

Written Statement

**Ealing Council Statement 9:
Green & Open Spaces
LPA9**

Tuesday 15 November 2010



Contents

1	Introduction	4
2	Policy Framework	5
3	Green Belt	7
4	Metropolitan Open Land	8
5	Green Corridors (including Blue Ribbon Network)	9
6	Local Green Space	10
7	Outdoor Sports and Active Recreation	12
8	Burial Land	13
9	Heritage	13
10	Conclusions	14
Appendices		
	Appendix 1 – Additional mapping corrections	15
	Appendix 2 – Green Corridor Policy	21
	Appendix 3 – Blue Ribbon Network	28
	Appendix 4 – Heritage	31
	Appendix 5 – Chapter 5 incorporating additional proposed changes	33

1. Introduction

1.1 The issues to be addressed in this hearing statement include:

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

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

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

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

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

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.

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.

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?

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

10. Can the greening of Warwick Road where it crosses Ealing Common (policy 5.2(c)) be effectively provided for without reference in the CS?

11. Whether a spatial policy for the safeguarding of outdoor, community sports facilities is necessary and, if so whether or not this is adequately provided for in the policies in chapter 5.

2. Policy Framework

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

- 2.1 As a plan which is both strategic and spatial in nature, the approach adopted in formulating a policy framework for Green Infrastructure & Open Space has involved taking a high level view of this infrastructure, through attempting to understand this space in its totality, i.e. as a network. Accordingly the policies and proposals relating to green space are set at this level too. The focus is therefore less about individual sites per se, but rather about setting a framework, within which policies/proposals to protect and enhance the network as a whole can sit. Of course certain proposals have been identified in relation to individual sites, although where these have, these were seen as being of strategic importance to the delivery of the wider network.
- 2.2 This approach to green space including the formulation of policies and proposals have been underpinned and informed by a range of evidence in relation to open space matters.
- 2.3 In 2002 the Council published a 'Parks & Open Space Strategy' for the borough. Whilst this strategy provided an important evidence base for the planning of open space in the borough during the initial stages of the Development Strategy preparation, its scope was limited dealing with publicly accessible open space only, and was also dated covering the period up to 2008 only. Moreover a number of other streams of work were also underway, including in relation to active recreation and nature conservation which sat outside of this strategy. Accordingly in early 2010 the Council commenced work on the preparation of a new open/green space strategy.
- 2.4 Progress in relation to the preparation of this Green Space Strategy is detailed in Background Paper 3: Open Space (EB26, October 2010). The October background paper primarily collated all of the audit data (excluding the quality data) completed as part of a PPG 17 compliant assessment. This audit work covered the full typology of open space in the borough including public parks, allotments, cemeteries, private sports grounds and green corridors, and categorised this space by function and size, according to the classification types defined in PPG17 and the London Plan. As a result of this audit work a number of mapping changes were identified in relation to the open space sites. The majority of these changes comprised fairly minor boundary adjustments, reflecting current management arrangements particularly in terms of Public Open Space

and allotments. These mapping changes were detailed in Appendix 2 and 4 of background paper 3 (EB26), and were carried forward into Vol. 2 of EAL 4 'An Atlas of Proposed Changes to the Adopted UDP Proposals Map' (September 2010).

- 2.5 Following the completion of this audit exercise, the need for some further refinement to the mapping itself was identified. This largely relates to a handful of sites, where minor boundary corrections are proposed, which have been brought to the Council's attention since the publication of the background paper in October 2011. These additional mapping changes are detailed in appendix 1.
- 2.6 Having completed the audit stage of the process, the next key step involved comparing supply to demand over the plan period. Spatially this was best understood through the use of deficiency mapping, the findings of which are detailed in section 4 of the Green Space Strategy. A brief summary of which is also detailed in the supporting text to Policy 5.5. The text included in the submission draft was based on an initial deficiency mapping exercise, undertaken internally by Council officers. Whilst the information gleaned from this exercise was more than adequate for the purpose of identifying broad areas of deficiency, the software used to calculate accessibility was limited. For example it was not possible to accurately factor in physical barriers to access, such as roads, rail lines and waterways etc. The Council were therefore keen to improve on this data, and an opportunity presented itself to work jointly with Green Space Information for Greater London, piloting their new mapping software, to prepare refined deficiency mapping (detailed in section 4 of the Green Space Strategy). Accordingly in light of this refined information the Council would welcome the opportunity to update the summary text in policy 5.5. The proposed revised text is detailed in appendix 5. Based on an analysis of these findings, and an understanding of opportunities the Green Space Strategy has identified key actions (see section 7). Not all of these actions fall within the remit of planning, however a number do, and these so far as possible have been captured in the emerging LDF documents. It is important to note too that not all of these actions are relevant to the Development Strategy, but instead will be deliverable through other LDF documents including in particular the Development Management DPD, Development Sites and the CIL/S106 SPD.
- 2.7 The draft National Planning Policy Framework (NPPF) encourages local planning authorities to take a more strategic approach to green infrastructure to give them a better understanding of the existing green infrastructure network and its functions in their area. Areas of green space of metropolitan significance, including for example Sites of Metropolitan Importance for Nature Conservation, Regionally Important Geological Sites, and the Blue Ribbon Network were identified jointly with the GLA.

With regard to the creation of a strategic network of green infrastructure, the Council has recently commenced work with Design for London and neighbouring boroughs to develop a green infrastructure plan (All London Green Grid).

- 2.8 It should be noted that the Green Space Strategy forming part of the submission documents (BS7, published July 2011), is still in draft form. This version of the Green Space Strategy was approved at Cabinet in September 2011 for consultation purposes. It is anticipated that public consultation on this draft will commence early next year. It is envisaged that the Action Plan in particular will be amplified further through this process.

3. Green Belt

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

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

- 3.1 Final proposal 5.1 – ‘Protect and Enhance Metropolitan Green Belt’ Identifies key proposals for the enhancement of different elements of the Green Belt Network.
- 3.2 With regard to the network of Green Belt land in the borough only one change is proposed. This affects the most eastern section of the Green Belt where it extends along the A40 east of the junction with Long Drive to Oldfield Lane North. This encompasses the former GSK Sports Ground, the London Marathon Playing Fields, Greenford Lagoons and Birchwood. In relation to this land it is proposed that the Green Belt designation be removed and the site be re-designated as Metropolitan Open Land. Please refer to EAL4 (page 15) for exact boundary details. This recommendation reflects the findings of the audit work detailed in Appendix 3 of Background Paper 3 (EB26) (October 2011). In summary this part of the wider Green Belt network is considered to more appropriately reflect the characteristics of Metropolitan Open Land rather than Green Belt. This accords with the advice in PPG 2, the draft NPPF and the London Plan (2011). Given that the presumption against built development which applies in the case of Green Belt applies equally to Metropolitan Open Land, the protection afforded to this site remains unchanged. It should be noted too, that it was recommended that part of the re-zoned area also be designated as Community Open Space to reflect its open recreation use.

- 3.3 In light of this recommended change the Council accepts that Policy 5.1(b) should be updated to reflect the revised boundary, removing any reference to this area of the network. New text should also be reinserted under policy 5.2 to reflect this addition to the MOL network. The proposed revisions to the text are detailed in appendix 5.

4 Metropolitan Open Land

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

10. Can the greening of Warwick Road where it crosses Ealing Common (policy 5.2(c)) be effectively provided for without reference in the CS?

- 4.1 Final proposal 5.2 – ‘Protect and Enhance Metropolitan Open Land (MOL)’ Identifies key proposals for the enhancement of different elements of the MOL Network.
- 4.2 A small number of minor boundary changes are proposed in relation to the MOL network in the borough. These are detailed in EAL4. These include the proposal to re-designate Green Belt land to MOL, as described in paragraph 3.2 above. In light of this mapping change some further refinement to the text of policy 5.2 is required, to reflect this addition to the MOL network (see appendix 5). It is proposed that the existing text from the Green Belt policy 5.1 be carried over into policy 5.2, with one amendment, removing any reference to the identification of a new high school on this land. On reflection the Council does not consider that such reference is a matter for the Core Strategy, as it does not constitute a strategic site. Further consideration should be given to its inclusion as part of the Development Sites DPD.
- 4.3 A further set of changes/corrections to mapping has also been identified since the publication of the Development Strategy. These are all minor in nature and are detailed in appendix 1.
- 4.4 In relation to policy 5.2 (f) the Council previously agreed to remove reference to the wording ‘public’ in response to representation 403. This minor change was omitted from the final submission draft. It is proposed that this now be re-inserted as originally intended.
- 4.5 With respect to Acton Park (5.2(a)) the proposal to create a district park encompassing existing public park land and private playing fields is intended to redress a longstanding issue of deficiency in this area. This is identified in the Green Space Strategy and also in policy 5.5. The London

Plan sets a size threshold of 20ha for district parks. Acton Park in itself falls below this threshold, although if combined with adjoining playing fields as proposed it would exceed this threshold. The Council acknowledges however that in order to meet the strict definition of a district park this would be dependent on securing access to what is presently privately maintained/owned sports facilities, and accepts that there are no mechanisms in place to bring this forward during the plan period. Nonetheless whilst it will be difficult to increase the area of publicly accessible open space in relation to this area to meet the size threshold, achieving district park status is more than just a matter of size, but is also determined by the quality of space and facilities. In this regard the Council retained reference to this objective in order to secure investment in the quality of the facilities and space. Given that the Green Space Strategy similarly identifies Acton Park as a priority park for investment, the Council accepts that reference to proposed district park status could now be removed. The proposed revisions to text are detailed in Appendix 5.

