

## **Matter 9 – Protecting and Enhancing Ealing’s Green and Open Spaces Issues and questions**

### **1. Whether the policy framework for Green Infrastructure (GI) and Open Space is an appropriate reflection of local needs and opportunities and is sufficiently clear, detailed, and conforms to national policy requirements**

The policy framework for GI and open space is illustrated in Map 8 which is too small to identify locations for neighbourhood planning. The size used in Volume 2 of the UDP 2004 Sheet 4 would enable residents to identify space. An updated deficiency map would assist policy development and the identification of parts of the borough that lack open space and have no proposals.

Policy 5.5 b) gives low priority to creating new public open space which is essential for areas of deprivation so that children have somewhere to play and meet their friends other than in overcrowded homes or the street. Undersized district or new local parks can only be developed if land is acquired, leased or public access permitted through conditions applied in planning consents. Effective new park provision cannot be left to *ad hoc* improvements as Section 106 funding becomes available. Existing garden land should also be protected from new development.

In high density development doorstep play or private amenity space is needed for adults and children. Section 106 finance for improving a nearby park which may be inaccessible to young children without an adult is no substitute. Land should be incorporated in planning applications for new open space with trees, shrubs and play equipment.

Although policy 5.5 b) refers to ‘further details following’ two examples are quoted in the policy which are commitments for Public Open Space in 2 major developments but the list of deficient areas in the text does not give rise to any proposals in the policy. Sheet 4 UDP vol 2 illustrates actual deficiency of open space while areas listed on page 60 are difficult to identify e.g. North Ealing is described as deficient in play space yet it has some in Pitshanger Park. Castlebar Hill W13 and areas to the South in Ealing Broadway Ward are a long walking distance from children’s play space.

Some deficiency areas can be satisfied by improving footpath and cycle path access over roads and railways e.g. Park Royal to Wormwood Scrubs and South Acton to Gunnersbury Park. Facilities in parks such as cycle racks help access as well for children who play football. or other organised games.

We support Twyford Sports Ground in Acton which is designated as Community Open Space. Community use of this privately owned site used to help compensate for the local deficiency in open space. But this is no longer the case. Community access should be promoted especially proposals for public access to the 4 acres in separate ownership that are unused. This could be included in the policy 5.5 b) to add to the two examples quoted.

**In view of the above we believe that the text of improvements to open space provision should be revised to be more meaningful and the policy should include specific proposals to satisfy at least some of the many deficiencies shown on Sheet 4 (UDP) with part of Twyford Sports Ground.**

### **2. Will the Green Belt boundary endure for the lifetime of the plan?**

If the lifetime of the plan is 15 years and the DNPPF suggests it is reviewed every 5 years we would support Green Belt protection over that period as envisaged in PPG2 para 2.1 which states ‘*The essential character of green belts is their permanence. Their protection must be*

*maintained as far as can be seen ahead.* The London Plan requires Metropolitan Open Land to have protection equal to Green Belt. We wish to see this permanence maintained and not reviewed every 5 years to accommodate the uses left over after brownfield sites have been developed for housing and economic development. Playing fields, nature conservation areas and parks, local food production, allotments and woodland to compensate for the effects of climate change are appropriate uses.

**3. Are all the proposed developments within the Green Belt (policy 5.1) justified and appropriate development within the advice in PPG2?**

PPG2 Para 3.1 emphasises the ‘presumption against inappropriate development’ and para 3.4 states that *‘the construction of new buildings inside a Green Belt is inappropriate unless it is for the following purposes’* including essential facilities for outdoor sport and recreation, cemeteries and other land uses which preserve the openness of the green belt and do not conflict with the purpose of including the land in it.

Para 5.1 b) second bullet point proposes a new secondary school in the Green Belt adjacent to the A40. This is not in accordance with para 3.4 in PPG 2. The first bullet point includes an education site, an existing secondary and primary school recently rebuilt for West London Academy which is being extended. Any claim that the site keeps a significant openness of green space would no longer be true.

The DNPPF describes Green Belt as still having an important function and that boundaries should only be altered in exceptional circumstances. Para 127 in the DNPPF states that LPAs should only refuse permission if the adverse planning impacts on the local area outweigh the desirability of establishing a school in that area. Allowing another school on Green Belt would erode yet again one of the major achievements of the planning system.

