

To London Borough of Ealing Strategic planning team Perceval House 14-16 Uxbridge Road London W5 2HL

By email to: localplan@ealing.gov.uk

4 April 2024

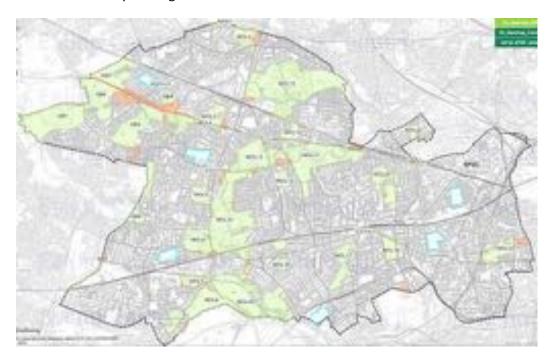
Dear Sirs,

### **Ealing Local Plan Reg 19 consultation response**

CPRE London is a membership-based charity with 2500 members across London, concerned with the protection and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners.

Thank you for the opportunity to provide comments on this important consultation.

Six sites proposed for MOL in the Regulation 18 documents should now be designated at MOL. See sites outlined in blue in the image below. These were assessed by the council as per a document entitled 'Potential new MOL designation NEW1' also labelled Appendix 3 (also attached to this letter). These are important sites and deserving of the MOL designation or, at a minimum, Local Green Space designation, to ensure they are protected into the future so they are not vulnerable to development, and can deliver the parks and sports facilities residents need, as well as contribute to the wider climate objectives which are central to the Local Plan by hosting SUDS and nature habitat.





**Street parks / green space per person.** We note the council has a major task to support the delivery of new housing and we strongly support this objective. It is vital that, as housing density is set to increase, residents have access to nearby green spaces as well as larger green spaces, nature and sports pitches further afield. Access should be articulated *per* person to ensure it is meaningful and well located. The council should adopt a policy which actively promotes changes to streets so they can become safe places for recreation and play, in Areas of Deficiency, while also retaining access for emergency services and utility vehicles.

Water management policy is paramount. It is increasingly worrying that housing densification, while necessary, is set to put unprecedented pressure on water management in Ealing and across London. The council must adopt policies to reduce water stress and manage run-off flooding and pollution, including land-use and development policies which: [NOTE a number of these policies would also help to moderate air temperature and create habitat for nature.]

- protect front and back gardens from further conversion for parking
- promote reinstatement of natural surfaces in front gardens
- promote introduction of SUDS planters in front and back gardens if the reinstatement of a permeable surface is not possible
- enable land / 'grey space' to be used for on-street rain gardens / SUDS
- enable the creation of wetland SUDS in green spaces and the council should create site allocations, clearly identified in the Local Plan
- promote use of grey and rainwater in existing and new developments
- promote reduced demand on water
- enable road drains to link to SUDS so road run-off is filtered
- promote the restoration and daylighting of rivers.

**Brent River Park and Warren Farm.** There is a major opportunity to promote a clearer identity for the Brent River Park in the Local Plan. We support the idea for a new Regional Park and hope the council will work with the Brent River Canal Society who can help with expertise and strong local support for improvements for residents, visitors and nature. Warren Farm – we support the designation of the site as Local Nature Reserve and hope the council will propose it and other sites for SSSI or SINC status as appropriate, with Metropolitan importance where appropriate.

**Nature Management Areas and New National Nature Reserves.** The Local Plan presents an important opportunity to identify sites to deliver on the London Mayor's habitat creation targets and to identify sites which must be safeguarded for future surface water flood management. We strongly urge the council to consider the Brent River Canal Society proposals to create nature management areas and more generally to identify specific sites / 'Site Allocations for Nature' and for water management.

**Green Belt / MOL deletion.** We are concerned that a number of the deletions are unjustified and in many cases would be extremely damaging to neighbouring protected land and/or would leave the site vulnerable to inappropriate development which would impact negatively on sensitive sites like riverside.

- Please SEE ANNEX 1 for OUR DETAILED COMMENTS ON PROPOSED CHANGES.
- Our comments are referenced to this document <u>Microsoft Word EPM 6 Atlas of Map Changes</u> (ealing.gov.uk).



