2.2.2. Paragraph 146 of the NPPF states that:

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.”

2.2.3. Paragraph 147 of the NPPF states that:

“Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport. They should

also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”

- 2.2.4. The NPPF, therefore, makes it clear that exceptional circumstances are required to alter Green Belt boundaries. This is a well-established and universally accepted requirement in the context of proposing to release Green Belt land for development. What is not explicitly covered in the NPPF, however, is correcting Green Belt boundaries to account for obvious anomalies, and inconsistencies where there are no plans to develop those sites or meet any other identified need.
- 2.2.5. Furthermore, the NPPF provides no formal definition or criteria on what constitutes exceptional circumstances. It is helpful, however, to refer to previous legal judgements which provide guidance on determining what may constitute an exceptional circumstance.

Gallagher Homes Limited v Solihull Metropolitan Borough Council [2014] EWHC 1283

- 2.2.6. This considered relevant examples of case law on the meaning of "exceptional circumstances" including: *Carpets of Worth Limited v Wyre Forest District Council* (1991) 62 P & CR 334; *Laing Homes Limited v Avon County Council* (1993) 67 P & CR 34; *COPAS v Royal Borough of Windsor and Maidenhead* [2001] EWCA Civ 180; [2002] P & CR 16; and *R (Hague) v Warwick District Council* [2008] EWHC 3252 (Admin).
- 2.2.7. From these authorities, a number of propositions were considered to be clear and uncontroversial including:
- *“Planning guidance is a material consideration for planning plan-making and decision-taking. However, it does not have statutory force: the only statutory obligation is to have regard to relevant policies.*
 - *Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt.*
 - *Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”*
- 2.2.8. The Gallagher Homes case states that: *“...something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change. The fact that, after the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that cannot of itself constitute an exceptional circumstance which necessitates and therefore justifies a change...”*.

2.2.9. Based on the above principles, a key consideration is therefore what has occurred since the Green Belt boundary was originally set that necessitates and therefore justifies a change to that boundary now.

Calverton Parish Council v Nottingham City Council [2015] EWHC 1078

2.2.10. This states that: *“...the fact that Green Belt reasons may continue to exist cannot preclude the existence of countervailing exceptional circumstances – otherwise, it would be close to impossible to revise the boundary. These circumstances, if found to exist, must be logically capable of trumping the purposes of the Green Belt; but whether they should not in any given case must depend on the correct identification of the circumstances said to be exceptional, and the strength of the Green Belt purposes.”*

2.2.11. It goes on to state that having established the objectively assessed need, the planning judgments involved in the ascertainment of exceptional circumstances should consider the following matters:

- *“The acuteness/intensity of the objectively assessed need (matters of degree may be important).*
- *The inherent constraints on supply/availability of land prima facie suitable for sustainable development.*
- *The consequent difficulties in achieving sustainable development without impinging on the Green Belt.*
- *The nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed).*
- *The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.”*

Keep Bourne End Green v Buckinghamshire Council & Anor [2020] EWHC 1984 (Admin)

2.2.12. This case very helpfully summarised the principles set out by Sir Duncan Ouseley in *Compton Parish Council v Guildford Borough Council [2020] JPL 661* including:

- *“There is no definition of the policy concept of “exceptional circumstances”. The expression is deliberately broad and not susceptible to dictionary definition. The matter is left to the judgment of the decision-maker in all the circumstances of the case.*
- *Whether a factor is capable of being an exceptional circumstance may be a matter of law, as an issue of legal relevance. But whether it amounts to such a circumstance in any given case is a matter of planning judgment.*
- *The suggestion that a factor is legally incapable of amounting to an exceptional circumstance will generally require caution and judicial restraint. The breadth of the phrase and the array of circumstances which may qualify as “exceptional” indicate that judicial emphasis is very much more on the rationality of the judgment made by the decision-maker than*

on seeking to define what can or cannot amount to “exceptional circumstances”.

- *“Exceptional circumstances” is a less demanding test than the “very special circumstances” test used in development control in the Green Belt.*
- *There is no requirement that Green Belt land may only be released as a last resort.*
- *There is no requirement to show that the assumptions upon which a Green Belt boundary was originally drawn up have been falsified by subsequent events.*
- *Exceptional circumstances may comprise one factor or a combination of factors of varying natures.*
- *General planning needs, for example general housing, are not excluded from amounting to exceptional circumstances. The need does not have to relate to a special form of housing or to a particular level of intensity.”*

Approach to establishing exceptional circumstances

2.2.13. As discussed earlier, there is no set definition of what qualifies as ‘exceptional circumstances’ when proposing changes to Green Belt boundaries. There is also no uniform approach in the way local authorities are seeking to demonstrate exceptional circumstances when seeking to amend Green Belt boundaries. The review of relevant previous cases provides some insight from a legal perspective.

2.2.14. In terms of MOL, the London Plan states that is afforded the same status and level of protection as Green Belt and MOL boundaries should only be changed through the Local Plan process in exceptional circumstances when this is fully evidenced and justified. It does not provide a definition of what qualifies as ‘exceptional circumstances’ when proposing changes to MOL boundaries.

