

**GREAT WEST CORRIDOR LOCAL PLAN REVIEW****PRE-SUBMISSION REGULATION 19 CONSULTATION  
RESPONSE ADOPTED BY BRENTFORD COMMUNITY COUNCIL****DRAFT**  
**BCC862 a****1. RESPONSE.**

We would like to thank you for inviting us to respond to your proposal, set out in Volume 4 (July 2019), **(GWCP)**, parts of Volume 2 (site allocations) **(SA)** relating to the Great West Corridor **(GWC)** and the supporting documents referred to. These include the integrated Impact Assessment **(IIA)** and the Masterplan and Capacity Study **(MACS)**.

Reference will also be made to the National Planning Policy Framework **(NPPF)**, the London Plan **(LP)**, the 2015 Local Plan, the 2017 Draft Local Plan Review (Preferred Option) **(LPRPO)**, the BCC response to the 2017 draft **(BCC820)**, attached) and other relevant documents.

**2. PREVIOUS RESPONSES.**

The BCC responded to the consultations on the 2015 Local Plan **(LP)** and gave evidence at the public inquiry. The Plan was adopted in 2015.

The Cabinet instructed two Local Plan Reviews and the Council produced a Consultation Issues paper in December 2015 for the Great West Corridor Plan **(CIP)**.

Planning Officers made a presentation to the BCC on their Issues paper and questionnaire to the BCC in February 2016.

This was supported by the paper: The Golden Mile: The Strategic Case for Transport Investment January 2015 **(SCTI)** by Steer, Davis Greave.

And a further supporting paper called: The Golden Mile Site Capacity Study plus an Executive Summary 2014 **(SCS)** by Urban Initiatives.

The BCC responded to the Issues paper and questionnaire and the presentation in January/February 2016. **BCC 757 and 758** (attached).

This paper is our response to The Great West Corridor Local Plan Review 2019, which has been written in the light of former correspondence and in response to the changes made in the Review documents since February 2017.

### **3.ADOPTED LOCAL PLAN COMMITMENTS: Para 1.6 : THE LONDON PLAN.**

The London Plan, Fig 2.10 designates Opportunity Areas OA 1-8 on the Elizabeth Line West. All of which, except OA6 would be centred on stations. OA6 would be on a shuttle branch of the Elizabeth Line, yet to be built.

It is noted that OA6 is the only OA proposed along the lines of a through route, the Great West Corridor. This poses further problems on this OA which, unlike the others, is not planned around an established focal point.

Perhaps, recognizing this, para 21.63 states “The Mayor will therefore review and clarify the area’s potential contribution to London’s growth when expansion proposals and their spatial and environmental implications are clearer”

The **GWCP** is the borough’s response, explaining whether OA6 can achieve the Mayor’ expansion targets when the “spatial and environmental implications” are clarified.

### **4. ADOPTED LOCAL PLAN COMMENTS: Para 1.8 COMMUNITY INVOLVEMENT.**

After the initial issues consultation the BCC wrote two responses (BCC757 and 758, attached) and were never advised whether they had been received and what effect their detailed comments had had on the development of the planning policies for the area.

**GWCP** Page 5 states that “the two area reviews have been shaped by ongoing consultation and engagement involving local people, businesses....” In practice consultation with residents was limited to two presentations followed by brief workshops.

In response to the 2017 draft (**LPRPO**) the BCC wrote **BCC820**, attached) and again were not advised whether these extensive comments had been received and how they influenced the plan making process.

### **5. GREAT WEST CORRIDOR PLAN AS PART OF HOUNSLOW DEVELOPMENT PLAN DOCUMENTS.**

**Para 1.18. Time Spans.** The 2015 Local Plan runs from 2015 to 2030. The **GWCP** is expected to be subject to an inquiry in public in 2020. As the **GWCP** is a review of the 2015 local plan it is not clear how its polices can extend beyond the life of the 2015 plan.

The GWC Plan runs from 2019 to 2034 while the London Plan runs from 2019 to 2041. Despite this difference in time spans the GWC Plan seeks to accommodate the London Plan's indicative figures for the OA in the period 2019-2034. This appears to be unnecessary, particularly when the GWC's Site Allocations propose the phasing of virtually all of the indicative figures for the period 2019-2029. Important implications of this approach for transport infrastructure etc.