### **Housing estate redevelopments**

- Where earmarked for demolition, consideration should be given to whether the estate could be redeveloped effectively with infill which should reduce the carbon footprint
- All estate redevelopment / infill should ensure retention of and improved access to green and amenity open space, particularly when considered 'per person' where densification is envisaged
- 'Grey space' should be targeted for infill hardstanding, roads and car parks should be a priority to chime with transport objectives to reduce car use and ownership
- Management of increased water use and water run-off should be a top priority to tackle water stress, pollution and flooding, by incorporating grey and rain water recycling and SUDS / rain gardens / SUDS planters.

#### **SITE ALLOCATIONS**

We have strong objections to a number of the Site Allocations, mainly on the basis that they would constitute inappropriate development on protected land, without justification. The comments relate to this document <a href="Ealing local plan report">Ealing local plan report</a>. Please SEE ANNEX 2 for our comments on specific allocations.

Yours faithfully

Head of Campaigns CPRE London



#### **ANNEX 1**

Comments here are referenced to this document <u>Microsoft Word - EPM 6 Atlas of Map Changes</u> (ealing.gov.uk).

Map 3 - GB2 and 3. We <u>strongly object</u> to the removal of the protection from the sites along the A40. We cannot see these are justified. Roads form part of Green Belt and are not removed simply because they are roads. Also this is an incredibly important part of a green chain. Its removal would also split the Green Belt in two which would leave the remaining sites more vulnerable / less defensible.

Map 4. GB 4 and 5. We strongly object to these removals which we do not believe are justified.

- **Removals of GB protection along A40.** This land forms an important Green Belt function and is a green corridor for nature's recovery and connects wider, larger pieces of Green Belt land.
- **'Recycling site' and 'driving range'** as marked on map: both of these sites form important, large areas of Green Belt connected to wider Green Belt and can and should be restored to provide sites for nature's recovery and/or sustainable water management.
- **Residential gardens at Ferrymead Avenue** this is very worrying as the site is next to the canal. Even if the site is private gardens, it should still be protected from development as it is part of an important waterside green chain and needs protection.

Map 5 GB5 Broadmead Road. We strongly object to the removal of Green Belt protection from this site which is clearly connected to wider Green Belt. While this is designed to make the way for redevelopment of the adjacent estate, the site will in fact be needed for the safe walking and cycling infrastructure it currently provides, as well as green / open space and drainage when a great deal of green space between buildings is likely to be lost in the neighbouring estate redevelopment. This land also forms an important green corridor which can support nature's recovery.

Map 6 GB 7 — We strongly object to removal of the Green Belt designation from the allotment site without proposal to re-designate as either MOL or Local Green Space. If the intention is for it to be retained as allotments then it should be protected.

Map 7 MOL 2 - We object to removal of MOL designation here which seems to be a site where enforcement is most appropriate action since it is apparently flytipped. The MOL designation does not need to be removed from the entire site. It can be tight around the built development. Removing it from all the site leaves the remainder vulnerable to development with concomitant impact on adjacent protected land.

Map 8 MOL 3 – We object to removal of MOL designation here. The MOL designation does not need to be removed from the entire site. It can be tight around the built development. Removing it from all the site leaves the remainder vulnerable to development with concomitant impact on adjacent protected land.

Map 9 – MOL 6 / 10. We object to removal of MOL designation from these sites which are largely open space / hardstanding. This leaves them vulnerable to inappropriate development. The MOL designation can wash over buildings and open sites which are currently hardstanding can eventually be sensitively restored to green space or partial green space.

**Map 10 – MOL 7**. We <u>strongly object</u> to removal of Mol designation from land south of the canal as this would leave a critical riverside space vulnerable to development. We are also unconvinced about removal of the roads from MOL. They are open space and MOL / Green Belt can incorporate MOL.



Map 11 – MOL 8. We <u>object</u> to the removal of MOL designation from land to the south of Wolsey Close as this appears unnecessary. Roads can be part of MOL: they are open space (assuming this refers to the road).

Map 13 – MOL 8. It is not clear why the designation needs to be removed. The land may be private gardens but appears to be demarcated by a stream/river (possibly underground?) and may be important to retain as MOL to manage flooding and riverside habitat.

