

Dear Sir,

**Hounslow Council Open Space Study:
Response to Consultation by the
Brentford Community Council**

Aug 15 2018
ref:BCC840

1. The Brentford Community Council met on August 13 and asked me to send these views to respond to the Council's Consultation on Open Spaces.
2. The BCC is the Amenity Society for the Brentford area of Hounslow.
3. The BCC supported the comments already sent to you by the Friends of St Pauls Rec in Brentford and asked that we draw your attention to the following:
4. The population of the borough was 254,000 in 2011 and 273,000 in 2015. It is likely that the population in 2018 is about 288,000.
5. The Mayor has set an annual target of 2081 new homes each year in the borough. If this target is achieved the population at the end of the Local Plan Period (2030) would be about 35,0500 (2081 units x 2.5 people x 12 years)..
6. Earlier plans included maps showing areas of "open space deficiency"
7. The draft London Plan 2017 (table 8.1) sets distances from homes for each category of open space. The borough plan should identify new and existing residential areas to test whether access to each type of open space meets the plan's criteria.
8. The Local Plan should include a map which shows areas which would fail to meet these criteria and propose policies to ensure there is adequate access to all types of open space from all the homes in the borough.
9. Due account needs to be taken of barriers to safe access. For example access to Gunnersbury Park from the Chiswick Curve residential development would involve crossing 40mph dual carriageways. This would be an unsafe route for unaccompanied children.
10. The Mayor (London Plan 2017, para 8.2.1) "strongly supports the protection of London's Green Belt and recognises (para 8.3.2) the importance of Metropolitan Open Land (MOL). However, MOL is not given the same protection. Para 8.3.3 shows that in "exceptional circumstances" MOL land could be developed.
11. The BCC and other Amenity societies in the borough successfully asked the Council to protect MOL at Brent Lea, but failed to do so where other new school developments were considered "exceptional"
12. We are concerned that, with the rise of population proposed by the Mayor, there will be a need for further school sites being proposed up to 2030. This could lead to the loss of further open spaces on Metropolitan Open Land at the time when the need for open space will be increasing.
13. It is likely that the 60,000 additional residents, who will be living in the

borough by 2030, will mostly be housed in flats. Some will be living in very high-rise flats, close to highly polluted areas and will be relying on sealed windows, pumped air and closed “winter gardens” as substitutes for balconies.

14. Of these, up to 6,000 new residents could be children of school age who will not only need school places, but also “Small open spaces, “Local Parks and Open Spaces” and “District Parks”, all as set out in table 8.1, and all within appropriate safe access distances.

15. The BCC is concerned that the objective to provide improved living standards for an ever-increasing population without the loss of Green Belt or the undesirable loss of further Metropolitan Open Land cannot be achieved.

16. The questions asked in your Survey are clearly addressed to individuals and groups associated with specific open spaces. BCC members all live in the TW8 area, which is covered by the Isleworth and Brentford Forum.

17. Our members live in houses and flats. The construction of several thousand new flats has been given planning consent where construction has not been started. When occupied, they will increase the demand for open spaces.

18. On-going improvements to Gunnersbury Park will greatly enhance local facilities. However, access across the A4 is too dangerous, especially for unsupervised children.

19. Private Open Spaces, like Syon Park, are priceless heritage assets but provide limited recreational facilities. The national importance of these assets make them inviolable.

20. The retention of private golf courses, however, may be a luxury the community can no longer afford.

The BCC welcomes the Council's initiative in commissioning an Open Space Study. We believe that a full understanding of the importance of open space to residents and a projection of the needs of a borough population rising to 350,000 people in the next 12 years should inform future plans for our borough.

Yours sincerely

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Brentford Community Council

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