

**Matter 7: Green and Blue Infrastructure, Community Infrastructure and Environmental Quality**

**Issue:** Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in relation to green and blue infrastructure, community infrastructure and environmental quality?

**Questions:**

**1) Policies GB2, GB3, GB8 and GB9 relate to open space; open space in educational use; allotments, agriculture and local food growing; and playspace, outdoor sports facilities and burial space respectively, are they positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:**

**a) Are the policies, opportunities for new provision and open space standards used to determine deficiencies of provision in publicly accessible open space - effective and based on robust and up-to-date evidence of need, and does the evidence take sufficient account of the expectations of Policy G4 of the London Plan?**

1. The Local Plan fails to meet NPPF (2024) paragraph 105 which requires policies to protect public rights of way and access; and fails to meet the expectations of London Plan policy G4 A4) to ensure that open space, particularly green space, included as part of development remains publicly accessible.
2. There are 1.24 acres (0.5 ha) of Public Open Space (POS) land and a Riverside Walk at Brentford Dock which has been used by the local community since the late 1970s and is valued by the community. It is a site which contains features of historic and recreational interest of metropolitan value, due to:
  - its location beside the River Thames, opposite Royal Botanic Gardens, Kew, UNESCO World Heritage Site;
  - potential to provide a missing link along the Thames Path;
  - its heritage as a transshipment dock designed for the Great Western Railway by Isambard Kingdom Brunel (1855) as described in the Hounslow Heritage Guide endorsed by Hounslow Council (1993-2008);
  - the contribution of the river landscape at Brentford is described in the Thames Landscape Strategy (2012 update) and in the Arcadian Thames section of the Mayor of London's All Green Grid Supplementary Planning document (2012)

This London and locally important POS is absent from the Plan. It should be designated and protected in the Local Plan.
3. Brentford Walks have been in communication with the London borough of Hounslow (LBH) since public access to this POS was closed off by Brentford Dock Limited in June 2023. At that time we requested key documents relating to the POS from LBH who have freehold interest in the land. We were informed that key documents were lost and not in their possession. Since 2023 Brentford Walks has provided the LBH with extensive evidence, including:

- Evidence submitted as part of the Definitive Map Modification Order (submitted 7.11.24 and duly made 16 December 2025)
  - Further evidence concerning the Land Registry details, Transfer of Freehold Agreement and Agreement regarding Public Access [13 May 2024]
4. This POS at Brentford Dock documented and public access is granted through the planning applications and legal agreements shown in the table below and on the following pages. LBH granted the planning permission and was a signatory on all the Agreements. All these documents should have been accessible and available to LBH since their original date, to inform preparation of the Local Plan.

Date	Planning permission or Agreement	Notes
1 July 1972	Notice of Passing Building Plans. The Greater London Council. Ref No HR 11275 (amended)	With 2.24 acres of Public Open Space land
13 April 1978	The Estate Plan attached to the 1978 Lease supplied by a resident. Also attached to the Transfer of Freehold Agreement	
26 April 1978	Brentford Dock – Revised Planning Application. London Borough Hounslow Planning & Communications Policy Committee resolved to approve the Revised Planning Application with condition. Reference: DG/PG/P/GS/7722/7713 with plan attached showing public open space. <u>Resolved:</u> On a vote that the development of the former Brentford Dock for residential purposes and public open space as shown on drawings AR/HO/798/02/3	Provided by LBH on following FOI EIR000384 on 9 April 2025  With 1.24 acres of Public Open Space land
February 1990	Notice of disposal of Open Space Land by the London Residuary Body – published in the Brentford & Chiswick Times February 1990	
29 March 1990	Agreement between London Residuary Body and Estmanco (Brentford Dock) Limited with clause stating that the completion of the sale of freehold of the Brentford Dock estate was conditional on an agreement granting the public access to use and enjoy the Open Space Land.  'The completion of the sale and purchase hereby agreed is conditional upon the following condition: the conclusion of an agreement with the LBH providing in respect of the Open Space Land rights which to the satisfaction of that authority and notwithstanding joiner of the freehold agreements for superior leasehold interests in the one owner preserve the rights contained in clauses 6(2)(i) and 6(3) of the said Form of Combined Superior Commercial Lease and Superior Lease for the public at all reasonable times to have access to and be permitted use and enjoy the Open Space Land'.  2 options were presented: '4. If the sale includes the Open Space Land the consideration for the sale and purchase hereby agreed shall be (1) £200,000 (the purchase price)	

	<p>(2) A covenant by the Purchaser to release the Vendor and the LRB from all liability to the Purchaser howsoever arising from the development and/or design and/or construction and/or maintenance of the Estate . . .</p> <p>5. If the sale excludes the Open Space Land the consideration for the sale purchase hereby agreed shall be set out in clause 4 above but with the substitution in sub-clause (1) of “Two Hundred and Fifty Thousand Pounds (£250,000)” for “Two Hundred Thousand Pounds”.’</p>	
5 August 1991	<p>Transfer of Freehold Agreement – ‘this transfer is made between the Greater London Council and Estmanco (Brentford Dock) Ltd as varied by an Agreement dated 29 March 1990 between the London Residuary Body and Estmanco (Brentford Dock) Ltd.’</p> <p>This agreement confirms the receipt of £200,000 – the sale included the Open Space Land and released the Vendor and the LRB from all liability for the maintenance.</p>	
5 August 1991	<p>The ‘even date’ Agreement: ‘The Transferee HEREBY COVENANTS with the Transferor to: (vi) comply with the provisions an Agreement made between the Transferor and the Transferee and bearing even date herewith relating to the open space land’</p>	<p>Requested 1.2.2025 as part of FOI EIR000384.</p> <p>Provided to Brentford Walks on 26 September 2025</p>

Plan No  
HR 11275 (as amended)

LONDON BOROUGH OF HOUNSLOW

PUBLIC HEALTH ACT, 1936.  
The Building Regulations 1965.

Notice of Passing of Building Plans.

To The Greater London Council,  
Department of Architecture and Civic Design,  
The County Hall,  
London,  
S.E.1.

WHEREAS in accordance with the Building Regulations 1965 (as amended) you deposited on the 7th day of July, 19 72, with the LONDON BOROUGH OF HOUNSLOW (hereinafter referred to as the Council) plans of which the reference number is HR 11275 (amended) in respect of building operations at Brentford Dock Site, south of High Street, Brentford (to be) known as: namely the erection of eleven blocks of dwellings, garages

clubrooms, shops etc. EXCLUDING Old Parsons Clubroom/Wardens House and Works  
THE COUNCIL HEREBY GIVE YOU NOTICE in pursuance of Section 64 of the Public Health Act, 1936, that the said plans were passed at their meeting held on the 10th day of July, 19 72.

AND TAKE NOTICE that the passing of the said plans operates as an approval thereof only for the purposes of the requirements of the Building Regulations 1965 (as amended), of Section 10 of the Clean Air Act 1956 (as amended), of the Thermal Insulation (Industrial Buildings) Act, 1957 and does not operate as an approval for the purposes of any other statutory provision whatsoever.

It is emphasised that if the proposed works constitute or involve development within the meaning of the Town and Country Planning Acts 1962 to 1968, for which express planning permission is necessary, no work may be proceeded with until such permission has been obtained.

Approval as to the provision of means of escape in case of fire may also be required under Section 40 of the Factories Act, 1961 or Section 28 of the Offices, Shops and Railway Premises Act, 1963, and approval as to the height of any chimney or the provision of grit arrestment plant may be required under the Clean Air Act 1968.

Further, if it is desired to obtain a grant towards the cost of improvement and/or conversion under the Housing Act 1969, an application must be made to the Council and their approval obtained, before work is commenced.

AND FURTHER TAKE NOTICE of the requirements of the Building Regulations that the Council shall be furnished with the following notices:—

- (a) not less than 24-hours' notice in writing of the date and time at which the operation will be commenced; and
- (b) not less than 24-hours' notice in writing before the covering up of any excavation for a foundation, any foundation, any damp-proof course or any concrete or other material laid over a site; and
- (c) not less than 24-hours' notice in writing before any drain or private sewer to which the regulations apply will be haunched or covered in any way; and
- (d) notice in writing not more than 7 days after the work of laying such drain or private sewer has been carried out, including any necessary work of haunching or surrounding the drain or private sewer with concrete and back-filling the trench.

