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NEW SPORTS FACILITIES
GUNNERSBURY PARK, POPE'S LANE, LONDON,
W3 8LQ
PLANNING STATEMENT
FOR



Contents

	Para No	Page No
1. Introduction	1.1 - 1.8	3 - 5
2. The Site & Surroundings	2.1 - 2.23	6 – 11
3. The Current Situation With Local Sports Participation	3.1 -3.7	12 - 14
4. The Proposals	4.1 - 4.12	15 - 18
5. Planning Policy Context	5.1 – 5.2	19
6. Consideration Of The Policy Context & Discussion Of The Planning Issues	6.1 - 6.44	20 - 35
7. Summary And Conclusions	7.1 – 7.3	36 – 40

Appendices

Appendix 1	Relevant Planning Policy Synopsis as at October 2015	
	App1.1 – 1.103	41 - 73
Appendix 2	Planning History of the Park	
		74 - 79

1. INTRODUCTION

- 1.1. Shireconsulting has been appointed by the London Boroughs of Ealing and Hounslow joint owners of Gunnersbury Park to advise upon progressing their proposals for new and improved sports facilities. As one of the applicant Councils is also the Local Planning Authority, we use different terminology to refer to the different departments. To avoid confusion the Council departments concerned with promoting this scheme are referred to as *“the Joint Applicants”* in this document, and the department of the London Borough of Hounslow concerned with Development Management is referred to as the *“Local Planning Authority”* (or *“LPA”*).
- 1.2. The Gunnersbury Park estate amounts to some 75 hectares of Metropolitan Open Land and is both a conservation area and listed Grade II* upon the English Heritage (EH) *“Register of Historic Parks & Gardens”*. The Park contains 2 listed mansions (one of which is the local museum), a large number of other listed structures, a café, children’s play area and an 18 hole pitch and putt golf course. There are also facilities for football, cricket and rugby.
- 1.3. The site has suffered from a lack of investment over a prolonged period and many of the listed buildings within the Park have fallen into disrepair and appear upon English Heritage’s *“Register of Buildings at Risk”*. New investment is urgently needed in order to stabilise these buildings and improve the cultural, recreational and sports facilities.
- 1.4. The Joint Applicants are committed to regenerating the Park and are working closely together to create a Park and museum of outstanding quality. New governance has been put in place to facilitate better decision making and ensure high-level support for regeneration initiatives. The first stage in this approach was the production of the first Conservation Management Plan (CMP) in 2008 (the provisions of this document, together with other background policy, are summarised in **Appendix 1** below). Grant funding has since been sought and obtained from bodies such as Heritage England (HE) and the Heritage Lottery Fund (HLF) to deliver the finance necessary to improve the Park’s facilities and community access. A key requirement of such funding was to address the Park holistically rather than adopting a piecemeal approach.

1.5. The scale of resources required to tackle the Park's problems identified in the CMP of 2008 was such that it was agreed that the overall regeneration project needed to be phased. A 15 year Masterplan was produced (entitled "*Gunnersbury 2026*" which would coincide with the Park's centenary) in 2012 and the current project was anticipated to constitute 'Phase Three'.

1.6. Improving the provision of sports facilities is a significant element of the 'Phase Three' and according to paragraph 4.5 of the Masterplan, "*Gunnersbury Park is a strategically important site given its ability to provide a range of sports and leisure activities on single site due to its size and provision of outdoor space*". According to the Masterplan at page 11:

"this phase focuses on the sports element within the western half of the park and will involve identifying partner(s) to create a vibrant sporting centre and new sports hub for the residents of both boroughs. This will provide a future for the model farm buildings and with increased sporting participation will help to make Gunnersbury Park a centre of sporting excellence. Phase three will also include further improvements and repair works to parkland and structures and in particular a re-assessment of the space and use of the walled garden currently occupied by Capel Manor and Greenscene to maximise the potential of the site and ensure value for money and sustainability. This might also include a relocated grounds maintenance depot and access to both the car park and heritage core".

1.7. In the initial stages of the regeneration project a number of consultants were appointed to produce a suite of documents (in addition to the CMP) to inform the Masterplan including:

- Gunnersbury Park Options Appraisal – considering sustainable uses for the major buildings and how this might be funded
- Museum Feasibility Study – considering the future development of the museum and its role in the regeneration of the whole Park

- Catering Review – to consider the business case based on a holistic approach and to scope the opportunity that exists
- 1.8. The current proposal should be seen as a further element in the overall regeneration of Gunnersbury Park and follows grant funding for restoration of some of the Park’s listed structures such as the Mansions. Negotiations relating to these various projects have been proceeding for some years with regular meetings between the project team, its funders, local stakeholders and the LPA. The attached Statement of Community Involvement covers these discussions in more detail, but attention is drawn to the comment within the LPA’s letter which followed the pre-application meeting of 8th July 2015 that *“the proposals would be acceptable in principle”*.

2. THE SITE & SURROUNDINGS

- 2.1. **The Site** - Gunnersbury Park is a public park of 72 hectares (186 acres) in total, situated in West London within the London Borough of Hounslow, and delineated by the M4 and Kensington Cemetery to the south, the North Circular (A406) to the east, and areas of mainly inter-war or post-war housing to the north and west. There are also areas of former industry to the south-west, which have mostly been redeveloped for offices. Although situated entirely within the London Borough of Hounslow, the northern and western edges of the Park are on the border with the London Borough of Ealing, and consequently the catchment area of the Park is formed from populations from both of the Joint Applicants.
- 2.2. Gunnersbury became a public park in 1926 and prior to this it had been a private estate occupied by a succession of owners, each of whom has left a legacy of historic structures and landscape features. The CMP of June 2008 divides the Park into 7 *“Character Zones”*.
- Area 1 Gunnersbury Park House, Gunnersbury House and Gardens
 - Area 2 Ornamental Parkland
 - Area 3 Wooded Lake
 - Area 4 Walled Garden
 - Area 5 Amenity Area
 - Area 6 Open Playing Fields
 - Area 7 Lionel Road Municipal Park Entrance
- 2.3. The current application site broadly includes Areas 4, 5 & 6.
- 2.4. **Area 1** being the historic core of the site, comprising the immediate setting for the most important listed structures, such as the various entrance lodges, East & West Stables and the Temple. The focus is Gunnersbury Park House (the ‘Large Mansion’) and Gunnersbury House (the ‘Small Mansion’) set in their 18th century and 19th century designed gardens and grounds. The Temple and round pond are important features to the west. The Mansions dominate this part of the site, looking out southwards over the raised terrace across lawns with some mature ornamental trees.

- 2.5. **Area 2** (to the south of the Mansions) comprises areas of grass parkland interspersed with individual and clumps of specimen trees. The central part of the parkland contains the 20th century pitch and putt course, as well as a cricket field, some disused tennis courts and a Pavilion.
- 2.6. **Area 3** contains 'The Potomac Lake' in the south-west corner of the Park and is surrounded by dense overgrown trees and shrubs. A high fence surrounds the lake and there is currently no public access. There is a derelict, listed, Gothic Tower adjacent to the Lake.
- 2.7. **Area 4** is occupied by two commercial operations, 'Capel Manor' a horticultural training college, and 'Greenscene', a horticultural contractor (it seems that plants are not grown here and the site is mainly utilised as a distribution depot). Area 4 is not accessible to the general public and is surrounded with high walls with gates and razor wire. 'Greenscene' are about to vacate this site and so there is an opportunity to take this area back and restore some public access.
- 2.8. **Area 5** includes an area which serves as the car park. There are also two bowling greens (one of which is derelict), a children's play area and fourteen hard-surfaced tennis courts (at the time of the CMP only seven of these were useable). There are also some changing facilities (which again need investment) and a complex of historic buildings that were formerly the 'Model Farm'. The 'Model Farm' is used partly as a depot for the park maintenance team and some of the buildings were partly used as changing rooms until being burnt out and vandalised in 2002.
- 2.9. **Area 6** is a large open flat expanse of grassland used for sport (football and rugby), bounded by trees to the south-west and by the back gardens of 1930s semi-detached and terraced housing to the north-west and north. This area also accommodates a high voltage cable, which sterilises the land along its route from built development.
- 2.10. **Area 7** is an area laid out as formal public park entrance in 1926 and accessed from Lionel Road North.

- 2.11. Tree surveys have shown that there are about 2,030 trees in the Park with a varied age range. The predominant species are Sycamore, Yew, Horse Chestnut, London Plane and Norway Maple. There are also many Ash, Oak, Common Beech and Pine, Holly, Hawthorn and Silver Birch. There is a wide variety of more unusual deciduous and evergreen ornamental trees. Generally these are either in single or small numbers. Gunnersbury Park is designated as a “*Nature Conservation Site of Borough Importance*”, and therefore has ecological value, with habitats provided by the buildings, wooded areas and water bodies. A Phase 1 Habitat survey conducted as part of a wider conservation management planning exercise recorded areas of mixed interest, fine mature trees and a large variety of bird life (source: Gunnersbury Park CMP 2008).
- 2.12. In terms of **Land use** Gunnersbury Park House houses the Ealing and Hounslow local history museum at ground floor, with its management offices and some residential flats on the floors above. The Museum is currently closed whilst it undergoes refurbishment (we understand that much of its collection is in off-site storage during these works). The ground floor of the adjoining Gunnersbury House still has occasional use as an arts centre and as education rooms associated with the adjacent Museum and again there are some residential flats on upper floors. Of the other historic structures some (such as the Temple, Orangery or ‘Princess Amelia’s’ Bath House) still have occasional use as function rooms. However, many of the smaller historic structures, have fallen into disrepair in recent years, although a programme of repairs are now in train for their restoration.
- 2.13. Originally over half of the Park was given over to formal sports pitches, although that figure has fallen considerably in recent times to about 20% which are actively used by sports clubs. There are facilities for football, cricket, rugby, bowling in the western half of the Park, with tennis courts and a grass running track in the area south of the pitch and putt course. Because of their gradient the football pitches do not meet Football Association requirements and will require re-profiling to make them compliant. A number of sporting events are also held at Gunnersbury, as was the annual ‘London Mela’ (from 2016 it will take place elsewhere).

- 2.14. Other 'commercial activities' on the site include 'Capel Manor College' (a Class D1 use), 'Greenscene' (as noted above this occupier uses the site more as a distribution point and has apparently done so for a considerable length of time). The activity may not readily fall into any particular part of the UCO, but a distribution use would be Class B8. The Park maintenance depot is behind the 'Model Farm' changing rooms.
- 2.15. **Heritage Assets** - The key history of the Park is set out in various documents such as the CMPs (the original 2008 version is in the process of being replaced by a new one, the draft of which dates from December 2014). According to the CMPs the following national, regional and local designations apply to Gunnersbury Park:
- Grade II* Registered Landscape (English Heritage's *Register of Parks and Gardens of Special Historic Interest*);
 - Four Grade II* and 17 Grade II listed structures (the Grade II listed wall around the 'Walled Garden' falls within the application boundary). 10 of the Park's listed buildings appear on English Heritage's *Buildings at Risk Register*;
 - Gunnersbury Park Conservation Area (106.7 ha) - designated by London Borough of Hounslow in 1980;
 - Metropolitan Open Land; and
 - Nature Conservation Site of Borough Importance, Grade II.
- 2.16. There are also thought to be "*significant archaeological remains*" within the Park associated with the development of the Gunnersbury Park Estate, as well as vestiges of structures dating from the Second World War (the Park housed a barracks and anti-aircraft battery).
- 2.17. There is little evidence upon LBH's on-line **planning register** of planning /listed building applications until 2009. However we have compiled an overall schedule using data provided by the LPA from its microfiche records as well as the on-line Register and this is attached as **Appendix 2**.

- 2.18. Attention is drawn to certain applications which relate to some of the specific areas of the Park under consideration.
- The 'Greenscene' operation was granted permission in 1992 (refs 00885/A/S27 & 00885/A/S30) and these allowed the change of use of a Council plant nursery to a commercial one serving the wholesale trade.
 - In 1994, application ref 00885/A/P4 (granted by the Secretary of State) allowed the change of use from a residential dwelling to a "*horticultural training and educational centre*", presumably what is now Capel Manor.
- 2.19. As Curtins explain in their Transport Statement which accompanies this application, **Public transport** to the Park is possible by bus, Underground and Overground services. According to Curtins, the Public Transport Accessibility Levels (PTAL) for Gunnersbury Park vary (from 1b to 4) depending which entrance point is used (see Curtins Transport Assessment, Table 3.2).
- 2.20. **Road access** to the main settlements in proximity to the subject site is good with Chiswick High Road about 2.5 km to the east, Brentford some 2.5 km away to the south west, Ealing some 2.5 Km away to the North west and Hounslow about 6.5 km to the south-west. The A406 Gunnersbury Avenue forms the eastern boundary of the Park and the Southern boundary is constituted by the M4/A4. Junction 1 of the M4 motorway is very accessible and therefore Heathrow, some 15 km away to the west.
- 2.21. **Pedestrian links** to the Park are good from the residential areas to the north and west, whereas those from the east and south are limited by the major arterial roads. However, there is a footbridge over the A4 and a pedestrian activated two-stage crossing over Gunnersbury Avenue.
- 2.22. **Existing Access to the Site** – for vehicles there are essentially two access points remaining. (a number of former access points from Gunnersbury Avenue to the Park, having been closed to vehicular traffic), both of which are taken from Pope's Lane to the north of the Park.

2.23. The vehicular access closest to the junction with Gunnersbury Avenue serves the Museum and its parking area and would have been the original entrance to the Large Mansion. The second access jointly serves the main parking area for visitors to the Park (as well as the 'Capel Manor College'/'Greenscene' operations) and this access point is to serve the proposal.

3. THE CURRENT SITUATION WITH LOCAL SPORTS PARTICIPATION

- 3.1. Sport and leisure are seen as essential to strengthening communities and improving health outcomes through more active lifestyles, whereas lack of participation in sport and high levels of deprivation result in poor health outcomes. A number of the 10% most deprived areas of England fall within Hounslow and the importance of open space for sport in a densely populated area, with a growing population, is clear. Open space and sports facilities should be accessible to all, and are viewed *“as particularly important in areas of deprivation, where health and environmental quality tend to be poorer. Open space often plays a vital role in environmental improvements and regeneration objectives”* (see Hounslow’s *“PPG17 Open Spaces Study”* paragraph 3.2.17 summarised at **Appendix 1**).
- 3.2. Surveys by Sport England show that participation in sport for some groups in Hounslow is below the London and National averages and is in decline. Paragraph 4.1 of Hounslow’s *“Physical Activity and Sport Strategy”* also notes that Hounslow Borough falls below the national and regional average for sports participation. The ward within which Gunnersbury Park sits is currently in the lowest quartile for participation and is also below the Borough’s average level. Data collated by the Department for Health also shows high levels of obesity in Hounslow’s children. Findings for 2012-13 (the latest available) indicate that nearly 25% of children in Hounslow are obese (the figure for Ealing is about 22%). By Year 6 (when they are 10-11 years old), 37% are either overweight or obese, which is higher than both the national and regional rates (33% and 36% respectively). (Source: Hounslow *“PPG17 Open Spaces Study”*, paragraph 3.2.13).
- 3.3. The Joint Applicants are keen to encourage active participation in sport by all groups. These surveys of participation in sport also show that, in particular, Black Asian Minority Ethnic groups are less likely to participate in physical activity. Using GLA figures the *“PPG 17 Open Spaces Study”* also noted the change in ethnic diversity of the Borough’s population which has changed from 35% in 2001 to 42% in 2008. The GLA anticipate that it will rise to 52% by 2026. As surveys of users have shown, the Park is used at least as heavily by LBE residents.