**Map 16 – MOL 9.** We <u>strongly object</u> to the removal of MOL from the Brent River Business Car Park. This important piece of MOL next to the river should be retained with the ambition to return the site to green space / largely green space and to avoid development which would damage the River Brent riverside habitat and also add to flood risk. Car parking can and should be accommodated elsewhere on the site.

Map 17 – MOL 9, sites adjacent to section of the River Brent. We object to the total removal of all these sites which form part of land which joins the north and south parts of the Brent River Park. This narrow section of the park is a vital green corridor for nature between the wider protected land and only land which has been built on should have the protection removed OR the designation should wash over. We are particularly concerned about the proposed removal of the designation at either side of Walker Close which would leave no protection right up to the river bank: this section of the riverside should be retained as protected land and improved to ensure the north-south route between the sites is green and accessible. The land surrounding the new building at Green Lane should also be retained as MOL to reflect the importance of the site for the River Brent nature corridor.

Map 19 – MOL 10. We object to this entire site being de-designated: it is mainly green open space connected to wider MOL. This large green site is clearly part of wider parcel of protected land (site, as marked on map, to West of High Lane). We cannot see any justification for removing the entire site as a boundary change. Only half of the site should be considered: just the part with built structure could be considered for removal.

Map 21 – MOL 10, land adjacent to River Brent. We objection to this change to MOL. This MOL removal is extremely worrying because it is adjacent to the River Brent and the important habitat and flood management potential it provides – and which development would destroy. Also, the site largely remains open. It has one old building which was likely to have been there before designation. This site should be retained in whole or in part as protected land adjacent to the river and restored to green space support flood management and nature's recovery, as well as to improve the Brent River Park's active travel routes.

### Map 24 - MOL 12

- Gurnell Leisure Centre. We strongly object to removal of the MOL designation from this site and for its allocation for development as it would enable inappropriate development on protected land and there is no clear justification for building in this location, where it would have a major impact on the adjacent protected land and is adjacent to the River Brent and its important habitat, as well as the flood risk it poses. The designation should continue to wash over the site.
- **Stockdove Way site.** There is <u>no need to remove the designation from the entire site</u>. The section to the site to the south is adjacent to the River Brent and important for habitat and flood management and should be retained in MOL. Only the build structure should be removed OR the designation should washover the building to avoid further damaging development at this sensitive site.



Map 25 – MOL 12, land adjacent to A40. We understand that the removal of this designation may be accompanied by development, therefore the boundary should be redrawn so that a 5 metre wide stretch of land to the north side of Perivale Lane is retained to retain the tree avenue, habitat and to enable road water and pollution run-off management from the A40 and Perivale Lane.

Map 26 – MOL 12, slipway. We strongly object to this deletion as the site is extremely important as part of a green chain / habitat corridor and for managing the River Brent waters. This should be retained as protected land.

Map 29 – MOL 15 Westway Shopping Park. We object to this deletion and feel this site should be considered as important for walking / cycling routes and infrastructure, connected to the green spaces around. Reference should be made the reason it was retained as protected land.

**Map 33 – MOL 18 Actonians**. We strongly object to the removal of protection from this site. It should be retained as MOL to ensure it is protected into the future. If the intention is for it to be retained as open space, then at a minimum it should be Local Green Space but, given the designations give the same strong protection, there seems no clear reason to remove the MOL protection.

### Map 35 - MOL 20 Park View Road sports ground.

- Part of this site, the Barclays Sports Ground, is listed as Site Allocation 21EA but that listing incorrectly states there will be no impact on the MOL because the MOL designation will be removed. But, as this map shows, the majority of this site will in fact remain as MOL. This needs to be corrected in the assessment of Site 21EA's suitability for development.
- We object to the removal of protection from the smaller section of this site as proposed. We are concerned that the removal of the designation would leave it open to development as housing or other development not ancillary to the sports ground. The designation should continue to wash over the site.