And, in addition, notice in writing of:—

- (e) the erection of a building, not more than 7 days after completion, or (if a building or part of a building is occupied before completion) not less than 7 days before occupation as well as not more than 7 days after completion;
- (f) any alteration or extension of a building, not more than 7 days after completion; and
- (g) the execution of works or the installation of fittings in connection with a building, not more than 7 days after completion.

The expression "24 hours' notice" does not include a Saturday, Sunday, Christmas Day, Good Friday, bank holiday or day appointed for public thanksgiving or mourning.

If this work is not commenced within three years of the deposit of the plans as aforesaid, the Council may, by notice given to you, declare that the deposit of the said plans shall be of no effect, pursuant to Section 66 of the Public Health Act, 1936.

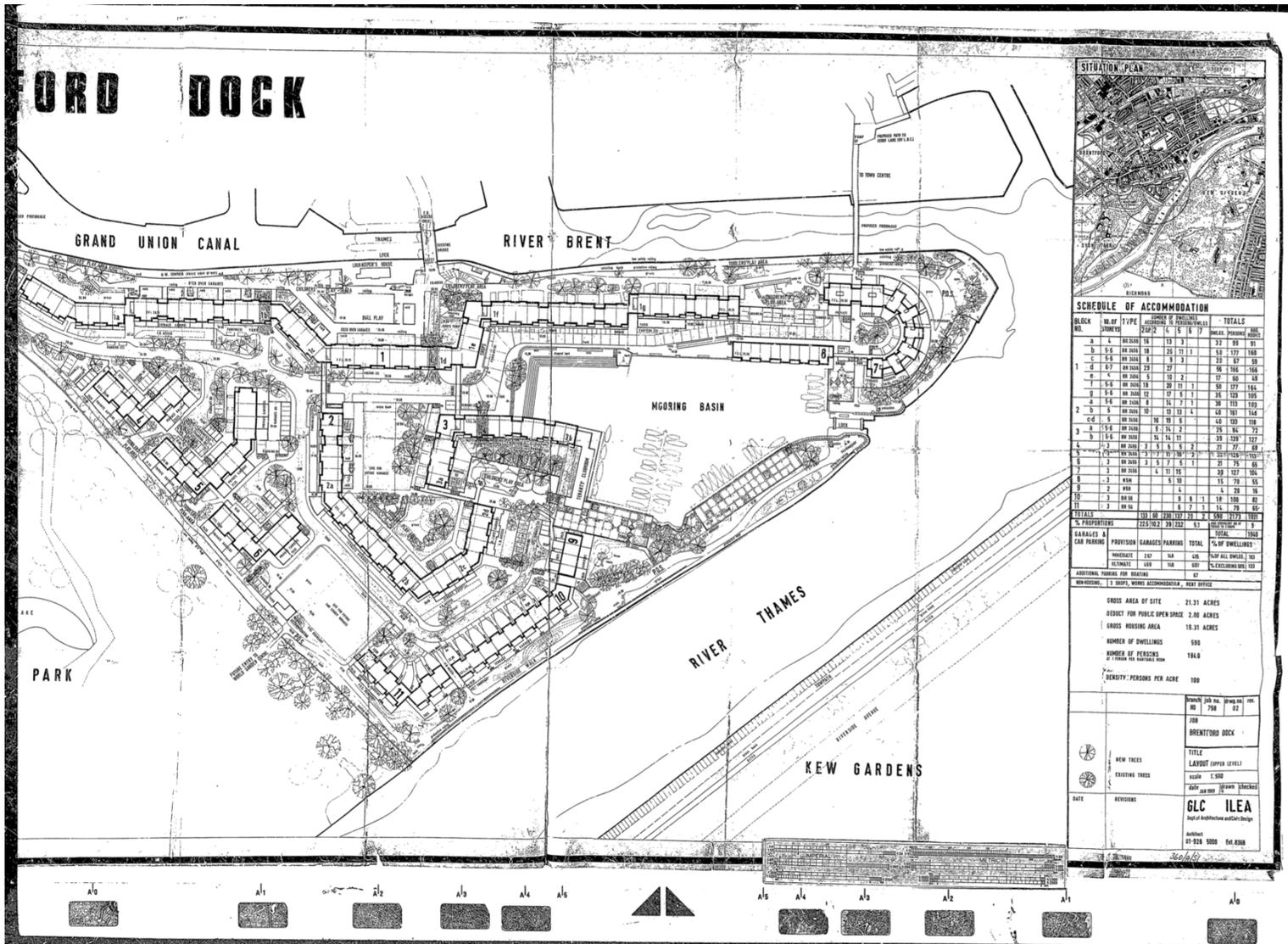
DATED the 11th day of July, 19 72.

Copyright Form.  
Public Health Act 1936

THE BOROUGH ENGINEER AND SURVEYOR,

*[Signature]*

DEPARTMENT OF ARCHITECTURE AND CIVIC DESIGN  
7th JULY 1972  
LONDON BOROUGH OF HOUNSLOW



**SCHEDULE OF ACCOMMODATION**

BLOCK NO.	NO. OF DWELLINGS	TYPE	ACCORDING TO PROVISIONS	TOTALS		
			2 3 4 5 6 7			
A	4	APARTMENT	153	3	32	198
B	5	APARTMENT	10	3	23	36
C	6	APARTMENT	8	3	23	34
D	7	APARTMENT	27	3	30	57
E	8	APARTMENT	53	3	57	103
F	9	APARTMENT	20	3	23	46
G	10	APARTMENT	11	3	17	31
H	11	APARTMENT	18	3	21	39
I	12	APARTMENT	11	3	17	31
J	13	APARTMENT	18	3	21	39
K	14	APARTMENT	11	3	17	31
L	15	APARTMENT	18	3	21	39
M	16	APARTMENT	11	3	17	31
N	17	APARTMENT	18	3	21	39
O	18	APARTMENT	11	3	17	31
P	19	APARTMENT	18	3	21	39
Q	20	APARTMENT	11	3	17	31
R	21	APARTMENT	18	3	21	39
S	22	APARTMENT	11	3	17	31
T	23	APARTMENT	18	3	21	39
U	24	APARTMENT	11	3	17	31
V	25	APARTMENT	18	3	21	39
W	26	APARTMENT	11	3	17	31
X	27	APARTMENT	18	3	21	39
Y	28	APARTMENT	11	3	17	31
Z	29	APARTMENT	18	3	21	39
AA	30	APARTMENT	11	3	17	31
AB	31	APARTMENT	18	3	21	39
AC	32	APARTMENT	11	3	17	31
AD	33	APARTMENT	18	3	21	39
AE	34	APARTMENT	11	3	17	31
AF	35	APARTMENT	18	3	21	39
AG	36	APARTMENT	11	3	17	31
AH	37	APARTMENT	18	3	21	39
AI	38	APARTMENT	11	3	17	31
AJ	39	APARTMENT	18	3	21	39
AK	40	APARTMENT	11	3	17	31
AL	41	APARTMENT	18	3	21	39
AM	42	APARTMENT	11	3	17	31
AN	43	APARTMENT	18	3	21	39
AO	44	APARTMENT	11	3	17	31
AP	45	APARTMENT	18	3	21	39
AP	46	APARTMENT	11	3	17	31
AP	47	APARTMENT	18	3	21	39
AP	48	APARTMENT	11	3	17	31
AP	49	APARTMENT	18	3	21	39
AP	50	APARTMENT	11	3	17	31
TOTALS	113		103	3	127	233

**PROVISIONS**

PROVISION	PROVIDEN	TOTAL	% OF DWELLINGS
GARAGES & CAR PARKING	207	183	16.3
WATER	400	357	31.6
SEWERAGE	400	357	31.6
ADDITIONAL PARKING FOR BOATING		67	