- 4.6 In drafting this and other policies in this chapter the Council have tried to avoid repeating national and regional policy, including in particular contextual text, in the interest of conciseness. PPS 12, Para. 4.30 is clear that Core Strategies should not repeat or reformulate national and regional policy. Metropolitan Open Land is clearly defined in the adopted London Plan (2011) (see Policy 7.17 and Glossary), and it is considered unnecessary to repeat this here.
- 4.7 At the last round of consultation representations were submitted in relation to the greening of Warwick Road. The Council in recognising this as a long standing aspiration of the local community, originally identified in the UDP, recommended reinserting text to this effect under policy 5.2(c). On reflection whilst the Council strongly supports this aspiration, it recognises that such a proposal is not necessarily of strategic importance to the wider MOL network. The Council accepts that perhaps such detail is better provided within the Green Space Strategy itself.
- 4.8 The Council's position with regard to Hanwell Cemeteries (5.2(e)), Twyford Abbey (5.2(b)), and Gunnersbury Park is detailed in its response to representations 121, 26 and 421 respectively (EAL12b).

5 Green Corridors (Including Blue Ribbon Network)

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?

- 5.1 Ealing has a network of Green Corridors across the borough. The green corridors provide important links between networks of strategic open spaces providing environmental, recreational and infrastructure facilities. The green corridors comprise roads, railways, walking and cycle routes, and corridors for the movement of wildlife. The waterway corridors are also designated as Blue Ribbon spaces, and are illustrated as such on map sheet 8. The role of the Blue Ribbon Network in relation to leisure, biodiversity and transport is recognised throughout the plan and particularly in relation to individual area based policies where these encompass or adjoin the network (see policies 2.9, 3.2 and 3.3 for example). In response to the representations received to the publication draft, the Council are also proposing a number of further changes to strengthen and recognise the role of the canal in particular. These changes are detailed in EAL12b, and were incorporated into EAL2. For ease of reference the extracted text is provided in appendix 3.
- 5.2 The Council's position regarding the A40 Green Corridor is comprehensively dealt with in the its response to representations reference – 62, 63, 278, 280, 294, 304, 306, 387, 438, 440, 443, 536, 579, 581, 794. For ease of reference the extracted text from EAL12b is provided in appendix 2. The Council's proposed changes in relation to map 8 and the Proposals Map are also set out in appendix 2 (and also incorporated into appendix 5).

6 Local Green Space

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

- 6.1 As detailed above in section 2, the Council through various evidence base reports, including the Green Space Strategy and the Facilities Strategy, have attempted to understand the need for space and facilities over the timeframe of the plan. In relation to publicly accessible open space in particular it has been possible to categorise this space according to its size, function and catchment, based on the hierarchy established in the London Plan (see Table 7.2). This has allowed the Council to distinguish between those sites lower down the hierarchy whose catchment serves a more local need, and those larger sites such as Metropolitan Parks which serve a wider area. Based on this categorisation and the established catchments, it has been possible to map the areas which are accessible to public open space, and by default those areas which are not accessible.

Deficiency in access to local parks for example is mapped in the Green Space Strategy. A similar categorisation has also been used in relation to sites of importance for nature conservation, distinguishing between sites of Metropolitan and Local importance. Redressing need at different levels is therefore recognised, and this approach is reflected through the actions identified in the Green Space Strategy itself and the proposals in the Development Strategy. The approach taken to redressing deficiency in access to nature through the designation of sites of local importance for nature conservation for example is as helpful illustration of this.

- 6.2 In line with the draft NPPF which introduces a new protection for locally important green spaces, the Development Strategy identifies and safeguards a number of locally important sites. These are protected through a range of local open space designations, including for example Public and Community Open Space.
- 6.3 At a borough wide level the Council is relatively well served in terms of open space, although it is acknowledged that there is some spatial variation in provision across the borough. The Development Strategy recognises the constraints on creating new open space, both physical and budgetary. Safeguarding and improving existing open space will therefore often take priority over the creation of new areas. The Green Space Strategy identifies a number of actions to enhance existing open space, and to improve physical access to these areas. The Council have also recently commenced work with Design for London and neighbouring boroughs to develop a green infrastructure plan (All London Green Grid). A key objective of this plan will be to develop better links between our open areas. It is proposed that some contextual text outlining the role of the Green Grid project is inserted in the supporting text of policy 5.5 (see appendix for proposed wording).
- 6.4 Policy 5.5 deals with the full range of open space types, including for food growing. The audit undertaken as part of the Green Space Strategy covered the full typology of open space. Allotments are categorised as Community Open Space. The full list of sites including any boundary revisions etc are detailed in Appendix 1, Table 3 of Background Paper 3 (EB26). Provision standards for open space, including allotments will be included in the emerging Development Management DPD (see local policy 7D). Provision requirements will be calculated on the basis of the size and type of development. This policy will also provide guidance on how standards should be adjusted in order to reflect deficiency, and in which cases it will be acceptable to accept off-site provision or contributions to improve the quality of existing (including investing in adjoining open space), should it not be possible to achieve standards on site, or to make quantitative provision off-site.

7 Outdoor Sports and Active Recreation

11. Whether a spatial policy for the safeguarding of outdoor, community sports facilities is necessary and, if so whether or not this is adequately provided for in the policies in chapter 5.

- 7.1 With regards to the use of open space for active recreation, the Council commissioned a Playing Pitch and Outdoor Sports Strategy in 2007. This strategy was prepared in accordance with the principles and methodology outlined in Sport England's 'Towards a level Playing Field: A guide to the production of playing pitch strategies'. Since early 2008 Ealing have been engaged with Sport England in its Facilities Improvement Service (FIS) programme which seeks to support local authorities in their strategic planning for sports and recreation. As part of this programme of support consultants appointed by Sport England have assisted the Council in reviewing its strategy for sports including updating the 2007 Playing Pitch Study. This update was published in February 2009. A key area of focus in undertaking this update has been to model/project demand over the life of the plan. The previous 2007 strategy only covered the period up to 2013. This update now analyses need up to 2021. It was not possible to extend this update to cover the full plan period up to 2026 because of limitations with the modelling software.
- 7.2 The findings of the FIS work to date are now carried forward into a Sports Facilities Strategy for Ealing, covering all facilities both indoor and outdoor, and whether publicly or privately managed.
- 7.3 Whilst the Sports Facilities Strategy identifies an as yet unmet demand for certain sports over the plan period, the strategy for redressing this demand can be achieved through focusing on existing facilities and their management to optimise the available space, rather than a need to create new space. The Action Plan at the end of the Facilities Strategy identifies opportunities to re-configure existing pitches, adapt uses, accommodate ATP's, adjust opening hours/club use etc, with the intention of increasing capacity, and to meet identified needs. The list of actions and categorisation of sites is indicative only at this stage. It is intended that this list effectively forms a 'Living Document' and will be updated on a periodic basis. The supporting text to policy 5.6 gives a flavour of some of the priority actions, although it should be noted that this represents a snapshot in time only.
- 7.4 Whilst policy 5.6 only defines and maps strategic sites, the scope of this policy applies to the whole network of sports grounds. Accordingly protection is afforded to all sites, and opportunities to secure improvements across the full hierarchy of sites will be sought. In fact all sports grounds are designated as Community Open Space as illustrated

on Map 8. For the purpose of clarity the Council could add reference to this position in the supporting text of policy 5.6 (See appendix 5 for proposed wording).

- 7.5 In respect of the Strategic Sites, these are sites comprising a number of pitches, accommodating a range of sports and used by a number of organisations and clubs. These sites also offer the greatest potential for improvement/enhancement during the plan period, including possible intensification of uses. Spatially the existing list also represent a broad distribution across the borough. A number of representors (54, 165) have suggested some additions to the list of strategic sites. The Council have considered these sites against the definition of a strategic site, and accept that two of the sites (Old Actonians & Brentham Sports Club) do in fact now satisfy the criteria for inclusion. Accordingly, the Facilities Strategy, map 8 and the supporting text to policy 5.6 should be updated (see appendix 5 for proposed changes).
- 7.6 The Council's position with respect to Twyford Avenue Sports Ground is dealt with in its response to representation 378.

8 Burial Provision

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.

- 8.1 Whilst it is feasible that this could be addressed through the Development Sites DPD, the Council would query whether cemeteries are an appropriate use for inclusion in the Development Sites DPD.

9 Heritage

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

- 9.1 The Council's position with regard to heritage land is comprehensively dealt with in its response to representation reference 625. For ease of reference the extracted text from EAL12b is provided in appendix 4. The Council in response to this particular representation suggested a minor change to the opening text of chapter 5. Unfortunately this change was accidentally omitted from the final submission draft. It is proposed that this now be re-inserted as originally intended.