## 6. STRATEGIC OBJECTIVES

**Pages 30/31. The BCC welcomes objectives 1/17. We set out our comments below on how they are to be delivered.**

Employment Growth. The BCC notes the very low **PTALs** in the corridor and is concerned that accessibility is improved before new structures are brought into use.

Housing Growth. The BCC notes the need for 50% affordable housing and in particular for family housing. There may be particular concern about the plan's proposals for co-location of industrial premises with family housing.

Health and Wellbeing. The BCC welcomes proposals to separate housing, schools and open spaces from pollution sources like major roads. We would look for policies that ensure that housing is only built on sites which are effectively screened.

The BCC looks to the plan to identify sites which can deliver new open spaces, especially in areas of open space deficiency. The Plan should also identify sites for health, education, recreational and leisure facilities. Specifically, the plan should identify a new site to allow the ageing Fountains Centre to be replaced and enlarged to meet the needs of new and existing residents without the break in service which would be required if the facility was re-built on its present site.

The BCC would welcome specific measures to increase pavement widths for the extensive planting of street trees.

The BCC would welcome policies which respect the scale and mass of listed and locally listed buildings by ensuring that new structures are sub-servient to them.

The BCC would welcome policies which ensure that all clusters of new development are centred around new open spaces.

The BCC would welcome policies which ensured that the public transport system in the area was sufficiently improved to allow 80% of all movements to be car free before additional development was permitted. We look for a comprehensive review of public transport to provide easy movement on all desire lines and in particular to link all parts of the corridor with Brentford Town Centre, Lionel Road Station and the Shuttle.

## **7. EMPLOYMENT GROWTH (GWC 1.)**

**(ALL references are to GWCP consultation and supporting documents)**

**Page 37 (a).** It is not clear how the LPA will “strengthen the economic profile”. Para (a) should be re-worded to clarify how the objective will be achieved.

**Page 37 (b).** There are no examples in London of successful co-location on the scale proposed for the GWCP. As co-location may be required to achieve the density of development required to meet targets, the policy should be backed by documentation to demonstrate that it is appropriate on this scale in the GWCP.

This policy is explained in greater detail at MASC pp 85/85 but it not made clear how the present access facilities for the industrial unit can be re-provided while providing family housing which is safe for children.

**Page 37 (c).** Text does not make clear that development potential would depend on transport improvements and measures to ensure no “harm” to heritage assets.

**Page 38 (g).** Text should be re-drafted to emphasise the inter-dependence of the GWCP and Brentford Town Centre to support policy TC2 in the 2015 Local Plan(LP). **Strongly agree.**

**Pages 38 & 39 (j, k & l).** This is a commitment to retain employment content on each individual site, which may depend on unproven techniques for co-located residential development. **It would be very useful to provide some indication in the Plan of current floorspace totals (sq. m.) and employment levels in the GWC for B1, B2, B8 etc. This would be an essential component of monitoring. I suspect that LBH do not have any reasonably accurate figures.**

**Page 40** Sets out in more detail the dependence of this policy on Policy E7 in the Draft London Plan. LP policy E7B refers to residential uses and policy E7 4c sets out the concern for quality of the residential elements. E7F3 states that “This approach (co-location) should only be considered as part of a plan-led process of consolidation and intensification (and clearly defined in

Development Plan policies maps) and not through ad hoc planning applications.

The Great West Corridor Masterplan and Capacity Study. Prepared for LB Hounslow by Urban Initiatives (July 2019) contains elements of the recommended masterplan approach. However this approach needs to be developed to provide clear guidance to developers.

**We are concerned that the GWCP does not include maps showing such detailed proposals.**

**Page 39 (p).** As it is essential that GWC development supports Brentford Town Centre. **The** need for retail within the GWCP should only be considered when it clearly does not conflict with Local Plan policies. **Strongly agree.**

**Pages 40, 41 & 42.** We welcome the strategy to intensify the industrial capacity within the GWC, but note that it should retain the present industrial and service industries north of the A4 and their extensive requirements for HGV access and parking.