- 3.4. The population of both Hounslow and Ealing is anticipated to grow considerably in future years and the recently adopted Hounslow Local Plan (see **Appendix 1**) anticipates that Brentford in particular will experience considerable change over the plan period. Between the 2001 and 2011 Censuses, Hounslow's population grew by 19.6%. The population of Ealing grew by 12.5% over this same period. In February 2013 the GLA 'Round Population Projections' predicted that the population of Hounslow would have grown by a further 5.2% by the time of the next census in 2021. For Ealing the anticipated growth in population is some 7.5%. As regards population structure, the LBH "*PPG17 Open Spaces Study*" noted a projected overall 14% increase of 0-16 year olds and was this was considered "*of particular importance in planning for future provision of play areas and certain types of sports facilities (e.g. junior football)*".
- 3.5. In order to improve levels of participation the standard of sports provision must continue to be improved and the opportunities for different activities widened. Documents such as "*Future Borough*" (Hounslow Together's Vision, Strategy And Action Plan) and the 'Hounslow Infrastructure Delivery Plan 2015 - 2030 (IDP)' identify promoting healthy lifestyles and increasing participation in sports as 'strategic aims' for the Borough. However, the IDP notes the significant shortfalls in Sports Facilities provision and states that the "*quality and accessibility of the current sports facilities in Hounslow....would be likely to deter participation in sports activities in the borough*" (for instance the cricket pavilion and nearby changing facilities) have fallen into disuse. For the future, additional badminton courts, fitness stations, synthetic pitches for outdoor sports such as hockey and football, cricket pitches, as well as indoor and outdoor tennis are going to be needed to meet the demand from the rising population. Following recent investment into Hounslow's Borough's leisure centres monthly visits have risen, but many of these facilities are now at capacity and bearing in mind the anticipated growth in local population in the next decade the need for quantitative improvement in provision is only going to become greater.

- 3.6. The Borough's parks and open spaces are seen as an essential part of meeting this increasing demand and continuing the improvement of provision. Gunnersbury Park is already playing a limited role in providing sports facilities, but currently is not realising its full potential (some of its facilities have been noted as being *"extremely poor"* - see for instance Hounslow *"Planning Policy Guidance 17 Study - Sports Facilities Volume 1"*).
- 3.7. Similarly, the 'Ealing Sports Facility Strategy' identifies considerable shortfalls in sports halls which provide the flexibility for a range of indoor recreational activities and facilities over the whole of the West London area. Demand exceeds supply and in the case of Ealing the 'optimum location' for new provision would be *"the South East corner of the borough"*. There is also a deficit in the provision of Artificial Grass Pitches (AGPs) and the 'West London 6 borough sub region' (which includes Ealing and Hounslow) is calculated to have a deficit of 21 pitches. There is justification for additional AGP provision and these *"facilities should preferably be floodlit for year round use with the capacity to be sub divided into smaller areas for training purposes"*. Ideally these new facilities *"will be built alongside existing leisure provision either on the site of existing indoor facilities to make best use of management and operational arrangements as well as ancillary changing rooms, etc or at outdoor strategic multi sport multi pitch sites"*.

4. THE PROPOSALS

- 4.1. The full detail of the proposed development scheme is set out in the Design & Access Statement, prepared by AFLS&P. In essence the **'sports hub'** comprises a sports hall for badminton, handball, netball, volleyball, five-a-side football, futsal, basketball, tennis and short tennis. In addition the sports hall will provide facility for indoor cricket, short mat bowls, hockey, gymnastics, judo, karate, table tennis, and trampoline. There will also be changing rooms, sports studios with associated changing, offices, cafe and community rooms (the building is anticipated to attain BREEAM 'Excellent' standard). There will also be natural grass pitches and AGPs, together with tennis courts and multi-use games area (MUGA). It is aimed that the Centre will also function as a 'hub' for coaching staff to operate outreach programmes to encourage participation by local schools. The entire development will sit within a structured setting of hard and soft landscaping which include works to the existing car parks and additional parking within the 'Walled Garden' to serve the wider park.
- 4.2. In relation to 'sustainable travel' cycling facilities are to be improved across the whole Park and there is also a 'Travel Plan' for the leisure building. The transportation consultants (Curtins) do not anticipate that there will be any material changes to traffic patterns arising from the proposal.
- 4.3. The Joint Applicants are mindful of the sensitive location of the Gunnersbury and have had a 'masterplan' for the overall Park prepared, so that the various elements of the regeneration scheme can be seen in their full context. Key to the Park's renaissance is the improvement of the facilities that it offers. Matters such as the proximity of residential property and the high voltage cable have dictated the siting and layout of the various elements of the subject scheme (it is not possible to build over the route of the cable, so this has had the effect of moving the focus of development towards the South). The main building has been located upon a former bowling green, following the recommendation of one of the officers from the LPA, because the impact upon views across the Park would be minimal in this position and few trees would be lost. The various sports pitches are to be grouped around the main building, to be close to the supporting changing facilities, but this has the benefit of moving the greatest activity away from any sensitive residential boundaries.

- 4.4. It is considered vitally important to improve the quality of sports provision locally (the cricket pavilion and the Park's changing facilities are very dilapidated and have fallen into disuse) and in order to secure funding from the various parent bodies the new facilities need to conform to latest requirements, as well as current health and safety standards. These requirements of other bodies have informed many aspects of the overall design. For instance, to avoid glare, technical sporting requirements prevent the inclusion of windows to a sports hall. The size and layout of the various pitches is also dictated by such sporting standards (a pitch must be of a certain size, have significant free space around it for a 'run-off' area to ensure players and officials do not injure themselves by running into any fixed object, as well as providing space for spectators to stand and watch in safety). The gradient of the Park needs to be re-profiled to enable use of football pitches to FA requirements and the existing, random, layout of these pitches has also been reconsidered to put them on to a better alignment to enable games to start earlier in the day (this is particularly important for younger user groups).
- 4.5. However, the new facilities must be financially sustainable to avoid being a burden upon the 'public purse' and so are being planned from the outset in a comprehensive way in order to avoid the need for having to include additional facilities to generate revenue at a future date. Other sources of income are being considered in order to strengthen the financial model and this explains why the offer has been made to house the Middlesex County Cricket Club, MCCC, (see later in this Report). The opportunity is being considered of improving the provision of health and fitness facilities from the Gunnersbury Park site as this will also assist with providing a revenue stream.
- 4.6. Depending upon specification, the total cost of the subject development proposals at Gunnersbury is estimated to be in the order of £9.0m. In addition to this capital investment some 26 jobs are anticipated to be created within the Centre, as well as up to 30 posts in the MCCC element.

- 4.7. **Middlesex County Cricket Club** - The MCCC provides services essential to local, regional and national cricket, as well as to local schools (through displays and demonstration and introductory courses, etc.). The MCCC already has an active programme of engagement with the community in order to promote the playing of cricket, this is particularly targeted towards youth groups as well as primary and secondary schools. The Club therefore makes a significant contribution to healthy living and vitality to many age categories including young people and older age groups. It works with disadvantaged young people and also actively supports participation by families. In the West London area it has a focus upon the South Asian Community and in 2014 the MCCC hosted a cricket road show at the Gunnersbury Park London 'Mela'. The Club serves the community and by providing an outlet for youth groups, it can also help to reduce crime.
- 4.8. The MCCC currently operates from the cricket ground at Lords in St Johns Wood (a considerable distance away) and wants to enhance its community role even further through closer engagement at the local level. The creation of a permanent the sports hub at Gunnersbury Park will provide a local base for the promotion of the playing of cricket in Ealing and Hounslow and will allow the co-ordination of the planned cricket development programme involving all sections of the population. This will include indoor net sessions within the new Sports Hall and coaching education programmes. The local voluntary sector cricket clubs in the area will also have direct access to better coaching and educational training, as well as assistance with administrative functions. MCCC staff will also ensure that grass facilities are effectively used by supporting the training and mentoring of grounds maintenance staff by offering Institute of Groundsmanship courses.
- 4.9. **Museum Store** - the Large Mansion has housed the Ealing & Hounslow Museums since 1929 (the Museum is currently closed whilst the building undergoes extensive restoration and repair work which will create new display rooms and provide space for events and functions). The Museum's collections have become so extensive that a considerable quantity has to be kept in storage, although material is brought out for public view through a programme of regularly changing exhibitions and items not on show can also be viewed by appointment.

- 4.10. The former archive areas, some of which were in the Mansion's basement, do not provide the quality of controlled environment needed for the purpose of safe storing of historic material and whilst the restoration works are underway the collections are being held in facility near Oxford. A purpose-built secure facility is needed, which can provide a temperature controlled environment. Operationally, it is much more convenient to have the store on a single level, close to the Museum, which will enable the display of the exhibits to be rotated easily and regularly. The new leisure building provides the opportunity to include provision for the Museum store without affecting the setting of either of the two listed mansions. The provision for appointment-only access to the store will be retained and there are also benefits in a single level building which can then permit access by members of the public.
- 4.11. **Structures being removed as part of the development** – the timber cricket pavilion (amounting to 186m² in area) and the brick built changing facilities (with an area of 321m²), adjoining the Model Farm are to be removed. Both structures have fallen out of use and have been damaged by fire (the pavilion in early October 2015). The structures both date from the 1950s and have no merit architecturally and so their loss has been accepted by the LPA's Conservation Officer would be a benefit in relation to enhancing the character and appearance of the Conservation Area.
- 4.12. There are also modern structures adjoining and within the 'Walled Garden' which are considered damaging (see CMPs 2008 & 2014 at **Appendix 1**) to the listed wall and its setting. With the departure of the 'Greenscene' operation, and other associated harmful structures can be removed. These include the various modern glasshouses, a small brick building formerly used as a toilet in the south east corner of the 'Walled Garden' and a short section of the listed wall itself (this section is made of concrete and is modern).

5. PLANNING POLICY CONTEXT

- 5.1. At time of writing the current 'Development Plan' for Hounslow comprises 'The London Plan' (March 2015) and the Hounslow Local Plan (HLP) which was adopted on the 15th September 2015 (this document is still in the period for legal challenge). A full assessment of the relevant national and local planning policy background is attached to this Statement as **Appendix 1**.
- 5.2. The HLP Proposals Map shows the entirety of Gunnersbury Park as Site Allocation 09 *"Restoration of core heritage parkland, refurbishment of listed buildings including potential enabling development and creation of a sporting hub"*. The entire Park is Metropolitan Open Land (MOL), as well as being an Historic Park & Garden (Grade II*). The land is within the Gunnersbury Park Conservation Area, and it is a *"Site of Importance for Nature Conservation"*(SINC). The Park is also considered to be a *"Critical Drainage Area"*(CDA).

6. CONSIDERATION OF THE POLICY CONTEXT & DISCUSSION OF THE PLANNING ISSUES

6.1. Below we discuss the planning policy background under the generic topic headings of **Core Principles, Need, Sustainable Development, Metropolitan Open Land** and **Residential Amenity**.

i. Core Principles

6.2. Relevant policy is set out in the accompanying **Appendix 1** to this Statement. The 'Development Plan' forms the *"starting point for decision making"* although other material considerations, including Government policy and other evidence may also form part of the determination process. TLP Policies **1.1, 2.6, 2.7 & 4.1** are all concerned with achieving the Mayor's objectives for Outer London and aims to meet the challenges of economic and population growth and provide the infrastructure and other facilities that will be needed. Policy **2.7** also expressly supports leisure, arts, cultural and tourism development. 'Tailored partnerships' are to be established to enable *"cross-boundary working arrangements to address particular issues"*. HLP 'Implementation' Policy **IMP1** also states that the Council is to take a *"plan-led and positive approach to all growth and development within the borough"* and within Policy **IMP2** the Council undertakes to support *"in principle proposals that accord with the identified site allocation"*. HLP Policy **IMP3** is an undertaking that the Council will work with *"strategic partners"* [including adjoining Boroughs] and other stakeholders in the local community to implement the Local Plan and provide the *"infrastructure needed to support growth"*.

ii. Need

6.3. Sport and leisure are seen as essential to strengthening communities and improving health outcomes through more active lifestyles. Promoting healthy lifestyles and increasing participation in sports are 'strategic aims' for the Joint Applicants. Both of the Joint Applicant boroughs have experienced considerable population growth in recent years and more growth is anticipated; with one of Hounslow's highest growth areas being Brentford.

- 6.4. Numerous studies and reports have noted that Hounslow Borough falls below the national and regional average for sports participation and that the Brentford ward itself sits below the Borough average. Levels of childhood obesity are above national levels and groups that traditionally have low participation rates in sport represent significant elements of the local population.
- 6.5. Over much of West London demand exceeds supply for many sports facilities but including, in particular, AGPs and sports hall. Many of Hounslow Borough's existing leisure centres are now at capacity and bearing in mind the levels of anticipated growth in local population in the next decade the need for additional provision is only going to become more acute. As well as quantitative deficiencies, the provision is often qualitatively deficient, which the Hounslow IDP identifies as a major barrier to increasing participation. Gunnersbury Park is expressly cited as failing to realise its full potential with its facilities having been noted as being *"extremely poor"*.
- 6.6. New facilities should normally be built close to existing leisure provision so as to make best use of management and operational arrangements as well as ancillary changing rooms. Parks and open spaces are seen by the Joint Applicants as an essential part of meeting the increasing demand and continuing the improvement of provision. Ealing's 'optimum location' for new sports provision is *"the South East corner of the borough"* and because of its strategic location to both Hounslow and Ealing, the restoration and regeneration of Gunnersbury Park is a key element in the delivery of these needed additional facilities.
- 6.7. The Joint Applicants are working together, as well as with other stakeholders, to improve the facilities at Gunnersbury Park and *"bring the outdoor sports facilities back into use for the benefit of residents from both boroughs"*. This joint working has produced 2026 Masterplan, the funding from a number of sources including the Heritage Lottery Fund and Allocation 09 of the Hounslow Local Plan which designates the Park for the creation of a 'sporting hub'.

iii. Sustainable Development

- 6.8. The NPPF states that there should be a positive attitude towards all development which generates wealth, creates employment, improves quality of life and environmental standards. Local planning authorities should *“seek to approve applications for sustainable development where possible”* and look *“for solutions rather than problems”* and as HM Treasury’s ‘Plan for Growth’ states, the default answer to applications should be ‘yes’. There is now a *“presumption in favour of sustainable development”* and such development *“should be seen as a golden thread running through both plan-making and decision-taking”* (paragraphs 14 & 187). According to the NPPF *“sustainable development is about positive growth”*, emphasising that *“planning must be a creative exercise in finding ways to improve the places in which we live our lives”* (Ministerial Foreword to the NPPF). There are ‘three dimensions’ to sustainable development: economic, social and environmental and these ‘mutually dependent’ roles (which must not be pursued in isolation) include: making provision for growth, supporting communities by providing the infrastructure they need, improving quality of life and health outcomes of residents, whilst making best use of previously developed land and protecting the environment. *“Early engagement”* improves the effectiveness of the planning system and good quality pre-application discussion delivers better outcomes for the community.
- 6.9. Sport and recreation is specifically identified in the NPPF (see paragraphs 69 to 73) as making an important contribution to the *“health and well-being of communities”* and that the Planning System plays an important role in facilitating social interaction by helping the services that the community needs to modernise and develop. Better sport provision is supported where it leads to renewal of previously developed land. It is also an aim of the Mayor to encourage sport and physical activity in London, particularly amongst groups/areas with low levels of participation and proposals that increase or enhance the provision of sports and recreation facilities are generally supported. TLP Policies **3.1, 3.2, 3.6, 3.16, 3.19, 4.5, 4.6 & 7.1** all acknowledge the role played by ‘social infrastructure’ which includes sports and leisure facilities, in enabling people and communities to have active and healthy lives, addressing London’s disparities and because of the benefits such facilities bring to those living, working and visiting the Capital.