10 Conclusions

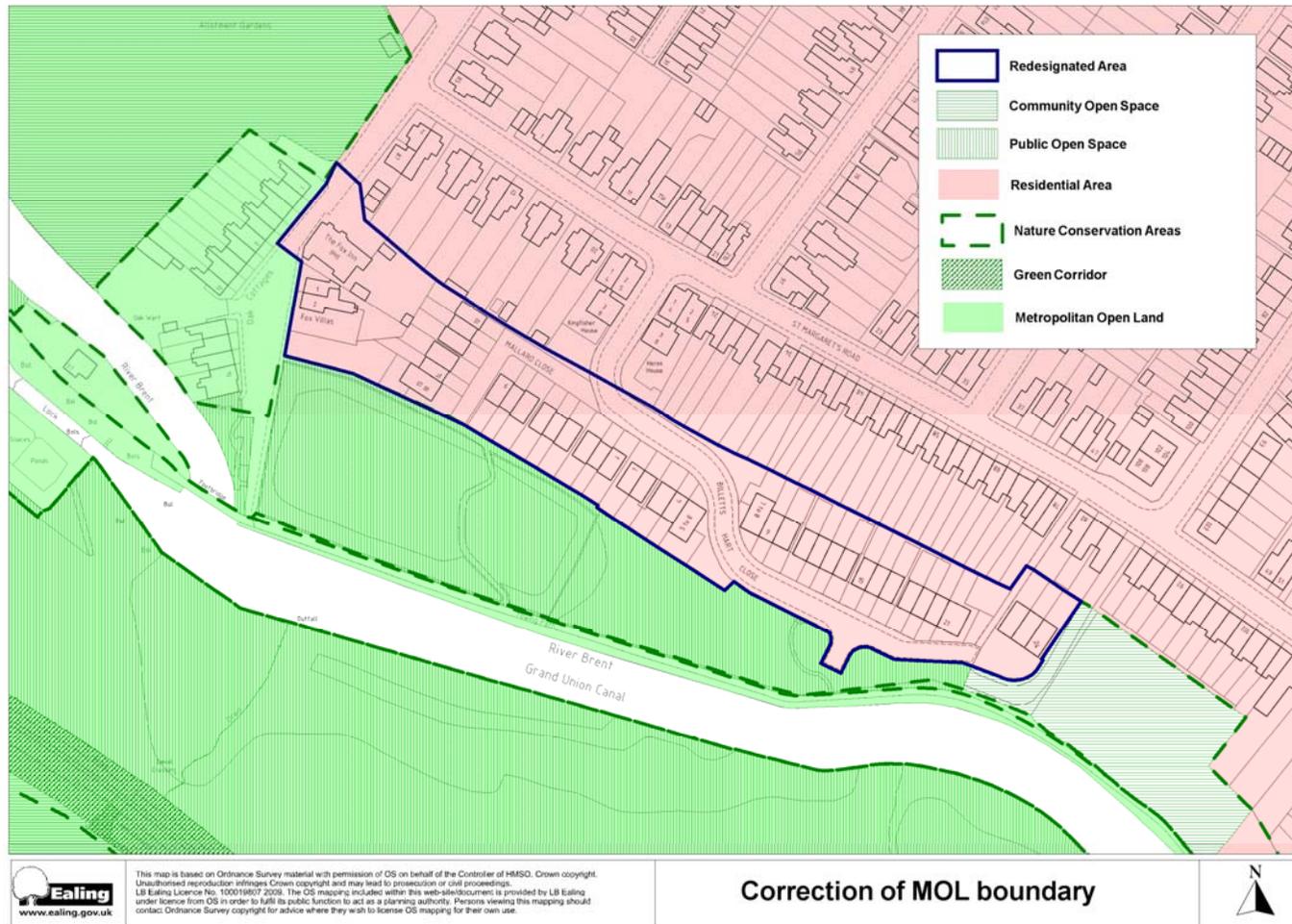
- 10.1 A number of changes/corrections are identified above. For ease of reference the Council have included chapter 5 in its entirety, incorporating these additional changes (denoted in underline and blue).

Appendix 1 – Additional mapping corrections

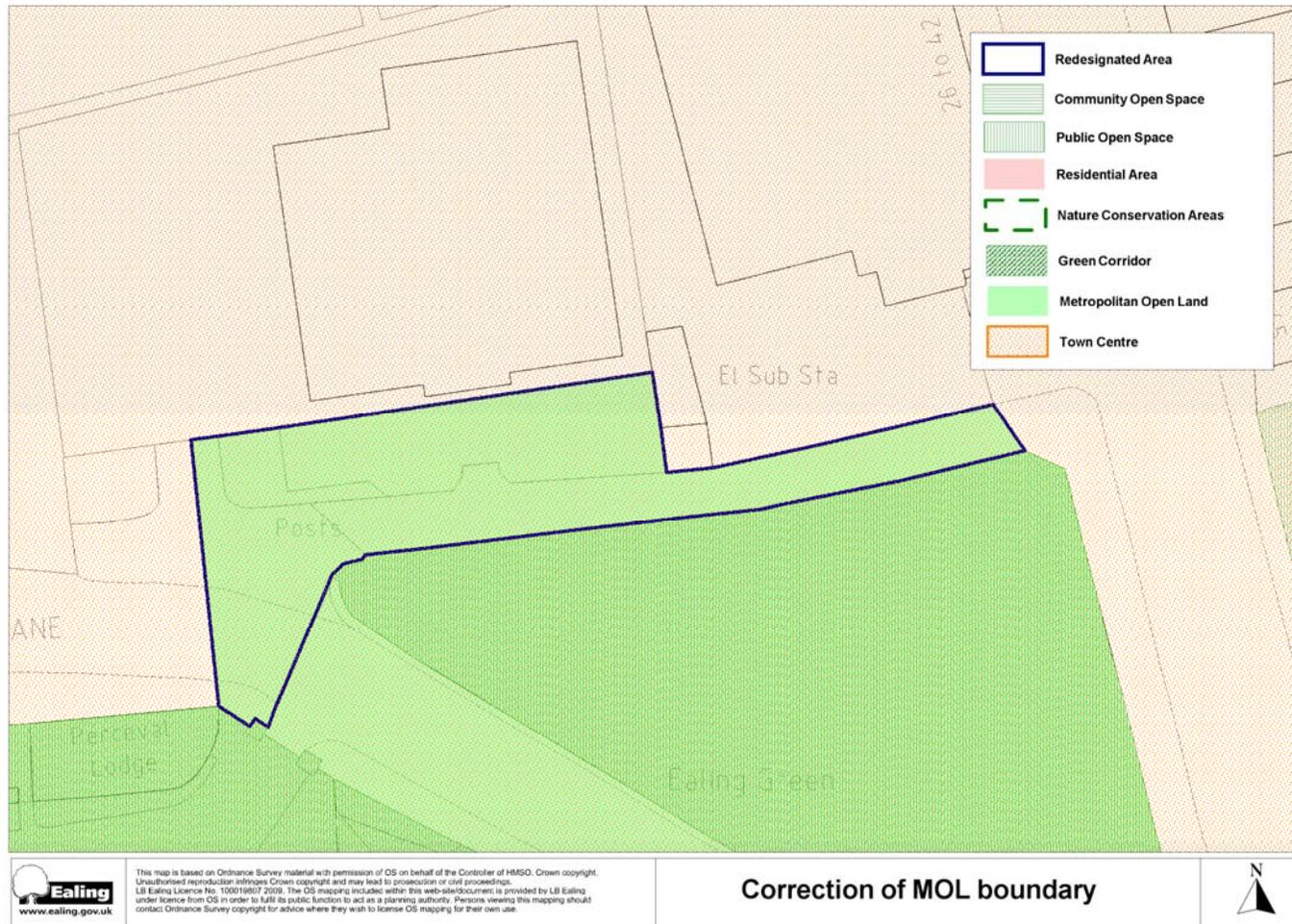
Table 1 – Additional mapping changes

Policy/ Paragraph	Suggested Change	Reason For Change
Atlas of Changes to the Proposals Map/ Map 8	Amend MOL boundary, removing properties at Billets Hart Close and land adjoining no. 2 Fox Villas. Re-designate as 'Residential Area'.	To update the proposals map following the implementation of the residential development at Billets Hart Close.
Atlas of Changes to the Proposals Map/ Map8	Amend MOL boundary of Ealing Green removing the forecourt area of 'Flavas' and footpath on the north side of Ealing Green.	To correct a cartographical error on the 2004 UDP Proposals Map.
Atlas of Changes to the Proposals Map/ Map 8	Further revisions to Community Open Space boundary for the South Acton Allotments to reflect the actual boundaries of the consented scheme.	To reflect the actual boundaries of the outline consent for the South Acton Estate.
Atlas of Changes to the Proposals Map/ Map 8	Popefield Playing Fields – Re-designate the whole site as Community Open Space.	To reflect the current use of the site as both allotments and as a sports ground.

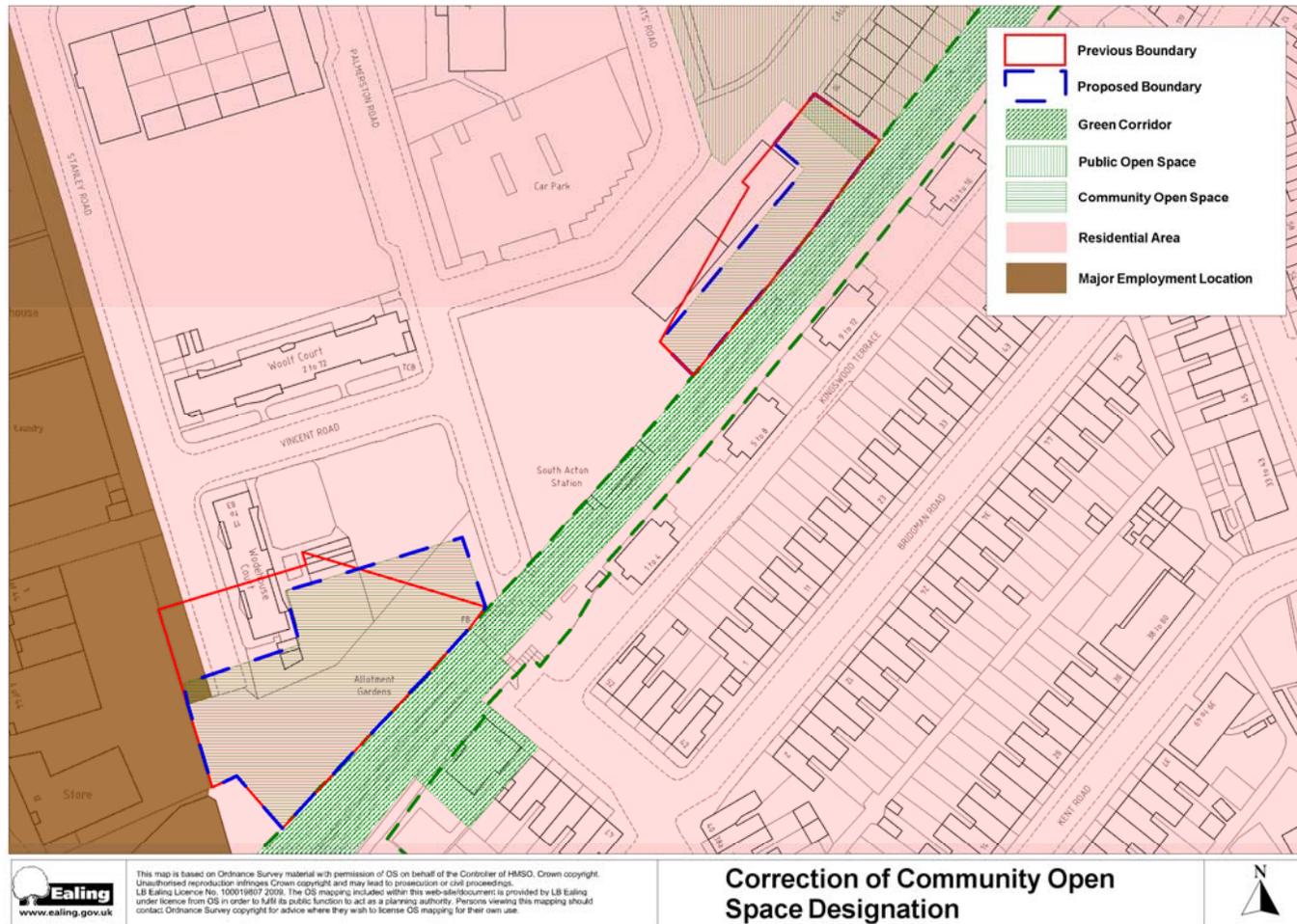
*Addendum to Atlas of Proposed Changes to the Adopted UDP Proposals Map 2004
Removal of Metropolitan Open Land designation from Billets Hart Close*



