Survey:
What is your name?David Pearson
1. Which part of the Plan are you commenting on?
Policy: See Paragraph: Table: Map: below
2. Do you consider the Plan is:
Legally compliant? Yes: X No:
Sound? Yes: No: X
3. If you believe the Plan to be unsound, is this because it is not:
Positively prepared
Justified X
Effective
Consistent with national policy
4. Please give reasons for your objection or support: I am broadly in favour of the plan but am concerned about the protection of green spaces, parks and sporting facilities where I think the plan needs to be strengthened.
These comments are therefore made by me in relation to the part of the plan dealing with the North West Place which is the area where I live. They are made in support of the draft Local Plan and of the underlying evidence documents in the importance they attach to the retention of parks, green spaces and sports playing fields and the need to increase the provision of these over the period of the plan. The projected growth in population over this period and the emphasis given to health means that the existing parks, green spaces and sports playing fields need to be retained and upgraded where necessary but, on any basis, maintained.

In this context I believe that the plan should be explicit in recognising the need to retain both Tenterden Sports Ground and the John Billam Playing Fields as sports facilities and open green space and that any investment necessary should be provided. Tenterden and John Billam are used by the Forest United Football Club and provide access to football for those who attend. Forest applied to Brent for a Community Asset Transfer of Tenterden and John Billam and Brent in time initiated a process which led to WECT being the preferred bidder but with a mechanism to ensure that Forest had the possibility of being able to continue to use these grounds. However, the CAT was limited to Tenterden. This process is still underway but I believe it is vital that this open green space be retained as sports playing fields.

There is some recognition of this need in the North West section of the plan at page 137 BP 4 where it says "COMMUNITY AND CULTURAL FACILITIES h) Protecting and enhancing playing pitch provision at Northwick Park, JFS School, Claremont High School and Tenterden Sports Ground". However, there is no mention of the John Billam Playing Fields which are used by Forest and form an integral part of the open space/playing fields complex. The plan recognises the importance of John Billam at page 134 paragraph 5.3.7 where it says "The most significant open space within this place is the designated Metropolitan Open Land (MOL) of Northwick Park. The adjoining site referred to as Ducker Pool, is designated as a Grade I SINC of borough importance. Smaller open spaces, and other SINC sites are scattered throughout this place including John Billam Playing Fields...". The character of the area means that both areas need to be identified as open green space which should be retained as such and should not be used for any building or similar development and should preferably continue to be used for sport, especially football.

The needs in terms of both Tenterden and John Billam being retained as football pitches are addressed in the Strategic Approach To Playing Pitch Provision In Brent 2016 particularly at paragraph 3.2.8 and pages 45 and 46 of the Table 14 – Site by site analysis for football and this general approach is supported by the Open Space, Sports and Recreation Study 2019 particularly paragraph 1.17 where it is stated "Existing natural greenspace should be protected and there will be a need to seek the provision of new natural greenspace of nature conservation value. Providing new natural greenspace at the current levels of population growth and development requirements will be difficult to achieve." and paragraph 4.8 which says "The National Planning Policy Framework (NPPF) Paragraph 97 suggests that planning policies and decisions should protect and enhance public rights of way and access. It also seeks to protect existing open space, sports and recreational buildings (including playing fields) from development, unless [certain conditions are fulfilled]".

As well as being used for sporting activities both of these areas provide green space and amenity for members of the public and are valued and used by them as such.

5. What change(s) do you consider necessary to make the Plan legally compliant or sound? See above. Both Tenterden Sports Ground and the John Billam Playing Fields should be specifically designated as green space and should be retained as such and should continue to be used as sports playing fields being maintained and upgraded as necessary in the light of the identified need for such spaces and facilities.
6. If your representation is seeking a change, do you wish to participate at the oral part of the examination?
No, I do not wish to participate at the oral examination Yes, I wish to participate at the oral examination
7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
I do not anticipate wishing to participate at the oral stage but would like to reserve the right to apply to do so depending on how matters progress.
If you would like to comment on additional policies, please fix another sheet to this.
To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names and addresses of those making representations can be made available and taken into account by the Inspector. The Council, its appointed Local Plan Programme Officer or the Planning Inspector appointed to undertake the Examination may also contact you regarding your response.
☐ Please indicate if you wish your personal data to be used for reasons other than identifying your representation and being contacted in relation to that representation.

I do not wish my personal data to be made available for any purposes other than those

listed above