### Map 37 - Trinity Way Open Space

- We <u>strongly object</u> removal of MOL designation at Trinity Way Open Space as this would leave it open to development. Also, it connects to wider MOL, albeit via corridors. These corridors could easily be enhanced to connect the sites more effectively both visually and for nature habitat, particularly at Trinity Way itself, but also at the unnecessary heart-shaped road system at the junction with Ashfield Road, where one arm could be closed to traffic and re-greened / incorporated as open/green space. This is currently a waste of space.
- We also <u>object to</u> the removal of protection from the smaller parcel to the west of Bromyard Avenue –
  where the MOL designation washes over the old building which must have been there when the site
  was designated.
- We are also concerned that the removal of MOL designation from the site near to Beechwood Grove would promote development on that site which would compromise the wider MOL. The removal of the designation should be limited to the part of the site which has built structure on it, not the whole site.

Map 38 – additions to Local Green Space. We SUPPORT additions Local Green Space. These sites could be improved further by pedestrianising adjacent streets and removing parking from them, so the size of the green spaces are effectively enlarged, while retaining access to houses e.g. the western section of Friary Rd could be completely closed to traffic / returned to open/green space, with cars using the eastern section for access to the north side of the triangle.



#### **ANNEX 2**

Site allocations – comments here are referenced to this document Ealing local plan report

#### WE OBJECT TO THE FOLLOWING SITE ALLOCATIONS ON THE FOLLOWING BASIS

AC10 - Haddon Court & Burghley Tower. We <u>strongly object</u> to this site being included for development as there is no clear justification for releasing this parcel of MOL. We do not see how 'existing use could be reprovided as part of the development' as stated in the assessment of the site's suitability for development. There are no special circumstances proven here.

19EA – Gurnell Leisure Centre. We <u>strongly object</u> to the removal of the MOL designation and to the inclusion of this as a site for development as there will clearly be a major impact on MOL. Though the site assessment states there is no impact because the designation will be removed, that is clearly an incorrect assessment / a circular argument. There is no clear justification for removing the designation and there will be extensive harm to this protected land and adjacent sites.

21EA Barclays Sports Ground. We <u>strongly object</u> to this site being allocated for development. It would be inappropriate development on MOL. The site is MOL 20 Park View Road sports ground. This Site Allocation listing incorrectly states there will be no impact on the MOL because the MOL designation will be removed. But, as Map 35 in the Atlas of Change shows, MOL 20 Park View Road sports ground will in fact remain as MOL, except one small piece is proposed for de-designation (though we do not accept that the dedesignation of that small is justified in any event). This needs to be corrected in the assessment of Site 21EA's suitability for development.

23EA Actonians Sports Ground. <u>We strongly object</u> to the inclusion of this site for development. It is protected MOL. There is no clear justification for the removal of protection from this site. No special circumstances have been shown to exist. It should be retained as MOL to ensure it is protected into the future. If the intention is for it to be retained as open space, then at a minimum it should be Local Green Space but, given the designations give the same strong protection, there seems no clear reason to remove the MOL protection.

EA30 Twyford Abbey – development on site MOL site has, as we understand, already been permitted, against much opposition, pointing to the importance of the site for nature conservation. The site allocation should reflect the need to protect the remainder of the site into the future and the MOL designation should remain in place for this purpose.

04GR Westway Cross – this site should only be developed on the current built footprint. The site is protected land and there is no clear justification for removing the protection.

06GR Smiths Farm – this site is clearly part of the wider Green Belt and is inappropriate for development. The land is used as a depot and is open land, not developed. It is an important part of the wider open land and allowing it to be developed would cut out a central piece of land in the wider 'parcel'.

NO04 - Islip Manor Housing Estate. This site is Green Belt and so inappropriate for development and the assessment states it is no longer viable as a development so this should be retained as Green Belt. It is clearly aligned with wider Green Belt. There are also mature trees and what is likely to be a SINC and these aspects should be protected and preserved.



NO15 West London Shooting Ground. We agree with the assessment that development on this site would comprise inappropriate development on Green Belt.

02PE - Land on the South Side of Western Avenue. This site is protected land and it is not clear what justification is given for its removal from protection or for development.

04PE - Alperton Lane South and Metroline Depot. We <u>strongly object</u> to this deletion as the site is extremely important as part of a green chain / habitat corridor and for managing the River Brent waters. As such, this should be retained as safeguarded as protected land.

16SO - Warren Farm and Imperial College Land. This site should be designated in its entirety as a nature reserve with appropriate level SINC and/or SSSI status.