1.1.1. Taking into account all of the above, we conclude that key considerations when setting out exceptional circumstances for changing Green Belt or MOL boundaries include:

- Changes to the character and use of Green Belt / MOL sites since they were originally designated several decades ago.
- Objectively assessed need for housing or other uses, which cannot be reasonably or adequately met elsewhere.
- The need to ensure sustainable patterns of development, including the re-use of previously developed land and focusing development in accessible locations.
- Any harm to the Green Belt / MOL should be considered against the benefits gained.
- Exceptional circumstances may comprise one factor or a combination of factors of varying natures.

1.2. Boundary corrections – non-development sites

- 1.2.1. The boundary adjustments to ensure the borough's Green Belt and MOL sites have correct, up-to-date, and defensible boundaries are presented in the 'Atlas of Change' document that accompanies the new Local Plan. These boundary adjustments, which reflect the current reality and use of sites, are important as sites having wrong or inconsistent policy designations can undermine the council's ability to protect them.
- 1.2.2. The exceptional circumstances for the proposed boundary corrections are that several changes to the character and use of these sites have taken place since they were originally designated several decades ago. This is in line with the Gallagher Homes case discussed earlier which noted that "*something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change.*".
- 1.2.3. Wrong and inconsistent policy designations that do not align with a site's use and character put these sites at greater risk of having their protected status challenged and ultimately be developed in an unplanned, piecemeal manner. This position also devalues the status of these designations as a whole. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site.
- 1.2.4. The above provide the justification for the proposed boundary changes. The detailed boundary changes are illustrated in the 'Atlas of Change' but to provide some examples of why these boundary adjustments are necessary, we provide some photographic examples of sites whose boundaries need to be adjusted. All the photographs in

1.2.5. Figure 1 below are of sites which are currently designated as Green Belt or MOL.

Figure 1 Examples of current GB/MOL designations that require boundary adjustments



2. Boundary changes – development sites

2.1. Introduction

2.1.1. The new Local Plan includes a small number of development sites (or site allocations) which are currently designated as GB or MOL. This chapter discusses the proposed boundary changes to these GB/MOL designations and the corresponding exceptional circumstances.

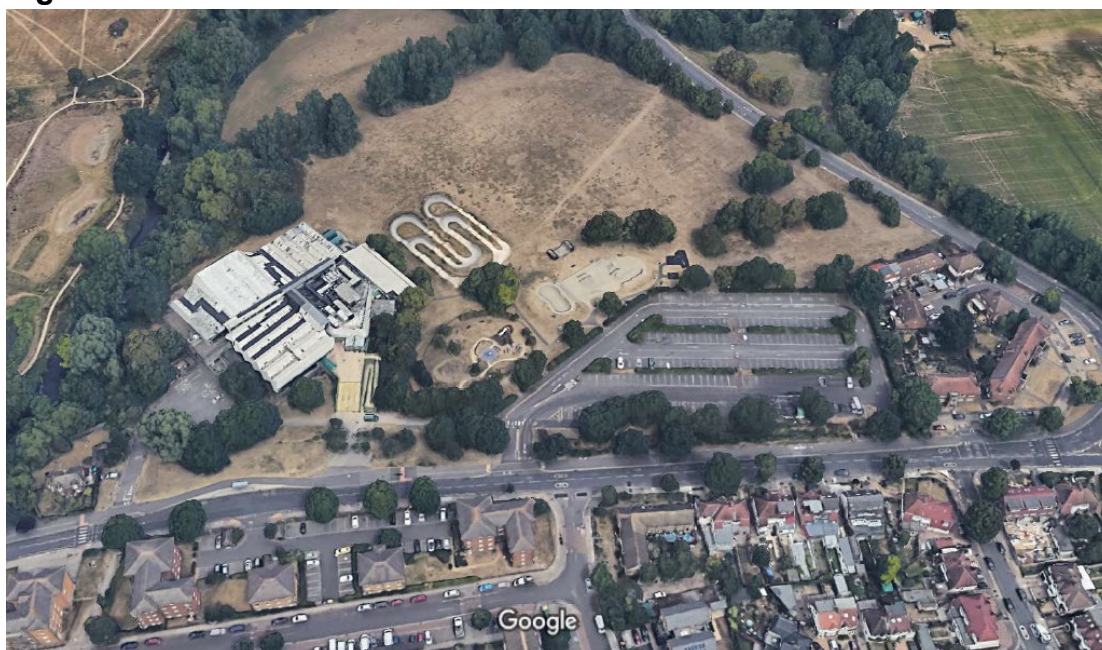
2.2. Gurnell Leisure Centre (Ealing)

2.2.1. The site comprises the two-storey Gurnell Leisure Centre and its associated surface car park, with open parkland and playing fields to the north-east and north-west. The open space includes several sporting and recreational facilities including a children’s adventure playground, a skate park, BMX track, playing fields used for football and cricket, and areas of open grassland and tree belts.

2.2.2. Peal Gardens immediately to the east comprises two and three-storey residential properties. An isolated pair of unlisted Victorian semi-detached properties are found to the south-west of the Leisure Centre on Ruislip Road East.

