



OWGRA

Osterley & Wyke Green Residents' Association

LONDON BOROUGH OF HOUNSLOW LOCAL PLAN

WEST OF BOROUGH

REPRESENTATIONS FROM OWGRA (Osterley and Wyke Green Residents Association)

September 2019

1. **Support for CPRE comments.** We are aware of the concerns and submission that has been made by the Campaign for the Preservation of Rural England (CPRE) with regard to LB Hounslow's Local Plan Review for the West of Borough. We have not repeated the points made by them in our response; however we strongly support their comments

This response should be treated as including the responses from CPRE as well as the points detailed below.

2. **Excessive use of Green Belt.** OWGRA are concerned at the **accumulated proposed build on 125 hectares of land** within the west of LB Hounslow area, with the proposed Local Plan identifying 49 different sites in Feltham and Bedfont for development. **Much of this land is designated Green Belt** and the Government's 2019 revised NPPF chapter 13 (paras 133 to 147) states clearly that there is a continued protection to prevent urban sprawl except in exceptional circumstances, such as buildings for agriculture and forestry, outdoor sport, recreation, cemeteries, burial grounds and allotments, limited infilling in villages, limited affordable housing provided they do not substantially cause harm to openness. We are strongly of the view that none of these apply here, and can see no justification for the use of such a large amount of Green Belt / Metropolitan Open Land (MOL) for development.

We therefore urge that the Plan be revised to accord the required protection to this Green Belt / MOL as required under the 2019 NPPF.

3. **Affordable housing targets.** Regarding limited affordable housing, LB Hounslow has not made any appropriate justification for **high affordable housing targets** apart from declaring that the borough is 'pro-growth'. But the NPPF makes clear that where boroughs are constrained by designated Green Belt this can be cited as a reason for reducing housing targets. i.e. the presence of Green Belt reducing the ability to build housing is a justification to reduce housing targets. Yet LB Hounslow has instead used the opposite argument. They have used the housing targets as the reason for proposing to develop a substantial amount of Green Belt / MOL.

We firmly believe this is wrong under the NPPF and the housing targets should instead have been adjusted in line with preserving the Green Belt / MOL.

4. **Other prescribed uses of Green Belt / MOL.** Certain other forms of development are also considered not inappropriate and in the 2019 NPPF and are listed as mineral extraction, engineering operations and local transport infrastructure requiring a Green Belt location. Yet these are not reflected in the Local Plan. For example, there are known **mineral extraction sites for future use** but there is no reference to them, e.g. Rectory Farm, Cranford. In addition the use of Bedfont Park for a new railway station is not mentioned in this context. So the amount of Green Belt/MOL land that LB Hounslow is proposing to remove is actually more than is stated in their Local Plan.

We urge that the Local Plan should be revised to reflect the proposed other uses for Green Belt / MOL land in this area.

5. **Dependency on transport enhancements.** There is heavy reliance on the creation of a **new railway station at Bedfont Park** to justify many of the proposed development sites. A new railway station depends on other bodies for its financing and operation. **There appears to be no justification or explanation in the revised Local Plan for the West Area as to how this development is to be achieved.** There is also no clear linkage requiring the development of this station as a condition of allowing all the proposed housing development. We believe therefore there is a high probability that the housing development will either precede the transport development, or indeed proceed without the transport development. The Local Plan recognises that such development requires the transport development but then does not include this dependency.

We request that the Local Plan be revised to make it clear that all the proposed housing developments are dependent on the transport development and will not be permitted without the transport development.

6. **Insufficient use of alternative sites.** LB Hounslow's Local Plan proposals do not set out **how suitable existing brownfield sites and underutilised other land can be used first** nor does it demonstrate how removing land from Green Belt designation can be offset by compensatory improvements of remaining Green Belt land (para 138 of NPPF). The prime reason for Green Belt / MOL having the protection it has is that development on such land is always preferred by developers versus using brownfields and other sites. The Local Plan should reflect this protection and require the use of such sites in preference to Green Belt / MOL. Instead it proposes the extensive use of Green Belt / MOL without providing any justification as to why all these alternative sources of land cannot be used instead.

The Local Plan should be revised to make it clear that brownfield and other types of land should always be used in preference to Green Belt / MOL land and to emphasize the protected nature of such land.

7. **Inherent value of Green Belt / MOL Land not recognised.** There is much current and realised **value in this Green Belt land**, which is clearly rural in character. However, instead LB Hounslow have described it as mostly low value and has not explained how
- it contains urban sprawl around this part of Greater London by acting as a buffer zone
 - stops towns from merging

- c. naturally manages water, temperature and air quality in an area which badly needs it being so close to Heathrow airport and
- d. also provides space for sport and recreation. Examples of this are: Bedfont Lakes (West) actually described as 'well performing green belt' and Lower Feltham West (Raleigh Park).

Further, some of the **areas proposed for development are currently valuable Sites of Importance for Nature Conservation (SINC)** e.g. Heathrow gateway, Royal Naval Association Club, South Bedfont and Bedfont Gardens and there are no specific plans for replacing them elsewhere within the borough. It is not correct or appropriate of LB Hounslow to propose the removal of sites classified as Green Belt/MOL land without addressing how this open land will be replaced and how all these other vital uses of such land will be accommodated in future. We request that the Local Plan be amended to reflect the inherent value of each of these Green Belt / MOL sites and the uses currently made of them.

Where LB Hounslow feel that such a site should be de-classified they should be required to replace the land and its uses with equivalent land and uses.

8. **Summary.** Our key concern with this draft Local Plan is the excessive and unjustified proposed utilization of Green Belt / MOL land for development. Such land has statutory protection for sound reasons and development is only permitted on such land in very limited and restricted cases. We believe that LB Hounslow has failed to demonstrate that their proposed use of such a large amount of this land is justified and that as a consequence their draft Local Plan is not a sound plan.

OWGRA seek a reduction of these plots of land for development where they include Green Belt designation and specific revisions to the Plan as detailed in the points above.