REMARKS: 1. STREET WORKS ACCOMMODATION - ROAD OFFICE

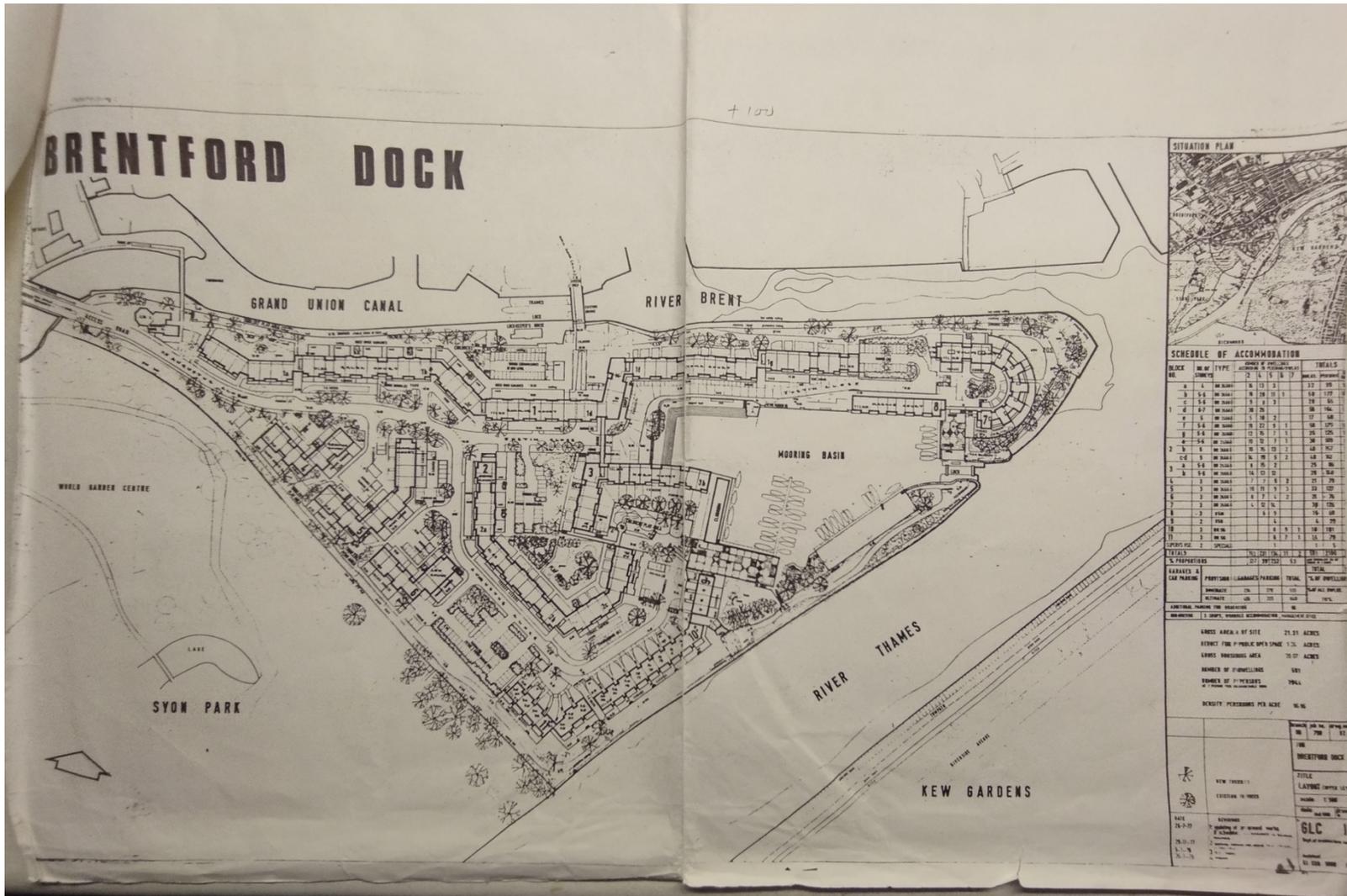
GROSS AREA OF SITE: 21.31 ACRES  
 DEDUCT FOR PUBLIC OPEN SPACE: 2.00 ACRES  
 GROSS HOUSING AREA: 19.31 ACRES  
 NUMBER OF DWELLINGS: 590  
 NUMBER OF PERSONS AT 1.70 PER DWELLING: 1003  
 DENSITY: PERSONS PER ACRE: 51.8

DRAWN: J.D. (DWG. NO.) 100  
 7/58 8/72  
 BRENTFORD DOCK  
 TITLE: LAYOUT (COPPER LEVEL)  
 SCALE: 1/500  
 DATE: 1972

REVISIONS:  
 DATE: \_\_\_\_\_  
 BY: \_\_\_\_\_  
 FOR: \_\_\_\_\_

GLC ILEA  
 Dept of Architecture and City Design  
 41-43 Abchurch Lane, London EC4A 3DF  
 Tel. 6308

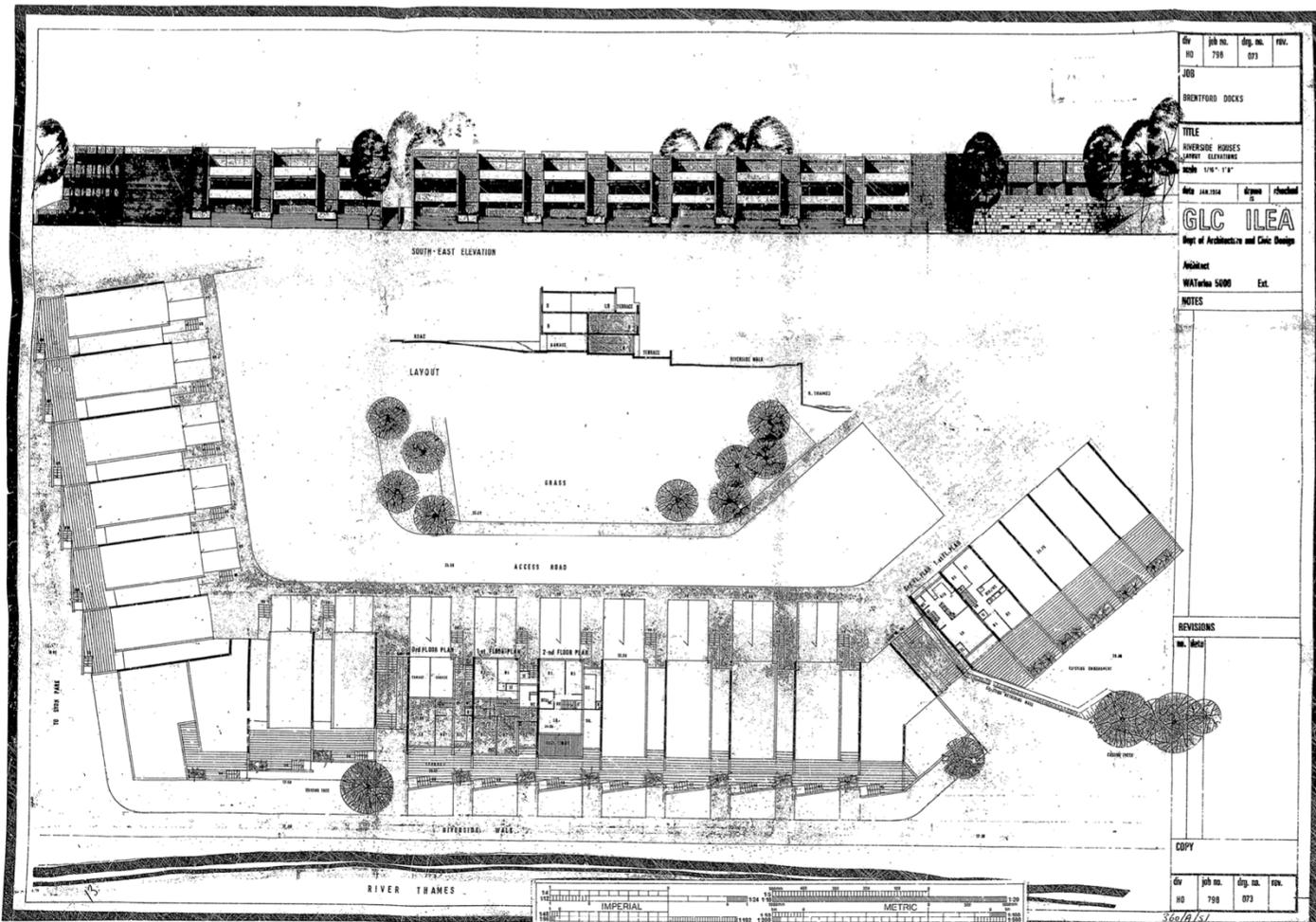
26 April 1978 Brentford Dock – Revised Planning Application – clear indication of 1.24 acres of Public Open Space Land and Riverside Walk on the southern perimeter.