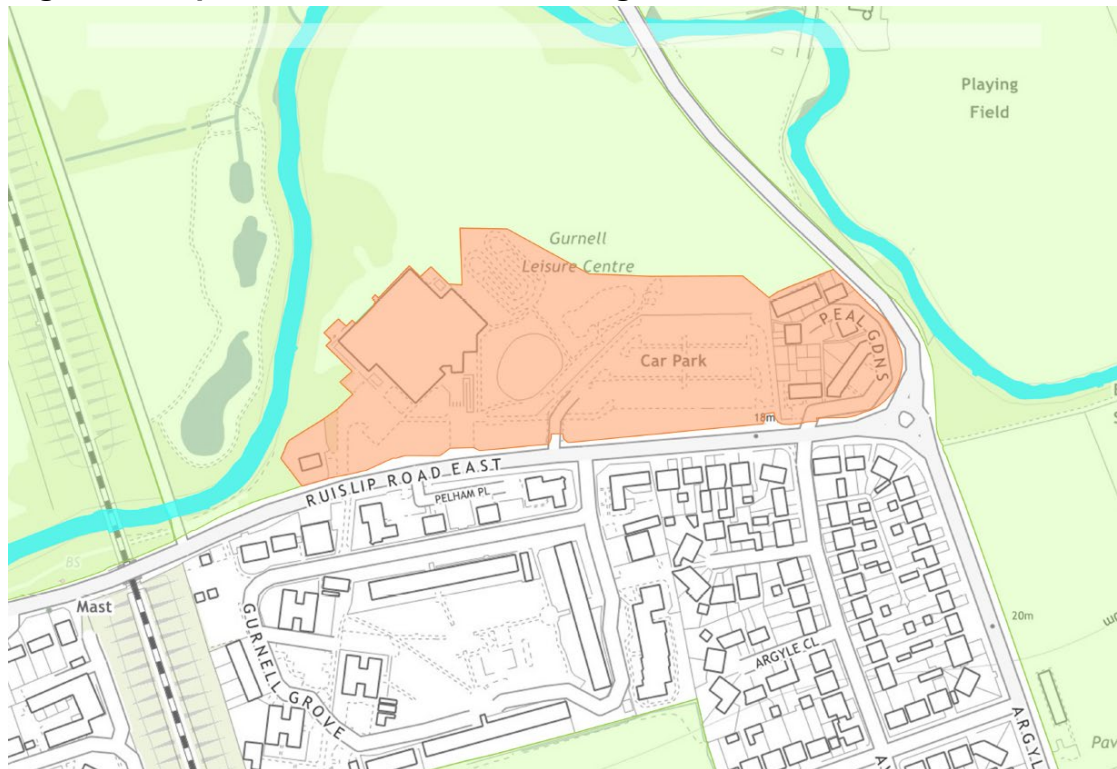
2.2.3. Built in the 1970s, Gurnell Leisure Centre has served the local community as a fitness and well-being hub for many decades. The building’s declining state led to its permanent closure in August 2020. Since then, all options have been explored to provide a reimagined leisure centre on the site. These include the reuse, retrofitting and repurposing of key aspects of the building. The demolition of the existing centre and construction of a replacement centre has been determined to be the most viable option moving forward.

Figure 2 Gurnell Leisure Centre - aerial view of current use



Imagery ©2024 Google, Imagery ©2024 Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The GeoInformation Group, Map data ©2024 20 m

Figure 3 Proposed removal of MOL designation, Gurnell Leisure Centre



- 2.2.4. The need to provide a new, modern swimming pool and sports and leisure centre is well documented. There is no other location in the borough that would be more suitable for the provision of such facilities and re-providing a new leisure centre in the location of the old one is the most sustainable option.
- 2.2.5. The council, working in close partnership with community and leisure and stakeholders through the Gurnell Community Sounding Board, is aiming to re-provide a modern leisure centre and other sporting and recreational facilities, alongside open space enhancements and flood risk mitigation improvements. Given the cost of this project, some enabling development is likely to be needed to help fund this.
- 2.2.6. In line with the new Local Plan's enabling development policy, the quantum of any residential enabling development should be limited to the amount necessary to financially secure the delivery of the replacement leisure centre and open space improvements. Furthermore, in line with the 50% public land affordable housing requirement, the housing mix should be optimised to include the maximum amount of genuinely affordable housing that is possible within scheme viability.
- 2.2.7. The design should seek to minimise the impact on the openness of the site and strike a satisfactory balance between minimising the encroachment into the green space, maintaining the essential open east / west connection which runs through the River Brent corridor, whilst also integrating with this space.
- 2.2.8. The built footprint should principally focus on the existing previously developed land, whilst ensuring the arrangement and form of blocks avoids introducing a hard edge/barrier between Ruislip Road East and the parkland to the north. Any

proposal would be expected to incorporate a comprehensive package of open space enhancements, including improvements related to accessibility (including a new pedestrian bridge over the river connecting to Longfield Playing Field), outdoor sporting facilities, landscaping, flood mitigation, wayfinding, and biodiversity.

2.2.9. Previous work on the site included an assessment of alternative sites was undertaken, in order to ascertain if the application site represented the genuine “site of last resort” in terms of its capability to accommodate:

- A replacement leisure centre.
- Facilitating the number of residential units.

2.2.10. The Alternative Sites Assessment’s (ASA) objective was to “*go towards establishing if the proposal could be delivered on an alternative site with either (i) a greater degree of benefits, or (ii) a lesser degree of harm, than that of the existing GLC site.*”

2.2.11. The methodology for the ASA was divided into 4 stages, representing logical steps in the process towards identifying whether there are available genuine alternatives:

- Stage 1 - Long list creation and sieving: Formation of a long list comprising 543 sites, sifted via a series of identified parameters in order to progress to Stage 2.
- Stage 2 - Mini-assessments: Via the sieving process, 183 sites are progressed into the mini-assessment stage, split into three sub-categories of land, being Urban Sites; Public and Community Open Spaces; and MOL and Green Belt Sites.
- Stage 3 - Capacity studies: From the mini-assessment, 15 sites score adequately enough to be further considered for a capacity study.
- Stage 4 - Detailed assessments: These 15 sites are then moved through to a detailed assessment, in part informed by the capacity study.

