

**London Borough of Ealing
Development (or Core) Strategy Submission
Development Plan Document Independent Examination**

Matter 9 – Protecting and Enhancing Ealing’s Green and Open Spaces

**Representation Number 48
DMH Stallard (Geoff Smith) on behalf of Monopoli Trust**

1. Our representations relate to Final Proposal 5.2(e), Metropolitan Open Land, which seeks the maintenance of nature conservation value and dignity of secluded cemeteries with eventual possibility of open space use. Also to achieve public realm improvements along the A4020 frontages.
2. We submit that this Final Proposal should not relate to the land as shown in our submissions, as it is not part of the Hanwell Cemeteries. It is in private ownership and is currently unused land. This land has never been used as a cemetery.
3. We further submit that this land is positioned in between existing buildings along the main road frontage, and as such, does not form part of any ‘green corridor’. This frontage includes public realm features, including pillars and railings, which would be retained as part of any development proposal for this site.
4. In the light of these facts, we consider that the inclusion of this land in Map 2 ‘Key Diagram’ as ‘Green Space’, and in Map 8 ‘Green and Open Spaces’, as ‘Metropolitan Open Land/Nature Conservation Area’ is ‘unsound’.
5. In relation to the soundness tests set out in paragraph 4.52 of PPS12, the inclusion of this land within Map 2 and Map 8 as described, fails the tests of ‘justified’ and ‘effective’.
6. The inclusion of this land as part of Hanwell Cemeteries cannot be ‘justified’. It is in private ownership, and has never been used for graves.
7. The inclusion of this land as part of Hanwell Cemeteries cannot be ‘effective’, as it is private ownership, it is not available for cemetery use, neither is it available for public open space use.
8. The Core Strategy can be made sound by excluding this land from the following designations:-
 - Map 2 ‘Key Diagram’ as Green Space

- Map 8 'Green and Open Spaces' as Metropolitan Open Land/Nature Conservation Area'

These two amendments are shown in our Representations on the Submission Proposals submitted on 28 October 2010.

9. In relation to the Issues and Questions in relation to Matter 9, we have the following comments which we consider further support our submissions.
10. **Question 4** relates to the proposed uses within designated Metropolitan Open Land. Metropolitan Open Land is defined in the London Plan as being 'strategically important open spaces within the built environment.' Whilst recognising that Hanwell Cemeteries may provide such a function, the land subject of these submissions does not. It is not part of the Cemeteries, and being located between existing buildings along the main road frontage, is in an excellent location for sensitive new development, such as housing.
11. Metropolitan Open Land should satisfy one or more criteria as set out in the London Plan (Policy 3D.10). This land does not satisfy any of the criteria. It is not distinguishable from the built up area, being located between No. 38 and No. 40 Uxbridge Road. It is not available to the public, as it is privately owned land. It does not contain environmental features of national or metropolitan value. Lastly, this land does not form part of a Green Chain, as the opposite side of Uxbridge Road is continuous development, comprising flats and houses.
12. **Question 6** relates to the need for supporting paragraphs in relation to Policies 5.1, 5.2 and 5.3. We consider that this is important in relation to Hanwell Cemeteries, as it would need to identify the boundaries of these cemeteries, which excludes this privately owned site.
13. For all of the above reasons we request that the land subject of this submission be excluded from the areas identified as being Hanwell Cemeteries, and as a consequence, be removed from the 'green space' designation on Map 2, and the Metropolitan Open Land/Nature Conservation Area on Map 8.