- 6.10. The 'All London Green Grid Supplementary Planning Guidance' aims to create an integrated network of green and open spaces together with the Blue Ribbon Network of rivers and waterways. Gunnersbury Park is within No. 11 (*"Brent Valley and Barnet Plateau"*), which includes the *"Strategic Link"* of cycling and walkways which should be improved through better signage, maintenance and management. There is also an emphasis upon preserving and enhancing landscape and protecting views. The masterplan for the entire Park is intended to put the whole redevelopment into one structured context and meets these policy aims. Furthermore, measures are to be put in place to promote biodiversity including bat boxes and new planting with native species as recommended in the Phase 1 Ecological Assessment and helping meet the terms of TLP Policy **5.10** and HLP Policies such as **GB4** or **GB7**.
- 6.11. 'Good design', which according to the NPPF goes beyond mere aesthetic considerations, is very strongly encouraged and new development should be carefully integrated into its surroundings and avoid any impact upon the setting of listed structures as well as upon residential amenity. The NPPF also encourages innovation in design and a mix of uses, in order to create a strong sense of place where the fear of crime does not undermine quality of life. In relation to the 'Development Plan' the achievement of sustainable development as its starting point and policies such as HLP Policies **CC1** & **CC2** seek high quality design which responds creatively to local context, improvements to quality of life; as well as increased community and social inclusion.
- 6.12. Designing out crime is also a concern of Policy **7.3** of TLP. The scheme has been designed with the principles of minimising opportunities for crime in mind. AFLS&P met with the local 'Secured by Design officer' whose recommendations for measures such as, use of toughened glass, turnstiles and CCTV have all been incorporated in the proposal.

- 6.13. Protecting local character is also important to the Development Plan and TLP Policy 7.4 requires the design of future development to contribute *"to a positive relationship between the urban structure and natural landscape features"*. Funding from the sporting bodies is dependent upon their design requirements being met and many of the main design elements of the Sports hall building in relation to form, footprint, volume and height are predetermined. However, in this case the architect has still been able to meet these specifications whilst achieving "the positive relationship" set out in planning policy. For instance there are minimum height requirements for the Sports Hall building, and the need to protect participants from glare which means that there can be no few windows. These requirements also dictate the required court size, which must include adequate circulation space and obstacle free 'runbacks', which then has an impact upon the position of the building's structural members, columns and ultimately its external envelope.
- 6.14. The need to improve sports provision and the funding from the HLF provides the opportunity to create a facility with 'sustainability measures' built in from the start. The new structure will meet the requirements of BREEAM 'excellent' (which go considerably beyond the minima required by Part L of the Building Regulations) and therefore meet 'Development Plan' policies seeking the highest standards of sustainable construction such as TLP Policies 5.3 HLP EQ1, EQ2 & Table EQ2.1, as well as the Mayor of London's SPG on 'Shaping Neighbourhoods: 'Play And Informal Recreation' & 'Sustainable Design and Construction'. Within the new leisure centre there is to be an emphasis upon natural ventilation (the sports hall will be ventilated using 'wind catchers') and the building is to have a green roof. Water saving measures will also be incorporated.
- 6.15. In accordance with the NPPF, the NPPG and Policies such as TLP Policies 5.12 & 5.13 and HLP EQ3 drainage has been designed, or existing drainage modified, so that run-off is minimised and there is no increased flood risk arising elsewhere. Paragraph 3.4.13 of the Mayor's SPG on 'Sustainable Design and Construction' notes that development utilising SuDS, can deliver *"multiple benefits"* including valuable habitat to improve *"green infrastructure, biodiversity, water efficiency and recreation"*.

- 6.16. TLP Policies **6.1** & **6.3** and HLP Policy **EC1** seek to ensure that highway considerations are taken into account in development control decisions and restrain development likely to increase traffic and parking problems in the vicinity. New car parking should not be a level which undermines the use of other transport modes according to TLP Policy **6.13** (the level of appropriate provision for sports facilities should be determined using Sport England guidance). According to the Transportation Consultants, Curtins, current parking provision is deficient to accommodate the levels already using the Park. The existing provision is inadequate in relation to the number of spaces (a shortfall of 32 spaces is calculated) as well as being deficient in terms of layout and surfacing. The 2026 Masterplan has the ambition of increasing current visitation levels to the Park considerably and so this parking provision would be further stressed. The current proposal provides an opportunity for this deficiency to be addressed through quantitative and qualitative improvements to parking provision. The improved parking provision can be shared between the various enhanced sports facilities and the other activities in the Park. The NPPF states that “a key tool” for facilitating more sustainable travel patterns will be a ‘Travel Plan’ (paragraphs 30 & 36) and in this case one is proposed to promote more sustainable travel to the Leisure Centre facility.
- 6.17. TLP policies, such as **6.1**, and HLP Policy **EC2** promote a “*Strategic Approach*” to integrating transport and development, and usually direct new sports development to the locations with the highest PTALs, so as to maximise opportunities for public transport use. However, it is recognised that this is not always possible and a low PTAL rating does not necessarily rule out new development. The recently adopted HLP’s Site Allocation for Gunnersbury Park acknowledges the wide spread of PTALs locally from 1a-4, but nevertheless anticipates the creation of a ‘sporting hub’ in this location.

6.18. Wherever they are located buildings which have a high element of public access should make provision for cycle parking, as well as those on foot. Safe and suitable access to a development of this type for all sections of the community must be achieved and the built environment must be inclusive, and fully accessible to the disabled (see TLP Policies 2.8 & 6.1, 6.3, 6.9, 6.10 & 7.2 and also the Mayor's SPG 'Accessible London: Achieving An Inclusive Environment'). The scheme incorporates cycle parking, as well as adjacent parking to disability standard. The interior of the Sports Hall has also been designed with the interests of all sectors of the community in mind and floors are level and doorways sufficiently wide for disability access.

iv. Metropolitan Open Land

6.19. The multi-purpose role of London's MOL is recognised throughout planning guidance (see for instance paragraph 73 of the NPPF and TLP Policy 2.18) and it is part of the network of 'green infrastructure', providing benefits in terms of *"health and well-being of communities"*, biodiversity, sport and recreation. The Metropolitan Open Land Background Paper of July 2014 found that Gunnersbury Park was providing leisure, recreation sports, arts and cultural facilities *"which serve either the whole or significant parts of London"* and contains features or landscapes of historic, recreational, and biodiversity value. Gunnersbury Park is acknowledged as one of the Borough's *"Metropolitan Parks"* (being those at the top of the open space hierarchy) and it is considered to be a *"Destination Park"* drawing people from a wide area.

6.20. MOL is not expressly considered in the NPPF, but *"Local Green Spaces"* which are of *"particular importance"* are given additional protection *"consistent with policy for Green Belts"*. The *"Government attaches great importance to Green Belts"* (according to paragraph 79 of the NPPF) and although increased access for recreational use is encouraged, most forms of new built development are considered to be 'inappropriate'. There are also a number of other exceptions to the presumption which can include certain facilities for outdoor sport and recreation; reuse of existing buildings, partial or complete redevelopment of previously developed sites, as well as engineering operations.

- 6.21. TLP Policy 7.17 and HLP Policies **GB1, GB2, GB9, CI1** and **CI4** all see the value of sport and recreation to MOL and set out to improve the provision of sports and other community facilities to meet existing and future needs. This is to be achieved by *“supporting high quality sports facilities to meet demands for a range of sports and active pursuits across the borough”* (taken from Policy GB9b). The dual use and co-location of different community facilities will also be encouraged. The promotion of recreational access can also extend to the building of new facilities, although MOL should only be built on if the purpose is for alternative sports provision which outweighs any loss of open land.
- 6.22. The 2008 version of the CMP noted that large areas of the Park are given over to sports provision and *“since its opening in 1926 Gunnersbury Park has been renowned for its sport and recreation facilities, for all levels....however, generally this provision is declining in standards of maintenance and use. Just one example being the lack of changing facilities since the Model Farm changing rooms suffered an arson attack.”* A vision was set out in this version of the CMP to become *“a sustainable high quality park with varied uses, which serve the local community and the region whilst respecting, enhancing and interpreting its historic framework and fabric”* but to do this additional development will be needed in order to make them compliant with the requirements and standards set for support from the various sports’ governing bodies. Facilities such as the **changing facilities, AGPs, the MUGA, and the tennis courts** are all acceptable in, and appropriate to, MOL and will all help to promote greater public use of the Park. In some cases the proposal is merely replacing facilities that have long been in the Park, such as the changing rooms in the Model Farm, but have fallen into disrepair or even disuse. However, the development of the **sports hall** will require the demonstration of ‘very special circumstances’ (VSC) before planning permission could be granted.

- 6.23. According to the NPPF, making provision for sport and recreational facilities is a core element of achieving the ‘social dimension’ of sustainable development. Councils are required to assess the quantity and quality of local recreational provision (NPPF, paragraph 73) and where deficiencies are identified these should be addressed. The matter of local and regional need for better sports and recreational provision has already been considered above. Using consultants the Applicants have assessed the local provision of recreational facilities. The findings of both Councils were consistent in that significant deficiencies were identified in relation to both the quality and quantity of existing indoor sports provision and in many cases leisure facilities failed to meet community expectations. Significant investment in sport and leisure provision in the coming years is viewed as essential in order to address existing deficiencies and also in anticipation of additional demand due to population growth. The Joint Applicants’ stated aim of improving sports facilities generally and at Gunnersbury specifically, in order to encourage active participation by the public is a ‘VSC’.
- 6.24. In relation to the proposals for a ‘Sporting Hub’ within Gunnersbury Park the 2008 CMP suggested siting any new building outside the historic core to minimise the impact on the main concentrations of historic buildings and features. Furthermore, significant views should be respected when siting any new facilities. The subject site was chosen by one of Hounslow Council’s planning officers because the impact of any building upon the heritage views within the Park was considered insignificant and the loss of large amounts of trees would not be an issue. The Design & Access Statement discusses the measures employed by the architect to enclose the new structure from view, making good use of the profile of the land and the screening by the belts of mature trees. In addition there is to be new planting including native trees and areas of meadowland, in order to promote biodiversity and enhance wildlife habitat as the NPPF (see paragraphs 117 & 118 amongst others) and TLP Policies **7.19** & **7.21** as well as HLP Policy **GB9** all require. As a result, there will be no adverse impact arising to the MOL, or upon the perception of openness arising from the proposed sports hall.

- 6.25. The proposal also includes space for the **Museum Store** & the **Middlesex County Cricket Club's (MCCC) offices** and below we consider the need for their representation within the proposal at Gunnersbury Park.
- 6.26. The **Museum** has long had to stop storing much of its collection, which is not on display at the Large Mansion due to the lack of space and the unsuitable environment of the basement. The need for environmentally controlled, single level, premises is a very specialist requirement which means that finding an existing suitable building is difficult and much of the Museum's collection is currently being stored near Oxford. The Museum needs to have its store close to its home in order to allow exhibition material to be rotated more easily, but a new structure may not be appropriate in relation to the impact upon the Park's concentration of heritage assets. The new Sports hall building also provides the opportunity to create bespoke environmentally controlled premises which will meet the Museum's express storage requirements in a convenient location. The Museum's bespoke storage requirements and the lack of alternative nearby locations is a further 'VSC' justifying this proposal.
- 6.27. The **MCCC** already runs an active programme of engagement with the community in order to promote the playing of cricket, this is particularly targeted towards youth groups, schools as well as the local South Asian Community (hosting a cricket road show at the Gunnersbury Park London 'Mela'). However the Club is a considerable distance away from these target groups and wants to provide its support at a more local level. The representation at Gunnersbury Park will enable coaching education and training sessions to be offered, as well as administrative support to local clubs. The work already being done in the wider community by the MCCC (as well as that that the Club would like to do), meets many of the Joint Applicants' strategic objectives relating to promoting participation in sport and improving health outcomes for residents. Furthermore, the addition of the MCCC facility does have further benefit in assisting with the delivery of the overall project in terms of providing additional funding. Into the future it provides an on-going income stream.

- 6.28. Normally, having established the need for an activity in MOL the first preference for location ought to be an existing structure. In this instance the possibility of refurbishing and instituting a new use for the Model Farm has been discounted for a number of reasons. This 'undesigned' heritage asset requires restoration, but could not be adapted to meet the storage needs of the Museum. Whilst in theory it could be refurbished as accommodation for an office function, the Joint Applicants have other uses in mind for these structures. Part of the building is already used by the grounds maintenance staff for vehicle storage and it is likely that the requirement for space will only increase once the landscaped gardens in the historic, eastern, part of the Park are restored to their former high quality. Because of its proximity to the Potomac Lake the Model Farm is also a possible venue for supporting facilities for schools visiting the south of the Park. Currently the only facilities such as WCs are close to the Mansions and are a very considerable distance from the Lake.
- 6.29. As with the Museum store, the MCCC element will be considerably below the height of the Sports Hall and is to be accommodated within the site's least sensitive elevation, against the background of dense tree screening and a brick wall which obviate any impact upon wider views.
- 6.30. The two existing **parking** areas are unattractive and inadequate to accommodate the levels of traffic already using the Park and certainly will not be able to cope with the anticipated parking demand (even excepting any additional demand arising from the current proposal). These areas are to be properly landscaped and such visual improvements will contribute to the setting of the adjacent listed structure. The majority of the new parking provision will be located inside the 'Walled Garden' and so will be entirely screened from view. The partial or complete redevelopment of previously developed sites is not 'inappropriate' and the installation of much of the new parking into the area of the 'Walled Garden' is clearly reuse of land that is 'brownfield' and in 'continuing use' also meeting these NPPF parameters. For the reasons given above, the new parking area will have no greater impact on the openness of the MOL than before, due to the nature and characteristics of the site and its surroundings. This includes the tree cover, embankments and proposed structured landscaping.

- 6.31. Landscape improvements are normally required when development is permitted (see for instance TLP Policy 7.19). The 'Hounslow Biodiversity Action Plan' (HBAP) 2013 notes that whilst Gunnersbury Park is a 'Site of Borough Importance for Nature Conservation Grade II', the majority of it is 'Neutral Grassland' but there is potential to improve its habitat potential through active management. The ecological value of the Park can be enhanced through the implementation of biodiversity improvements into the proposal (such as areas of uncultivated meadow to the benefit of wildlife).
- 6.32. The various project and landscape architects are aware of the need for a sympathetic scheme of external lighting for the site in order to minimise any external impacts. This is a matter which can be dealt with by means of a planning condition.

v. Heritage

- 6.33. The conservation of the historic environment is a *"core planning principle"* of the NPPF and there should be *"a positive strategy"* for its preservation including those heritage assets at risk of neglect and decay. In his 'Foreword' to the NPPF the then Minister for Planning states *"our historic environment – buildings, landscapes, towns and villages – can better be cherished if their spirit of place thrives, rather than withers"*. The concepts of conservation being *"an active process of maintenance and managing change"* and the need to put heritage assets to viable use also appears throughout the NPPF and the NPPG. Ensuring that heritage assets remain in active use to prevent deterioration means that changes to them will have to be accepted. As the NPPG says *"the optimum viable use"* does not have to be the *"original use"* as *"that may no longer be economically viable"* and even *"harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused provided the harm is minimised"*.
- 6.34. The Hounslow IDP notes the poor condition, and lack of investment in, some of the Borough's heritage assets. This is particularly the case with Gunnersbury Park where so many of its listed structures are upon the 'Heritage at Risk' (HAR) Register.