2.2.12. At Stage 1, 542 sites were to be assessed through ‘cascade sieving’. Of these, 254 sites were excluded on the basis that their area was less than the 0.25ha threshold. Therefore, 288 sites were progressed onto the next criteria assessment. A further 27 sites were excluded on the basis that they had already been allocated for disposal as part of the council’s Medium Term Financial Strategy. Therefore, 261 sites were progressed onto the next criteria assessment. As a result of the exclusions of the cascade sieving, 184 sites were progressed to the Stage 2: Mini-assessments.

2.2.13. At Stage 2, of the 184 sites progressed through the mini-assessments, 171 were eliminated on the basis that they did not score better than the benchmark set by the existing Gurnell Leisure Centre site.

2.2.14. A total of 13 remaining sites were shortlisted for Stage 3: Capacity study. The 13 sites were assessed for their potential residential capacities. Whilst some had fewer constraints than others with a greater capacity to accommodate development, on balance it was considered that none were able

to appropriately support a meaningful provision of residential uses to the same degree and with as minimal an impact as that of the existing Gurnell Leisure Centre site, much less accommodate both the residential and leisure uses at the same time.

- 2.2.15. The ASA demonstrated that there are no other sites or combination of sites within the borough that are more suitable to deliver a new leisure centre and / or the requisite enabling residential development.
- 2.2.16. Based on the above, the existing Gurnell Leisure Centre site represents the genuine site of last resort in terms of providing a new leisure centre alongside the requisite enabling residential development.

2.3. Former Barclays Sports Ground (Ealing)

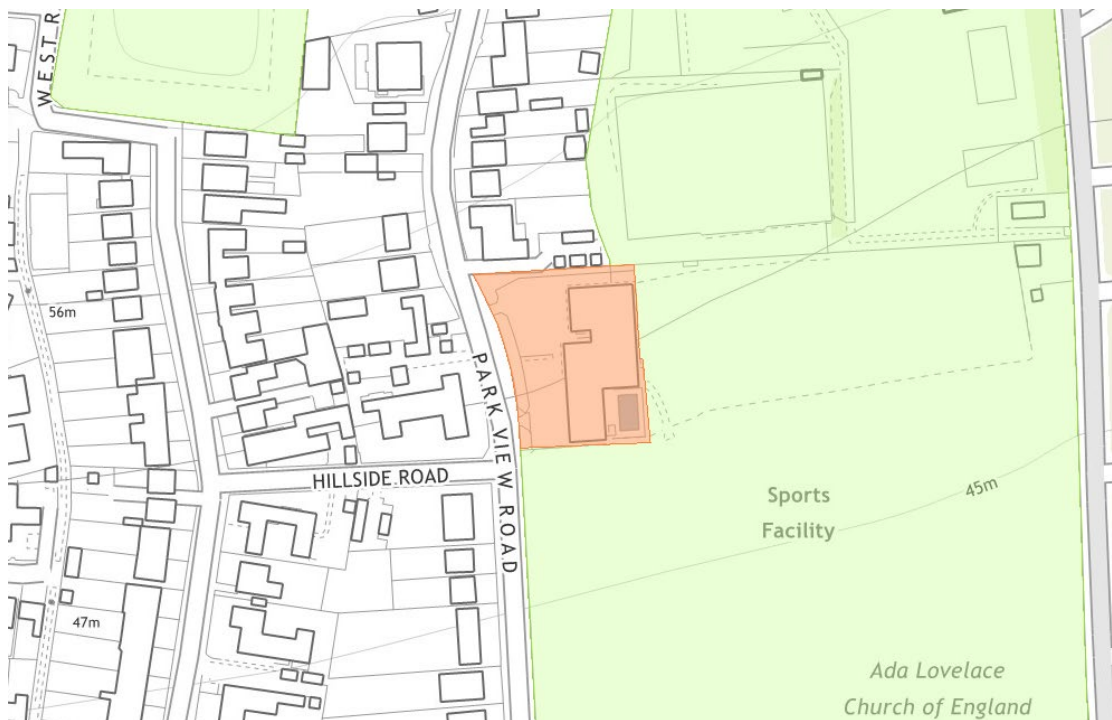
- 2.3.1. The site contains a disused part-two and part-three storey sports pavilion / club house and maintenance workshop facility with groundsman accommodation above. This previously served the former privately owned company sports ground to the south and east, both of which have been closed since circa 2000.
- 2.3.2. Adjacent to the club house building are and adjacent sports grounds which are designated as Community Open Space and Metropolitan Open Land. St Augustine's Priory School is located to the north of the site and Ada Lovelace High School opened to the south of the site in 2020.
- 2.3.3. The site is located within a predominantly residential area, comprising mostly two storey houses, although Thorn Tree Court and Red Lodge opposite are four-storeys.
- 2.3.4. Ealing's Sports Facilities Strategy 2022-2031 identifies the site and the wider sports ground as an opportunity to secure new community provision, identifying the site for new hockey provision, potentially linked to the existing facilities at St Augustine's via combined facilities. The location is also identified as a potential opportunity for reinstatement of cricket and football pitches.