## **8. HOUSING GROWTH (GWC 2.)**

**Page 44.** We support objectives 3,4 & 5.and note that there is a need for 50% affordable housing and for extensive family housing (as defined in the London Plan) which needs to meet the needs of children growing up here.

**Pages 46/51. Policy GWC2** should include a commitment to locate housing in areas which are not exposed to pollution. This will require plans which locate residential buildings and their amenity spaces away from polluting roads.

It is noted that the total number of residential units listed in the site allocations within the boundary of the GWC shown in volume 2 of the Local Plan Review is 6,620, which is short of the target. It is also noted that some of the sites include housing directly facing the corridor, which are subject to high pollution levels and which should be placed behind non-residential blocks. There may be other factors which affect the sustainable level of housing on these sites. It should also be noted that the number of "Projected Housing Completions" shown on Fig 4.4 is 6,740

**Page 49. Fig 4.4.** Housing Trajectory. We note that housing completions in the GWC are expected to run from 2021 to 2028, which could depend on planning consents being granted from 2020 onwards. Average completions would be about 750 p/a. In addition, consents for sites like the Brentford Community Stadium complex, The Citadel and, subject to the appeal result,

the Citroen site and others could be built out in the early phase of the plan period. It is unclear how the Brentford Community Stadium and the Citroen site have been incorporated within the housing trajectory.

**We are concerned that no significant transport improvement may be operational before the buildings are complete which could result in gridlock.**

**Page 51. Fig 4.5.** The diagram shows that virtually all the residential sites are for “residential with B1 uses”. B1 uses include offices, research and industrial uses.

The **MACS** shows in greater detail how this mix could be achieved. For example Fig 6.3 shows a welcome “employment buffer” close to the A4, protecting residential blocks behind with a new service road at the back. Fig 6.2 shows the West Cross Campus in a varied mix of separately identified uses. The mix includes specific areas for industrial uses.

**As the proposed mix of uses is established in the MACS document it would be helpful if the plans the GWCP fully reflected this mix. This change would clearly establish the planning briefs for development sites and avoid abortive work by developers.**

## **9. HEALTH AND WELLBEING (GWC 3.)**

**Page 52.** We fully support objectives 6,7 and 8 and look to see how the policies proposed would help to secure them. We fully support the measures on page 53, but doubt if they will ensure the objectives are achieved.

**Page 54.** Sets out the Council's criteria for acceptable design, which is welcome. However, we request that in accordance with para 4.37 an additional criteria is added to ensure that housing areas, including their amenity areas, are protected from pollution. This is particularly important where family housing is proposed:

**The Council will not normally support planning applications to provide new housing within the GWCP area, which is not protected by a barrier of non-residential development constructed before the residential units are occupied.**

**Page 57. Para 4.41.** States that “new development in the borough needs to be supported by health and social infrastructure to ensure that residents have access to facilities and services that they may require at every stage of their

lives" without setting out what they are. If this was done it would be possible to include a policy which stated that:

**The Council will not normally support applications to develop new housing until they are satisfied that the necessary facilities and services will be operational before any of the new units are occupied.**

The Plan is not clear on the extent to which the health and social infrastructure proposed will meet projected needs.

## **10. OPEN SPACE AND GREEN INFRASTRUCTURE (GWC 4.)**

**Page 58.** We welcome objectives 9 and 10 and would propose three additional objectives: 1. The elimination of open space deficiencies, 2. The creation of new open spaces in the centre of new developments and 3. The widening of pavements and the extensive planting of street trees.

(1). Open Space deficiencies are shown in **MACS** page 53 Fig 2.25. Proposals for eliminating them do not appear the **GWCP**.

(2). See **MACS** page 88. Proposing "new public spaces central to each parcel (of development). An excellent policy which should be incorporated in **GWCP** and in all appropriate Site Allocations descriptions of "minimum development quantum".

(3) We propose (below) changes to street and pavement widths. Where practicable widened pavements should include new street trees.

The point about pavement widths is very important. There are parts of the GWC, particularly between the Central and East areas where open verges are in the "wrong place" (i.e. further from the A4 corridor than pavements and cycle routes) and they should be exchanged.