*Addendum to Atlas of Proposed Changes to the Adopted UDP Proposals Map 2004
Removal of Metropolitan Open Land designation – Footpath north side of Ealing Green*



*Addendum to Atlas of Proposed Changes to the Adopted UDP Proposals Map 2004
Boundary correction to community open space designation – South Acton Allotments (Map 17)*



Appendix 2 – Green Corridor

Table 2 – Extract from EAL12b

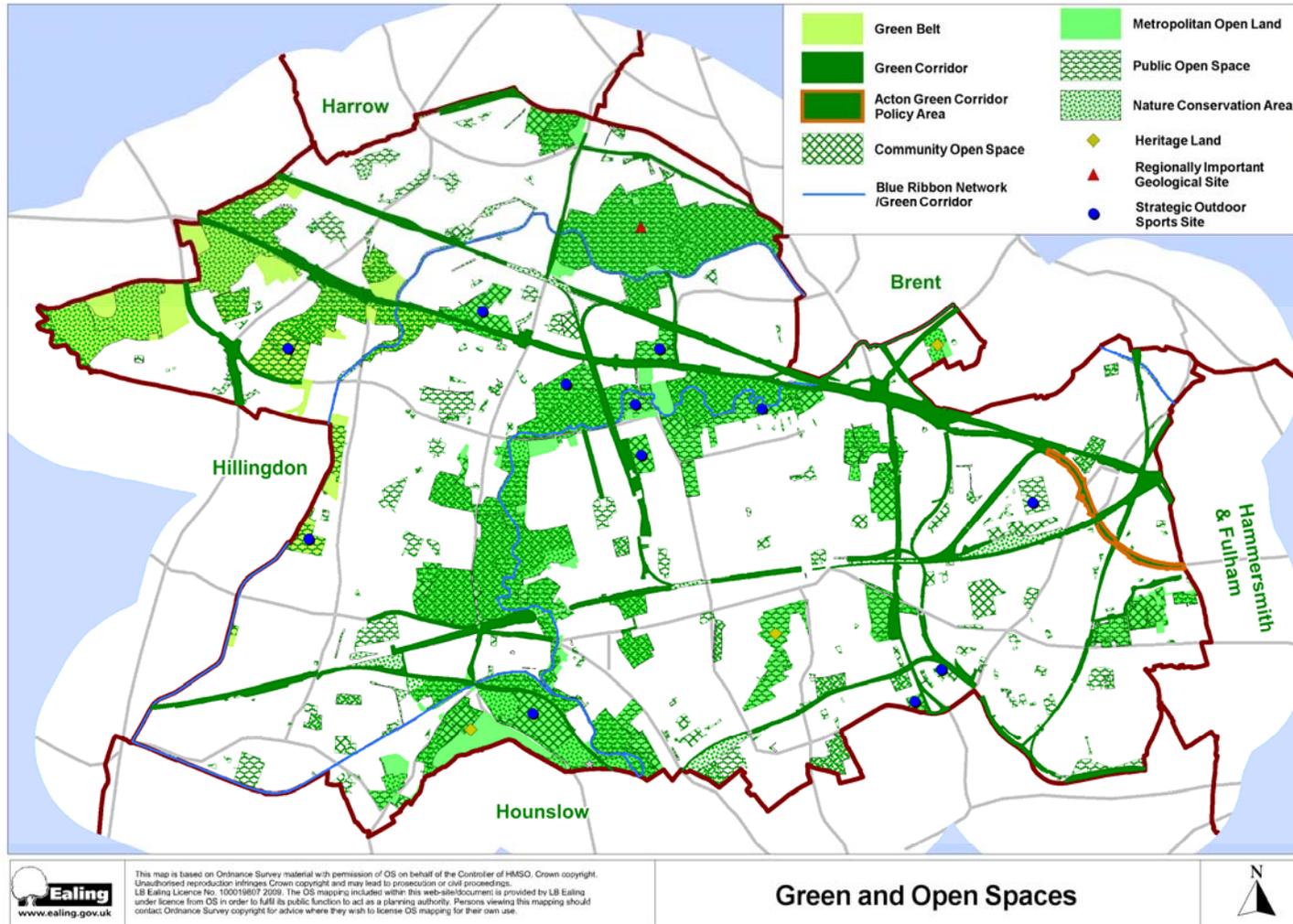
Representation Number (Name)	Policy/Chp	Council's Response	Change
63, 62, 284, 306, 443, 536, 581, 794	3.1, 5.3	<p>Ealing has a network of Green Corridors across the borough. The green corridors provide important links between networks of strategic open spaces providing environmental, recreational and infrastructure facilities. The green corridors comprise roads, railways, walking and cycle routes, and corridors for the movement of wildlife. Final Proposal 5.3 is an overarching policy covering the full extent of the Green Corridor network across the borough. The Council however recognise the unique circumstances that exist with regard to the Acton A40 part of the Green Corridor network, in that this section of the Green Corridor is still to be delivered. Whilst there is presently a policy presumption against built development within the Green Corridor, established in UDP policy, and proposed to be taken forward as a new local policy in the Development Management DPD, the Council recognises that the delivery of the A40 Acton Green Corridor in the form of an enhanced landscape strip, improved cycleway/pedestrian route, and an improved noise environment will most likely be dependent on and enabled by some development on parts of the sites defined as Green Corridor. This position has been tested on appeal, where it has been acknowledged that some encroachment of the Green Corridor may be necessary to enable its delivery, and can be accommodated without compromising the delivery of the Green Corridor objectives. A further planning application was submitted in 2007, however this was refused on Green Corridor grounds. The UDP map shows a Green Corridor of approximately 25m deep in the Acton area. Similarly SPG 22 defined the Green Corridor, based on a 25m deep strip (measured from the edge of the highway), allowing adequate space for footpaths and cycleways (approx. 4-6m width) and landscaping, planting and mounding (18-20m). This measurement was based on the depth of an established Green Corridor created along the Hayes By Pass. It is recognised however that the focus of this delivery of the Green Corridor should be on a qualitative rather than a quantitative approach. With regard to the A40 Acton Green Corridor, the Council acknowledges that a distinction should be made in the policy and on the Proposals Map to recognise that this section of the Green Corridor network is unique from the rest of the network in that it is yet to be</p>	<p>Change - The Council recommends a change to Map 8 and the supporting text of Final Proposals 5.3 to recognise the distinction between the A40 Acton section of the Green Corridor and the rest of the network. Map 8 to be amended to include a different notation for the section of the A40 Green Corridor east of the Guinness Mounds to the borough boundary. Add new footnote to Final Proposal 3.1 as follows: '69 'Further detail regarding the delivery of enhanced greening opportunities, including an improved cycle/pedestrian environment, along the eastern end of the corridor is detailed in Final Proposal 5.3, and the emerging Development Management and Development Sites DPD's'.</p> <p>Delete existing supporting text to policy 5.3 (Minor Change). The replacement supporting text to policy 5.3 should acknowledge that some enabling development may be appropriate and define the key objectives which it will expect any development proposal to adhere to. The proposed wording for this supporting text is as follows: 'Green Corridors provide important links between networks of strategic open space in the borough. They comprise roads, railways, walking and cycle routes and corridors for the movement of wildlife. Whilst the vast majority of the Green Corridor network already exists on the ground, and will continue to be safeguarded as such, a section of the corridor east of Guinness Mounds to East Acton remains unimplemented. This is illustrated on Map 8. The delivery of this section of the Green Corridor, in the form of an enhanced landscape strip, improved cycleway/pedestrian route, and an improved noise environment will most likely be dependent on and enabled by some development on parts of the land defined as Green Corridor. The delivery of this corridor should contribute to the following key objectives/aims:</p> <ul style="list-style-type: none"> - Through enhanced landscaping transform this section of the A40, in order to deliver improvements to the appearance and quality of the experience of the A40 for all users, including residents, drivers, pedestrians, cyclists and wildlife passing along or crossing the A40. - Reduce the adverse effects arising from the A40, particularly in terms of noise and air quality - Improve personal security – actual and perceived - Enhance biodiversity. - Promoting alternative transport, particularly through an improved walking/cycling environment. <p>The delivery of these Green Corridor objectives however also need to be balanced against the need to create quality development, including the need to provide for adequate servicing, private amenity space, and to maintain adequate separation distances in the interests of privacy. In this regard development proposals will also need to be judged against the criteria within the new Green Corridor policy of the emerging Development Management DPD, and the Development Sites DPD, which will provide further detail with regard to the type and scale of development which may be considered acceptable in relation to individual sites</p>