04NO - Northolt Driving Range. There is no clear justification given for releasing this piece of Green Belt. It clearly performs the functions of Green Belt and is connected to wider areas of Green Belt which would be compromised if the designation was to be removed.

Northolt 06NO - Existing open green space and trees should be retained to ensure local residents have access to green space and to ensure surface water and air temperature can be managed effectively — and more generally this is a clear opportunity to create a corridor of green space to connect with other green spaces and create a green chain /corridor to support nature's recovery.

Northolt 07NO - Existing open green space and trees should be retained to ensure local residents have access to green space and to ensure surface water and air temperature can be managed effectively – and more generally this is a clear opportunity to create a corridor of green space to connect with other green spaces and create a green chain /corridor to support nature's recovery.

Northolt 08NO – Existing open green space and trees should be retained to ensure local residents have access to green space and to ensure surface water and air temperature can be managed effectively – and more generally this is a clear opportunity to create a corridor of green space to connect with other green spaces and create a green chain /corridor to support nature's recovery.

Northolt 10NO – Existing open green space and trees should be retained to ensure local residents have access to green space and to ensure surface water and air temperature can be managed effectively – and more generally this is a clear opportunity to create a corridor of green space to connect with other green spaces and create a green chain /corridor to support nature's recovery.

08HA High Lane Housing Estate – Existing open green space and trees should be retained to ensure local residents have access to green space and to ensure surface water and air temperature can be managed effectively.

05NO Medlar Farm Estates - Existing open green space and trees should be retained to ensure local residents have access to green space and to ensure surface water and air temperature can be managed effectively.

Parcel Name/Number: NEW01, Islip Manor Park, Eastcote Lane, Northolt, UB5 5RG

Current Designation: Public Open Space

Date of Review: 16/11/2015 and 09/03/2021

Name of Reviewer: KD/ ID

### NEW1 - Map of site





## Assessment against Green Belt purposes

Purpose	Significance/Contribution	Notes
1.To check unrestricted sprawl of large built-up areas	N/A	
2.To prevent neighbouring towns from merging into one another	N/A	
3.To assist in safeguarding the countryside from encroachment	N/A	

Criteria	Significance/Contribution	Notes
A. It contributes to the physical structure of London by being clearly distinguishable from the built-up area.	Slight/negligible importance	As a greenspace in the midst of a residential area, the site looks different from its surroundings. However, the significance of this distinguished difference is slight to negligible.
B. It includes open air facilities, especially for leisure, recreation sports, arts and cultural activities, which serve either the whole or significant parts of London.	No importance	Locally important, however due to the relatively small size of the site, it is unlikely that the offer could be further expanded in the future to accommodate a wider catchment.

Criteria	Significance/Contribution	Notes
C. It contains features or landscapes (historic, recreational, biodiversity) of national or metropolitan value.	No importance	The north-western corner of the site contains a community orchard and a nature area, which is small in size and of local importance only. There would be no potential to enhance this due to the small scale of the site.
D. It forms part of a green chain or link in the network of green infrastructure and meets one of the above criteria.	No importance	None of the above criteria apply and the parcel is isolated from other green infrastructure. There are no green corridors leading to the site and due to its 'urban park' character, it would be difficult to connect it to any wider green network.

Parcel Name/Number: NEW02, Ravenor Park, UB6 9LB

Current Designation: Public Open Space

Date of Review: 21/01/2016 and 01/03/2021

Name of Reviewer: IW / KDE / ID

### NEW2 - Map of site





## Assessment against Green Belt purposes

Purpose	Significance/Contribution	Notes
1.To check unrestricted sprawl of large built-up areas	N/A	
2.To prevent neighbouring towns from merging into one another	N/A	
3.To assist in safeguarding the countryside from encroachment	N/A	

Criteria	Significance/Contribution	Notes
A. It contributes to the physical structure of London by being clearly distinguishable from the built-up area.	Slight/negligible importance	The land forms a very small break in the built form synonymous with an urban park, rather than an expanse of open land.
B. It includes open air facilities, especially for leisure, recreation sports, arts and cultural activities, which serve either the whole or significant parts of London.	No importance	The children's playground, basketball courts, tennis courts and open-air gym make a significant contribution to the local leisure and recreation offer. But they do not serve the whole or significant parts of London.