**Page 59. "Our Approach"** This is a valuable initiative which should be spelled out in the Master Plan in some detail as it difficult to secure "a well-connected network" unless its path is defined and the requirement to secure it is spelled out in all the relevant allocated development sites.

**Page 60. Para 4.4** refers to the limited access to open spaces, but does not propose solutions. Policies to redress These problems should be included in this section and/or be referred to in **GWC 6** and in sections **P1/P3**.

Note the welcome introduction of a new walking/cycling route, running along the western end of Gunnersbury Cemetery from the A4 corridor to Gunnersbury Park.

**Page 61. Para 4.49.** Applications should conform to fig 4.7 and to P1/P3. Plans P1,P2 and P3 should be drawn in more detail to define the requirements for green infrastructure and this should also be reflected in the Minimum Development Quantum Requirement for development sites.

**Page 63. Fig 4.7.** We welcome the “public realm improvements” proposed along the A4. Many of the buildings are set back and it may be possible to establish a building line well back from the road to promote an integrated frontage and extensive greening close to the high levels of pollution shown on **MACS** fig 2.27 (page 57). This would eliminate development proposed on site 15 and look to the eventual removal of the office block west of the Brent river.

## **11. DESIGN AND HERITAGE (GWC 5.)**

We would make the general observation that the expression of building heights above sea level (Above Ordnance Datum) is not in itself helpful in envisaging impacts on the urban townscape. The use of AOD and height above ground level would be more helpful.

The heights of existing and planned buildings provide a better indication to readers of the Plan e.g. Chiswick Curve proposal (120 m.), Brentford Towers (65 m.), Kew Eye (92 m.), the standpipe tower at the London Museum of Water and Steam (61 m.).

**Page 64. Para 1.** States “within the corridor the concentration of listed Art Deco buildings of its heyday provide distinctiveness and character...” Page 66 para 2 suggests “ clusters ... ranging from 40 to 66 meters AOD” would be appropriate.

**We would request that these local assets be protected by specific policies which would require designs to be sympathetic to the original buildings and heights LOWER than the heritage assets so that the new structures are subservient to the heritage assets.**

**Page 64. Para 2 .** Rightly draws attention to the proliferation of digital advertisements which disfigure the corridor. Now that the Mayor and the Council are proposing the upgrading of the environment of the corridor it would be appropriate for the Council to adopt specific polices to limit the number, size and design of advertisements and to seek to remove non-compliant ones in the hope that this policy would be supported at appeal.  
**Strongly support.**

**Page 64. Para 3.** It should be recognised that Opportunity Area 6 (New London Plan page 52 Fig 2.10 unlike Opportunity Areas 1/8 is not sited close to an established centre, but is located on both side of a major radial corridor. This places a special duty on the LPA to provide coherent policies which ensures that new development integrates well with the scale and character of residential Brentford. This is recorded in various character area studies and conservation area appraisals.

Agree. The Plan needs to acknowledge, and provide policies for the mitigation of, increased movement in residential areas to the north and south of the Plan area, especially in the Central area.

This makes Objective 11 hard to achieve and places additional emphasis on the importance of achieving objectives 12 and 13.

**Page 65.** We support the approach and commend the work put into the Master Plan study.

**Page 65. (a)** We endorse the idea of a Design Review Panel and would look to the involvement of borough residents and borough professionals.

**Page 65. b) and Page 66 (h).** Statement should specifically call for new build to respect the scale of heritage assets. (See comments ref to page 64 para 1, above).

Strongly agree.

**Pages 65/67. We are concerned that Policy GWC5 takes no account of the need to relate all new development in the GWC to the character scale and layout of the existing areas of Brentford. The GWC is a part of the Brentford community and should seek to relate well to the surrounding areas.**

**Page 70 para 4.58.** "Boroughs should identify on maps in Development Plans the locations where tall buildings will be an appropriate form of development. Fig 4.9 shows buildings of over 60m (20 floors) at the Golden Mile station and at Great West House,

**MACS page 2.** Illustrates the artist's view of the A4 including the Golden Mile Station. (The railway bridge over the A4 marks the position. We enclose a variation of this drawing to show a 20+ storey building on this site.

As can clearly be seen the proposed structure would dominate the carefully designed proposals for this section of the A4. Being on rising ground it would dominate the Gillette building and the other Art Deco buildings nearby and would potentially "harm" heritage assets for miles around.