- 6.35. As long ago as 2008, the CMP pointed out that Gunnersbury Park was one of the top 12 ‘at risk’ properties in England. It was also acknowledged that reversing this decline would involve a considerable *“amount of backing, both in human resources and financial terms”*. The entire Park is listed Grade II* on the Register of Historic Parks & Gardens although much of it has not been actively managed in the past. In order to remove buildings from the HAR Register wherever possible, support for investment initiatives will be given by Hounslow Council, although retaining public accessibility to the Park is regarded as paramount (see 2008 CMP). TLP Policy 7.7 (*“Heritage-Led Regeneration”*) seeks to use heritage assets as a means of stimulating *“environmental, economic and community regeneration”*. Likewise, HLP Policy CC4 states that opportunities to enhance the significance of the Borough’s heritage assets and their settings will be identified *“as a positive means of supporting an area’s distinctive character and sense of history”*. This is to be done through promoting *“heritage-led regeneration, particularly where this brings long term value and sense of place to development”*.
- 6.36. In the case of Grade II* registered parks and gardens and listed buildings paragraph 132 of the NPPF states that *“any harm or loss”* of significance *“should require clear and convincing justification”* but where a proposal leads to *“less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use”*. There are even cases where *“substantial harm to or loss of designated heritage assets of the highest significance”* can be permitted if the circumstances are *“wholly exceptional”* such as where *“it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss”*. The definition of ‘public benefits’, according to paragraph 020 of the NPPG, is very broad and *“could be anything that delivers economic, social or environmental progress”* but *“should be of a nature or scale to be of benefit to the public at large”*. This is certainly a case where the level of wider public benefit is very high.

- 6.37. Purcell's Heritage Impact Assessment agrees and whilst some *"minor adverse impacts"* are found to result from the proposals, this impact has been minimised *"through the discreet placement of the new sports pavilion, careful design treatment of the park fronting elevations and the optimisation of existing and supplementary screening around its curtilage"*. When considered as a whole Purcell find that the proposals *"result in 'less than substantial harm' on the overall heritage value of the park"* and any *"low level adverse impact must be weighed up against the overall public benefit of the proposals which will result in the revitalisation of the park and will enable through revenue generation the regeneration of the park and its component parts, a key objective of both the Local Plan, the English Heritage at Risk Register and the Park wide Conservation Management Plan...."*
- 6.38. There may also be cases where *"removing later inappropriate additions to historic buildings which harm their significance"* is considered beneficial by Government policy and for instance within conservation areas, opportunities should be sought from new development to enhance or *"better reveal their significance"*. The 2008 CMP identified a number of issues affecting the Park and put forward some policy solutions. Many of its problems stemmed in the past from a lack of clear management, declining funding and visitation due to the poor quality of the facilities. To address these issues the *"priority actions"* were, amongst other things, to put in place a better management regime, complete a number of feasibility studies into improving the Park's facilities (one of which involved the proposed 'Sports Hub'), finalise a masterplan and investigate other sources of funding. Many of these recommendations were adopted with the constitution of a Management Board by the Joint Applicants, the completion of the feasibility studies and the securing of outside funds, such as that from the HLF. The current proposal forms a major part of the overall 15 year Masterplan for the regeneration of the Park. The three phases will eventually see the restoration of the parkland setting of the main concentration of the historic structures and the removal of unsympathetic later alterations, including the golf course. The subject phase is focused upon improved sports provision in the western part of the Park to make Gunnersbury *"a centre of sporting excellence"* and the current proposal includes a structured landscaping scheme, new planting and earthworks to create interest.

- 6.39. The lack of interaction between the 'Greenscene' horticultural operation and the rest of the Park was noted in the 2008 version of the CMP. Likewise, the draft 2014 CMP, and its accompanying Gazetteer, point to the *"ongoing deterioration"* of the 'Walled Garden' and that some of the adjoining planting/lean-to structures are damaging to its structure. The removal of the entire 'Greenscene' operation, together with those damaging elements (including the 20th century greenhouses and other utilitarian structures, as well as the section of concrete blocks in the listed wall) *"would allow reinstatement or evocation of the historic character and layout"*. The removal of 'Greenscene' and its associated structures should also be seen as a major benefit in heritage terms.
- 6.40. Similarly, there are also benefits to the setting of the Conservation Area from the removal of the 1950s disused cricket pavilion and changing rooms. Both buildings are accepted by the Conservation Officer as being of no architectural merit and the draft CMP of 2014 goes as far as describing them as *"detractors"* from the Conservation Area. Accordingly, the loss of these structures does not need to be justified in heritage terms. In fact the NPPF (paragraph 137) would support the removal of these structures given the attendant enhancement to the Conservation Area's character and appearance.
- 6.41. A Park-wide **archaeological** assessment was carried out by MOLA in 2013 which identified features of potential interest (mainly dating from the Second World War) within this part of the Park. A further, more detailed assessment, has now been carried out in relation to the land directly affected by the current proposal. Although there is disturbance to the ground with the latest proposals, according to MOLA, the *"heritage significance of any remains removed or truncated by the proposed works would be reduced to negligible"*. MOLA also considers *"that archaeological remains liable to be affected by the proposals are generally likely to be of low significance and that any further investigation required in order to formulate an appropriate mitigation strategy for the impact of the proposals could be carried out under a planning condition (i.e. post-determination) set out with the granting of planning consent....."in accordance with an approved Written Scheme of Investigation (WSI)....."*

vi. Residential Amenity

- 6.42. The Applicants are mindful of the amenity of nearby residents, such as those whose houses back on to the Park from Lionel Road and Pope's Lane. Issues such as lighting, acoustics and traffic are all the subject of specific studies by specialist consultants. HLP Policies **EQ4, EQ5, EQ6 & EQ8** are all looking to minimise pollution from whatever source and reduce the impact of development upon biodiversity and surrounding sensitive users, such as housing, through incorporating attenuation measures. Moving the AGPs away from their originally suggested position adjoining the rear boundaries of the houses on Pope's Lane has led to the creation of an acoustic environment where the noise level following completion of the proposal is not appreciably different to the position being experienced currently at the Park's residential boundaries even though the intensity of recreational use may have increased.
- 6.43. Modern methods of directing lighting mean that there is no overspill from the outdoor pitches on to surrounding residential properties.
- 6.44. On the matter of traffic, the increase in car parking provision is not so substantial as to cause any harm to amenity and the increases in vehicle movements are small, when compared with traffic levels in the locality (which includes the North Circular and the A4). The new car parking is to be fully enclosed behind the 'Walled Garden' and so there will not any disturbance arising from car door slamming and engines starting up.

7. SUMMARY AND CONCLUSIONS

7.1. In the light of the above we can **summarise** the findings and **conclude** as follows:

- The Joint Applicants have a number of overall strategic objectives to improve the quality of local community facilities and in particular promote healthier lifestyles. Surveys of local sport and leisure facilities provision have revealed significant deficiencies in both the quantity and quality provision. Much of the existing provision is already at capacity and future planning must take account of significant recent and programmed growth in population. The Councils have pledged to address these deficiencies in documents such as ‘Sustainable Community Strategies’, as well as within various planning documents (such as the recently adopted HLP). The Joint Applicants acknowledge that making such improvements will require a corporate response with the various arms of local government working together.
- The parks and open spaces are seen as a vital part of the solution to improving provision. There have been sports facilities at Gunnersbury Park for many decades, but studies have noted that the quality of this provision is “*extremely poor*” and this is given as an important reason for discouraging participation. The existing football pitches do not meet FA requirements in relation to their gradient or orientation and the layout is considered to be random. Meeting the latest requirements of a sport’s governing body is an essential prerequisite for continued funding and support, so the various elements of the scheme (such as the Sports Hall and AGPs) have been designed to accord with modern size parameters in terms of height, width, court length and clearance from harmful obstacles. It is anticipated that the ‘Sports Hub’ will meet the BREEAM ‘Excellent’ level as required in ‘Development Plan’ policies, such as Hounslow Local Plan EQ.2.

- Gunnersbury Park and a number of features within it are within the top 12 properties in England deemed to be 'at risk' by Historic England and it is recognised that significant investment is needed to restore and repair the buildings and landscape.
- The recently adopted Hounslow Local Plan designates Gunnersbury Park for regeneration and this includes the creation of a 'sporting hub'. The new leisure building will sit within the context of a structured landscaping scheme and thought has also been given to providing improved facilities for cyclists.
- There are no residents that will be affected by the new leisure facility and the various AGPs have been sited close to the changing facilities and supporting activities in the main building away from potentially sensitive boundaries. The lighting scheme upon the various outdoor pitches has been designed to minimise any light overspill and protect amenity.
- Government policy is predicated upon delivering development that is sustainable and the default answer to applications should be 'yes'. The NPPF explains that there are 3 dimensions (economic, social and environmental) to achieving sustainable development - and all three should figure within the application determination process. Any development that: creates jobs ('economic'); helps build communities by providing much needed facilities that contribute to improving health outcomes ('social'); and which generates new investment into the historic environment whilst reusing previously developed land ('environmental'); should be viewed **positively**.
- The NPPF also encourages pre-application consultation and engagement as a means of securing better outcomes. In this case there has been considerable consultation with stakeholders including Historic England, the various sports governing bodies, the HLF, the different officers of the Joint Applicants, as well as the LPA and the Highways Authority.

- After examining the various elements of the scheme against the Government's up-to-date policy in the NPPF it can be concluded that much of the application content does not constitute 'inappropriate' development in the MOL. The improved pitches for outdoor recreation are an appropriate activity in this type of location. Existing car parking is being improved through better surfacing and additional landscaping and the new parking is to be introduced inside the 'Walled Garden', where there will be no impact upon openness.
- The 'Greenscene' operation is about to relocate and this land will fall vacant. Whilst a nursery may, in some circumstances fall within the scope of an 'appropriate' MOL use, we understand that this particular operation did not grow plants on the site. It seems that Gunnersbury served as a distribution depot for this part of London and that this use has been in operation for a considerable period of time. This means that the 'Greenscene' premises can be considered to be 'previously developed land' as defined by the NPPF. The reuse of such land even in MOL would not be inappropriate according to the NPPF provided that any new buildings are not 'materially larger'. In this instance there are no new structures.
- On the matter of demonstration of 'very special circumstances' for the other elements of the proposal, one can advance the need to help meet a shortfall in local provision of sports facilities and meet stated overall corporate strategic objectives to improve the quality and quantity of sports facilities by providing something of regional significance. The Museum will have a modern, environmentally controlled, storage facility at a convenient location which does not compromise the setting of the listed Mansions. The MCCC will have a local base in which to develop its cricket development programme and provide support to clubs in the West London area.

- In relation to the historic environment there are also significant benefits arising to the heritage assets and their settings; including the removal of the various utilitarian structures associated with the Greenscene' occupation, together with the return of public access to the 'Walled Garden'. Likewise, the removal of the 1950s cricket pavilion and derelict changing rooms would eliminate two structures currently described as being "*detractors*" in the Conservation Area. While some 'minor adverse impacts' resulting from the proposals have been identified by the Heritage Consultants, they acknowledge that any impact has been minimised through careful design treatment and the optimisation of curtilage screening. They also conclude that any 'low level adverse impact' is more than outweighed by the substantial overall public benefit of the proposals which will result in the revitalisation of the Park and the achievement of a key Local Plan objective. The proposals are also found to be consistent with paragraphs such as 131 of the NPPF, in looking to protect what is most important about Gunnersbury Park through considered intervention and through the use of new build development which reflects the qualities of an active park environment.

7.2. In final submission the proposal promotes a balanced and sustainable new leisure and community development that will:

- Meet the identified leisure needs of the area;
- Continue to serve a wide variety of user groups at an established sports and leisure destination;
- Regenerate the Park and boost the local economy;
- Create an enhanced public realm, that will enhance the character and appearance of the MOL;
- Provide an enjoyable destination for residents and visitors; and

- Help fulfil a number of both Joint Applicants' long-term Strategic Objectives.
- 7.3. The proposed development seeks to perpetuate the use of the municipal park, encouraging visitors and bringing in essential revenue that will help support the wider regeneration of Gunnersbury Park as a whole, without impacting upon its key heritage values. The proposals form a further part in the master-planned regeneration of Gunnersbury Park and are fully supported by national and 'development plan' policy. Accordingly, we trust that the Local Planning Authority will grant the necessary permissions and allow what is a joint Corporate Priority project to move forward.

Appendix 1

Planning Policy Background

Introduction

- App 1.1. The National Planning Policy Framework (NPPF) sets out the Government's commitment to a planned system of development control. It notes that where the Development Plan contains relevant policies, applications for planning permission should be determined in line with the Development Plan unless material considerations indicate otherwise (paragraphs 2 & 11). One such consideration will be whether the plan policies are relevant and up to date. Paragraph 13 of the NPPF reconfirms that Government statements of planning policy are also material considerations which (if relevant) must be taken into account in decisions on planning applications. On occasions Government Policy can be a material consideration that may overtake or supplement Development Plan Policies.
- App 1.2. At the time of writing, the current '**Development Plan**' for this site comprises the **Mayor's Spatial Strategy for Greater London** of March 2015 ('The London Plan' or TLP) and the **Hounslow Local Plan** (HLP) adopted on the 15th September 2015 (this document is still in the period for legal challenge). The HLP Proposals Map shows the entirety of Gunnersbury Park as Site Allocation 09 "*Restoration of core heritage parkland, refurbishment of listed buildings including potential enabling development and creation of a sporting hub*". The entire Park is Metropolitan Open Land (MOL), as well as being an Historic Park & Garden (Grade II*). The land is within the Gunnersbury Park Conservation Area, and it is a "*Site of Importance for Nature Conservation*" (SINC). The Park is also considered to be a "*Critical Drainage Area*" (CDA).
- App 1.3. There is a considerable quantity of planning policy that will be relevant to the determination of any applications on this site. This planning policy is at National and Local levels and we consider this below, commencing with National policy.

i. National Context

App 1.4. As well as the NPPF (and its accompanying ‘National Planning Practice Guidance’, or NPPG, regarding such matters as flood control), in this case relevant national planning policy could also include ministerial statements (including the various statements which accompanied various recent Budgets), as well as the HM Treasury’s ‘Plan For Growth’ of 2012 & ‘Fixing the Foundations’ of 2015.

App 1.5. In his ‘Foreword’ to the NPPF the Minister for Planning (now the Secretary of State) is very clear that *“development means growth”* and that *“Sustainable development is about positive growth”*, emphasising that *“planning must be a creative exercise in finding ways to improve the places in which we live our lives”*. The Minister continued *“our historic environment – buildings, landscapes, towns and villages – can better be cherished if their spirit of place thrives, rather than withers”*. The NPPF explains (at paragraph 6) that *“the purpose of the planning system is to contribute to the achievement of sustainable development”*. There is now a *“presumption in favour of sustainable development”* and such development *“should be seen as a golden thread running through both plan-making and decision-taking”*. Local planning authorities should *“seek to approve applications for sustainable development where possible”* and look *“for solutions rather than problems”*(paragraphs 14 & 187).

App 1.6. According to paragraph 7 *“there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles”*. These roles include supporting growth, making provision for infrastructure (economic); *“supporting strong, vibrant and healthy communities...with accessible local services that reflect the community’s needs and support its health, social and cultural well-being”*(social); and *“protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently”*(environmental).

App 1.7. Crucially *“these roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions”*(paragraph 8).