Criteria	Significance/Contribution	Notes
C. It contains features or landscapes (historic, recreational, biodiversity) of national or metropolitan value.	No importance	There are no historic, recreational or biodiversity features within the parcel.
D. It forms part of a green chain or link in the network of green infrastructure and meets one of the above criteria.	No importance	The land does not form part of a green link and there is little to no potential to form such a link.

Parcel Name/Number ...NEW03, Southall Park

Current Designation: Public Open Space

Date of Review... 01/04/2021

Name of Reviewer ... ID

### NEW3 - Map of site





## Assessment against Green Belt purposes

Purpose	Significance/Contribution	Notes
1.To check unrestricted sprawl of large built-up areas	N/A	
2.To prevent neighbouring towns from merging into one another	N/A	
3.To assist in safeguarding the countryside from encroachment	N/A	

Criteria	Significance/Contribution	Notes
A. It contributes to the physical structure of London by being clearly distinguishable from the built-up area.	Slight/negligible importance	Although comparable in size to some of the smaller MOL parcels currently designated in the borough, unlike these other designated parcels which are typically contiguous with a larger network and whose scale can be appreciated in these terms, this site is isolated from other areas of open space. Based on size alone the scale of this parcel is not considered to be significant structurally. Based on its siting it is also noted that the space sits within a definable neighbourhood, rather than separating distinct areas. That said, this parcel does have a number of defining features which sets it apart from comparable standalone sites. Most notably, this parcel is largely open on two sides (Uxbridge Road and Green Drive), affording views across the site from neighbouring streets, and this creates a strong impression of a break.
B. It includes open air facilities, especially for leisure, recreation sports,	Slight/negligible importance	The site is well used and appreciated as a resource, although principally it functions as municipal park serving the needs of the local community of Southall. Based on its size the park is classified as a Local Park. Containing one of the largest Sikh communities in

Criteria	Significance/Contribution	Notes
arts and cultural activities, which serve either the whole or significant parts of London.		the country Southall hosts many cultural events, and the park does at times accommodate such activities. Whilst such events can attract visitors from further afield, the park itself does not contain any permanent features or facilities.
C. It contains features or landscapes (historic, recreational, biodiversity) of national or metropolitan value.	No importance	A small section of the parcel at its southern end is managed for nature conservation, and this area is designated as a SINC, although it is noted that its value is of local significance only.
D. It forms part of a green chain or link in the network of green infrastructure and meets one of the above criteria.	No importance	As noted above the site is isolated from other green spaces, and there is limited potential to enhance this in the future.

Parcel Name/Number ... NEW04 Blondin Park

Current Designation: Public Open Space

Date of Review ...22/02/16 and 23/04/2021

Name of Reviewer ... IW / KD / ID

### NEW4 - Map of site





## Assessment against Green Belt purposes

Purpose	Significance/Contribution	Notes
1.To check unrestricted sprawl of large built-up areas	N/A	
2.To prevent neighbouring towns from merging into one another	N/A	
3.To assist in safeguarding the countryside from encroachment	N/A	

Criteria	Significance/Contribution	Notes
A. It contributes to the physical structure of London by being clearly distinguishable from the built up area.	Slight/negligible importance	This parcel is relatively small and isolated from other areas of open space. It essentially forms an island site which is locked in by adjoining residential properties. Only limited public views exist across the site from its boundary, including from the end of Blondin Avenue and Niagara Avenue. The views from other accesses on Swyncombe Avenue and Boston Manor Road are limited further. The north-western boundary of the site adjoins Northfields Depot, and so the site is also partially visible from passing trains. Whilst the parcel does form a gap in the urban form, the scale of this break is not considered to be significant at a strategic level and the break is only really appreciated from private land.
B. It includes open air facilities, especially for leisure, recreation sports, arts and cultural activities,	No importance	The site contains no such facilities.