We have concerns that the policies on high buildings do not adequately reflect the topography of the GWC. (Rises from about 10m. AOD at Lionel Road, to 16 m. at Great West Quarter, 10m. at the River Brent/canal, 25 m. at Homebase, and 27 m. at Tesco).

Great West House is now the dominant structure at the intersection of the A4 and Boston Manor Road. It is now 17 floors high. The adjacent Mille building is 11 floors (circa 45 - 50m.?) high and the University buildings which make up the cluster are maximum 12 and 18 storeys in height (35m to 51.5m).

It is noted that the symbol used on fig 4.9 indicates a building which is at least 20 floors high. Site 18 shows the office block and 70 additional residential units and 90 car spaces (below ground level). It is likely that a viable scheme to demolish and rebuild would lead to an office building considerably higher than the present structure as the plan shows no limit to a height which would be acceptable

**As stated in MASC page 127 para 2:** "Where the height difference between areas with different height approaches is more than two storeys the abrupt change in height creates an imbalance and breaks the coherence of the urban fabric".

To integrate the design and scale of new development within the corridor with the existing residential terraces outside the corridor the advice on heights should also refer to the height difference between existing structures immediately outside the corridor and the proposed development inside, close to the western boundary, as shown on **GWCP** fig 5.4. This would affect sites 2 and 11.

**Also, Fig 5.6** (northern boundary). This would affect sites 22, 23, 24, 25, and 26. Other benefits arising out of carefully controlled transitions are listed in **MASC** page 127, para 3.

**MASC page 128 para 7.6.3** sets out general guidance for building heights.

**We object to the general heights proposed for:**

1. **Great West Campus.** if applications for co-location are proposed as heights around 24m will be difficult to achieve if high standards of family housing is to be reconciled with industrial units requiring HGV access.
2. **Gillette Creative Hub.** All the buildings on both sides of Harlequin Avenue should be lower than the parapet of the Gillette building. (This principal was central to the recent refusal of development on site 12)

3. **Industrial Strip.** The Art Deco buildings should be retained and all new development should be to lower heights to be subservient to their character and scale.
4. **River Brent Quarter.** Views looking north up the Canal basin towards the Glaxo building are much prized and should not be interrupted by 20m buildings on these sites.
5. **London Gateway.** Unable to locate this proposal.

“The London Gateway will be an attractive employment destination marked by unique buildings of the highest design quality to mark the four corners of the intersection of Boston Manor Road and Great West Road.” (page 98)  
NB There does not appear to be a proposal for the SE corner of this intersection.

6. **Where excess general heights are unacceptable additional set back heights are also unacceptable.**

As, if adopted, these descriptions will form part of the planning brief for development sites, it would be helpful to list which sites are included in each named area.

**GWCP. Page 70 para 4.60.** We note that this para correctly sets out proposed heights as: 3 m per residential floor and 4 meters for each commercial floor. The **MASC** sets out the heights in fig 7.13 on the basis of commercial floor heights only. This appears to licence an unintended additional floor or mezzanine in some residential buildings. For the avoidance of doubt, it would be helpful to define the number of storeys proposed in each case.

**GWCP. Pages 70/71/72 paras 4.61/64.** Emphasis is rightly laid on the importance of Kew Gardens as a World Heritage Site which has already been “harmed” by developments in Brentford. Greater emphasis should also be placed on the protection of buildings which are not Grade 1 or Grade II\*. There are a significant number of Grade II buildings forming groups and extensive Victorian terraces within designated conservation areas.

**Strongly agree.**

**Page 72 paras 4.65/6.** In section 11 (above) we have asked the Council to adopt a clear planning policy on the control of advertisements which is appropriate for an upgraded Great West corridor and for the Brentford community.

**Page 72 para 4.67.** While it is recognized that each area of Brentford should have a variety of uses it is important to ensure that all developments support the vitality of Brentford Town Centre as set out in section 6 above to ensure that Local Plan Policies TC2/3 (2015).

**Strongly agree.**

## 12. CONNECTING PEOPLE AND PLACES GWC 6

This is a part of the Plan that causes us great concern. The 2017 Draft of the Plan described the transport improvements required as “game changing”. Our fear is that development will proceed before the necessary infrastructure is in place or even committed.