App 1.8. These messages are confirmed in paragraph 17, which amongst other things says that:

- It should be recognised that *“some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production)”*;
- *“Every effort should be made.....[to] meet thedevelopment needs of an area”*;
- *“...always seek to secure high quality design”*;
- Make *“effective use of land by reusing land that has been previously developed”*;
- *“conserve heritage assets in a manner appropriate to their significance...”*; and
- *“...take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.*

App 1.9. The NPPF states that *“a key tool”* for facilitating more sustainable travel patterns will be a ‘Travel Plan’ and *“all developments which generate significant amounts of movement should be required to provide”* one (paragraphs 30 & 36).

App 1.10. Paragraph 188 says that *“early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community”*. Paragraph 190 continues *“the more issues that can be resolved at pre-application stage, the greater the benefits”*.

- App 1.11. In relation to the provision of social and community facilities paragraph 69 states that *“the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities”* and, according to paragraph 70, in order *“to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: plan positively for the provision and use of shared space, community facilities [including meeting places, sports venues and local services].....enhance the sustainability of communities and residential environments”*; and ensure that *“established facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community”*. This paragraph concludes that *“an integrated approach”* should be taken to delivering the facilities and services that community needs.
- App 1.12. Section 12 of the NPPF is headed *“Conserving and Enhancing The Historic Environment”* and sets out the Government’s policy for dealing with ‘heritage assets’. These are widely defined in the ‘Glossary’ at Annex 2 to the NPPF as being *“a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets [including listed buildings and conservation areas] and assets identified by the local planning authority (including local listing)”*.
- App 1.13. The NPPG states that the conservation of heritage assets in accordance with their *“significance is a core planning principle. Heritage assets are an irreplaceable resource and effective conservation delivers wider social, cultural, economic and environmental benefits”* (similar comment appears at paragraph 126 of the NPPF). Conservation is defined in the NPPG as *“an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use to as yet undiscovered, undesignated buried remains of archaeological interest”* (Ref ID 18a-003-20140306 Last updated 06 03 2014).

App 1.14. Paragraph 126 of the NPPF says that LPAs should have *“a positive strategy for the conservation and enjoyment of the historic environment including heritage assets most at risk through neglect, decay or other threats”*. NPPF Paragraph 131 continues, in determining planning applications relating to ‘heritage assets’ account should be taken of:

- *“the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness”*.

App 1.15. The NPPF also considers it ‘desirable’ (at paragraph 131) to sustain and enhance the significance of heritage assets and put them to viable use *“consistent with their conservation”*. That same paragraph then continues to say that LPAs should take into account: the significance of heritage assets: the need to put them to viable use, as well as *“the desirability of new development making a positive contribution to local character and distinctiveness”*.

App 1.16. According to the NPPG *“disrepair and damage and their impact on viability can be a material consideration in deciding an application”* and it is essential to keep heritage assets in active use in order to minimise *“the risks of neglect and decay”*. It is further stated that *“ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time”*. The NPPG continues *“putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation”* and it is considered *“important that any use is viable, not just for the owner, but also the future conservation of the asset”*. *“The optimum viable use”* does not have to be the *“original use”* as *“that may no longer be economically viable”* and even *“harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused provided the harm is minimised”* (NPPG, Reference IDs 18a-003, 014, 015 & 016-20140306).

- App 1.17. 'Significance' for the purposes of heritage policy is defined in the 'Glossary' as being *"the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting"*. An applicant is required to describe *"the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance"*. Where necessary *"appropriate expertise"* should be used to assess 'heritage assets' and where archaeological interests may be affected a desk-based evaluation should be submitted (NPPF, paragraph 128).
- App 1.18. According to the NPPG, it is a matter of judgement for the *"decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework"* as to whether a proposal causes *"substantial harm"* and works that are *"moderate or minor in scale are likely to cause less than substantial harm or no harm at all"*. The NPPG continues to say that, in itself, removal of material is not necessarily harmful, especially *"when removing later inappropriate additions to historic buildings which harm their significance"* (NPPG, ID 18a-017-20140306).
- App 1.19. In the case of Grade II* registered parks and gardens and listed buildings paragraph 132 of the NPPF states that *"any harm or loss" of significance "should require clear and convincing justification"*. Where a proposal leads to *"less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use"*. (paragraph 134). *"Substantial harm to or loss of designated heritage assets of the highest significance"* can be permitted if the circumstances are *"wholly exceptional"* such as where *"it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss"*. (NPPF, paragraphs 132 & 133).

App 1.20. The definition of ‘public benefits’, according to paragraph 020 of the NPPG, is very broad and *“could be anything that delivers economic, social or environmental progress”* but *“should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit”*. Such benefits may include:

- *“sustaining or enhancing the significance of a heritage asset and the contribution of its setting;*
- *reducing or removing risks to a heritage asset;*
- *securing the optimum viable use of a heritage asset in support of its long term conservation.”*

App 1.21. There may also be cases where *“removing later inappropriate additions to historic buildings which harm their significance”* is beneficial and where the *“partial loss of a heritage asset is justified, the aim then is to capture and record the evidence of the asset’s significance which is to be lost, interpret its contribution to the understanding of our past, and make that publicly available”* (NPPG, Reference IDs 18a-003-20140306 & 18a-017-20140306). Likewise, within conservation areas, opportunities should be sought from new development to enhance or *“better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably”* (NPPF, paragraph 137).

App 1.22. On the matter of design, paragraph 57 of the NPPF states that *“it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes”*. Similarly, paragraph 32 seeks *“safe and suitable access to the site..[to]...be achieved for all people”*.

App 1.23. Decisions on proposals should ensure that designs *“create and sustain an appropriate mix of uses.... establish a strong sense of place... respond to local character and history, {and} reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation”* (NPPF, paragraphs 58, 59 & 60).

App 1.24. Paragraph 61 of the NPPF continues that *“although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment”*. *“In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area”* and design should be ‘evolved’ to *“take account of the views of the community”* (NPPF, paragraphs 63 & 66).

App 1.25. Access to open spaces, as well as sport and recreation are also specifically identified, at paragraph 73 of the NPPF, as making an important contribution to the *“health and well-being of communities”*. According to paragraph 74, existing open space *“should not be built on unless.....the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss”*.

App 1.26. MOL is not expressly considered in the NPPF, but *“Local Green Spaces”* which are of *“particular importance”* are given additional protection *“consistent with policy for Green Belts”*. Within the Green Belt most forms of new development are ruled out, other than in ‘very special circumstances’ (VSC) and such circumstances *“will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations....”* (paragraphs 76-78 & 87-88).

App 1.27. In the Green Belt, there are some exceptions to this restriction which include:

- *“provision of appropriate facilities for outdoor sport, outdoor recreation...;”*
- *limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it...”*

App 1.28. According to paragraph 90 *“certain other forms of development are also not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. [amongst others] these are.....engineering operations”*. As noted above, certain types of leisure development can be acceptable and the NPPF encourages Councils to *“enhance the beneficial use of the Green Belt [through providing] opportunities for outdoor sport and recreation”*(NPPF, paragraph 81).

App 1.29. Emphasis is placed upon promoting biodiversity and protecting/enhancing wildlife habitats and in that regard, the NPPF, at paragraph 109, states:

“the planning system should contribute to and enhance the natural and local environment by....minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”.

App 1.30. The NPPF continues *“when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles”*, which amongst others include the incorporation of measures to improve bio-diversity and recreate *“priority habitats”*(paragraphs 117 & 118).

App 1.31. Planning Obligations are covered at paragraphs 203 and 204 of the NPPF. This latter paragraph advises *that “planning obligations should only be sought where they meet all of the following tests:”*

- *“necessary to make the development acceptable in planning terms;*
- *directly related to the development; and*
- *fairly and reasonably related in scale and kind to the development.”*

App 1.32. Overall, it can be seen from the NPPF (as well as the Treasury's 'Plan for Growth'/Budget statements, all of which underpin the NPPF and which state that the default answer to applications should be 'yes') that there should be a positive attitude towards all development which generates wealth and creates employment because *"economic growth can secure higher social and environmental standards"*(paragraph 8).

ii. Strategic & Local Policy

a. The London Plan

App 1.33. **The Mayor's Spatial Strategy for Greater London ("The London Plan" or TLP) adopted March 2015** – Policy 1.1 (*"Delivering the Strategic Vision and Objectives for London"*) is concerned with achieving the Mayor's objectives for London and states that *"growth will be supported and managed across all parts of London to ensure it takes place within the current boundaries of Greater London without:*

- *a) encroaching on the Green Belt, or on London's protected open spaces, or*
- *b) having unacceptable impacts on the environment"*.

App 1.34. Policy 1.1 continues that it aims to meet the challenges of economic and population growth whilst becoming a *"world leader in improving the environment"*. Access to *"easy, safe and convenient.....jobs, opportunities and facilities"* will be sought.

App 1.35. Hounslow is defined as 'Outer London' for the purposes of TLP and Policy 2.6 *"Outer London: Vision And Strategy"* is relevant. Policy 2.6 states that the:

"The Mayor will, and boroughs and other stakeholders should, work to realise the potential of outer London, recognising and building upon its great diversity and varied strengths by providing locally sensitive approaches through LDFs and other development frameworks to enhance and promote its distinct existing and emerging strategic and local economic opportunities, and transport requirements.....[and] enhance the quality of life in outer London for present and future residents as one of its key contributions to London as a whole".

App 1.36. Policy 4.1 (*“Developing London’s Economy”*) states that the Mayor will work to *“promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London”*. Similarly, Policy 2.7 (*“Outer London: Economy”*) specifically aims to promote new economic growth of Outer London through *“making the most effective use of existing and new infrastructure investment; encouraging walking, cycling and public transport use”* and promoting *“synergies for clusters of related activities and business locations”*. This policy continues that *“appropriate weight is given to wider economic as well as more local environmental and other objectives when considering business and residential development proposals”*. Policy 2.7 also expressly supports leisure, arts, cultural and tourism development. ‘Tailored partnerships’ are to be established to enable *“cross-boundary working arrangements to address particular issues”*.

App 1.37. These general statements for promoting sustainability are given more detail within:

- Policies 2.8 (*“Outer London: Transport”*) & 6.1 both advocate a *“Strategic Approach”* to integrating transport and development and aim to reduce car travel and promote access by other modes, such as cycling and walking (see also Policies 6.9 *“Cycling”* & 6.10 *“Walking”*). 6.3 (*“Assessing the effects of development on transport capacity”*) requires transportation assessments and travel plans to be submitted with larger development schemes;
- Policy 6.13 (*“Parking”*) that seeks to ensure that on-site car parking at new developments is not at a level which undermines the use of other transport modes such as walking, cycling and public transport. The Table, 6.2, which accompanies this policy sets out the car parking standards. For *“sports facilities”* these are to be *“determined according to the usage of the sports facility”*, having regard to 2010 Sport England guidance. Cycle parking must be provided in accordance with the minimum standards at Table 6.3.

- Policies **3.1** (*“Ensuring Equal Life Chances for All”*), **3.2** (*“Improving health and addressing health inequalities”*), **3.6** (*“Children and young people’s play and informal recreation facilities”*), **3.16** (*“Protection and Enhancement of Social Infrastructure”*), which specifically includes sports and leisure facilities within its scope and acknowledges that ‘social infrastructure’ provision must be improved to meet the needs of London’s growing population), & **7.1** (*“Lifetime Neighbourhoods”*) are all concerned with enabling people and communities to have active and healthy lives and addressing London’s disparities. Such disparities will be addressed through, amongst other things, the promotion of healthy lifestyles and for children through *“safe access to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery”*.
- Policy **3.19** specifically concerns *“Sports Facilities”*. The Mayor *“aims to increase participation in, and tackle inequality of access to, sport and physical activity in London particularly amongst groups/areas with low levels of participation... [and]....Development proposals that increase or enhance the provision of sports and recreation facilities will be supported.....”*. Policy 3.19 continues *“wherever possible, multi-use public facilities for sport and recreational activity should be encouraged....”* *“where sports facility developments are proposed on existing open space, they will need to be considered carefully in light of policies on Green Belt and protecting open space....”*. Policies **4.5** (*“London’s Visitor Infrastructure”*) & **4.6** also give *“Support For and Enhancement of Arts, Culture, Sport and Entertainment”* because of the benefits such facilities bring to those living, working and visiting the Capital.
- Policy **7.8** (*“Heritage Assets And Archaeology”*) requires development to *“identify, value, conserve, restore, re-use and incorporate heritage assets”* and conserve their settings through *“being sympathetic to their form, scale, materials and architectural detail”*. Policy **7.7** (*“Heritage-Led Regeneration”*) seeks to use heritage assets as a means of stimulating *“environmental, economic and community regeneration”*. The principle of heritage-led regeneration should be carried over into development plans.

- Policy 2.18 (*“Green infrastructure: the multi functional network of green and open spaces”*) seeks *“to protect, promote, expand and manage the extent and quality of, and access to, London’s network of green infrastructure. This multifunctional network will secure benefits.....to biodiversity; natural...landscapes; culture; building a sense of place; the economy; sport; recreation;.....mitigatingclimate change; water management; and the social benefits that promote individual and community health and well-being”*. As its title suggests, Policy 7.18 (*“Protecting open space and addressing deficiency”*) generally resists the loss of open spaces and Boroughs should try to improve provision in areas of deficiency.
- Policy 7.17 (*“Metropolitan Open Land”*) states that *“the Mayor strongly supports the current extent of Metropolitan Open Land (MOL), its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL”*. In making decisions affecting MOL *“the strongest protection should be given....and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL”*. Paragraph 7.56 of the accompanying reasoned justification to Policy 7.17 explains that:

“the Mayor is keen to see improvements in its overall quality and accessibility. Such improvements are likely to help human health, biodiversity and quality of life....Appropriate development should be limited to small scale structures to support outdoor open space uses and minimise any adverse impact on the openness of MOL. Green chains are important to London’s open space network, recreation and biodiversity”.

- Policy 7.19 (*"Biodiversity and Access to Nature"*) states that *"a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy. This means planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the layout, design and materials of development proposals and appropriate biodiversity action plans"*. For planning decisions *"development proposals should: wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity"*. The policy continues *"on Sites of Importance for Nature Conservation development proposals should... give sites of borough and local importance for nature conservation the level of protection commensurate with their importance"*. If a proposal affects *"a site of recognised nature conservation interest"*, a hierarchy is applied:

"1: avoid adverse impact to the biodiversity interest;

2: minimize impact and seek mitigation;

3: only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation".

- Policy 7.21 (*"Trees and woodlands"*) seeks to protect *"existing trees of value"* and planting of appropriate species is encouraged.
- Policy 5.3 is concerned with using *"Sustainable Design & Construction"* to help tackle climate change by use of high quality sustainable design and Policy 5.10 (*"Urban Greening"*) aims for the incorporation of *"green infrastructure"* into proposals from the outset. Also, on the matter of design, Policies 7.2 (*"An Inclusive Environment"*), 7.3 (*"Designing Out Crime"*) & 7.4 (*"Local Character"*), amongst other things require the design of future development to:
 - ✓ meet the highest standards of accessibility and inclusion;
 - ✓ concentrate upon creating safe, secure, environments; and
 - ✓ contribute *"to a positive relationship between the urban structure and natural landscape features"*.