**SITUATION PLAN**

**SCHEDULE OF ACCOMMODATION**

BLOCK NO.	STREETS	TYPE	NUMBER OF DWELLINGS				TOTALS
			2	3	4	5	
A	1	FLAT	16	13	3	32	
B	2	FLAT	16	13	3	32	
C	3	FLAT	16	13	3	32	
D	4	FLAT	16	13	3	32	
E	5	FLAT	16	13	3	32	
F	6	FLAT	16	13	3	32	
G	7	FLAT	16	13	3	32	
H	8	FLAT	16	13	3	32	
I	9	FLAT	16	13	3	32	
J	10	FLAT	16	13	3	32	
K	11	FLAT	16	13	3	32	
L	12	FLAT	16	13	3	32	
M	13	FLAT	16	13	3	32	
N	14	FLAT	16	13	3	32	
O	15	FLAT	16	13	3	32	
P	16	FLAT	16	13	3	32	
Q	17	FLAT	16	13	3	32	
R	18	FLAT	16	13	3	32	
S	19	FLAT	16	13	3	32	
T	20	FLAT	16	13	3	32	
U	21	FLAT	16	13	3	32	
V	22	FLAT	16	13	3	32	
W	23	FLAT	16	13	3	32	
X	24	FLAT	16	13	3	32	
Y	25	FLAT	16	13	3	32	
Z	26	FLAT	16	13	3	32	
AA	27	FLAT	16	13	3	32	
AB	28	FLAT	16	13	3	32	
AC	29	FLAT	16	13	3	32	
AD	30	FLAT	16	13	3	32	
AE	31	FLAT	16	13	3	32	
AF	32	FLAT	16	13	3	32	
AG	33	FLAT	16	13	3	32	
AH	34	FLAT	16	13	3	32	
AI	35	FLAT	16	13	3	32	
AJ	36	FLAT	16	13	3	32	
AK	37	FLAT	16	13	3	32	
AL	38	FLAT	16	13	3	32	
AM	39	FLAT	16	13	3	32	
AN	40	FLAT	16	13	3	32	
AO	41	FLAT	16	13	3	32	
AP	42	FLAT	16	13	3	32	
AQ	43	FLAT	16	13	3	32	
AR	44	FLAT	16	13	3	32	
AS	45	FLAT	16	13	3	32	
AT	46	FLAT	16	13	3	32	
AU	47	FLAT	16	13	3	32	
AV	48	FLAT	16	13	3	32	
AW	49	FLAT	16	13	3	32	
AX	50	FLAT	16	13	3	32	
AY	51	FLAT	16	13	3	32	
AZ	52	FLAT	16	13	3	32	
BA	53	FLAT	16	13	3	32	
BB	54	FLAT	16	13	3	32	
BC	55	FLAT	16	13	3	32	
BD	56	FLAT	16	13	3	32	
BE	57	FLAT	16	13	3	32	
BF	58	FLAT	16	13	3	32	
BG	59	FLAT	16	13	3	32	
BH	60	FLAT	16	13	3	32	
BI	61	FLAT	16	13	3	32	
BJ	62	FLAT	16	13	3	32	
BK	63	FLAT	16	13	3	32	
BL	64	FLAT	16	13	3	32	
BM	65	FLAT	16	13	3	32	
BN	66	FLAT	16	13	3	32	
BO	67	FLAT	16	13	3	32	
BP	68	FLAT	16	13	3	32	
BQ	69	FLAT	16	13	3	32	
BR	70	FLAT	16	13	3	32	
BS	71	FLAT	16	13	3	32	
BT	72	FLAT	16	13	3	32	
BU	73	FLAT	16	13	3	32	
BV	74	FLAT	16	13	3	32	
BW	75	FLAT	16	13	3	32	
BX	76	FLAT	16	13	3	32	
BY	77	FLAT	16	13	3	32	
BZ	78	FLAT	16	13	3	32	
CA	79	FLAT	16	13	3	32	
CB	80	FLAT	16	13	3	32	
CC	81	FLAT	16	13	3	32	
CD	82	FLAT	16	13	3	32	
CE	83	FLAT	16	13	3	32	
CF	84	FLAT	16	13	3	32	
CG	85	FLAT	16	13	3	32	
CH	86	FLAT	16	13	3	32	
CI	87	FLAT	16	13	3	32	
CJ	88	FLAT	16	13	3	32	
CK	89	FLAT	16	13	3	32	
CL	90	FLAT	16	13	3	32	
CM	91	FLAT	16	13	3	32	
CN	92	FLAT	16	13	3	32	
CO	93	FLAT	16	13	3	32	
CP	94	FLAT	16	13	3	32	
CQ	95	FLAT	16	13	3	32	
CR	96	FLAT	16	13	3	32	
CS	97	FLAT	16	13	3	32	
CT	98	FLAT	16	13	3	32	
CU	99	FLAT	16	13	3	32	
CV	100	FLAT	16	13	3	32	
CV TOTALS			160	130	30	320	
CD TOTALS			160	130	30	320	
CE TOTALS			160	130	30	320	
CF TOTALS			160	130	30	320	
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CT TOTALS			160	130	30	320	
CU TOTALS			160	130	30	320	
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Dr	job no.	des. no.	rev.
HO	798	073	

JOB  
BRENTFORD DOCKS

TITLE  
RIVERSIDE HOUSES  
PARKWAY ELEVATIONS  
Scale 1/4" = 1'-0"

Date JAN. 1954  
Checked  
GLC ILEA

Dept. of Architecture and Civic Design

Architect  
WATkins 5000 Est.

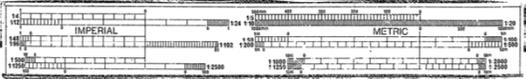
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REVISIONS