Page 74. We welcome strategic objectives 14/18 and would wish to add further objectives:

### **1. Relating new development to PTALs.**

The 2017 draft Local Plan Review (Preferred Options) identified the dependence of the expansion policies for the Great West Road on “game-changing sustainable transport infrastructure”.

In 2014 traffic consultants Steer Davis Grieve had produced The Golden Mile Capacity Study which identified that only half the development proposed in the Mayor’s target for the Great West Corridor without major public transport improvements. ??

The Mayor is now seeking to reduce journeys by car by 80% placing increased demands on public transport.

The PTALs for most of the GWC sites is poor. There is a track record of schemes with planning consent not being financed as access is so bad.

**We propose that development should only be approved where PTALs are sufficiently improved to ensure that the new development would not add to the traffic congestion which is already facing local residents.**  
Strongly agree.

**2. Phasing Development.** GWCP page 49 fig 4.4 shows the housing element delivered between 2020 and 2029. Site Allocations show phasing for each development.

However, it is not clear whether this phasing is planned to enable the housing completions to come AFTER the public transport improvements will be operational and the sustainable PTALs have improved to levels which are acceptable and which will assure that there is no increased congestion.

**We propose that phasing is built robustly into the Local Plan Review policies to ensure that the risk of congestion is not further increased.**  
Strongly agree.

**Page 75 para (a) 1.** The safeguarding should include a footbridge and disabled access on both sides of the A4 and provision for a later rail bridge.

**Page 75 para (a) 11.** In view of the likely expansion of passenger numbers at Heathrow it is probable that spare capacity on the Piccadilly line will decrease.

**Page 75 para (a) III** A major review of bus services would be welcome.

**Page 75 para (a) IV** Improved bus services along the A4 are essential to make full use of the proposed rail links. The service needs to be in place at the outset of the plan period. Safe pedestrian crossings, suitable for unaccompanied children will be needed at every bus stop.

**Strongly agree – currently the only TfL bus route is the H91.**

**Page 75 paras (c)/g).** To be meaningful these objectives need to be supported by specific realistic proposals.

**Page 76 para (h)** The plan should include clear policies to relate acceptable levels of density to **PTALs** and normally refuse applications which do not comply.

**Perhaps this suggests that the phasing of development should reflect the relatively good PTALs in the Eastern section?**

**Page 76 para (j) III.** The Council's Priority Cycle Network should be published for consultation and included in the papers for the inspector.

**Page 76 para (I) I/VI.** This proposal shows that the provision of the crucial rail improvements rests on charges placed on incoming developers. It would appear that the funding for them is insecure, which might prejudice the sustainability of the plan. (See also page 78 para 4.69).

**Page 78 para 4.69.** This proposes a radical change to transportation in Brentford which can only be sustainable if the public transport and public realm improvements are in place before additional development are started. If these changes depend on funds obtained from development charges that will not be possible unless sufficient funds are raised at the outset to start the infrastructure improvement process.

**Page 78 para 4.72. Residents will be deeply concerned that this para says that the project depends on “significant transport projects that the council hopes to deliver within the plan period to meet these objectives”. In reality there appears to be no certainty that sufficient funds will be available for the funding, design and construction of these transport projects at an early stage**

**in the plan period. Residents will therefore face the prospect of increasing congestion and possible gridlock for much of the plan period. If funding does prove to be that difficult it is likely that developers will not wish to invest in the borough and that the plan will not achieve its objectives.**

Very strongly agree. There is no firm commitment, let alone funding, for significant transport projects.

**Page 78 paras 4.73/4.** It is clear from the plan that the proposed shuttle and the proposed orbital link serve would serve the north west and the south east parts of the corridor.

It might be helpful for the Council to decide now which if these two costly projects should be given priority. The Orbital link is backed by several boroughs and might be a suitable choice. It would directly improve the **PTAL** of all the sites in Brentford East.