Figure 4 Former Barclays Sports Ground - aerial view of current use



Imagery ©2024 Google, Imagery ©2024 Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The GeoInformation Group, Map data ©2024 10 m

Figure 5 Proposed removal of MOL designation, Former Barclays Sports Ground



2.3.5. The proposed use of the site is as a leisure-led scheme with enabling residential use and facilitating access to sports and play pitches. The proposed main use (open-air sports and leisure) is compatible with the site's MOL designation.

Therefore, the council is only proposing to remove the MOL designation from the north-western corner of the site, which has been previously developed.

- 2.3.6. The focus of the built development should be around the existing previously developed land, minimising encroachment into usable green space, with future development located on the site of the existing club house building and immediate hardstanding only. Any development should minimise the impact on MOL openness and function, including maintenance of views north / south through the site.
- 2.3.7. Limited enabling development on the site should secure the provision of replacement supporting leisure facilities and enable enhancements to the wider sports ground, including securing community access. The quantum of residential development should be limited to the amount necessary to financially secure the delivery of the replacement leisure centre, minimising the amount of development on open space. The housing mix should be optimised to include the maximum amount of genuinely affordable housing that is possible within scheme viability.
- 2.3.8. Any built leisure facilities should principally serve the identified need for outdoor leisure activities that serve the wider area, in accordance with Ealing's Sports Facilities Strategy. In the absence of this project going ahead, the sports ground is expected to remain unused and local community needs unmet.

2.4. Old Actonians Sports Ground (Ealing)

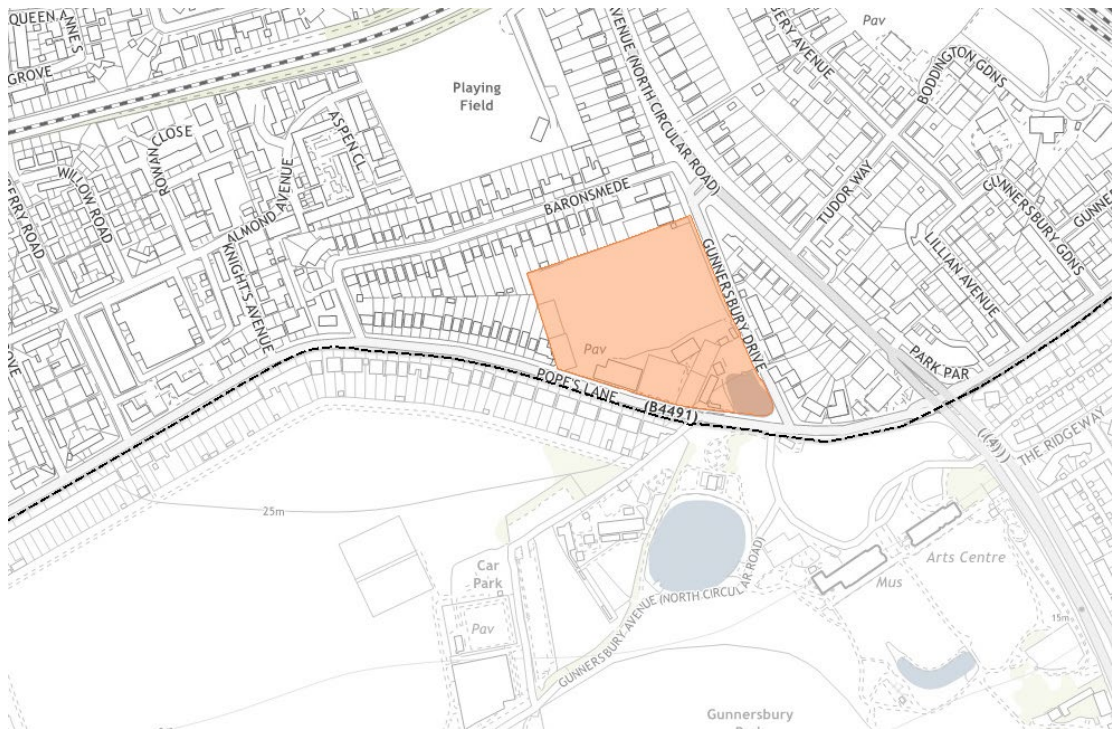
- 2.4.1. The site functions as a well-used and valued community sports ground, accommodating a range of outdoor and indoor sporting activities. The current facilities on the site include an outdoor rugby, cricket and football pitch, cricket nets, netball, and tennis courts as well as a pavilion and indoor sports spaces for squash, badminton, table tennis, and boxing.
- 2.4.2. Although most of the site is occupied as a grass pitch and a series of courts, a number of single and two-storey buildings are located in the southern half of the site. These buildings, encompassing a pavilion, changing rooms, club building, and indoor sports space are generally in poor condition, and in need of upgrade or replacement, as identified in Ealing's Sports Facilities Strategy 2022-2031.
- 2.4.3. The site is located within a predominantly residential area, consisting of properties which are mostly two-storeys in height. Gunnersbury Park is located to the south of the site, separated by Pope's Lane.
- 2.4.4. Given the age and condition of the existing sports and leisure facilities, and the cost of improving them, it is anticipated that some enabling residential development alongside any built leisure facilities will be necessary to cross-subsidise the enhancements to the leisure offer.
- 2.4.5. Development proposals should support the overriding objective of enhancing the outdoor leisure offer, minimising the reduction of any usable recreation space, and securing the long-term future of these activities.