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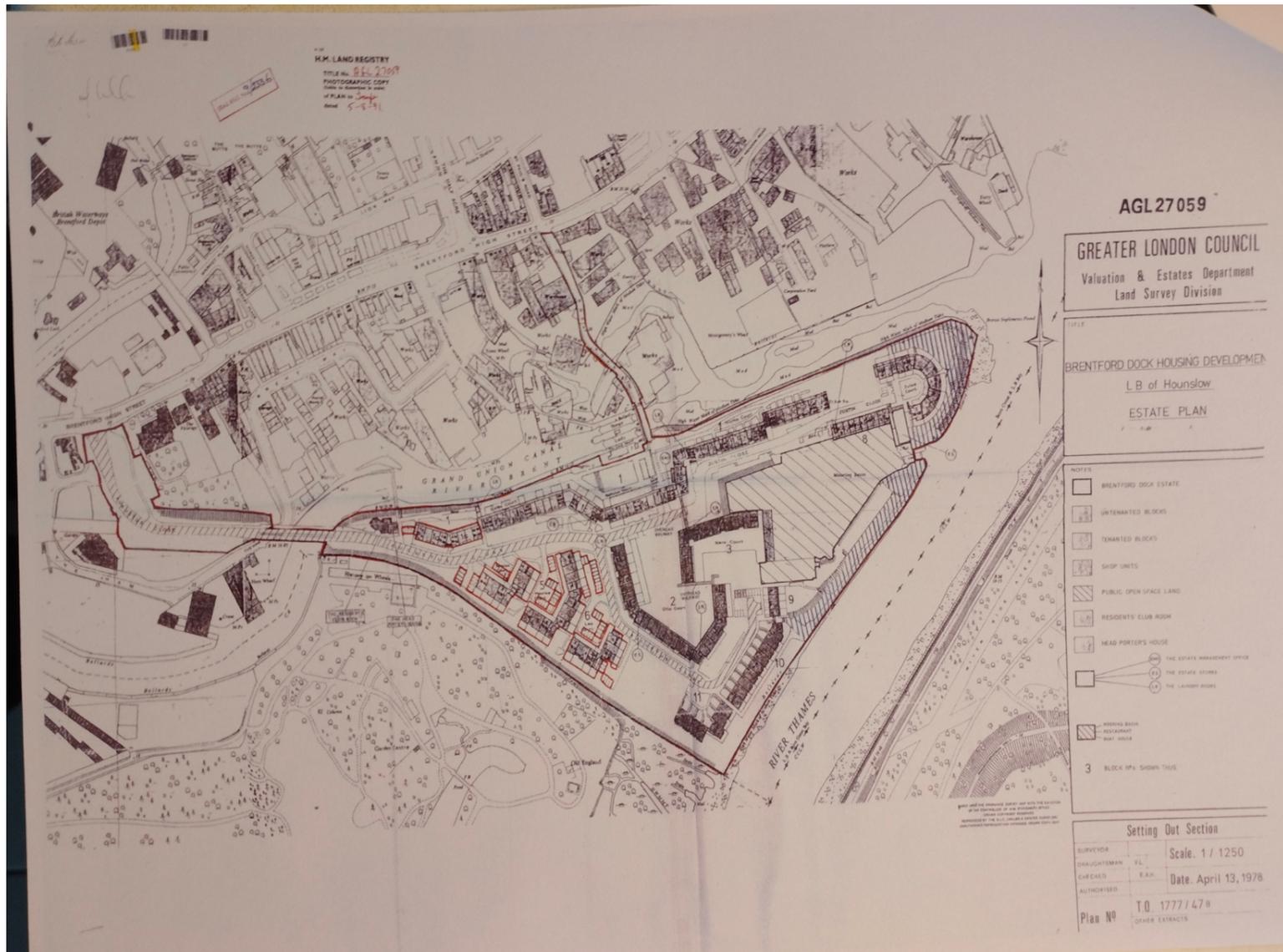
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Land Registry Title Plan AGL 27059 The Estate Plan (13 April 1978) is attached to the 1978 Lease supplied by a resident and the 1990 Lease Transfer of the Freehold Agreement. Note the hatched blue area identified in the key as Public Open Land



Notice of disposal of Open Space Land by the London Residuary Body. Brentford & Chiswick Times February 1990. The map showing public open space was available for inspection.

### NOTICE OF INTENDED DISPOSAL OF OPEN SPACE LAND PURSUANT TO SECTION 123(2A) OF THE LOCAL GOVERNMENT ACT 1972

The London Residuary Body hereby gives notice of its intention to dispose of open space land vested in it at Brentford Dock in the London Borough of Hounslow.

The London Residuary Body intends to dispose of the open space land together with the remainder of the land vested in it at Brentford Dock to Estmanco (Brentford Dock) Limited.

"Open space" for the purposes of Section 123(2A) means "any land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground".

Copies of a map "Open Space Land at Brentford Dock" specifying the open space land in question are available for inspection from 9.30 a.m. to 12 noon and from 2 p.m. to 5 p.m. Mondays to Fridays at the following places:

- Room 1B 4S Island Block, County Hall, London SE1 7PB
- Room 2 Justin Close, Brentford Dock, Brentford, Middlesex TW8 8QE

The interest to be sold is the freehold subject to an agreement for a lease for 98 years and 3 days from 25.3.78. The lease is to provide for rights of public access to the open space land.

The proposed disposal will be subject to a condition precedent for the preservation of the rights of public access to be provided by the lease.

Any person desiring to make representations in respect of the proposed disposal of open space land should do so in writing to me before 15.3.90.

**JOHN HOWES**  
Director of Administration  
London Residuary Body

St Vincent House  
30 Orange Street  
London WC2H 7HH

### HOUNSLOW TOWN & COUNTRY PLANNING ACT 1971

Application has been made to the Council in respect of the following proposals and copies of the application, plans and accompanying documents are available for inspection at the office of the Borough Planning Department, Civic Centre, Lampton Road, Hounslow.\*

Any representations should be made in writing to the Borough Planning Officer (quoting the appropriate reference number) within a period of 21 days beginning with the date of publication of this notice.

**Isleworth Riverside Conservation Area**  
11/37/P4  
37 Ailsa Road, Twickenham  
Erection of single storey flank extension to provide accommodation for disabled persons  
\*(also at Isleworth library)

**Turnham Green Conservation Area**  
1094/54/P1  
4 Arlington Park Mansions, Sutton Lane, W4  
Creation of storeroom in existing balcony space  
\*(also at Chiswick library)

**Heston Village Conservation Area**  
1195/82/P3  
82 Wheatlands, Heston  
Erection of extension at second floor level to dwellinghouse  
\*(also at Heston library)

**Bedford Park Conservation Area**  
455/19/P1  
19 Flanders Road, W4  
Erection of loft extension and conversion of habitable room  
\*(also at Chiswick library)

#### JUMBLE SALES

##### ANTIQUE & COLLECTION FAIR

**CAMELLIA RESTAURANT**  
Syon Park, Brentford, Middx.

February 18th, 11am-5pm  
(trade 10 a.m.)

A Quality Fair — 1990 Christmas Refreshments — Good Parking

#### FAMILY FUNERAL DIRECTOR

These members of the London Residuary Body are qualified funeral directors and can provide you with a full range of funeral services. For a list of names and addresses, please contact the London Residuary Body.

#### DEATHS

**BYGRAVE, Mrs Alice** — 82 Lyndhurst Avenue, Weybridge, Surrey, died peacefully on Tuesday 16th February. Funeral on Friday 16th February. Crematorium at 2pm.

**GOODE, Alice Lavinia** — 45, enbarn, beloved Mother & mother, died peacefully on 3rd in Princess Alice Home aged 91. Funeral has taken place at 11.30am on Tuesday 14th February.

**HICKEY, James Bernard** — 45, loved husband and Father, died on Tuesday 14th February.

**PARKINSON, Mrs Christ** — 45, shop Court, died in Hospital, Service Kew Rd Church 15th February 12.45.

**QUINCEY** — On February 14th John, beloved husband of Mary, died peacefully at home. Father of Peter, 5 years. Husband of Lily and who knew him, family donations to Hammersmith Cancer Research Fund. Burial at St Paul's Church, W4. Tel. 01 994 4312.

**SMITH** — On 9th February at home in Bedford Park, Frederick Smith D.C.M., 74 years. Husband of Lily and John and Elizabeth and G. of Stewart, Iain, Susan, David. Funeral service at 4 Al Angels Church, W4, Monday 19 Feb 11.30am. Followed by interment in Chiswick New Cemetery, W4. Director: 468 Chiswick Rd, W4. Tel. 01 994 0056.

#### BIRTHS

**HUNTER, Julie and Bruce** — congratulations on the arrival of a son, William Thomas, a brother to Edward and Richard.

**ROACH, Jill and Marvin** — congratulations on the birth of a son, Matthew, born at Ashford on 6 February 1990. Mum: Hannah, born at Ashford. — Love Doll and June.