- Policies **5.12** & **5.13** are concerned with *“Flood Risk Management”*, and *“Sustainable Drainage”* utilising Sustainable Urban Drainage Systems (SUDS) to ensure that development addresses flood control measures at the planning stage and incorporates methods to attenuate run-off. Developments must comply with Government flood risk management requirements, including complying with the ‘exceptions test’, being able to demonstrate safe and resilient design under flood conditions.
- Policy **8.2** which states that strategic and local priorities should be addressed through *“Planning Obligations”* linked to planning decisions. Funding for Cross-rail will be sought from new development (see also Policy **6.5** *“Funding Crossrail and other Strategically Important Transport infrastructure”* & **8.3** *“Community Infrastructure Levy”*).

App 1.38. The **Mayoral Community Infrastructure Levy (MCIL) & Mayor of London Supplementary Planning Guidance on ‘Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy’ April 2013** – the MCIL has been levied since 1st April 2012 (to support the funding of Crossrail and other significant infrastructure), upon proposals for buildings *“to which people usually go”* and which exceed 100m² in area. The levy for Hounslow is currently £35 per m².

b. Hounslow Local Plan 2015

App 1.39. At paragraph 2.46 the HLP notes Brentford as providing *“the most opportunity for change”* as the area *“will benefit from high levels of growth over the next 15 years, which will deliver much needed housing and jobs, as well as improved infrastructure, retail and leisure”*. This is to be achieved by a number of measures, of which No.8 reads *“securing the restoration and regeneration of Gunnersbury Park and Mansions, and Boston Manor House and Grounds”*.

App 1.40. Policy **CC1** (*“Context and Character”*) encourages development to respond creatively to an area’s character, wider context and history whilst enhancing the *“special qualities and heritage”*.

- App 1.41. These matters are also taken up within Policy **CC2** (entitled *“Urban Design and Architecture”*) which promotes *“high quality urban design and architecture to create attractive, distinctive, and liveable places”*, by amongst other things *“working with applicants at an early stage (pre-application) to guide and shape the design of development proposals”* to *“create places that...foster active lifestyles..”*
- App 1.42. Policy **CC4** (*“Heritage”*) states that opportunities to enhance the significance of the borough’s heritage assets and their settings will be identified *“as a positive means of supporting an area’s distinctive character and sense of history”*. This is to be done through various measures including promoting *“heritage-led regeneration, particularly where this brings long term value and sense of place to development”*. The regeneration of heritage assets at risk, including those within Gunnersbury Park, and elsewhere will be secured. Where a building makes *“little contribution to [a conservation] area, consent for demolition will not be given unless there are approved plans for redevelopment or re-use of the land which will conserve and enhance the character of the area. Sustainability and salvage aspects should be factored into proposals”*.
- App 1.43. Policy **GB1** states that *“Green Belt and Metropolitan Open Land”* will be protected to maintain *“openness, quality and permanence”*. This is to be *“achieved through the positive management of both designations and improving public access.....including the promotion of sports, recreation, leisure and cultural uses”*. Development proposals will be expected to be *“compatible with and not inappropriate development in...Metropolitan Open Landexcept in very special circumstances”*. Policy **GB4** (*“The Green Infrastructure Network”*) also seeks to improve the public access to open space and *“maximise the diverse benefits and multiple functions”* that such spaces serve. Proposals will be expected to *“make a positive contribution to the green infrastructure network by improving its quality, functions, linkages, accessibility, design and management”*.

- App 1.44. Similarly *“Local Open Space”* will be protected and its quality and public access will be enhanced under the terms of Policy **GB2** (*“Open Space”*). Policy **GB7** (*“Biodiversity”*) states that the Borough’s natural environment will be safeguarded and its biodiversity enhanced by protecting sites of nature conservation interest and *“encouraging the greening of the borough, through landscaping and tree planting...”*.
- App 1.45. Policies **GB9** (*“Play Space, Outdoor Sports Facilities and Burial Space”*), **CI1** (*“Providing And Protecting Community Facilities”*) and **CI4** (*“Culture and Leisure Facilities”*) all set out the Council’s stance to protect and improve the provision of play space, sports and other community facilities to meet existing and future needs. This is to be achieved by *“supporting high quality sports facilities to meet demands for a range of sports and active pursuits across the borough”* (taken from Policy GB9b). The dual use and co-location of different community facilities will also be encouraged.
- App 1.46. Policies **EQ1** (*“Energy and Carbon Reduction”*), **EQ2** (*“Sustainable Design and Construction”*) & **EQ3** (*“Flood Risk and Surface Water Management”*) state that *“the highest standards of sustainable design and construction in development to mitigate and adapt to climate change”* (taken from Policy EQ2) will be promoted and that developments will be expected to meet carbon reduction targets. The incorporation of sustainable design measures such as renewable energy and low carbon technologies is to be encouraged. Surface water run-off is to be managed through sustainable urban drainage. Table **EQ2.1** (*“Standards for sustainable design and construction”*) requires all non-residential development over 500m² to meet a BREEAM rating of ‘Excellent’.
- App 1.47. Policies **EQ4** (*“Air Quality”*), **EQ5** (*“Noise”*), **EQ6** (*“Lighting”*) & **EQ8** (*“Contamination”*) are all looking to minimise pollution from whatever source and reduce the impact of development upon biodiversity and surrounding sensitive users, such as housing, through incorporating attenuation measures. The matter of reducing the impact of any light pollution upon biodiversity and residential amenity also appears as a consideration under the terms of Policy GB9 (mentioned above) when the addition of floodlighting would enable *“longer use of outdoor sports facilities”*.

App 1.48. Policy **EC2** (*“Developing A Sustainable Local Transport Network”*) aims to *“secure a more sustainable local travel network that maximises opportunities for walking, cycling and using public transport, reduces congestion, improves the public realm and improves health and well-being”*. Schemes should be located near to where there is *“public transport accessibility and capacity, road capacity and access to good quality walking and cycling networks. Developments should provide a minimum number of cycle parking spaces and an appropriate maximum number of car parking spaces consistent with the standards in the London Plan”*. Demonstration that the proposal will have no adverse impact on the transport network is required through the preparation of Transport Assessments and Travel Plans for all major schemes.

App 1.49. Implementation Policy **IMP1** (*“Sustainable Development”*), states that the Council is to take a *“plan-led and positive approach to all growth and development within the borough that is considered to be in accordance with the principles of sustainable development as set out in the NPPF...”*. Policy **IMP2** (*“Delivering Site Allocations”*) continues to the effect that the Council will support *“in principle proposals that accord with the identified site allocation and the proposed use of the site and which have regard to the context, constraints and other provisions of the respective site allocations”*. Finally, Policy **IMP3** (*“Implementing and Monitoring the Local Plan”*) is an undertaking that the Council will work with *“strategic partners”* [including adjoining Boroughs] and other stakeholders in the local community to implement the Local Plan and provide the *“infrastructure needed to support growth”*.

App 1.50. **Hounslow Community Infrastructure Levy Charging Schedule (adopted 24th July 2015)** – Gunnersbury Park is within CIL Zone 1 (East), where the charge for most forms of non-residential development is £20 per m² of development.

c. Other Guidance & Policy

App 1.51. In addition to planning policy, elements of Hounslow’s Supplementary Planning Guidance (SPG) may be still be relevant. These include:

- **Supplementary Planning Guidance of February 1997** - This covers general design standards and controls; and
- **Sustainability Checklist of 2003** - which is required to accompany most forms of planning application, including leisure uses.

App 1.52. ***“Future Borough” - Hounslow Together’s Vision, Strategy And Action Plan*** (produced jointly by the Local Strategic Partnership of LBH, the NHS, Metropolitan Police as well as community / voluntary groups) sets out its *“Vision for Hounslow 2030”* for the Borough’s *“people”, its “places”, and its “economy”*.

App 1.53. Many of the aims of this document are relevant in this case and improved ‘green infrastructure’ and encouraging healthier lifestyles, amongst others, are seen as key to attaining a number of these objectives. A *“high quality environment”* is viewed as *“crucial if the borough is to succeed in attracting or retaining investment in the future”*. The Borough’s green spaces are seen as its *“greatest assets.....which ensure our unique identity and attract visitors from outside Hounslow”*(page 28).

People	Promote healthy choices and healthy lifestyles - promote physical activity (page 19).
Place	Improve the borough’s open spaces - and secure money from new developments to contribute to the improvement of local parks (page 29).
Place	Enhance local biodiversity - continue to protect local biodiversity (page 29).
Place	Protect our environment - future development must protect and enhance the borough’s open spaces, waterways and built environments (page 29).
Place	Conserve our heritage - continue to conserve and protect our valued local heritage sites (page 29).
Economy	Support employment opportunities for residents & encourage local businesses to employ Hounslow people (page 33)..

- App 1.54. **The Gunnersbury Park Estate Conservation Management Plan 2008 (CMP)** - This CMP document was completed in July 2008 after having been put out for consultation in March of that year. It notes that the Park is a *“Grade II* English Heritage Registered Park containing 21 Grade II* and Grade II English Heritage listed buildings, making it one of the top 30% of Registered Parks and Gardens within the country and containing some of the top 10% of historic buildings within England”*.
- App 1.55. However, it was also noted that some of the buildings within the Park are also designated as being ‘at risk’, and English Heritage has named Gunnersbury Park as one of the top 12 ‘at risk’ properties in England (Executive summary page 8). The CMP continued *“in order to reverse this decline, a vast amount of backing, both in human resources and financial terms, is required”*. The lack of interaction between the ‘Greenscene’ horticultural operation and the rest of the Park was also noted (paragraph 2.3.75).
- App 1.56. The 2008 CMP set out a number of options for the Park as *“the ‘do nothing’ option would result in the significant loss of the historic buildings on the site, would be detrimental to the landscape and would be impossible to reverse. Without timely, effective action now, there is a risk that Gunnersbury Park, as it exists today will not survive”*. *“The reversal of decline within the Park’s built heritage depends on finding sustainable uses for all buildings”*. (paragraph 4.4.10).
- App 1.57. It was thought that the size of the conservation deficit would mean that external funds will have to be sought and that it was unlikely that all necessary funds could come from public sources. Maintaining public accessibility to the Park was viewed as *“key, and uses that also require large sections of the park to be closed to public access should not be allowed.....No types of use can be ruled in or out as they may prove to be the only viable option”* (paragraphs 4.2.8, 4.2.9, 4.4.10 & 4.4.11).

App 1.58. The 2008 version of the CMP noted (at paragraph 4.83) that large areas of the Park are given over to sports provision and *“since its opening in 1926 Gunnersbury Park has been renowned for its sport and recreation facilities, for all levels...however, generally this provision is declining in standards of maintenance and use. Just one example being the lack of changing facilities since the Model Farm changing rooms suffered an arson attack.”* In relation to the proposals for a ‘Sporting Hub’ within Gunnersbury Park the CMP gave the following guidance at paragraph 4.8.3, including siting any new building to the area outside the historic core to minimise the impact on any historic buildings and features. Furthermore, significant views should be respected when siting any new facilities. High quality, inclusive, well-managed visitor facilities were to be provided in suitable locations across the Park (paragraphs 4.8.6 & 4.8.7). A vision was set out to become *“a sustainable high quality park with varied uses, which serve the local community and the region whilst respecting, enhancing and interpreting its historic framework and fabric”* (Executive Summary, page 8).

App 1.59. According to the CMP the key issues affecting the Park were:

- *Lack of clear management and maintenance structure;*
- *Limited and decreasing funding;*
- *Deterioration of built fabric and landscape, most prominently the buildings identified as being at risk;*
- *Poor visitor facilities; and*
- *Declining use.*

App 1.60. To address these issues the *“priority actions”* were:

- *Establish a clear management regime and structure to take Gunnersbury Park forward, including the appointment of a Political Champion;*
- *Adopt the Conservation Management Plan as formal guidance;*
- *Carry out works to buildings at risk, to stabilise their condition and commission feasibility studies for all buildings to determine a sustainable use;*
- *Commission a feasibility study for the location of Gunnersbury Park Museum;*

- *Complete the Sports Hub feasibility study;*
- *Finalise and adopt the Masterplan; and*
- *Investigate alternative sources of public and private funding to implement the Conservation Management Plan and Masterplan*

App 1.61. The CMP then set out a number of “agreed policies” for the Park as follows:

- *“POLICY A: Decisions relating to the management, conservation and enhancement of the Park should respect and develop its significance whilst being committed to the principles of sustainability.*
- *POLICY B: Conserve and enhance the Park’s distinctive landscape character and structure*
- *POLICY C: Conserve and enhance the Park’s built heritage assets.*
- *POLICY D: The archaeological remains and potential of the site should be conserved.*
- *POLICY E: The historic associations of the Site should be recognised.*
- *POLICY F: Ensure the long-term conservation and development of the collections.*
- *POLICY G: Continue to offer a variety of safe, secure and inclusive opportunities for visitors in a high quality environment.*
- *POLICY H: To provide a clear, high quality and consistent message and interpretative vision that links the whole Park and its different components.*
- *POLICY I: Conserve and enhance the Park’s nature conservation”.*

App 1.62. **Gunnersbury Park Options Appraisal June 2009** – This Study followed the CMP and four Options were examined for future strategy/management of the Park:

- Option A Minimum Intervention
- Option B Mixed Use Development
- Option C Restoration and Upgrading
- Option D Destination Development

App 1.63. The preferred option had to be “deliverable”, “sustainable”, and had “to meet the aspirations of the Conservation Management Plan”. The maintenance of the main heritage assets (the Large and Small Mansion Houses, the Stable blocks, the landscape and the museum) was the priority and so the ‘preferred option’ was Option C.

- App 1.64. The estimated costs of the various works within this Option were such that it would be unlikely that they could be found from either of the owning Councils' capital budgets. The *'Options Appraisal'* therefore considered the scope for 'enabling development' (involving the sale or lease of a small section of the Park to a developer for housing) to provide partnership funding for the proposed investment at Gunnersbury Park.
- App 1.65. Five possible sites for this 'enabling development' were considered – *'South Paddock'* (5.9 acres) *'Pope's Lane Entrance'* (4.2 acres); *'Lionel Road North 1 & 2'* (4.5 and 1.1 acres respectively); *'Walled garden'*; & *'the Stable blocks'*. We understand that none of the preferred options was progressed, as it was not considered acceptable by LBE to dispose of tranches of the Park's land.
- App 1.66. Some of the properties surrounding Gunnersbury Park have the benefit of covenants restricting the scope of the uses within the Park and its buildings. Nevertheless, previously the covenants have successfully been modified to allow new activities; such as in 1979 (ground floor use of the Small Mansion as a training centre for the local authority's park staff) and in 1992/3 (an application to permit part of the plant nursery to be used as a commercial nursery for wholesale trade).
- App 1.67. **Gunnersbury 2026** - A 15 year Masterplan for the Park in three phases; 'Phase Three' is primarily involved with the improvement of sports facilities. According to paragraph 4.5 of the Masterplan, *"Gunnersbury Park is a strategically important site given its ability to provide a range of sports and leisure activities on single site due to its size and provision of outdoor space"*.
- App 1.68. According to the Masterplan (at page 11):

'Phase Three' "focuses on the sports element within the western half of the park and will involve identifying partner(s) to create a vibrant sporting centre and new sports hub for the residents of both boroughs. This will provide a future for the model farm buildings and with increased sporting participation will help to make Gunnersbury Park a centre of sporting excellence. Phase three will also include further improvements and repair works to parkland and structures and in particular a re-assessment of the space and use of the walled garden currently occupied by Capel Manor and Greenscene to maximise the potential of the site and ensure value for money and sustainability. This might also include a relocated grounds maintenance depot and access to both the car park and heritage core".