**Green Belt policy should retain the presumption against inappropriate development and the proposed new Greenford High School should be relocated to a brownfield site and deleted from 5.1 b) second bullet point (the proposed school site is illustrated in the Atlas Vol 2 Map as being transferred to MOL).**

**4. A definition of Metropolitan Open Land (MOL) is necessary. Are the proposed uses compatible within MOL to ensure its protection?**

The London Plan policy 7.17 defines it as ‘strategic open land within the urban area that contributes to the structure of London’. ‘The strongest protection should be given and inappropriate development refused.’ The RLP also provides useful criteria for its designation.

CS Policy 1.1 i) protects the ‘pattern of green spaces’ but we consider it would be more effective in avoiding inappropriate development if it quoted from PPG2 or if Policies 3.1/1 iii) in the UDP 2004 were included for both Green Belt and MOL

In the UDP the policies were the same as for the Green Belt as they have a similar function.

Accordingly, the introduction to Policy 5.1 should be amended to read as follows **‘The Council will protect and enhance the network of MOL in the Borough and realise its potential by promoting the following proposals.’**

Policy 5.2 a) Acton Park in itself is not large enough to classify as a district park: The neighbouring private playing fields and their extensive indoor facilities cannot legitimately be included in a district

park if access depends upon club membership. A proposal should either be identified for land purchase or free access or the reference to the district park deleted

Under Policy 5.2 f) the development of buildings or structures to support intensive outdoor recreation would increase the flood risk in the Brent River Park (BRP) if the floodplain lost capacity for storing floodwater. Intensive outdoor recreation areas should be located in higher parts of the flood plain releasing low lying areas for enhancement of their nature conservation and flood water storage potential. The area for storage of flood water has already been reduced by the building of Gurnell Pool and the adjacent skateboard park. If permanent sports equipment were constructed on the flood plain it is likely to wash downstream in a major flood perhaps damming the water.

The policy should also include a reference to further enhancement of BRP. It is an important physical feature which has been considerably improved over the years despite problems of pollution created largely by sewer misconnections.

**We propose that areas adjacent to the Brent River should be designated as linear biodiversity improvement sites with a view to creating riverside habitats with water management using reed beds to improve water quality. Furthermore, the reference to public parkland should be amended to include community open space and private green space.**

Policy 5.2 g) relates to Horsenden Hill Metropolitan Park. As well as a park this is an important viewpoint and landmark, an archeological interest area and a nature conservation site of metropolitan importance. In policy 5.4 on nature conservation it is only listed as a site for Regional geo-diversity. It would be preferable to list all these attributes under Policy 5.2 especially because the geological sections are very limited and it is the only site identified in Ealing.

**In summary, we object to intensive recreation equipment on the floodplain where it will reduce its capacity for storage of flood water. Similarly expansion of the footprint of Gurnell Pool would further increase flood risk. Identifying the proposal as 'Subject to flood risk' is not an adequate justification.**

The London Plan policy 7.21 offers supplementary guidance on trees and woodland and the identification of areas for planting in the Borough. If these could be identified in broad terms it would enable funds to be sought through organisations like the Woodland Trust which raise memorial funds for planting throughout the country.

**We request a commitment in the Green Belt MOL policies so that the Green Space Strategy in course of preparation can explore suitable areas.**

#### **5. Is adequate provision made for the establishing of local green spaces for uses such as allotments?**

Protection for local open space is provided in Policy 5.5 a) titled 'Promoting parks... and Addressing Deficiency'. The policy lacks proposals for the means of financing new open space in existing deficiency. The DNPPF protects Local Open Space and this should be reflected in the title by including the words "Protecting and".

Allotments at present have long waiting lists in the Borough. These may be substantially reduced when fees rise in 2013. But if rises after that are to be in line with inflation the Council should give consideration to additional allotment space as the number of flat dwellers increases.

To summarise, **since** deficiency is considered under policy **5.5b** the word **‘or allotments’** should be inserted after **‘gardening’**.

**6. To make policies 5.1, 5.2 and 5.3 effective, is there no need for further supporting paragraphs? At least an explanation of green corridors and their benefits would be necessary to justify policy 5.3, but MOL and Green Belt may also require supporting text.**

If PPG2 is abolished it is very important that the high level of support for green infrastructure is included in the CP. The London Plan also contains justification.