#### RUBY WEDDING

**PETTIT, Ken and May** — celebrating their 50th wedding anniversary on 15th February 1940. Wedding — Carol, Ian, Maureen, Janet, Ray and grandsons Paul, Gary, Neil, Simon and

5 August 1991 Even Date Agreement

1. '... HEREBY AGREES that the public shall at all reasonable times have access to and be permitted to use and enjoy the land shown hatched in blue on the plan annexed hereto
2. .... IT IS HEREBY DECLARED that the access provided for by Clause 1 above includes access from each of the two parts of opens space land to the other across the lock gates as indicated on the plan and between those gates and the open space land by the most direct route or by such sufficiently wide and convenient route as the Company or its lessee of the adjoining mooring basin may provide for this purpose'

50p

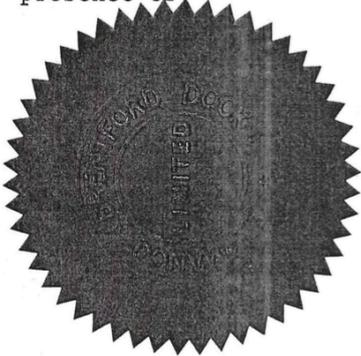
THIS AGREEMENT made this 7th day of August One thousand nine hundred and ninety one BETWEEN ESTMANCO (BRENTFORD DOCK) LIMITED whose registered office is at 2 Justin Close Brentford Middlesex (hereinafter called "the Company") of the one part and THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF HOUNSLOW of The Civic Centre Lampton Road Hounslow Middlesex TW3 4DN (hereinafter called "Hounslow") of the other part is supplemental to an Agreement made the First day of August One thousand nine hundred and seventy eight between the Greater London Council of the one part and the Company of the other part as varied by an Agreement made the Twenty ninth day of March One thousand nine hundred and ninety between The London Residuary Body of the one part and the Company of the other part

NOW THIS DEED W I T N E S S E S AND IT IS HEREBY AGREED as follows:

1. IN pursuance of the said Agreements and in consideration of the covenants hereinafter contained and on the part of Hounslow to be performed and observed the Company HEREBY AGREES that the public shall at all reasonable times have access to and be permitted to use and enjoy the land shown hatched blue on the plan annexed hereto
2. FOR the avoidance of doubt IT IS HEREBY DECLARED that the access provided for by Clause 1 above includes access from each of the two parts of the open space land to the other across the lock gates as indicated on the plan and between those gates and the open space land by the most

direct route or by such sufficiently wide and convenient route as the Company or its lessee of the adjoining mooring basin may provide for this purpose

The Common Seal of Estmanco )  
(Brentford Dock) Limited )  
was hereunto affixed in the )  
presence of: )



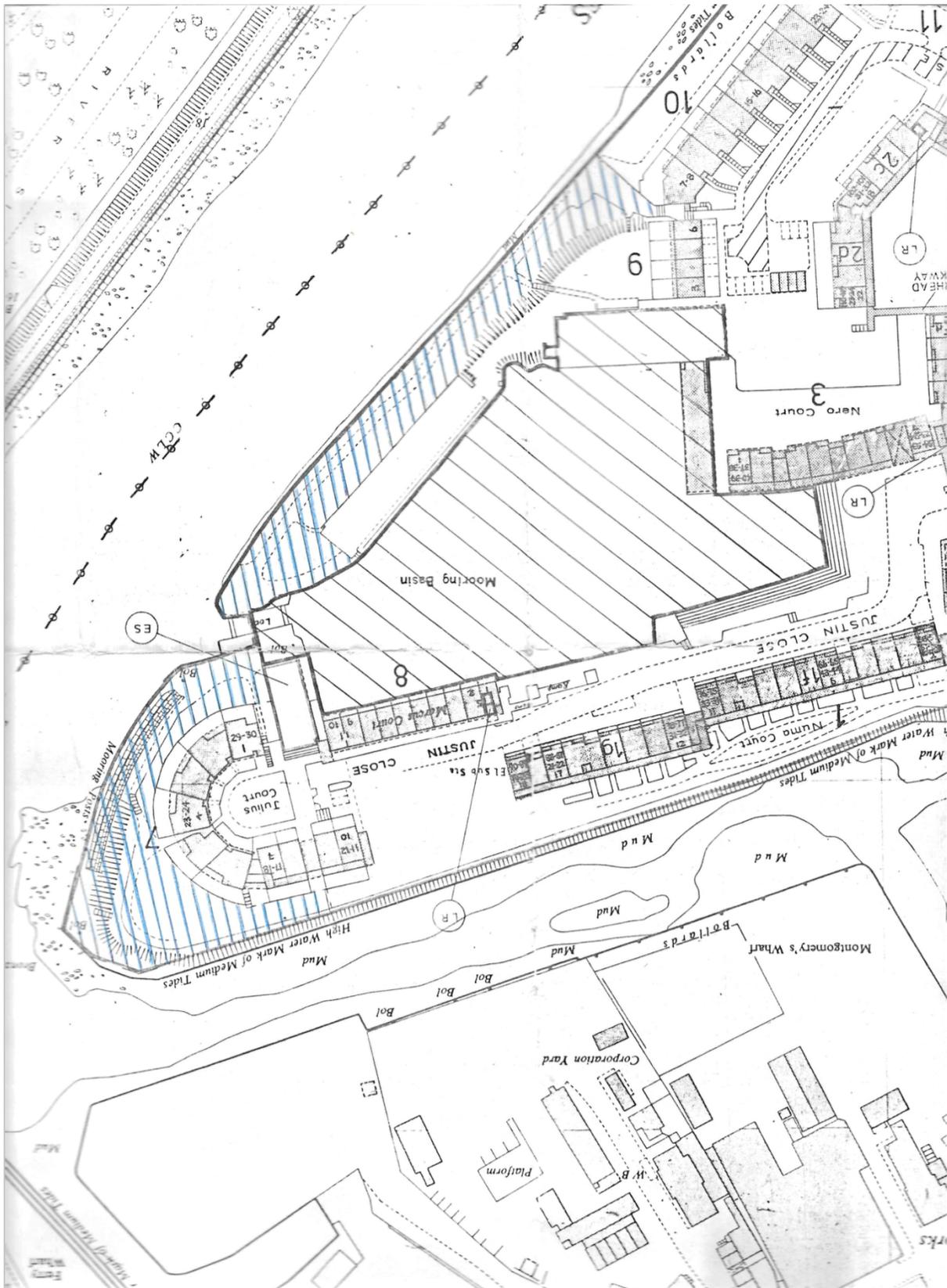
Director *Lennie Rogers*  
Secretary *Sarah Coby*

The Common Seal of The Mayor )  
and Burgesses of the )  
London Borough of Hounslow )  
was hereunto affixed in )  
the presence of: )



*Alec Ham*  
Mayor  
Director of *Legal Services* ~~Administration and Support Services~~