Representation Number (Name)	Policy/Chp	Council's Response	Change
		delivered. Moreover, the policy should acknowledge that some enabling development may be acceptable in this part of the corridor. This policy should also be read in conjunction with final proposal 3.1 'Realising the potential of the A40 Corridor & Park Royal', the Proposed emerging policies of the Development Management DPD, and the Development Sites DPD.	along this stretch of the Green Corridor.
278, 304, 438, 579, 280, 440	3.1, 5.3	With regard to the A40 Green Corridor in Acton, the area defined as Green Corridor in the Development Strategy remains unchanged from that established in the 2004 UDP and SPG22. This is illustrated on Map 8 of the Development Strategy. On average this measures 25m in depth. The basis for this measurement is set out in SPG 22. It should be noted however that this dimension was not intended as a hard and fast requirement. The intention of the UDP & SPG policy was to ensure that the depth of the Green Corridor is substantial enough to effect a significant transformation of this corridor. The Council's preferred approach is to define the key development principles/design parameters within the Development Strategy which it would expect any development proposals to adhere to. The next iteration of the Development Management DPD, will include more detailed criteria to guide consideration of planning applications, which either adjoin or directly affect the Green Corridor network.	<p>Change - The Council recommends a change to Map 8 and the supporting text of Final Proposals 5.3 to recognise the distinction between the A40 Acton section of the Green Corridor and the rest of the network. Map 8 to be amended to include a different notation for the section of the A40 Green Corridor east of the Guinness Mounds to the borough boundary. Add new footnote to Final Proposal 3.1 as follows: '69 'Further detail regarding the delivery of enhanced greening opportunities, including an improved cycle/pedestrian environment, along the eastern end of the corridor is detailed in Final Proposal 5.3, and the emerging Development Management and Development Sites DPD's'.</p> <p>Delete existing supporting text to policy 5.3. The replacement supporting text to policy 5.3 should acknowledge that some enabling development may be appropriate and define the key objectives which it will expect any development proposal to adhere to. The proposed wording for this supporting text is as follows: 'Green Corridors provide important links between networks of strategic open space in the borough. They comprise roads, railways, walking and cycle routes and corridors for the movement of wildlife. Whilst the vast majority of the Green Corridor network already exists on the ground, and will continue to be safeguarded as such, a section of the corridor east of Guinness Mounds to East Acton remains unimplemented. This is illustrated on Map 8. The delivery of this section of the Green Corridor, in the form of an enhanced landscape strip, improved cycleway/pedestrian route, and an improved noise environment will most likely be dependent on and enabled by some development on parts of the land defined as Green Corridor. The delivery of this corridor should contribute to the following key objectives/aims:</p> <ul style="list-style-type: none"> - Through enhanced landscaping transform this section of the A40, in order to deliver improvements to the appearance and quality of the experience of the A40 for all users, including residents, drivers, pedestrians, cyclists and wildlife passing along or crossing the A40. - Reduce the adverse effects arising from the A40, particularly in terms of noise and air quality - Improve personal security – actual and perceived - Enhance biodiversity. - Promoting alternative transport, particularly through an improved walking/cycling environment. <p>The delivery of these Green Corridor objectives however also need to be balanced against the need to create quality development, including the need to provide for adequate servicing, private amenity space, and to maintain adequate separation distances in the interests of</p>

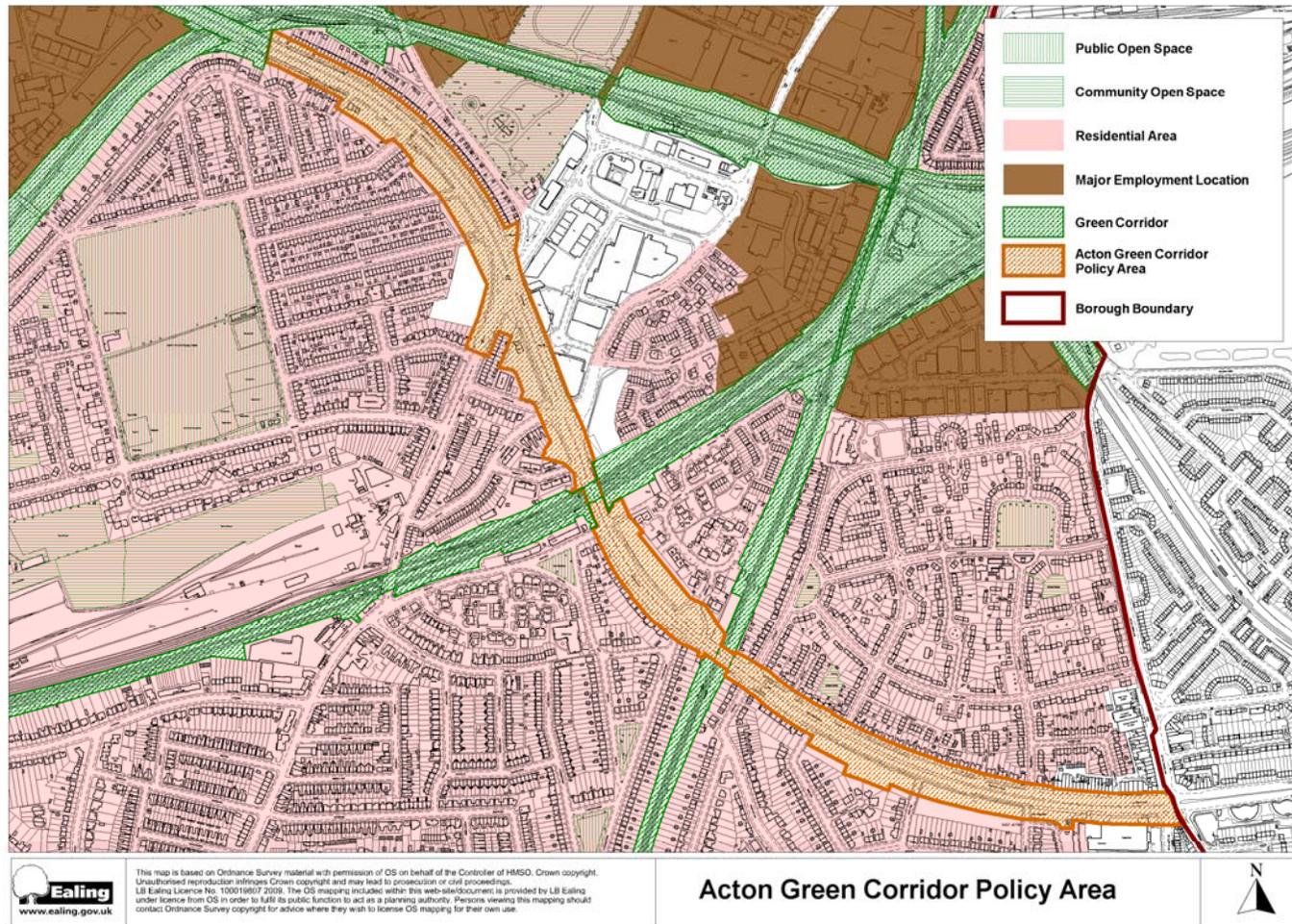
Representation Number (Name)	Policy/Chp	Council's Response	Change
			privacy. In this regard development proposals will also need to be judged against the criteria within the new Green Corridor policy of the emerging Development Management DPD, and the Development Sites DPD, which will provide further detail with regard to the type and scale of development which may be considered acceptable in relation to individual sites along this stretch of the Green Corridor.
387	5.3	Green Corridors provide important links between the network of strategic open spaces. In the case of the A40 Green Corridor its primary purpose is to enhance the appearance of this important transport route through landscaping and planting. A secondary but valuable purpose of providing a green corridor is to provide an environmental screen alongside the road to protect adjoining areas from noise, fumes and visual intrusion. The Green Corridor may also function as a wildlife corridor facilitating the movement and migration of wildlife between the open areas, which it connects. It is recommended that additional supporting text be added to this proposal which identifies the different functions/objectives of the Green Corridor network, including that of a wildlife corridor.	<p>Change - The Council recommends a change to Map 8 and the supporting text of Final Proposals 5.3 to recognise the distinction between the A40 Acton section of the Green Corridor and the rest of the network. Map 8 to be amended to include a different notation for the section of the A40 Green Corridor east of the Guinness Mounds to the borough boundary. Add new footnote to Final Proposal 3.1 as follows: '69 'Further detail regarding the delivery of enhanced greening opportunities, including an improved cycle/pedestrian environment, along the eastern end of the corridor is detailed in Final Proposal 5.3, and the emerging Development Management and Development Sites DPD's'.</p> <p>Delete existing supporting text to policy 5.3 (Minor Change). The replacement supporting text to policy 5.3 should acknowledge that some enabling development may be appropriate and define the key objectives which it will expect any development proposal to adhere to. The proposed wording for this supporting text is as follows: 'Green Corridors provide important links between networks of strategic open space in the borough. They comprise roads, railways, walking and cycle routes and corridors for the movement of wildlife. Whilst the vast majority of the Green Corridor network already exists on the ground, and will continue to be safeguarded as such, a section of the corridor east of Guinness Mounds to East Acton remains unimplemented. This is illustrated on Map 8. The delivery of this section of the Green Corridor, in the form of an enhanced landscape strip, improved cycleway/pedestrian route, and an improved noise environment will most likely be dependent on and enabled by some development on parts of the land defined as Green Corridor. The delivery of this corridor should contribute to the following key objectives/aims:</p> <ul style="list-style-type: none"> - Through enhanced landscaping transform this section of the A40, in order to deliver improvements to the appearance and quality of the experience of the A40 for all users, including residents, drivers, pedestrians, cyclists and wildlife passing along or crossing the A40. - Reduce the adverse effects arising from the A40, particularly in terms of noise and air quality - Improve personal security – actual and perceived - Enhance biodiversity. - Promoting alternative transport, particularly through an improved walking/cycling environment. <p>The delivery of these Green Corridor objectives however also need to be balanced against the need to create quality development, including the need to provide for adequate servicing, private amenity space, and to maintain adequate separation distances in the interests of privacy. In this regard development proposals will also need to be judged against the criteria within the new Green Corridor policy of the emerging Development Management DPD, and</p>

Representation Number (Name)	Policy/Chp	Council's Response	Change
			the Development Sites DPD, which will provide further detail with regard to the type and scale of development which may be considered acceptable in relation to individual sites along this stretch of the Green Corridor.