This borough pioneered the **Green Corridor** concept with the assistance of the London Ecology Unit to link Green Belt and Metropolitan Open Land allowing the movement of natural vegetation and animals. In addition,

1) along main roads they provide green or physical buffers for cyclists and pedestrians from car fumes while improving the amenity of drivers stuck in congested traffic.

2) along railways and canals they are an important amenity for users including wildlife.

We consider that the Green Corridor policy is not detailed enough and should provide greater protection on the lines of UDP policy 3.2 and table 10.3.

Along Western Ave (A40) where land was purchased for transport improvements many years ago 25m of this land adjacent to the road was set aside for separate footpath and cycleway with bunding and planting providing protection from pollution and road traffic noise. The remainder of the land is available for housing. Schemes have not been permitted because not enough space was left for Green Corridor (the Inspector for the Allan Rd W3 appeal supported the Green Corridor concept).

Unauthorised hoardings along the A40 Green Corridor (infrequently enforced against through lack of Council resources) are very damaging to the amenity of road users and residents. The problem also occurs where railways cross roads. Refusal on grounds of amenity and safety needs more policy support in defining the amenity of Green Corridors in order to give a greater chance of successful enforcement on appeal (currently limited in practice).

The built form of hoardings creates areas unsuitable for growth of grass, shrubs or trees. Instead their space should be used for more trees and shrubs which would reduce blown particulates and some pollutants. Safety is an increasing issue as the designs of electronic advertisements vie with one another to catch the eye of motorists and add to the danger of congested roads.

**We would like to see a survey carried out to identify this problem as part of the open space strategy; and wording included here to support refusals of new ones or renewals of existing ones.**

We welcome greening and pollution control proposed by TfL but it is not a substitute for the separate provision of the Green Corridor. Even when enough vehicles are adapted to reduce pollution in 5 or 10 years time there is still a noise problem for pedestrians, cyclists and residents. Bunding to reduce noise pollution is also essential and has proved invaluable with the construction of the Northala Field Mounds S of the A40 in Northolt. The completion of the Green Corridor could be funded from the sale of the remainder of land for housing which would be greatly increased in value with the enhanced amenity. It is not sustainable to improve

transport for motorists without providing for a healthier environment.

**Therefore, we request that policy 5.3c) includes the requirement for the A40 Green Corridor to have a width of about 25m with space for cycleway, footpath and landscaped bunds between East Acton junction and Allan Way.**

In Policy 5.3 d) the Brent River is defined as a Green Corridor along a very urban section as far south as the A40 where it links to the BRP. There is no objection to a cycle route through the BRP but this would be better located away from the river where its bank sides have nature conservation value and are subject to flooding.

**7. If additional land is to be identified to meet policy 5.7 requirements, to be effective this should be identified in the Development Sites DPD, but there is no reference to this document.**

There is still burial land available at Greenford cemetery, a location in the centre of the borough. We would also like to see space planted with trees for Green Burials as well as reuse of existing space to avoid sterilising open land with graves with fixed memorials. Cremation should be encouraged but the nearest crematoria are outside the borough at Ruislip and Kew.

**8. Is reference to the Blue Ribbon network necessary when reference is made to the Grand Union Canal and the River Brent in Policy 5.3 and do they provide an opportunity for north-south routes and freight transport? Should reference to the network also be included within the appropriate local area in Appendix 2 to be effective?**

The London Plan has 5 Blue Ribbon policies which do not apply to the River Brent although it and its tributary Costons Brook are watercourses and therefore part of the Blue Ribbon network in the Thames Basin. The River Brent is shallow and polluted but has wildlife and amenity value. There is currently very little freight use of the GUC: boats are almost entirely confined to those for recreation and tourism and the towpath to walkers and cycling. But freight use in Park Royal should be encouraged by provision of wharves or space for their future construction.

**9. Has the heritage value of parks and green spaces been fully recognised?**

Some parks are defined as conservation areas e.g. Acton Green, Acton Park, Cuckoo estate (Hanwell), Ealing Common, Ealing Cricket Ground, Ealing Green, Hanwell Cemeteries, Hanwell Village Green, Haven Green, Montpelier Park, Northolt Village Green and Norwood Green. Walpole Park/Pitzhanger Manor is part of a Conservation Area and defined as Heritage land as are Osterley Park and Twyford Abbey.

**We consider that since the Manor House grounds in Southall have recently been restored these also now justify historic recognition.**