Figure 6 Old Actonians Sports Ground - aerial view of current use



Imagery ©2024 Google, Imagery ©2024 Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The GeoInformation Group, Map data ©2024 20 m

Figure 7 Proposed removal of MOL designation – Old Actonians Sports Ground



2.4.6. Any built leisure facilities should be principally geared to serving the need for outdoor leisure activities and appropriately sized relative to this need. Some indoor facilities will be supported where these are shown to meet a need, are

modestly sized, and complement rather than compromise the outdoor leisure offer.

- 2.4.7. The quantum of residential development should be limited to the amount absolutely necessary to financially secure the delivery of the replacement sports and leisure facilities, limiting the amount of development on open space. Furthermore, the housing mix should be optimised to include the maximum amount of genuinely affordable housing that is possible within scheme viability.
- 2.4.8. By consolidating the footprint of the existing buildings on the site, the proposals should increase the amount of usable pitch/court space. Replacement leisure buildings and associated enabling residential development should be located along the southern edge of the site, effectively extending the building line from 162-198 Pope's Lane.
- 2.4.9. Proposals should explore the opportunity to jointly manage Baron's Pond and secure day time access to facilities for local schools. They will also include greening and biodiversity measures.
- 2.4.10. In the absence of the proposed development, it is unlikely that the site's inefficient layout and aging sports and leisure facilities will be improved.

2.5. Westway Cross (Greenford)

- 2.5.1. The site is located in the southwestern edge of the Horsenden Hill MOL parcel. It includes part of Westway Shopping Centre, including retail units and associated parking facilities. Over the years, the shopping centre has expanded, and as a result there are currently several retail and food outlets as well as the entirety of the shopping centre's car park, which are currently designated as MOL.
- 2.5.2. The proposed use of the site is residential-led mixed-use development providing new homes, retail/commercial space, office space, and public green space, retaining and improving access to Paradise Fields. The location is appropriate as it is brownfield land with good public transport accessibility thanks to its close proximity to Greenford Station.
- 2.5.3. Any development should make better, more efficient use of the site while improving access to the high quality Metropolitan Open Land adjacent to the north. The site has been previously developed and therefore there will be no loss of green open space. It clearly does not function as MOL and the incremental development that has taken place over the years has considerably changed the site's function and appearance since its original MOL designation.

Figure 8 Westway Cross - aerial view of current use



Imagery ©2024 Google, Imagery ©2024 Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The GeoInformation Group, Map data ©2024 20 m

Figure 9 Proposed removal of MOL designation – Westway Cross



2.6. Smith's Farm (Greenford)

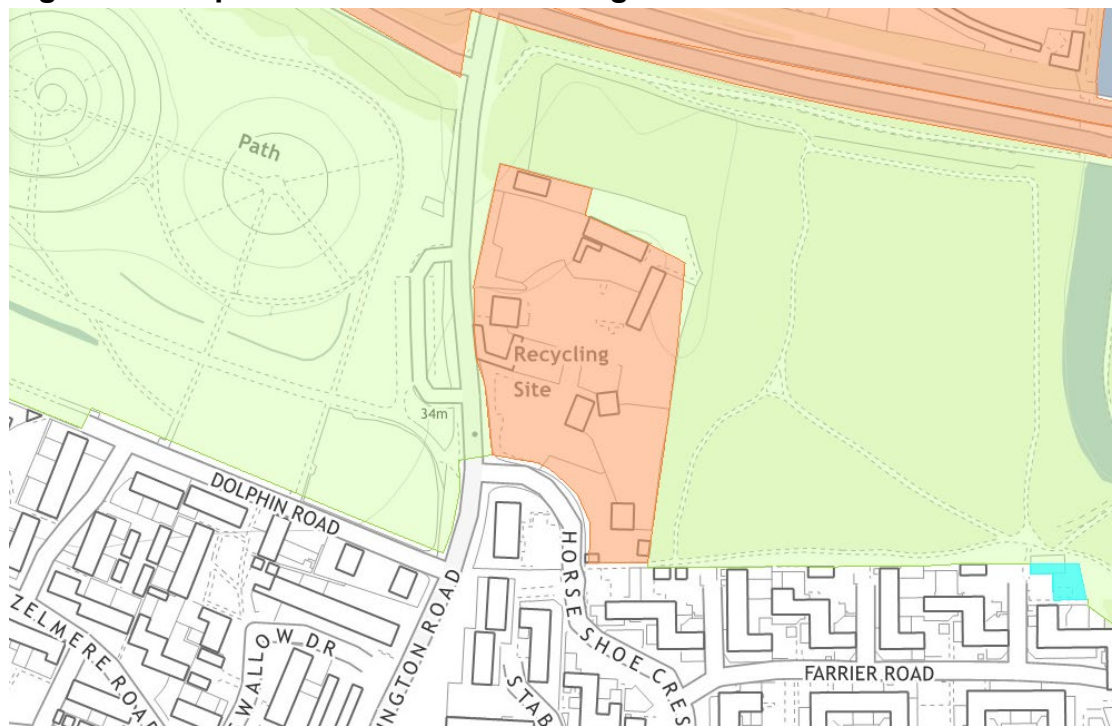
2.6.1. The site features a range of industrial uses, in addition to a used car dealership. It has been used for commercial purposes for the last 25 years. The most recent uses include a lorry park, workshops, storage, and plant yards.