App 1.69. **Conservation Management Plan & Gazetteer December 2014** – these documents were produced by Purcell to accompany the Stage II applications to the Heritage Lottery Fund (HLF) for grant funding. The Gazetteer *"is a record of the surviving heritage features on site including architectural and historic landscape featuresintended for use as a reference guide to allow anyone planning change or conservation at the site, to quickly check the status of a particular feature or building"*(Gazetteer Introduction, page 6). The documents updated the 2008 CMP (see above) in line with current guidance and legislation and included the strategy set out within the Gunnersbury 2026 Masterplan.

App 1.70. The documents are in the process of being updated to take account of progress since the end of 2014 and as Purcell is also the heritage adviser on the current project we will leave the detailed analysis of their content to that consultant. However, attention is drawn to what the Gazetteer 2014 says on the matter of the 'Walled Garden'. Its *"ongoing deterioration"* is noted and that some of the adjoining planting/lean-to structures are damaging to its structure. The removal of some of these elements (such as the 20th century greenhouses in the west section) *"would allow reinstatement or evocation of the historic character and layout"*(Gazetteer page 213).

- App 1.71. Also noted is the comment, at page 182 of the 2014 CMP that *“while the area generally retains its naturalistic parkland character, the central part of this area has been overlain with a 20th century pitch and putt course which together with the disused tennis courts and the cricket pavilion to the north are detractors”*.
- App 1.72. **All London Green Grid Supplementary Planning Guidance March 2012** – this is a GLA document adopted following consultation towards the end of 2011, which aims to create a *“green grid”* – an integrated network of green and open spaces together with the Blue Ribbon Network of rivers and waterways. It is in accordance with *“the London Plan’s approach to the provision, enhancement and management of green infrastructure”* (see Policy 2.18). This SPG aims to increase the delivery of green infrastructure by boroughs, developers, and communities.
- App 1.73. Greater London is divided into 11 *“Grid Areas”*, of which No. 11 (*“Brent Valley and Barnet Plateau”*), includes the subject area. The cycle network / walkways through the subject site, referred to as the *“Gunnersbury Link”*, are noted as being a *“Strategic Link”* passing through the green infrastructure network. The eastern branch of the *“Gunnersbury Link”* *“passes through Ealing Common and urban development to Gunnersbury Park and the Thames, although the M4 and railway lines create a substantial barrier between the river and the park”*. Where possible these *“Strategic Links”* should be improved through better signage, maintenance and management (paragraphs 4.20 & 5.174).
- App 1.74. **Mayor of London’s Supplementary Planning Guidance on ‘Shaping Neighbourhoods: ‘Play And Informal Recreation’ (September 2012) & Accessible London: Achieving An Inclusive Environment’ (October 2014)** – *“Safe and stimulating play facilities are essential for a child’s well-being, health and future development”* (see paragraph 1.1 of *“Play & Informal Recreation”*). These documents are concerned with ensuring that new development of recreational playspace has been designed to provide a good standard of inclusivity and accessibility to all user groups.

- App 1.75. **Mayor of London's Supplementary Planning Guidance: Sustainable Design and Construction (April 2014)** – the purpose of this document is to assist in the implementation of the various TLP policies relating to combating 'Climate Change'. At paragraph 2.82 it states that *“Developments should be sensitively designed so that there is no net loss in the quality and quantity of habitat across a development site and to enhance biodiversity and increase connectivity between patches of urban habitat”*.
- App 1.76. Where development is proposed near to sites of Borough nature conservation importance:
- “developers will have to carry out an assessment of the potential impacts the scheme could have on these sites.....The assessment should be commensurate to the scale of the development and the statutory or non-statutory protection afforded to the site . The assessment needs to have informed the design of the development, which should minimise impacts, including on the connectivity of green corridors....The assessment needs to be submitted alongside the planning application (paragraph 2.8.6).*
- App 1.77. Beneath the heading of *“Promoting the creation of additional habitat”*, paragraph 2.8.11 states *“new habitat provision should be provided as part of a development's urban greening measures. This can include ecologically sensitive landscaping, including water features or new habitat provided on buildings, such as in the form of green roofs and walls and roof gardens, ponds and wetlands potentially incorporated with SuDs and bird and bat boxes and insect habitats...”*. Paragraph 2.8.12 continues *“opportunities for improving the connectivity of green infrastructure, including the creation of corridors for nature conservation, across London”* should be taken.
- App 1.78. Paragraph 3.4.13 encourages development to utilise SuDS, in order to deliver *“schemes that provide multiple benefits, in addition to reducing flood risk”* such as by *“providing additional valuable habitat to improve the status of our water bodies”* and *“contribute to the wider goals relating to green infrastructure, biodiversity, water efficiency and recreation”*.

d. Evidence Base

- App 1.79. **Metropolitan Open Land Background Paper July 2014** – produced as a background paper to the emerging Hounslow Local Plan it assessed the Borough’s MOL and whether the land was still performing its role adequately and whether the boundaries are appropriate. Gunnersbury Park was found to be providing leisure, recreation sports, arts and cultural facilities *“which serve either the whole or significant parts of London”* and contains features or landscapes of historic, recreational, and biodiversity value (Table 1)
- App 1.80. Where there is a *“known pressure”* to provide improved educational facilities *“within the borough due to the growing population”* it is viewed as *“inevitable that some schools will have to expand to accommodate this shortage. For this reason, it is useful to look at the schools in or adjoining Metropolitan Open Land in a positive manner to ensure that future development and growth can be facilitated where required, in accordance with the planning system”*(paragraph 2.5).
- App 1.81. **Hounslow Physical Activity and Sport Strategy 2012-2022** – paragraph 4.1 notes that Hounslow Borough falls below the national and regional average for sports participation. The ward within which Gunnersbury Park sits is in the lowest quartile for participation and is below the Borough’s average level (see Figure 1).
- App 1.82. Section 5 is entitled *“The need for Change”* and 5.1 states that to achieve a difference in participation certain factors limiting participation must be addressed. This includes improving the sports and play facilities across the Borough and increasing opportunities for people to take part. There has been some recent investment into the Borough’s leisure centres that has seen visits rise from 60,000 visits a month to over 110,000 visits a month (paragraph 5.2). However, making a long-term significant change in participation rates requires greater action (paragraph 5.3).

- App 1.83. The Borough's parks and open spaces have an important part to play in the community and enable a wide range of sports and physical activities to take place and amongst the list of "Key Actions" is "overcome physical and cultural barriers to attendance at leisure and park facilities in order to improve use by all parts of the community" and "Identify appropriate external funding opportunities to improve community and leisure facilities within Hounslow" (paragraph 6.16 & "Key Actions" page 16).
- App 1.84. Many of the Borough's leisure centres are near capacity and the Council is working with "Governing Bodies to identify key clubs in our Borough that require support and the core needs they have for future development" (paragraphs 6.27 & 6.28 as well as "Key Actions", page 19).
- App 1.85. Amongst the specific "Cross-Cutting Actions" identified in the Strategy are increasing participation by those with a disability and reducing "the age-related decline in participation in physical activity and sport with a particular focus on the 16-25 year old age group" (paragraph 6.39).
- App 1.86. **Open Space Background Paper April 2013 (with minor amendments March and August 2014)** - The purpose of this paper is given as:
- Setting out the "requirements for open space from new development, to meet identified need, and provide an assessment of open space with regard to the Mayor of London's guidance. This will help maximise the benefits of open space for the borough's residents, and contribute to various cross-cutting objectives, including improving health through active lifestyles, promoting well-being and tackling environmental concerns. The paper therefore takes forward the vision from Hounslow's Community Strategy (Borough Future: Hounslow Together's vision, strategy and action plan, 2011)".*
- App 1.87. Paragraph 2.20 puts Gunnersbury Park as one of the Borough's eight "Metropolitan Parks" (being those at the top of the open space hierarchy) and it is considered to be a "Destination Park" drawing people from a wide area.

- App 1.88. However, Gunnersbury also *“fulfils the role of a local park to residents living in its immediate vicinity, who are likely to use it on a more frequent basis than those travelling from further away”*. Gunnersbury is also noted as having a *“dual function”* as open space and a nature conservation area (paragraph 3.3). Its role as open space is rated as *“High quality/high value”* in the map at ‘Figure 4’.
- App 1.89. *“Open Space Policy Principle 1: Approach to Public Open Space”* and paragraph 3.13 state that open space will be protected and enhanced *“to ensure that the needs of existing and future population are met”*. *“Open spaces are part of well planned, sustainable neighbourhoods, and contribute to the local context and character of the borough. They are also part of the network of green infrastructure, providing benefits in terms of biodiversity, sport and recreation, building a sense of place and mitigating the effects of climate change”*.
- App 1.90. Paragraph 3.15 continues *“the borough’s wealth of Public Open Space (1365.0ha, equivalent to 5.3ha per 1,000 population) is an integral element of its character”* but increasing population levels are acknowledged as intensifying the pressure upon the resource. *“To accommodate for the rise in population it will be necessary to invest in maintaining and improving the quality and facilities of existing public open space”*.
- App 1.91. **Planning Policy Guidance 17 Study Open Space Volume July 2011** - The Borough’s Nature Conservation Areas *“act as valuable green spaces in terms of meeting local needs, biodiversity and habitat conservation and in helping reduce and mitigate the impacts of climate change. It is therefore recommended that these spaces should be protected, and current provision maintained where there is currently a good level of provision in relation to the borough average”* (Page 63). Parks and Gardens make up a large amount of the Borough’s total Public Open Space (759has out of an estimated total of 1,526 has) and Gunnersbury is one of the Borough’s six ‘Metropolitan Parks’.

- App 1.92. Overall Gunnersbury is assessed as *“High quality / high value”* being one of *“the borough’s highest performing open spaces, and should be maintained and protected to sustain their current status”*(paragraph 4.2.11 & Table at Appendix 4).
- App 1.93. Gunnersbury is noted as being one of the Borough’s most visited parks and it acts as a ‘destination’ drawing visitors from a wide area (paragraphs 2.1.18 & 3.2.51)
- App 1.94. A number of recommendations for improving Gunnersbury Park’s offer are made including; increasing the quantity and quality of childrens’ playspace; and completing the cycleways within and around the Park (see Appendix 5).
- App 1.95. In some instances it may even be appropriate to consider flexibility in the protection of some open space if this assists in ensuring adequate provision of essential local infrastructure (e.g. schools), or where it helps to improve the quality of higher value open space elsewhere (paragraphs 4.5.12 & 4.5.17).
- App 1.96. **Planning Policy Guidance 17 Study- Sports Facilities Volume May 2010** - This study assessed the quality and quantity of indoor and outdoor sports provision in the overall Borough. It concluded that certain facilities would be needed, such as additional health and fitness stations and a synthetic pitch (Table on page 13). In respect of outdoor provision the Study found that football pitches are currently adequately provided but there was likely to be a shortfall in provision by 2026 (paragraph 1.46). Likewise, the current adequate provision for cricket will become a shortfall of 1 pitch by 2026 (paragraph 1.52). When the quality of provision was assessed the majority of pitches were found to have *“very poor ancillary facilities”* and the changing rooms at Gunnersbury were noted in particular as being *“extremely poor”*(paragraphs 5.3.9 & 5.3.10).

App 1.97. **Hounslow Biodiversity Action Plan (HBAP) 2013** – Gunnersbury Park is a Site of Borough Importance for Nature Conservation Grade II. ‘Neutral Grassland’ forms the largest constituent habitat within Hounslow with large sites such as Gunnersbury Park being an example. Recreational activity can restrict biodiversity, but there is potential to improve the habitat potential of such grassland through active management (Section 2.4, page 36). Amongst other things the HBAP aims to promote the understanding and good management of parkland sites and veteran trees; protect and enhance the ecological value of the built environment that will benefit wildlife and promote community engagement with local flora and fauna; and implement biodiversity improvements into new development.

App 1.98. **Hounslow Infrastructure Delivery Plan 2015 – 2030 (IDP)** - a significant shortfall in Sports Facilities has been identified in the 2010 PPG17 Study (see above) as being *“35 mini-pitches and 14 junior pitches for football”*. The *“quality and accessibility of the current sports facilities in Hounslow....would be likely to deter participation in sports activities in the borough”*. However there have some improvements since the 2010 study and so the results would need to be reviewed (such a review is likely to be undertaken soon). For the future *“Seven badminton courts, suggested provision requirement of 2 x 4 court halls; 90 fitness stations/ pieces of equipment; One synthetic pitch (to be used for hockey and other activities); Mini-pitches and junior pitches for football; One cricket pitch; Participation in tennis through providing mini programmes at sports halls and outdoor tennis courts”* are considered to be needed. *“Increasing participation in sports is a strategic aim for the borough”* and coupled with increasing population, the shortfall is only likely to become more acute. The Council will continue to work with *“the national governing bodies for the relevant sports”* to address the shortfall (IDP paragraphs 7.4, 7.5, 7.11, 7.12,).

App 1.99. Section 9 is entitled *“Heritage Assets”* and notes, at paragraph 9.3, that *“some heritage assets located in Hounslow are in a poor condition and require different degrees of investment and repair to ensure they’re available for the benefit of future generations”*. It also notes that a number of the Borough’s buildings (including Gunnersbury) are upon the English Heritage (EH) ‘Heritage at Risk’ (HAR) Register. Some of the buildings at Gunnersbury are those highlighted as being in most urgent need of attention. The council aims to remove buildings from the HAR Register wherever possible and will support bids for funding to restore buildings, and improve areas including, on occasions, *“enabling development in or around the asset to help fund its repair while providing future occupation, so that the building or site can be secured in the longer term”*(paragraphs 9.4 – 9.7 & Table 9.7).

App 1.100. **Ealing Sports Facility Strategy 2012 to 2021** - The introduction at page 3 says:

This strategy has developed the evidence base into an assessment of future need for a range of indoor and outdoor sports facility types. It sets out the need, scale and location for facilities to meet the current rate and frequency of sports participation and considers how the projected changes in the Ealing population up to 2021, based on the Borough’s own population projections, influences the projected need for sports facilities up to 2021 and beyond.

App 1.101. Page 53 establishes that in West London there is a deficit of 152 badminton courts or 38 four court sports halls. In relation to supply and demand for sports halls in Ealing current demand considerably exceeds current supply. Ealing’s sports halls are currently estimated to be full and total capacity can only meet 65.3% of total demand (Pages 53-57).

App 1.102. Ealing's existing *"provision of sports halls is very much dominated by the 4 badminton court size sports hall, which provides for the full range of indoor hall sports at the recreational level but is limited in space to allow dual programming of activities, or, the holding of events and competitions. A sports hall of 6 to 8 court size would give the flexibility to programme several activities at the same time and give the opportunity to host events and competitions for a wide range of indoor sports. The optimum location for new provision has already been identified as the South East corner of the borough"*(Page 61)

App 1.103. The level of demand for Artificial Grass Pitches (AGPs) is such that the 'West London 6 borough sub region' is calculated to have a deficit of 21 pitches (Page 114). There is justification for additional AGP provision and these *"facilities should preferably be floodlit for year round use with the capacity to be sub divided into smaller areas for training purposes"*. Ideally these new facilities *"will be built alongside existing leisure provision either on the site of existing indoor facilities to make best use of management and operational arrangements as well as ancillary changing rooms, etc or at outdoor strategic multi sport multi pitch sites"*.

App 1.104. In respect of improving the facilities in Gunnersbury Park, Ealing Council undertakes to work with Hounslow *"and other partners to bring the outdoor sports facilities back into use for the benefit of residents from both boroughs"*. The current sports facilities on site are noted as being *"limited to a pitch and putt golf course and a bowls green"*, whereas *"future development ideally will consist of an artificial grass pitch, cricket, football and/or rugby pitches, ancillary facilities and complimentary indoor sports facilities"*(Page 79).