Map 8 – Green and Open Spaces in Ealing (Revised) denoting new Acton Green Corridor Policy Area



Addendum to Atlas of Proposed Changes to the Adopted UDP Proposals Map 2004 denoting the extent of the Acton Green Corridor Policy Area



Appendix 3 – Blue Ribbon Network

Table 3 – Extract from EAL12b

Representation Number (Name)	Policy/Chp	Council's Response	Change
453	3.3	Agreed, an additional point should be added promoting the use of the canal for the transport of freight. See also Development Management Policies 7.26 and 7.30.	Change - agreed that additional bullet (f) is added promoting the use of the canal for the transport of freight: 'To promote the use of the Grand Union Canal for freight transport'.
454	3.4	The principle of promoting the blue ribbon network is supported, although it is noted that the scope of final proposal 3.4 is limited to that of the Southern Gateway area, which is some distance away from the canal or river network.	Change – Add reference in 5.3 to read 'Green Corridors and Blue Ribbon network in the borough...' Add Blue Ribbon network (Canal and River Brent) to Key Diagram (Map 3) and Map 7. Add new bullet 4.4 (i) To promote use of the Blue Ribbon network for freight and recreation use.
171	5.4	There are significant extensions proposed to the network of nature conservation sites, particularly around the Brent River Park area. Based on these extensions the full extent of the River itself within Ealing is covered by SINC/SMI designations. The lack of reference to the river itself within the policy text is acknowledged and it is agreed that this should be redressed particularly with reference to Policies 5.2(f), 5.3(d) & 5.4 (e). With reference to 5.4 it is proposed that the policy be broadened to include reference to the Blue Ribbon network, i.e. the canal/river corridors. Under policy 5.3(d) the following additions are proposed: '5.3(d) River Brent: management of the corridor (including the river itself) from the northern boundary of Brent River Park to the borough boundary, particularly for nature conservation & flood management purposes'. Moreover, it should be noted that both the emerging Development Management DPD and Replacement London Plan, comprise various policies relating to the Blue Ribbon network. Policy 7.28 of the Development Management DPD for example requires development proposals to restore and enhance the Blue Ribbon Network by increasing habitat value.	Minor Changes proposed (for clarification) - With reference to 5.4 it is proposed that the policy be broadened to include reference to the Blue Ribbon network, i.e. the canal/river corridors. Suggested text change as follows to Final Proposal 5.4(a) as follows: 'Biodiversity will be considered in the management of all green spaces, and the network of waterways, including parks, gardens,..' Under policy 5.3(d) the following additions are proposed: '5.3(d) River Brent: management of the corridor (including the river itself) from the northern boundary of Brent River Park to the borough boundary, particularly for nature conservation & flood management purposes'.
170		There are significant extensions proposed to the network of nature conservation sites, particularly around the Brent River Park area. Based on these extensions the full extent of the River itself within Ealing is covered by SINC/SMI designations. The lack of reference to the river itself within the policy text is acknowledged and it is agreed that this should be redressed particularly with reference to Policies 5.2(f), 5.3(d) & 5.4 (e). With reference to 5.4 it is proposed that the policy be broadened to include reference to the Blue Ribbon network, i.e. the canal/river corridors. Under policy 5.3(d) the following additions are proposed: '5.3(d) River Brent: management of the corridor (including the river itself) from the northern boundary of Brent River Park to the	Minor Changes proposed (for clarification) - With reference to 5.4 it is proposed that the policy be broadened to include reference to the Blue Ribbon network, i.e. the canal/river corridors. Suggested text change as follows to Final Proposal 5.4(a) as follows: 'Biodiversity will be considered in the management of all green spaces, and the network of waterways, including parks, gardens,..' Under policy 5.3(d) the following additions are proposed: '5.3(d) River Brent: management of the corridor (including the river itself) from the northern boundary of Brent River Park to the borough boundary, particularly for nature conservation & flood management purposes'.

Representation Number (Name)	Policy/Chp	Council's Response	Change
		borough boundary, particularly for nature conservation & flood management purposes'. Moreover, it should be noted that both the emerging Development Management DPD and Replacement London Plan, comprise various policies relating to the Blue Ribbon network. Policy 7.28 of the Development Management DPD for example requires development proposals to restore and enhance the Blue Ribbon Network by increasing habitat value.	
461	Appendix 3	Agreed, the role of the Canal should be reviewed in relation to each of the neighbourhood areas.	Minor Change - proposed text to follow

Appendix 4 - Heritage

Table 4 – Extract from EAL12b

Representation Number (Name)	Policy/Chp	Council's Response	Change
625	5	<p>Only a handful of open space sites are also recognised for their heritage value. These sites are designated as Heritage Land, and may also be listed on English Heritage's Gardens of Special Historic Interest Register. Map sheet 8 identifies heritage land in the borough. The open space proposals identified in chapter 5 of the Development Strategy recognise the heritage value of individual sites, for example in relation to Twyford Abbey, Walpole Park etc. Additional text could be added to the opening statement of chapter 5, which recognises the heritage value of parts of the open space network as follows:</p> <p>'Ealing's metropolitan open areas and green corridors provide the boundaries of residential and business areas, and enhance the A40 and Uxbridge Road corridors. There are also many valuable parks and small incidental green spaces which add distinctive character to the borough's neighbourhoods; provide recreation and children's play space; provide an opportunity for food growing; form a habitat for wildlife; contribute to the historic environment; and are also important in addressing climate change forming an important carbon sink, and improving air quality.</p> <p>As is the case with other heritage assets - listed buildings, ancient monuments etc - the Development Sites document will identify any relevant heritage assets pertaining to that site (in text, and on a plan), along with consideration of their particular sensitivities and opportunities in relation to the development of the site. Further reference could also be added to Heritage Land as part of the Heritage policies set out in the Development Management DPD.</p>	<p>Minor change (for clarification) - recommend additional text to be added to the opening statement of chapter 5 as follows: 'Ealing's metropolitan open areas and green corridors provide the boundaries of residential and business areas, and enhance the A40 and Uxbridge Road corridors. There are also many valuable parks and small incidental green spaces which add distinctive character to the borough's neighbourhoods; provide recreation and children's play space; provide an opportunity for food growing; form a habitat for wildlife; contribute to the historic environment; and are also important in addressing climate change forming an important carbon sink, and improving air quality.</p>

Appendix 5 – Chapter 5 incorporating additional proposed changes

CHAPTER 5: PROTECTING AND ENHANCING EALING'S GREEN AND OPEN SPACES

Ealing's metropolitan open areas and green corridors provide the boundaries of residential and business areas, and enhance the A40 and Uxbridge Road corridors. The amount and quality of green space in Ealing is considered to be one of its many attractions. There are 19 major open areas in the borough (designated green belt or metropolitan open land) and a total of ~~8.4~~ 9.75 square kilometres of parks and green spaces – ~~45~~ 17 per cent of the total borough's land. There are some 10 miles of canals in the borough as well as the rivers Brent and Crane and other smaller rivers and tributaries. Map 8 shows green and open space in the borough.

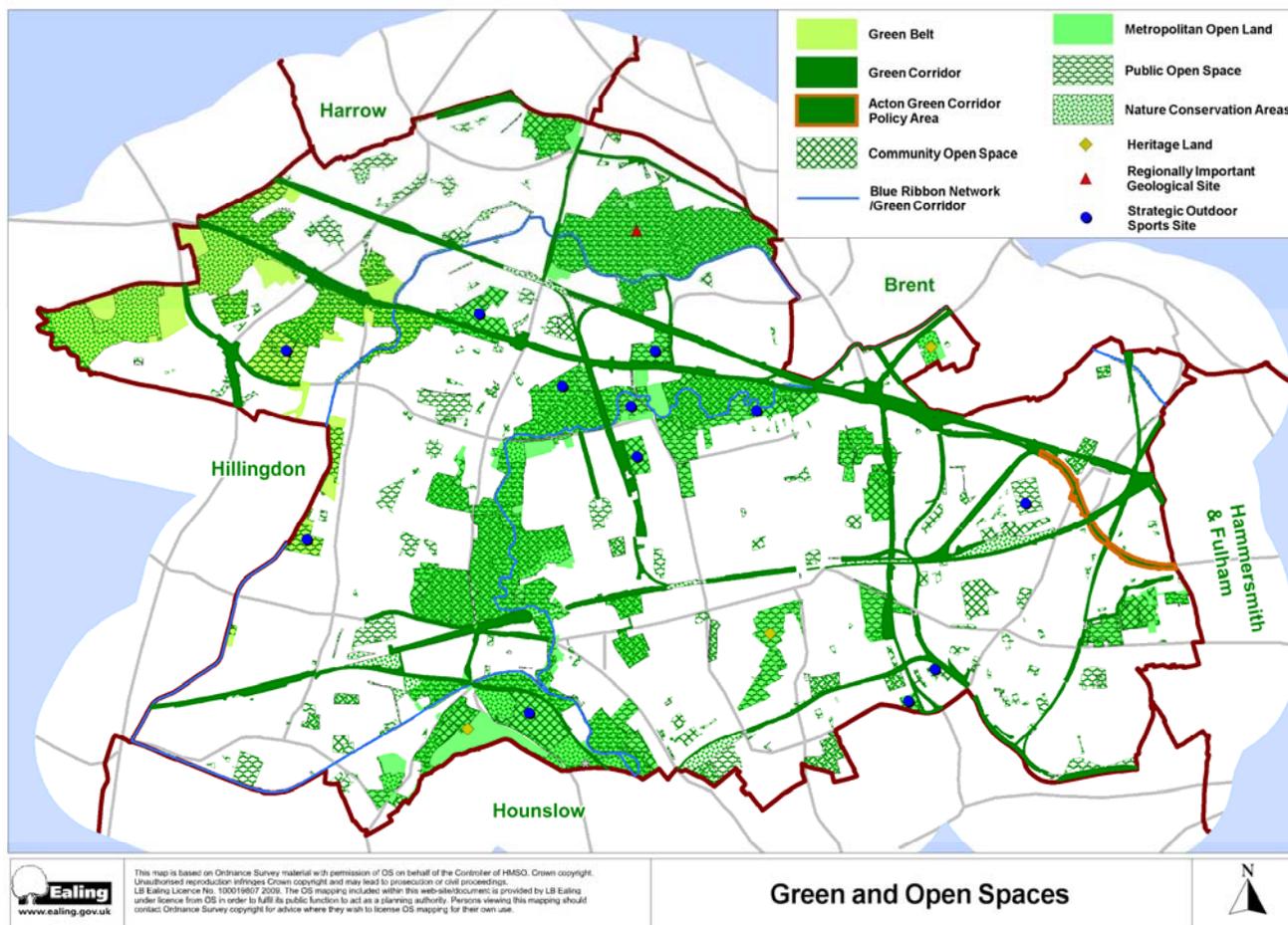
Ealing's metropolitan open areas and green corridors provide the boundaries of residential and business areas, and enhance the A40 and Uxbridge Road corridors. There are also many valuable parks and small incidental green spaces which add distinctive character to the borough's neighbourhoods; provide recreation and children's play space; provide an opportunity for food growing; form a habitat for wildlife; [contribute to the historic environment](#); and are also important in addressing climate change forming an important carbon sink, and improving air quality.