Figure 10 Smith's Farm - aerial view of current use



Imagery ©2024 Google, Imagery ©2024 Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The GeoInformation Group, Map data ©2024 20 m

Figure 11 Proposed removal of GB designation – Smith's Farm



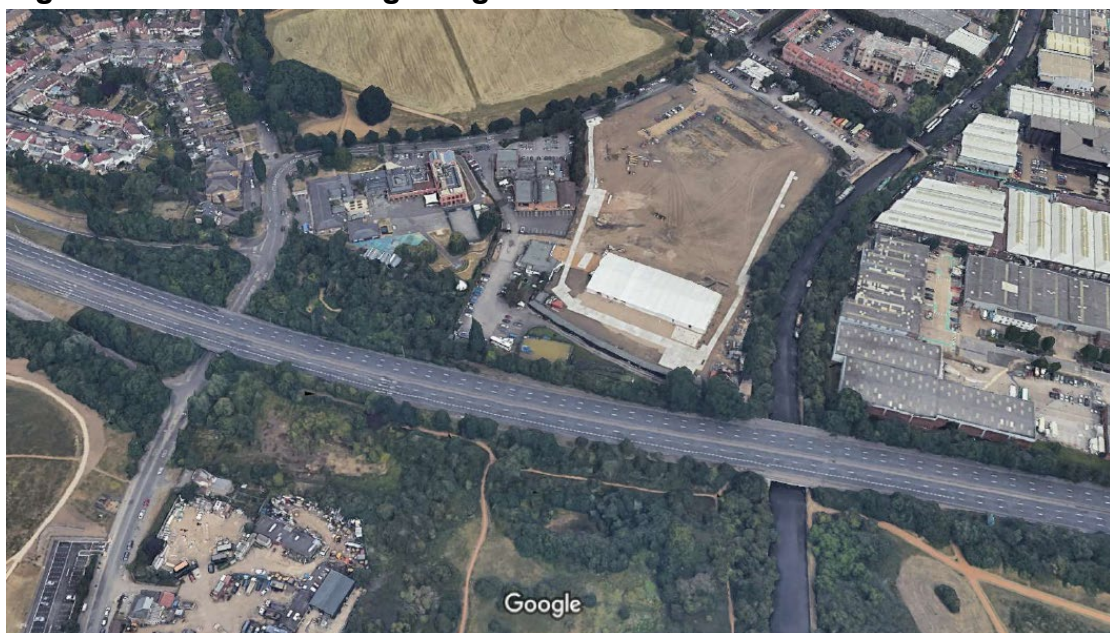
2.6.2. The existing use and appearance of the site create a noticeable break in the Green Belt between Northala Fields to the west and Smith's Farm and Marnham Fields to the east. It also creates severance between the Green Belt parcels as there is no connecting route through the site.

- 2.6.3. The use of the site has changed considerably since its initial designation as Green Belt. The existing use of the site makes no contribution to its Green Belt designation. On the contrary, it has a detrimental impact on the green link between Northala Fields to the west and Smith's Farm and Marnham Fields to the east. The quality of the landscape is poor, with little greenness.
- 2.6.4. The proposed use of the site is a residential-led, mixed-use scheme including an employment component. It should include improvements to the Green Belt and improved permeability and a through route for pedestrians and cyclists between Marnham Fields and Northala Fields. It should retain and refurbish the locally listed farmhouse and barn.
- 2.6.5. In the absence of the proposals going ahead, the site is likely to remain in its current inappropriate use, adversely affecting the quality and accessibility of the wider Green Belt parcel that also includes Northala Fields and Marnham Fields.

2.7. Northolt Driving Range (Northolt)

- 2.7.1. The Green Belt parcel includes Belvue Park and land south of Rowdell Road. While Belvue Park is green and open, land south of Rowdell Road is neither. It includes a number of built developments including a school and a private membership gym, hardstanding parking areas, the derelict former golf driving range, and the A40 and its slip roads.
- 2.7.2. The land south of Rowdell Road has changed significantly since it was originally designated Green Belt many decades ago and it currently makes no contribution towards Green Belt purposes. There is an opportunity to make better and more efficient use of the land to provide an employment-led, mixed-use scheme, which incorporates improvements to active travel and the canal towpath.

Figure 12 Northolt Driving Range - aerial view of current use



Imagery ©2024 Google, Imagery ©2024 Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The GeoInformation Group, Map data ©2024 20 m

Figure 13 Proposed removal of GB designation, Northolt Driving Range



- 2.7.3. There is a well-documented need for more industrial space in London, as demand is increasing and diversifying, putting additional pressure on the affordability of industrial space, particularly for smaller businesses and business start-ups.
- 2.7.4. Ealing Local Plan Policy SP1: A Vision for Ealing sets out a requirement for Ealing to grow and diversify its business space, and further strengthen the role of its industrial areas. Ealing's Employment Land Review (ELR) shows a historic shift from a net surplus of industrial land over the plan period to a potential deficit, with a net requirement for one additional hectare of growth.
- 2.7.5. The bulk of projected need (70% of the gross total) is for logistics space. The location of the site adjacent to an existing Strategic Industrial Land (SIL) and within the borough's dominant logistics corridor along the A40 presents a unique opportunity to designate new industrial land that will help meet these needs.
- 2.7.6. The borough's need for additional industrial land, the lack of alternative sites suitable and available for industrial use, and the site's location adjacent to well-established Strategic Industrial Land, with good strategic road connectivity constitute the exceptional circumstances for changing its Green Belt designation. The former golf driving range site is proposed to be designated Locally Significant Industrial Site (LSIS).
- 2.7.7. The land west of the driving range has changed significantly since it was originally designated as Green Belt, with several built developments as discussed earlier and evidenced by aerial photos. The A40, which is also currently designated as Green Belt, is today one of the busiest major roads in London, with the levels of traffic passing through it being incompatible with its Green Belt designation.