Appendix 2

Site Planning History*

Reference	Address	Description	Decision	Date
00885/A/S1)	Gunnersbury Park	Erection of single storey bowls pavilion	Granted	19/04/66
00885/A/S2	Gunnersbury Park	Conversion of part of large mansion into three flats	Granted	12/11/51
00885/A/S3	Gunnersbury Park	Conversion of three rooms into committee room, offices and wc accommodation	N/A	N/A
00885/A/S4	Gunnersbury Park	Conversion of part of first floor of small mansion into flats	Granted	28/05/56
00885/A/S5	Gunnersbury Park	Erection of a new railing and wall	Granted	28/05/56
00885/A/S6	Gunnersbury Park	Erection of Pavilion	Granted	25/11/58
00885/A/S7	Gunnersbury Park	Erection of changing room and wc accommodation	Granted	11/05/62
00885/A/S8	Gunnersbury Park	Erection of a cricket pavilion	Granted	21/02/63
00885/A/S9	Gunnersbury Park	Erection of a small tea pavilion	N/A	N/A
00885/A/S10	Gunnersbury Park	Alterations to wc opposite superintendents office and at west end of small mansion	N/A	N/A
00885/A/S11	Gunnersbury Park	Conversion of part of western wing into three flats	N/A	N/A
00885/A/S12	Gunnersbury Park	Conversion of second floor of the centre block and east wing of the Mansion House into four separate flats	Granted	14 /07/52
00885/A/S13	Gunnersbury Park	Conversion of first floor of east wing of mansion into three separate flats	N/A	N/A
00885/A/S15	Gunnersbury Park	Use of ground floor of small mansion as day centre for teachers and parks staff, alterations including construction of new boilerhouse	Granted	25/07/69
00885/A/S16	Gunnersbury Park	Erection of athletics stadium, including flood-lit towers and car park	N/A	N/A
00885/A/S17	Gunnersbury Park	Erection of a shelter near Lionel Road	No record of permission	N/A
00885/A/L1 & 00885/A/L2	Gunnersbury Park	Listed Buildings Demolition of dairy – listed building consent	Appeal granted – for demolition	13/03/75
00885/A/S18	Gunnersbury Park	Use of rooms in east block of stable buildings for arts and craft activities	N/A	N/A
00885/A/S19	Gunnersbury Park	Reconstruction of bowls pavilion after fire damage	Granted at committee	14 /07/75
00885/A/L3	Gunnersbury Park	Demolition of lodge at Gunnersbury Avenue entrance – listed building	No Further Action	N/A
00885/A/S20	Gunnersbury Park	Erection of garage	Granted	08/11/79

00885/A/S21	Gunnersbury Park	Erection of athletic stadium, including floodlighting poles and car parking	Refused	26/02/65 (?)
00885/A/S22	Gunnersbury Park	Demolition of storage sheds/wc and erection of single storey building to provide men's room and toilet facilities	Granted	10/04/80
00885/A/L4	Gunnersbury Park	Alterations to east stable block and erection of two storey link extension in connection with conversion to offices – Listed Building Consent	Withdrawn	N/A
00885/A/P1	Gunnersbury Park	Conversion of east stable block to offices, erection of two storey link extension and layout of car park	Withdrawn	N/A
00885/A/P2	Gunnersbury Park	Continued use of part of site as riding school and retention of two caravans	Granted	12/01/84
00885/A/S23	Gunnersbury Park	Erection of temporary structure to provide indoor riding school	Granted limited period	23/08/84
00885/A/S24	Gunnersbury Park	Use of part of ground floor as art gallery and studios/craft workshop	Granted	07/11/85
00885/A/P3	Gunnersbury Park	Use of north stable block and adjoining buildings as carriage museum and riding school staff quarters and of east stable block and adjoining buildings for stabling of horses and ancillary purposes and provision of paddock, exercise and riding areas	Granted	02/09/86
00885/A/S25	Gunnersbury Park	Erection of two glasshouses within nursery area	Granted	26/11/87
00885/A/S26	Gunnersbury Park	Erection of chain link fence surmounting existing boundary wall to nursery	No further action	N/A
00885/A/L5	Gunnersbury Park	Refurbishment of existing toilets, provision of disabled toilets and access ramp, internal alterations and new door to gents	Granted by Secretary of State	05/09/90
00885/A/L6	Gunnersbury Park	Alterations to include fire screen, doors and wall linings	Granted by Secretary of State	22/08/90
00885/A/S27	Gunnersbury Park	Change of use from Council nursery to commercial nursery to supply wholesale trade only	Granted	24/03/92
00885/A/S28	Gunnersbury Park	Erection of mobile building for use as ground maintenance and changing room	Granted	02/04/92
00885/A/S29	Gunnersbury Park	Erection of detached garage	Granted	02/04/92
00885/A/S30	Gunnersbury Park	Use of the remaining area as a wholesale nursery	Granted	23/07/92
00885/A/L7	Gunnersbury Park	Removal of existing field gates and installation of chain link gates with barb wire	Granted	21/06/94
00885/A/P4	Gunnersbury Park	Change of use from residential dwelling to horticultural training and educational centre	Granted Secretary of State	02/10/94
00885/A/L8, P5, P6, & P7	Gunnersbury Park	Applications and associated details all relate to the classrooms and potting sheds	N/A	N/A
00885/A/L9	Gunnersbury Park	Demolition of shelter located on the south terrace of the large mansions within Gunnersbury Park Conservation Area	Granted Secretary of State	29/11/95
00885/A/L10 & 00885/A/P8	Gunnersbury Park	Construction of new slate roof incorporating external alterations to the existing bath house	Granted	23/11/99

00885/A/P9	Gunnersbury Park	Demolition of existing outbuildings and erection of classrooms	N/A	N/A
00885/A/L11	Gunnersbury Park	Internal alterations and restoration of 19th century style windows and doors to existing bath house	No Records	N/A
00885/A/L12	Gunnersbury Park	External alterations to Bath House chamber	No records	N/A
00885/A/P10 & 00885/A/L13	Gunnersbury Park	Erection of single storey pitched roof classroom and library extension	Approved	21/05/02
00885/A/P11	Gunnersbury Park	Erection of a new butterfly house, aviary, child play facility and ancillary accommodation to site	Withdrawn	06/02/06
00885/A/P12 & 00885/A/L14	Gunnersbury Park	Conversion of existing greenhouse to form 2x classrooms, internal alterations to existing cottage and the creation of a new greenhouse to existing site.	Granted	10/05/05
00885/A/L14(A)	Gunnersbury Park	Fixing details of approved planning permission	N/A	N/A
P/2009/1090 00885/C/L1 (Listed Building Application)	Gunnersbury Park Museum, Pope's Lane Chiswick London W3 8LQ	To demolish the existing derelict toilet block located to the North of the Large Mansion and to erect a new Toilet Block facility on the same location.)	Granted	20/08/2009
P/2009/1058 00885/C/P1 (Full Application)	Gunnersbury Park Museum, Pope's Lane Chiswick London W3 8LQ	To demolish the existing derelict toilet block located to the North of the Large Mansion and to erect a new Toilet Block facility on the same location	Granted	20/08/2009
P/2010/1322 00885/C/L1 (5a,b,c) (Approval of Details)	Gunnersbury Park Museum, Pope's Lane Chiswick London W3 8LQ	Details of facing and roofing materials, external joinery, mortar mix and pointing finish required by condition 5a,b & c of planning permission 00885/C/L1 dated 20/08/2009 for demolition of the existing derelict toilet block located to the North of the Large Mansion and to erect a new toilet block at the same location	Details approved	04/08/2010
P/2010/1325 00885/C/L1(3) (Approval of Details)	Gunnersbury Park Museum, Pope's Lane Chiswick London W3 8LQ	Details of materials required by condition 3 of planning permission 00885/C/L1 dated 20/08/2009 for demolition of the existing derelict toilet block located to the North of the Large Mansion and to erect a new toilet block at the same location.	Details approved	04/08/2010
P/2010/1326 00885/C/L1(4) (Approval of Details)	Gunnersbury Park Museum, Pope's Lane Chiswick London W3 8LQ	Details of commencement notification required by condition 4 of planning permission 00885/C/L1 dated 20/08/2009 for demolition of the existing derelict toilet block located to the North of the Large Mansion and to erect a new toilet block at the same location.	Details approved	04/08/2010
P/2010/1502 00885/C/TA1 (Works to Trees)	Gunnersbury Park Museum, Pope's Lane London W3 8LQ	Works to trees within a conservation area, including felling dangerous dead, diseased and dying trees. (5 day notice)	Conservation Tree Works Granted	14/07/2010
P/2012/1007	Capel Manor College Popes Lane Ealing London W3 8LQ	Details submitted pursuant to condition 5 & 6 (landscaping scheme and detailed drawing of existing trees) of planning permission 0085/A/P5 (amended on 17 July 1995) for the demolition of existing out buildings and erection of classrooms against garden wall.	Approved	25/06/2012

P/2012/1429 (works to trees)	Capel Manor College The Walled Garden Gunnersbury Park London W3 8LQ	Works to a tree in a conservation area: Fell one Turkey Oak (ID1) leaving stump as close to ground level as possible.	Granted	29/06/2012
P/2014/0819	Gunnersbury Park Museum Gunnersbury Park Chiswick London W3 8LQ	Repair and alteration of Gunnersbury Park House (Large Mansion & Museum) and the parkland structures. Restoration and improvements to the parkland including improvements to existing paving, planting, fencing, drainage and park furniture, refurbished toddler play area, recreation of the horseshoe pond, works to heritage trees to restore views, new community garden and nature trail, new landscaping around the café, new signage and new accessible footpaths.	Granted	30/06/2014
P/2014/0817	Gunnersbury Park Museum Gunnersbury Park Chiswick London W3 8LQ	Repair and alteration of Gunnersbury Park House (Large Mansion & Museum) and the parkland structures. Restoration and improvements to the parkland including improvements to existing paving, planting, fencing, drainage and park furniture, refurbished toddler play area, recreation of the horseshoe pond, works to heritage trees to restore views, new community garden and nature trail, new landscaping around the café, new signage and new accessible footpaths.	Approved	17/04/2014
P/2014/0884	The Cafe Gunnersbury Park Museum Gunnersbury Park Chiswick London W3 8LQ	The demolition and removal of the existing cafe and public toilets and the formation of a new cafe and carriage display building, including public toilets	Approved	29/05/2014
P/2015/0150	The Cafe Gunnersbury Park Museum Gunnersbury Park Chiswick London W3 8LQ	Variation of condition 3 (approved plans) to allow a smaller footprint of the new buildings of planning permission 00885/C/S2 dated 29/05/2014 for the demolition and removal of the existing cafe and public toilets and the formation of a new cafe and carriage display building, including public toilets	Approved	17/03/2015
P/2015/3595	Gunnersbury Park Museum Gunnersbury Park Chiswick London W3 8LQ	Details of acoustic/thermal insulation and fire precaution and noise report submitted pursuant to condition 19 and 23 of planning permission 00885/C/S1 dated 17/04/2014 for repair and alteration of Gunnersbury Park House (Large Mansion & Museum) and the parkland structures. Restoration and improvements to the parkland including improvements to existing paving, planting, fencing, drainage and park furniture, refurbished toddler play area, recreation of the horseshoe pond, works to heritage trees to restore views, new community garden and nature trail, new landscaping around the cafe, new signage and new accessible footpaths.	No Further Action	20/08/2015

P/2015/3596	Gunnersbury Park Museum Gunnersbury Park Chiswick London W3 8LQ	Variation of condition 2 to allow the samples of materials to be submitted following the appointment of the main contractor, who will be responsible for providing all samples of planning permission 00885/C/L2 dated 30/06/2014 for repair and alteration of Gunnersbury Park House (Large Mansion & Museum) and the parkland structures. Restoration and improvements to the parkland including improvements to existing paving, planting, fencing, drainage and park furniture, refurbished toddler play area, recreation of the horseshoe pond, works to heritage trees to restore views, new community garden and nature trail, new landscaping around the cafe, new signage and new accessible footpaths.	In progress	
P/2015/3593	Gunnersbury Park Museum Gunnersbury Park Chiswick London W3 8LQ	Details of secure & protection of interior features, internal works, archaeological evaluation and programme of building recording submitted pursuant to condition 3, 6, 8 & 9 of planning permission 00885/C/L2 dated 30/06/2014 for repair and alteration of Gunnersbury Park House (Large Mansion & Museum) and the parkland structures. Restoration and improvements to the parkland including improvements to existing paving, planting, fencing, drainage and park furniture, refurbished toddler play area, recreation of the horseshoe pond, works to heritage trees to restore views, new community garden and nature trail, new landscaping around the cafe, new signage and new accessible footpaths	In progress	
P/2015/3588	Gunnersbury Park Museum Gunnersbury Park Chiswick London W3 8LQ	Details of mud and dirt debris preventive measures and written scheme of investigation submitted pursuant to condition 10 and 12 of planning permission 00885/C/S1 dated 17/04/2014 for repair and alteration of Gunnersbury Park House (Large Mansion & Museum) and the parkland structures. Restoration and improvements to the parkland including improvements to existing paving, planting, fencing, drainage and park furniture, refurbished toddler play area, recreation of the horseshoe pond, works to heritage trees to restore views, new community garden and nature trail, new landscaping around the cafe, new signage and new accessible footpaths.	In progress	

P/2015/3589	Gunnersbury Park Museum Gunnersbury Park Chiswick London W3 8LQ	Details of public management programme, all street furniture and rainwater goods submitted pursuant to condition 13, 18 and 12 of planning permission 00885/C/S1 dated 17/04/2014 for repair and alteration of Gunnersbury Park House (Large Mansion & Museum) and the parkland structures. Restoration and improvements to the parkland including improvements to existing paving, planting, fencing, drainage and park furniture, refurbished toddler play area, recreation of the horseshoe pond, works to heritage trees to restore views, new community garden and nature trail, new landscaping around the cafe, new signage and new accessible footpaths.	In progress	
P/2015/3590	Gunnersbury Park Museum Gunnersbury Park Chiswick London W3 8LQ	Details of tree works, landscape management plan and affected trees or shrubs submitted pursuant to condition 6, 14 and 17 of planning permission 00885/C/S1 dated 17/04/2014 for repair and alteration of Gunnersbury Park House (Large Mansion & Museum) and the parkland structures. Restoration and improvements to the parkland including improvements to existing paving, planting, fencing, drainage and park furniture, refurbished toddler play area, recreation of the horseshoe pond, works to heritage trees to restore views, new community garden and nature trail, new landscaping around the cafe, new signage and new accessible footpaths	In progress	
P/2015/3594	Gunnersbury Park Museum Gunnersbury Park Chiswick London W3 8LQ	Variation of conditions 2 & 7, 5, 19 and 23 to allow the samples of materials to be submitted following the appointment of the main contractor, the detailed information will be submitted as the internal proposals for the Large Mansion are developed further, various details will need to be developed following opening up of floor and ceiling voids and development of the Stage 2 and to appoint a Noise Consultant & prepare the appropriate report of planning permission 00885/C/S1 dated 17/04/2014 for repair and alteration of Gunnersbury Park House (Large Mansion & Museum) and the parkland structures. Restoration and improvements to the parkland including improvements to existing paving, planting, fencing, drainage and park furniture, refurbished toddler play area, recreation of the horseshoe pond, works to heritage trees to restore views, new community garden and nature trail, new landscaping around the cafe, new signage and new accessible footpaths.	In progress	

* Source: LBH Planning History Schedule emailed 17/02/12 updated using LBH online records on 17/09/15