SEAL REG. No. *9/2334*



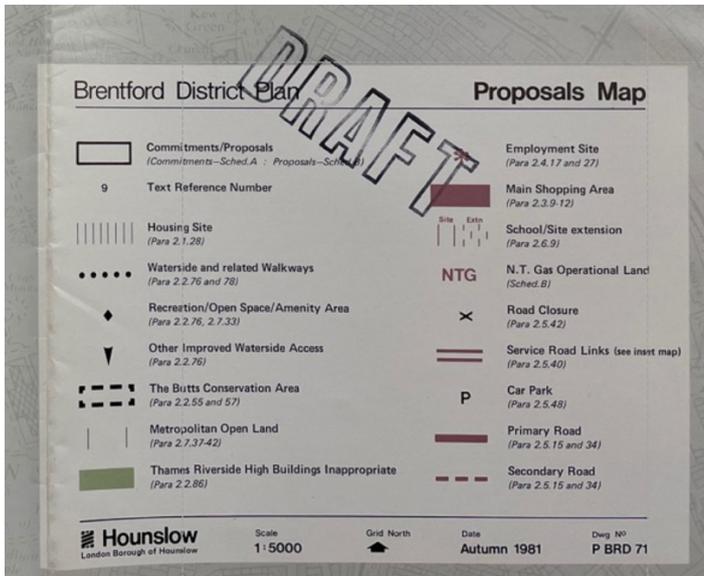
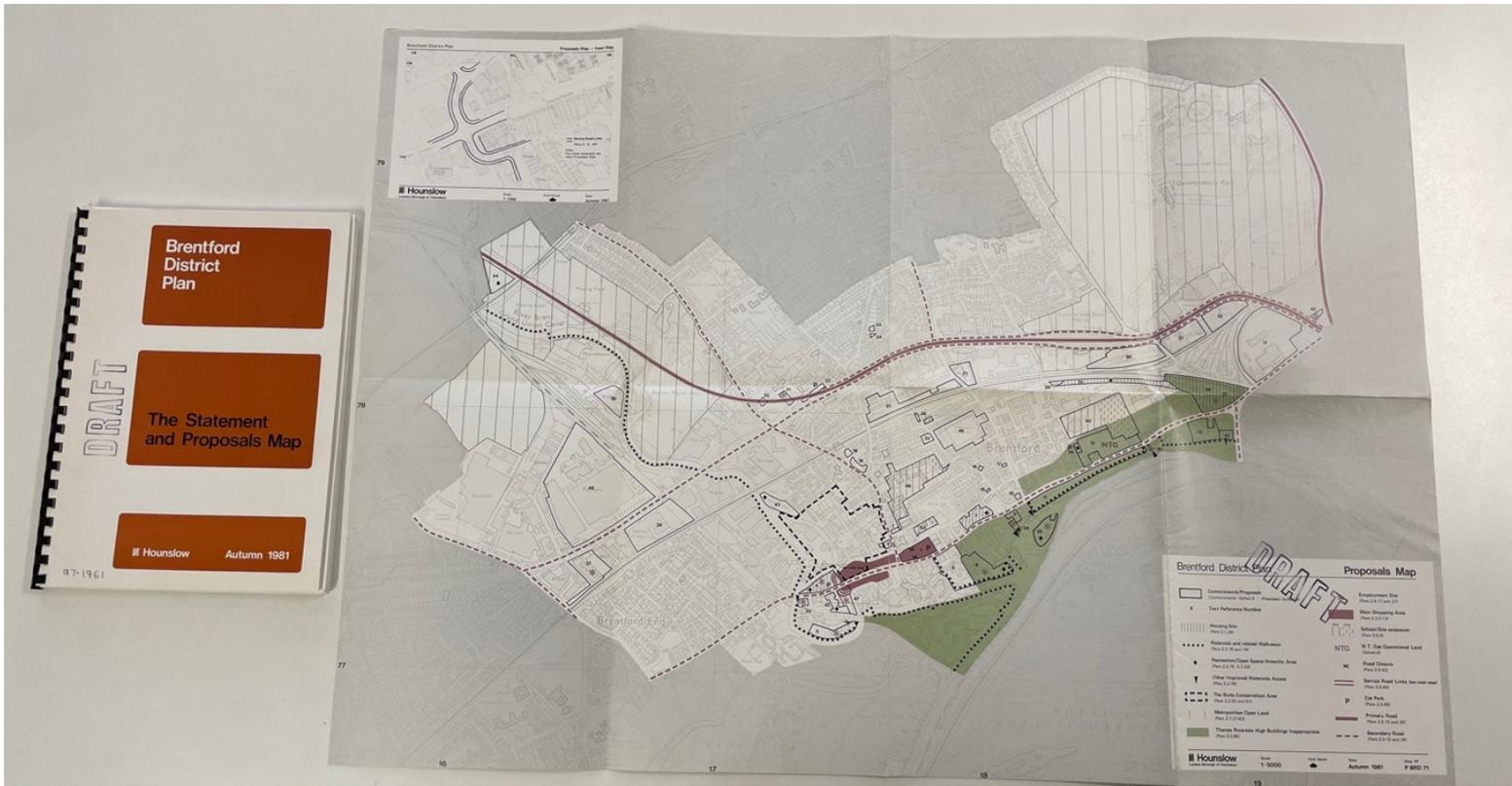
This Public Open Space Land and Riverside Walk is also referenced in the following historic documents:

- Plan for Brentford 1967
- Hounslow, Brentford district plan: The statement and proposals map. Autumn 1981
- London Borough of Hounslow Urban Context and Character Study 2014

Plan for Brentford 1967 [Source: London Metropolitan Archives GLC/RA/D2G/05/018]. The area facing the River Thames is shown in green and marked P for Public.



Hounslow, Brentford district plan: The statement and proposals map. Autumn 1981 [Source: London Metropolitan Archives GLC/DG/AE/ROL/02/075 ]



London Borough of Hounslow Urban Context and Character Study 2014. Part of Hounslow Local Plan (2015) evidence. Identifies viewing point and pocket park at Brentford Dock and Marina.

# Brentford

## green and blue landscape

There are a limited number of open spaces within the study area (St Paul's Recreation Ground, Watermans Park and Carville Hall Park, cut in half by the Great West Road), although there are larger areas of parkland immediately surrounding Brentford at Syon Park, Osterley Park, Boston Manor and Gunnersbury Park, each possessing its own historic mansion, all of which are now listed. Just across the river lies Kew UNESCO World Heritage Site that not only provides a unique place to visit but also provides pleasant views and broad vistas from the Brentford banks of the river. The protected buffer zone includes the Brentford river frontages facing Kew.

The River Thames and the Grand Union Canal form an integral part of London's Blue Ribbon Network. The Canal, combined with the River Brent, joins the Thames south of the Thames Lock, and provides the gateway to the inland waterways that pass through the rest of the country. Whilst some major waterside sites have been redeveloped for housing, other areas still provide for traditional uses. These include boatyards, moorings and a plethora of small industrial and commercial uses, all of which contribute in their own way to Brentford's unique waterside environment, its intimate scale and unique sense of place. Much of the riverbank and canal tow-path is accessible to the public but other parts need to be provided where appropriate and where opportunities arise. In some cases new development has been allowed to cut off views of the river.

The contribution of the waterways to the quality of the local environment, biodiversity and recreational amenity are also of fundamental significance, and this has been recognised by their designation within London's Blue Ribbon Network and as Sites of Metropolitan Importance for Nature Conservation (SINC). The section of the river flowing through Brentford is part of the tidal Thames and supports a diverse mix of habitats. The Thames islands, which include Brentford Ait and Lots Ait, were originally deliberately planted with trees to hide the industrial scene from the Kew side. They now form an extended landscape with Kew.

With the exception of those in the historic Butts area and in the modernist Brentford Dock estate, few of the streets are significantly tree-lined. Grass verges are only found in the interwar developments on the fringes and are generally well-maintained though some are scruffy from parking use. Later post-war large infill and peripheral developments, typified by residential buildings standing alone in open space and undefined by street patterns, sometimes result in lifeless, un/underused green areas.

The High Street offers a sequence of more formal small urban square-like spaces with seating and planting, though quality could be improved.

6

- Public gardens
- Parks & playing fields
- Natural & semi-natural urban green spaces
- Green corridors
- School playing fields
- Outdoor sports facilities
- Amenity spaces
- Cemeteries & churchyards
- Accessible countryside (green belt)
- Alotments, community gardens & urbanicity farms
- Children's & teenagers' play areas
- Rivers, natural water bodies
- Canals, man-made water bodies
- Wooded areas
- Street trees

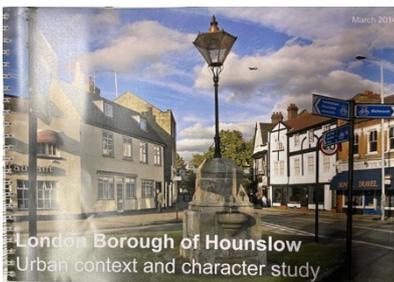
Viewing point in pocket park, tip of Brentford Dock and Marina

River Brent crossing from towpath to playing fields of Boston Manor Park

Waterman's Park between High Street and River Thames with houseboats

Square in Brentford Lock residential development off High Street

Badly designed and meaningless open space



[Source: Local Studies Service: Feltham Library]

5. This 1.24 acres of Public Open Space land at Brentford Dock is absent from the Local Plan (Regulation 19) and the LBH Open Space Study (2018); and there is no explanation why this POS is excluded, following direct reference to the POS in the 1981 District Plan and the Urban Context and Character Study 2014.
6. The protection of public access to the riverside at Brentford Dock has been a historic consideration by the LBH. The Planning Committee Report 12 January 2023 considered the proposal of an Article 4 Direction to restrict the installation of gates and also references consideration of an earlier proposal on 7 January 2021. The Plan has failed to designate or put policy in place to protect this valuable POS, in accordance with London Plan policy G4 part A2, knowing that protection of public access has been a concern for many years.
7. Brentford Walks has presented the Council with extensive evidence of this POS and the LBH has failed to provide any convincing evidence that contradicts the 26 April 1978 Brentford Dock Revised Planning Application, the Land Registry Estate Plan (13 April 1978), the Transfer of Freehold Agreement (5 August 1991) and the Even Date Agreement (5 August 1991) which grants public access to the Public Open Space land.
8. With regard to the open space standards and evidence of need, the Open Space Study reports the accessibility catchment from the community survey at Table 2.3 is a 15 minute walk or 1,200m for parks and gardens and the London Plan benchmarks at Table 2.4. is 400m from home for Local Parks and Open Spaces.