Open spaces provide a respite from the hustle and bustle of city life, which is beneficial to health and can instill a sense of calm into the lives of people visiting them. Quiet or relative quiet can be key in determining the tranquility of an open space. Preserving this quiet through the identification and designation of quiet areas or zones is an important step in ensuring that residents enjoy this important amenity on their doorsteps.

As Ealing becomes more densely developed, the need for open space will inevitably grow and green space will become an ever more valuable resource. The need to protect established sites, enhance the quality and value of existing sites, including improving access to this network and identifying new green spaces will be essential.

This Development Strategy recognises the constraints on creating new open space, both physical and budgetary. Safeguarding and improving existing open space will therefore often take priority over the creation of new areas. Plans for building much needed housing and other development will not mean building on green space.

Map 8: Green and Open Spaces in Ealing



Policy 5.1

Protect and Enhance Metropolitan Green Belt

The council in seeking to enhance the network of Green Belt in the borough will promote the following proposals:

(a) Land in Northolt South

- Down Barns & Willow Tree Open Space: management for agriculture (Down Barns), West London Shooting Range (Down Barns), landscape interest & protection of moated manor site (Down Barns).

(b) Land around the A40 – Northolt, Greenford

- Land from Lime Trees Park to the A40: management of recreational open space, golf course and education site;
- Western Avenue Parkway from borough boundary east to ~~Oldfield Lane~~ [Long Drive](#): landscaping of open land; creation of cycle routes ~~sensitive development of site for high school within green belt setting where A40 crosses Oldfield Lane.~~
- Northolt and Greenford Countryside Park: [Management as a Metropolitan Park](#); development of a unified parkland area, and visitor centre at Northala Park
- Northolt Golf Course and Medlar Fields – golf, new wetland/watercourses.
- Rectory Field – development of play facilities and five-a-side football.
- Islip Manor: management of recreation & education open space [\(as District Park\)](#).

(c) Land in Greenford Southall Borders

- Spike's Bridge – King George's field: development of a district park linking with open space across the canal in Hillingdon, including the refurbishment or replacement of the sports pavilion and other buildings.

In addition to projects and management matters referred to above, all Green Belt sites will be managed for informal recreation uses, the protection of nature conservation interests and the council will seek to enhance pedestrian and cycle links.

Policy 5.2

Protect and Enhance Metropolitan Open Land (MOL)

The council in realising the potential of the network of Metropolitan Open Land in the borough will promote the following proposals:

(a) Acton Park – ~~development of a district park encompassing~~ [Management as](#) public parkland and private playing fields.

(b) Land in Park Royal:

- Twyford Abbey – creation of public park to serve residents and workers, consistent with Heritage Land designation.

(c) Land along A406:

- Hanger Hill – development of a district park, encompassing the public park, former Fox Reservoir and playing fields; management of the remainder of the land for nature conservation, and beech planting alongside North Circular Road.
- Ealing Common – management for informal recreation, amenity nature conservation and occasional public events.

(d) Ealing Green, Walpole Park, Culmington tennis enclosure and Lammas Park – integrated management as a district park, protecting its historic park and heritage land status (Walpole Park). Refurbishment of Buildings at Lammas Park.

(e) Hanwell cemeteries: maintenance of nature conservation value and dignity of secluded cemeteries with eventual possibility of open space use; public realm improvements along A4020 frontages.

(f) Brent River Park and adjacent MOL (see also Policy 2.9 above):

- Brent River Park (BRP) - sensitive management of this public parkland for amenity, nature conservation use, and as flood plain; scope for more intensive outdoor recreation uses in the vicinity of Gurnell pool, subject to addressing flood risk issues; improved athletics track and sports facilities. Refurbishment of stable block and animal centre
- Norwood Green – Osterley: farm management to enhance nature conservation, education, tourism and recreation, including respecting heritage land designation due to association with Osterley Park.

(g) Horsenden Hill Metropolitan Park: management for nature conservation and informal recreation; protection and enhancement of the canal side, with improved community facilities at Horsenden Farm. Refurbishment of bowling green clubhouse and changing rooms, and installation of a MUGA.

[\(h\) Land around the A40 - Greenford: Management for recreation, nature conservation and flood risk management.](#)

Policy 5.3

Protect & Enhance Green Corridors

The council in seeking to protect and promote the network of Green Corridors [and Blue Ribbon Network](#) in the borough will promote the following proposals for enhancement:

(a) Grand Union Canal (including the towpath, associated land and small-related areas): protection as a nature conservation Site of Metropolitan Importance and an urban conservation area, and towpath upgrades and promotion as a cycle route for both leisure and commuting.

(b) Railway lines i.e. 'overground' lines (main inter-city line, Greenford Branch Line, North London Line, Marylebone Line and Brentford Line) and London Underground lines (Central, District and Piccadilly lines): management of green cuttings, embankments and verges with broadening when adjacent to green space.

(c) Road Network: protection and enhancement of landscaped corridors, including additional planting where possible. Where feasible footpaths and cycle paths to be incorporated within the corridor, with landscaping providing a buffer between road edge and paths.

(d) River Brent: management of the corridor (including the river itself) from the northern boundary of Brent River Park to the borough boundary particularly for nature conservation and flood management purposes. Where possible, creation of cycle routes along the river will be considered.

[Green Corridors provide important links between networks of strategic open space in the borough. They comprise roads, railways, walking and cycle routes and corridors for the movement of wildlife. Whilst the vast majority of the Green Corridor network already exists on the ground, and will continue to be safeguarded as such, a section of the corridor just east of Guinness Mounds to East Acton remains unimplemented. This is illustrated on Map 8. The delivery of this section of the Green Corridor, in the form of an enhanced landscape strip, improved cycleway/pedestrian route, and an improved noise environment will most likely be dependent on and enabled by some development on parts of the land defined as Green Corridor. The delivery of this corridor should contribute to the following key objectives/aims:](#)

- [Through enhanced landscaping transform this section of the A40, in order to deliver improvements to the appearance and quality of the experience of the A40 for all users, including residents, drivers, pedestrians, cyclists and wildlife passing along or crossing the A40.](#)
- [Reduce the adverse effects arising from the A40, particularly in terms of noise and air quality.](#)
- [Improve personal security – actual and perceived.](#)
- [Enhance biodiversity.](#)
- [Promoting alternative transport, particularly through an improved walking/cycling environment.](#)

The delivery of these Green Corridor objectives however also need to be balanced against the need to create quality development, including the need to provide for adequate servicing, private amenity space, and to maintain adequate separation distances in the interests of privacy. In this regard development proposals will also need to be judged against the criteria within the new Green Corridor policy of the Development Management DPD, and the Development Sites DPD, which provide further detail with regard to the type and scale of development which may be considered acceptable in relation to individual sites along this stretch of the Green Corridor.

Policy 5.4

Protect the Natural Environment – Biodiversity and Geodiversity

(a) To protect and promote the network of Nature Conservation sites in the borough, through enhancing the natural value of existing sites, and improving access particularly in areas of deficiency. Biodiversity will be considered in the management of all green spaces and the network of waterways, including parks, gardens, private amenity space, cemeteries, green corridors and other incidental areas, and where development is proposed in or adjacent to such spaces.

(b) To protect and enhance Horsenden Hill as a site of regional importance for geo-diversity.

(c) To identify open spaces such as parkland, playing fields, canal and river corridors that are valued for their tranquillity, and designate them as quiet areas in recognition of their intrinsic value and to protect them for future generations

There are ~~96~~103 nature conservation sites in the borough. The majority of these sites are located within parks and open spaces, others are found along rivers, canals and railway lines. Some parks are predominately managed for nature conservation, such as Horsenden Hill. Others have small areas designated as nature conservation areas but are principally a formal urban park. The network of sites for nature conservation indicated in the Development Strategy are based on the Mayor of London's study (2007) and the consideration of the study during the 2007 and 2009 LDF consultation. Particular priority will also be placed on the protection of sites not formally designated for nature conservation importance, including gardens and private amenity space.

The promotion of biodiversity in Ealing includes the protection of habitats of value (as described above), and of priority species identified in Biodiversity Action Plans¹. The protection of these species is the primary reason for having a policy of managing green space throughout the borough in a way that is sensitive to conservation of the natural environment. These measures also seek to address the issue of deficiency in access to nature.

The Mayor has identified areas of deficiency in access to nature for all boroughs in London including Ealing (as part of the London Plan Implementation Report 'Access to nature'). These are defined as localities that are more than one kilometre walking distance from a publicly accessible Site of Borough (Grades I or II) or Metropolitan Importance for Nature Conservation. Sites with restricted access have been excluded from this exercise. Within Ealing there are notable deficiencies to the east of the borough, and in pockets of Southall, including in particular Acton Central, East Acton (part), Ealing Common (part), Ealing Broadway (part), Walpole (part), Perivale (part) and in Southall Broadway. The problem is somewhat masked in Southall with the only access to nature being the narrow canal side green corridor skewing deficiency mapping. Access to nature in the borough will be improved through the following means:

- improving the natural value of an accessible site, or creating new open space, to provide significant experience of nature;
- creating new access points to a site providing a significant experience of nature, or opening up access to a previously restricted site; and,
- improving the walking access through areas surrounding a site, extending the catchment area.

