

The Officer's report on this proposal refers to the high level of protection that should be given to Metropolitan Open Land in London and local policies, but fails to mention the important policies relating to this recreation ground as **publically accessible open space** at National level (NPPF) and in the London Plan.

As a publically accessible open space **NPPF para 74** is relevant to this proposal;

'Existing open space should not be built on unless-

An assessment has been undertaken which has clearly shown the open space to be surplus to requirements or-

The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location or-

The development is for an alternative sports and recreational provision, the needs for which clearly outweigh the loss'.

These criteria have been incorporated into the emerging Local Plan in relation to the loss of local open space (policy GB2); and are apply to all open space in the borough through the NPPF and the London Plan. The London Plan also stresses the need to address deficiencies in publically accessible open space (**policy 7.18**), and deficiency is also an important consideration in the Local Plan (**GB2**). The London and Local Plans both stress the need to take into account the open space needs of an increasing population

The third criteria is not applicable to educational provision; the first might be relevant if private or exceptionally public, sports pitches became redundant. MOL/Green Belt policies would still apply and under other policies, significant new or retained public accessibility would be sought. However, Public Open Space has a crucial role in promoting healthy communities and to suggest that there is a surplus is as inappropriate as a surplus of fresh air, good health, or quality of life; open spaces provide the borough's residents with compensation and mitigation for aircraft noise, congestion and pollution, and have an important role in enhancing the borough's economy.

The second criteria will therefore be the only one of relevance. This requires an area of replacement open space, equivalent in area and quality to be provided in a suitable location locally, or in an area of deficiency. Such provision could be split between two or more sites. The acquisition of land for new open space will generally be at residential value, and therefore this is the appropriate amount that should be paid by the EFA to the Council if, in very special circumstances, public open space is to be used other than as a temporary emergency. For a temporary use improvements to the quality of the space and full reinstatement should be required. All transactions should be in the public domain, and money dedicated to the provision of new open space. There can be no justification for the use of open space, classified as of high value and high quality, as a cheap land bank for education or other initiatives

Although Para 72 of the NPPF states that great weight should be given to the need to create, expand or alter schools, it as was confirmed by the Inspector at the recent hearing into the Local Plan that this policy is independent of, and does not pre-empt, policies relating to the protection of MOL and publically accessible open space. Statements supporting new schools from other Government departments have limited relevance to these planning considerations.

Open space deficiency. The report gives misleading information in relation to **open space deficiency**.

It should have quoted the supporting facts to policy GB2 that this is mapped using 400m catchment area and taking access barriers into account. The plan also states that the open space evidence base identifies Brentford as one of the most significant areas of deficiency. Brent Lea is on the edge this area of open space deficiency and at 1.3 Ha at present is already below the 2Ha 'local park' standard of the London Plan. The loss of up to half of this area would reduce the remainder below the size which could be feasibly regarded as meeting the requirements of a local park, and would mean that most of Brentford End would be brought into this area of deficiency.

This park is not a satisfactory site for a new school in terms of MOL and open space policies. Although whilst there is a search for an appropriate permanent site a temporary use for two years might be acceptable, the location should be amended to minimise the impact on the park, and conditions imposed requiring concurrent enhancement work and full reinstatement at the end of the temporary use.

C J Hern