Section 4 of the Study assesses Parks & Gardens. Table 4.2 excludes 83 hectares at Syon Park because it is private, has restricted access times and an entry fee. The assessment includes 70 hectares at Gunnersbury Park. However, only the eastern part of Brentford is within 15 minute walking distance from Gunnersbury Park. The centre of Brentford is a 28 minute walk to Gunnersbury Park and 18 minutes by public transport and Isleworth is a 63 minute walk and 20 minutes on public transport (google maps). 2.6 and tables 2.3 and 2.4 outline accessibility catchment methodology. Given the prioritisation and emphasis on active travel in the Reg 19 Plan, the accessibility catchment should reflect that.

Table 4.2 should also exclude Gunnersbury Park because it is not in an accessible 15 minute walking or public transport for most of Isleworth or Brentford. This would result in 9 parks and gardens in Brentford & Isleworth providing 35.99 ha for a population of 55,731. This is equivalent to 0.645 ha per 1000 population, which is below the Fields In Trust's (FIT) 0.80 hectares per 1,000 population as a guideline quantity standard.

9. The Local Plan (Reg 19) fails to meet the expectations of London Plan policy G4 A1 and 2.

**Q1b) Has a review been undertaken of the existing evidence to assess whether the conclusions relating to opportunities for provision and open space standards remain valid and, in such circumstances, would the Plan approach be justified?**

10. The Open Space Study and review of existing open space fails to include 1.24 acres of POS Land at Brentford Dock, and therefore is not justified. This POS had potential to form part of the Thames Path, is of historic importance and is highly valued by the local community. LBH's

failure to protect this POS fails to comply with NPPF (2023) paragraph 97, NPPF (2024) para 98, 105-107).

**Q1d) Whether the definition of Local Open Space in the Plan is intended to be distinct from the designation of land as Local Green Space set out in national policy, and if so, whether this should be made clearer?**

11. The NPPF (2024) paragraphs 105 requires planning policies and decisions should protect and enhance public rights of way and access and the designation of Local Green Space. London Plan policy G4 A4 refers to 'open space, particularly green space . . . ' and table 8.1 categorises public open space, including local parks and open spaces, small open spaces, pocket parks and linear open spaces.
12. The Plan identifies Local Open Space as a key element of green infrastructure (para 7.8) and goes on to state at para 7.9 The majority of open spaces in the borough are highly valued by local residents for their landscape, heritage, biodiversity or space for recreation, and provide areas for community activities and cultural events. In this respect, they can help aid community involvement and the general well-being of residents.
13. There is no definition of Local Open Space in the glossary of the Plan and no clear indication of how Local Open Space is distinct from Local Green Space set out in the NPPF or the London Plan.
14. The POS at Brentford Dock is 0.5 ha so could be described as a small open space but also a linear open space i.e. 'These are open spaces and towpaths alongside the Thames, canals and other waterways, paths, disused railways, nature conservation areas and other routes that provide opportunities for informal recreation. They can often be characterised by elements that are not public open space but that contribute to the enjoyment of the space.
15. The POS at Brentford Dock conforms to the definition of Local Green Space and should be designated, in compliance with the NPPF paragraph 106 and 107.

**2. Policies GB4 and GB5 relate to the green infrastructure network and blue ribbon network respectively; are they positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:**

**a) Whether the components of each of the networks have been adequately mapped in full within the Plan or other parts of the development plan, to be sufficiently clear for decision makers when the policies should be applied?**

16. No the components of the green and blue ribbon infrastructure network has not been adequately mapped. The 1.24 acres (0.5 ha) at Brentford Dock are absent and should be described and mapped.

The important contribution of the River Thames at Brentford is documented in the All Green Grid, [Arcadian Thames Area Framework](#) section 9.

The POS at Brentford Dock should be described in the Local Plan and protected under policies GB4 and GB5.

17. The POS at Brentford Dock has not been assessed; or given an appropriate designation; or protected by Hounslow policy GB4; or ensured that open space remains publicly accessible and therefore fails to comply with London Plan Policy G4.
18. London Plan policy SI 14 Part A requires development plans to 'address the strategic importance of London's network of linked waterways, including the River Thames, and should seek to maximise their multifunctional social, economic and environmental benefits'. Paragraph 9.14.2 reinforces the importance of London's waterways as multifunctional assets including their role in providing 'recreation corridors; green infrastructure; a series of diverse and important habitats; a unique backdrop for important heritage assets, including World Heritage Sites, landscapes, views, cultural and community activities'.

The absence of reference to and mapping of the POS at Brentford Dock fails to comply with London Plan SI 4.

- 4. Policies CI1, CI2, CI3, CI4 and CI5 relate to the provision and protection of community facilities; education and school places; health facilities and healthy places; culture and leisure facilities, and places of worship respectively – are they positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:**
  - a. Would the policies, when taken together with other policies of the development plan, provide an appropriate and justified strategy to ensure sufficient provision is made for community infrastructure and facilities to support the intended levels of growth during the Plan period (including health, education and cultural infrastructure)?**

19. Policy CI3 seeks to make the borough an environment which encourages healthy living. The POS and Riverside Walk at Brentford Dock plays a vital role in providing access to nature and the river, and a safe place to walk, which contributes to health and wellbeing. The failure of the Council to protect this POS is a failure in the Local Authority's statutory duty. The closure of this POS and failure of the Council to reinstate public access has a detrimental impact on the health, wellbeing and enjoyment of the local community.
20. Failure to protect this POS comprises failure of the Local Plan to deliver two of their objectives:
  - Objective Four: reinforcing local character and context
  - Objective Five: maximising the benefits of our green and blue infrastructure

**Further information:**

21. Brentford Walks submitted a Definitive Map Modification Order to LBH, which was duly made on 16 December 2024. We expect this to be determined within the 12 months statutory requirement (Wildlife and Countryside Act 1981) by 16 December 2025. An enforcement request was also submitted on 20 May 2025, requesting the POS permitted under the revised planning application 1978 be re-instated. No effective action has been taken.

22. We expect LBH to act by whatever means possible, to protect the POS and reinstate public access at Brentford Dock, in perpetuity. This includes protection by policies within the Local Plan.

### **Conclusion:**

23. The Public Open Space and Riverside Walk at Brentford Dock makes an important contribution to the open space and green and blue infrastructure network. It is of historic importance and part of the Arcadian Thames and Thames Landscape Strategy. It is crucial in providing access to the River Thames for all, in line with London Plan, and is a vital missing link in the Thames Path.

24. The Council has failed to:

- review key documents which were in the Councils direct control and of which they were a signatory;
- reference this important Public Open Space land in the Plan, designate it, include it on the Policies map and is therefore failing to protect it in the future
- act in an effective and timely manner to protect this Public Open Space

25. The Plan is not consistent with London Plan policies G4 and SI 4; or the NPPF para 98, 105 - 107, and therefore unsound.

26. Brentford Walks requests that the Council:

- References the 1.24 acres of POS at Brentford Dock in the Plan and designates it as Local Open Space or Local Green Space, in accordance with National and Regional Policy
- Include the POS at Brentford Dock on the Policies Map
- Protects this POS in perpetuity for the use and enjoyment of all

27. Failure to reference and protect this POS makes the review of Open Space and policies to protect open space in this Plan ineffective and unjustified. Failure to protect Local Green Space is inconsistent with national policy and the London Plan, making the Plan is unsound.

[word count: 2,829 excluding the questions]