The use of planning gain will also be considered with respect to the creation, improvement and management of wildlife sites.

Within Ealing, a key tool to redress this deficiency has been to identify further sites of Local Importance. These are defined as the best available to alleviate geographic deficiency in access. These sites may also have been selected for their potential for enhancement. In this regard, the Mayor of London has identified priority sites for reducing areas of deficiency. These are sites of Local Importance which have potential to be enhanced to Borough Importance for nature conservation. The following sites have been identified in Ealing for this purpose:

¹ See Ealing Biodiversity Action Plan (2001) and London Biodiversity Action Plan.

- Walpole Park & Lammas Park
- Southall Park Nature Conservation Area
- Rectory Park nature area

Other priority sites for improving access to nature in areas of deficiency in Ealing are identified as follows:

- Pitshanger Park
- Havelock Cemetery
- Acton Park
- Trinity Way Nature area
- North Acton Cemetery
- Southfields Rec. Nature Area
- Ealing Common
- North Acton Playing Fields

The development of opportunity areas², including in particular Southall, must also demonstrate that they would not cause an adverse impact on any European site of nature conservation importance, located in neighbouring boroughs, notably the South West London Water Bodies.

The planning of new development and regeneration should also have regard to the conservation of geological features, and opportunities should be taken to achieve positive gains for conservation through the form and design of development. Where development is proposed which would affect an identified geological site (including in particular Horsenden Hill) the approach should be to seek to avoid adverse impact on the geological interest, and if this is not possible, to minimise such impact and seek to avoid adverse impact on the geological interest. If this is not possible, the approach should be to minimise such impact and seek mitigation of any residual impacts. Horsenden Hill is designated as a Regionally Important Geological Site (RIGS). RIGSs are identified and designated for their strategic importance for geo-diversity (variety of rocks, fossils, minerals, landforms and soils that give character to the natural landscape and environment) across London.

² Both Park Royal and Southall are defined as opportunity areas in the London Plan.

Many people suffer from unwanted noise. Road traffic is a significant source, but aircraft noise and commercial development can also contribute to the ambient noise experienced by many people. Many of the open spaces within the borough provide a refuge from urban noise, and in many cases, it is this absence or the perception of relative quiet that is a key factor in determining whether the area is regarded as tranquil. Identifying and designating quiet area areas, in line with the requirements of the Environmental Noise Directive, will provide a level of protection against the encroachment of unwanted noise.

Policy 5.5

Promoting Parks, Local Green Space and Addressing Deficiency

The council will seek:

(a) To protect open space of local value required for informal recreation, including for walking, jogging, gardening and food growing.

(b) To address deficiency in access to open space in the borough, and to meet the open space needs arising from new development, including in particular at Southall Gas Works and Southern Gateway (Park Royal). Key priorities in terms of proposals for addressing deficiency are ~~currently being identified as part of work on~~ [through](#) the Green Space Strategy. ~~Further details will follow in the final submission version of the Development Strategy.~~

(c) To secure developer contributions to provide a key funding source for the delivery of the above proposals.

(d) To make provision for a network of green ways through parks and open spaces as a means of encouraging walking and cycling and running for recreation and to get to and from local destinations.

(e) To promote the use of parks for events and other activities, providing this is managed in a sensitive and compatible manner.

These policies are based on the council's Green Space Strategy [\(2012-2022\)](#) and [emerging work on an All London Green Grid](#). ~~(currently being finalised), and a wider analysis of deficiency presented in the West London Sub-Regional Development Framework.~~ The former comprises a quantitative and qualitative audit of green space, and an assessment of current and future needs over the plan period. [The All London Green Grid will create a network of interlinked, multi-functional and high quality open and green spaces that connect with town centres, public transport nodes, the countryside in the urban fringe, rivers and major employment and residential areas. Ealing is an important part of two 'area](#)

frameworks' the River Brent Plateau framework and the Colne and Crane framework. The project is being rolled out by Design for London (DfL), and provides the sub regional context in which the green space strategy shall be embedded.

The policies to enhance green space, improve access to this space and where possible to create new green spaces respond to the deficiency areas identified in the strategies referred to above, as follows:

- ~~District Park deficiency particularly in Acton Central, Park Royal, Southfields and Hanger Hill.~~
- ~~Local Park deficiency particularly in Southall (Southall West, Southall Green and Southall Town Centre), Ealing (North Ealing), Hanwell (North Hanwell) and in Park Royal.~~
- ~~Areas of deficiency in play provision in South Ealing, North Ealing, the majority of Southall West, Park Royal, and in large parts of Acton Central, North Greenford and Perivale.~~
- ~~Very low playground provision in relation to child density in Southall West, Acton Central and Southfields.~~
- ~~Southall West, Acton Central, Hanger Lane and Ealing Common have high child density and are more than 400m from existing facilities. Hence they need new facilities.~~

- In quantity terms, as a proportion of public open space per head of population, Ealing Broadway and South Acton Wards are particularly deficient. Over the plan period this position may also worsen in relation to Southall Green and Southall Broadway wards.
- In terms of deficiency in access:
 - Local Park deficiency throughout the borough, but particularly through the centre of Ealing.
 - District Park deficiency in the east of the borough and across much of Southall.
 - Metropolitan Park deficiency particularly in the Hanger Hill ward.
- There is a lower density of play opportunities through the centre and east of the borough, in particular the wards of Ealing Common, Ealing Broadway, Hanger Hill and the western side of East Acton.
- There is a notable gap in provision of MUGA's and play opportunities for older children in the Hanger Hill area.

The Green Space Strategy identifies priority parks for investment to help redress this deficiency.

Policy 7.18 of the ~~Replacement~~ London Plan also seeks to ensure that future open space needs are considered in planning policies for Opportunity Areas (Park Royal and Southall). In this regard, new public open space provision is proposed as part of the Southern Gateway site and Southall Gas Works site.

Policy 5.6 Outdoor Sports and Active Recreation

The council will seek:

(a) To protect and promote a network of sports grounds and other active recreation areas in the borough. Sites identified as being of strategic and local importance for outdoor sports will be protected and promoted primarily for this function.

(b) To develop a sports hub as part of this network, with a range of sports provision ~~adjoining Gurnell Pool~~ in the Gurnell area, and the development of several strategic 'satellite sites' located strategically to serve communities across the borough.

(c) To secure developer contributions to provide a key funding source for the delivery of various priority projects.

The council's Facilities Strategy (2011) (Incorporating the Playing Pitch and Outdoor Sports Strategy (2007) and updates (2010)) provides an analysis of both existing and future needs over the lifetime of the plan, identifying areas of deficiency in terms of access. At a borough wide level, this ~~Development~~ Strategy identifies a requirement of 0.82ha of outdoor sports pitches per 1,000 people in the borough by 2021.

The council's emerging Facilities Strategy will also sets out an action plan to promote this network, and to address deficiency in terms of physical access, quantity of provision, and in terms of quality of facilities. As a tool for alleviating deficiency, this strategy identifies a hierarchy of sites in the borough for sports and active recreation, defining sites of strategic and local importance and distinguishing between sites of single and multi sports use, and identifies opportunities for future development/enhancement. The following strategic sites are defined and mapped on the Proposals Map:

- Warren Farm

- Rectory Park
- Ealing Central Sports Ground
- North Acton Playing Fields
- Perivale Park
- Spikes Bridge Park
- Gurnell Playing Fields and Environs
- Former Liverpool and Victoria Sports Ground
- London Playing Fields
- Trailfinders Sports Ground
- [Old Actonians Sports Club](#)
- [Brentham Sports Club](#)

These are sites which comprise a number of pitches, and accommodate a range of sports, often used by a significant number of organisations and clubs. These sites will be primarily safeguarded and protected for outdoor sports related activities. Some ancillary development on these sites may be necessary and desirable to enhance the primary active recreation function of these sites.

Key priority projects include the promotion of a 'sports hub' facility at Perivale Park encompassing the Perivale Athletics Field (a National Throw Centre), a new outdoor gym, a Golf Range and Junior Gold Development Centre, tennis courts, new multi-use games areas (MUGAs) and dedicated pitches for football and rugby. The centre will also link to the Gurnell Swimming Pool. It also proposes developing smaller 'satellite' hub facilities at strategic sites in the borough. The following proposals have also been identified for other [key](#) sports fields in the borough:

- Rectory Park Playing Fields, Northolt – the establishment of a centre of football excellence in the park and the replacement of changing facilities.
- Ealing Central Sports Ground, Perivale – replacement or refurbishment of the pavilion and changing rooms.
- Spikesbridge Park, Southall – the development of a new pavilion incorporating community uses and possibly replacement accommodation for the Cornucopia Centre on the edge of the park.
- Warren Farm – improved changing rooms, outdoor sports areas and social facilities.

All sports grounds in the borough are currently designated and safeguarded as Community Open Space.

Policy 5.7

Provide Additional Burial Land

To seek to protect existing sites, maximise their use (including consideration for reuse), and identify additional burial land located to serve those parts of the borough experiencing significant shortage.

There are five cemeteries run by the council in the borough at present (Acton, Greenford Park, Havelock, Hortus and South Ealing) and three other cemeteries (Westminster, Kensington & Chelsea and Gunnersbury) either under different management, or located outside the borough. Of the cemeteries located in the borough under the management of the council, only Greenford has remaining capacity (~~Hortus is predicted to reach full capacity by the end of 2010~~). Whilst it is predicted that Greenford will have remaining capacity to cover the plan period for the borough as a whole, and has potential if extended further to provide a further 15 years (i.e. 30 years in total), this would not address the acute local need for burial space in certain parts of the borough. In this regard there is a particular requirement from the Muslim community for additional services and facilities to be provided somewhere in Southall. All cemeteries located in the borough are currently designated as Community Open Space.