Criteria	Significance/Contribution	Notes
which serve either the whole or significant parts of London.		
C. It contains features or landscapes (historic, recreational, biodiversity) of national or metropolitan value.	Slight/negligible importance	The allotments and nature area to the south/west of the site are designated as a SINC, although of local importance only.
D. It forms part of a green chain or link in the network of green infrastructure and meets one of the above criteria.	Slight/negligible importance	The site is isolated from other MOL parcels, although it adjoins the railway line a Green Corridor which links to other open space sites. The northern edge of the railway line furthest from the site is of greater significance as a Green Corridor as this is the only section which is vegetated.

Parcel Name/Number ... NEW05 Twyford Avenue Sports Ground

Current Designation: Community Open Space

Date of Review ...22/02/16 and 23/04/2021

Name of Reviewer ... IW / KD / ID

### NEW5 - Map of site















## Assessment against Green Belt purposes

Purpose	Significance/Contribution	Notes
1.To check unrestricted sprawl of large built-up areas	N/A	
2.To prevent neighbouring towns from merging into one another	N/A	
3.To assist in safeguarding the countryside from encroachment	N/A	

Criteria	Significance/Contribution	Notes
A. It contributes to the physical structure of London by being clearly distinguishable from the built-up area.	No importance	This parcel is relatively small and isolated from other areas of open space. This parcel essentially forms an island site which is locked in by adjoining residential properties and a school. Given its island condition only limited public views exist across the site from its boundary. From the main access off Twyford Avenue views are restricted by the presence of internal boundary walls and other structures and parking area. The clearest views are evident from the end of Buxton Gardens. As the site is largely open, clear of trees and other structures, views across the site are fairly uninterrupted from this point and from within the site. Despite its openness, its scale is not considered to be significant at a strategic level, and this break is only really appreciated from within the parcel and from private land.
B. It includes open air facilities, especially for leisure, recreation sports,	Slight/negligible importance	The majority of the site at present is currently in use as a sports ground. Wasps Amateur Rugby club currently owns the majority of the site and it is used by its members. Pupils from Twyford High School also have limited access. Although the site serves a

Criteria	Significance/Contribution	Notes
arts and cultural activities, which serve either the whole or significant parts of London.		catchment which is wider than that of the borough, the scale and the type of facilities offered here are such that it couldn't be said to serve the whole or significant parts of London.
C. It contains features or landscapes (historic, recreational, biodiversity) of national or metropolitan value.	No importance	It is noted that the northern half of the parcel is designated as an Archaeological Interest Area. Whilst this is significant it has no bearing on its landscape or openness.
D. It forms part of a green chain or link in the network of green infrastructure and meets one of the above criteria.	No importance	This site is isolated from other parcels or green links.

Parcel Name/Number: NEW06, North Acton Playing Fields, W3 0JF

Current Designation: Public Open Space

Date of Review: 07/03/2016 and 23/04/2021

Name of Reviewer: KDE / IW / ID

### NEW6 - Map of site

















## Assessment against Green Belt Purposes

Purpose	Significance/Contribution	Notes
1.To check unrestricted sprawl of large built-up areas	N/A	
2.To prevent neighbouring towns from merging into one another	N/A	
3.To assist in safeguarding the countryside from encroachment	N/A	

Criteria	Significance/Contribution	Notes
A. It contributes to the physical structure of London by being clearly distinguishable from the built up area.	Slight/negligible importance	The land forms a less obvious gap in urban form and all of it is contained within North Acton. It does not separate distinct settlements or distinguish between built up areas. A break in urban form is achieved by the land; however, this is not of any strategic, regional or even local importance.
B. It includes open air facilities, especially for leisure, recreation sports, arts and cultural activities, which serve either the whole or significant parts of London.	No importance	The land contains North Acton playing fields, which is are used for local play and less for the purposes of organised sports. The playing fields contain several football goal frames and the pitches are not marked out. There is little potential for this land to be upgraded to accommodating any activity of strategic or regional importance; however, there is scope for local enhancements/investment to be incorporated.

Criteria	Significance/Contribution	Notes
C. It contains features or landscapes (historic, recreational, biodiversity) of national or metropolitan value.	No importance	The site does not contain any features of historic, recreational or biodiversity of national or metropolitan value.
D. It forms part of a green chain or link in the network of green infrastructure and meets one of the above criteria.	No importance	The site is isolated from other green spaces in the borough and is not part of a green chain/link. There is also little potential to enhance this in the future.