2.7.8. Along with the industrial use of the former driving range, there is potential for a residential element near Belvue School and/or along the canal. This would improve pedestrian routes to and through the site and connections to green space.

1.1. Kingdom Workshop, Sharvel Road (Northolt)

1.1.1. The site is located within Down Barns Farm and close to the West London Shooting Ground, designated Green Belt and an area of Local SINC. The current use on the site is an unconsented lorry repair workshop, which is not a compliant Green Belt use.

1.1.2. The site has been selected to accommodate future Gypsy and Traveller need within the borough with a proposal for six pitches, following a public consultation exercise in July and August 2023.

1.1.3. The borough has a well-documented need for additional Gypsy and Traveller accommodation. Ealing Council considered several potential sites to meet this need, with this site being identified as the most suitable. Full details of the selection assessment process and details of 'Site 5: West London Shooting Ground' can be found in the Gypsy and Traveller Pitch Provision Site Assessment, June 2023.

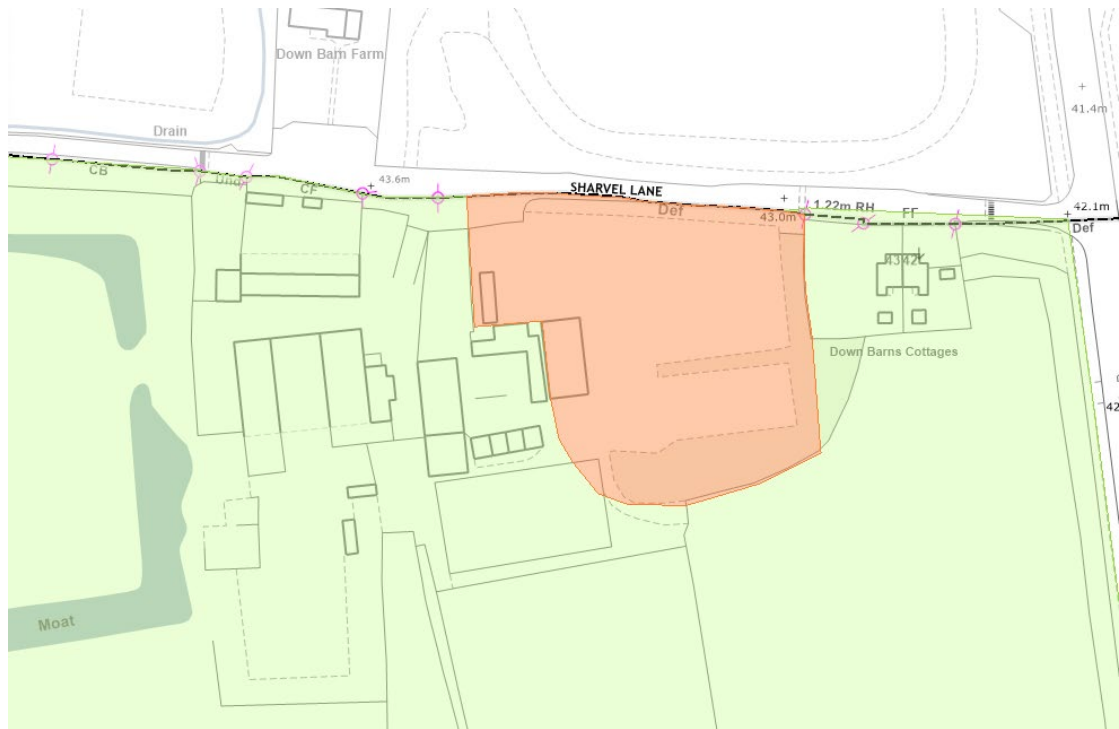
1.1.4. The layout and design of the pitches will be decided in consultation with the local Gypsy and Traveller community. It will ensure new development includes tree and hedge planting to screen the site from neighbouring uses and to create a defensible boundary.

Figure 14 Kingdom Workshop, Sharvel Road – aerial view of current use



Imagery ©2024 Google, Imagery ©2024 Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The GeoInformation Group, Map data ©2024 20 m

Figure 15 Proposed removal of GB designation – Kingdom Workshop, Sharvel Road



1.1.5. The assessment has identified this site as the most suitable in the borough for the provision of new Gypsy and Traveller accommodation. Ealing Council's approach is in line with the guidance in the government's 'Planning policy for traveller sites' and specifically Policy E: Traveller sites in Green Belt which states that:

"If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only."

1.1.6. The need for additional Gypsy and Traveller accommodation and the fact that the site has been identified as the most appropriate in the borough constitute the exceptional circumstances required for the proposed boundary change to remove the Green Belt designation from this part of the wider GB parcel.