**If this decision was taken a more specific programme to fund and construct the link might be defined which could then be related to a phasing programme for the development sites.**

**Page 79 para 4.77** Confirms our concern that “enhancing connectivity and accessibility is essential to maximising sustainable growth” As this issue is at the heart of the Review the plan should include quantifiable improvements to **PTALs** which must be achieved before development can proceed.  
Strongly agree.

**Pages 79/80.** We note that these policies make no reference to the continuing requirement for through traffic on the A4, M4 and A406. It is likely that development at Heathrow and to the west of London will generate additional through traffic and that the Mayor’s extension of ULEZ to the A406 will encourage additional traffic to bypass inner London, increasing traffic on this road.

We understand that CS9 is now to be known as Cycleway 9. We note that Cycleway 9 will be considered by Hounslow Cabinet on 3rd September 2019.

### **13. PLACES POLICIES 05: GREAT WEST CORRIDOR WEST P1.**

**Page 95 Fig 5.4.** We note that this plan is not the same as the **MASC** plan at Fig 6.2. We welcome the plan at fig 5.4 because it clearly defines land uses, particularly on the Tesco site and the West Cross Campus or Estate. This plan also shows the retention of the Art Deco structures south of the A4.

The Plan should lay much greater emphasis upon the importance of the **Srt Deco structures.**

**Page 88 para 5.9** states that the area is “dominated by the traffic runs along the A4”. It is likely that through traffic will continue to dominate even when the Mayor succeeds in getting 80% of residents out of their cars. The A4 will continue to be a dominant radial to Heathrow and the west.

The Plan is lacking in clear policies for tackling the “urban barrier” represented by the A4/M4 corridor, particularly in the Central area.

**Page 89 fig 5.3.** illustrates the road lined with buildings including three storey Art Deco structures. In our view new buildings close to these heritage assets should respect both their character and their scale and should not be higher or more dominant.

The drawing (which looks east) omits the 60m + high (at least 20 storeys) tower shown on Fig 5.4 on the site of the PC World building. It is also shown in MACS page 143 Fig 7.18 as 68/82 meters in height, equivalent to 27 floors, (It is, however, shown in the Masterplan modelling (page 15 Site Allocations).

Such a structure would be totally out of character with the other buildings in this sector.

**Although this tower would mark the location of the proposed station and could “enable” public works to be cross funded it is an unacceptable element which will harm the integrated design of this section of the GWC, The listed and locally listed buildings and by virtue of its height cause harm to heritage asset further away including Syon Park, Boston Manor, possibly Kew Gardens and numerous conservation areas.**

**Strongly agree.**

As any extension of the shuttle rail link over the A4 is likely to be costly it is not likely to be funded until the end of the plan period. In the meantime it would be desirable to provide a footbridge over the A4 directly connected to the station forecourt with disabled access on both sides of the A4. The high-level route should be continued towards Brentford town centre.

**Strongly agree.**

Great West Corridor West contains two valued structures on the south side of the A4 and the iconic listed Gillette building to the north at the junction with Syon Lane. Nearby is the listed former Nat West bank.

**Page 95 Fig 5.4** should show all four buildings.

**The Planning Designations & Heritage Constraints for sites 3, 4, 9, 10, 11 and 12 should all specify that new development is restricted in height and constrained in design to ensure that no new structure dominates the heritage assets. Care will need to be taken to ensure that any tall buildings on site 2 does not adversely affect the setting of the listed Gillette building.**

**Page 90:** . We welcome the development of the Sky Campus particularly if measures can be taken to reduce its dependency on cars.

We are concerned about the proposal to introduce housing on the West Cross Estate. The report pledges to retain the present mix of industry, workshops, servicing and warehousing which are an essential support for business and residents in Brentford. These structures also require easy access for workers, visiting tradesmen and HGV supplies. It is difficult to see how they could be re-provided in 9 floor industrial buildings (MASC page 114) and we would anticipate that these buildings would remain un-let and Brentford would be denied this valuable asset.

Is the proposed Workplace Parking Levy worth a mention? Due for consideration this autumn by LBH Cabinet.

The proposal to combine this type of development with high rise affordable family housing on the east side of the campus presents further difficulties. Children growing up in this area would be exposed to dangerous traffic hazards associated with industrial activity.

The problems of providing family housing with amenity space to the Mayor's standards would be exacerbated in a scheme based on co-location. The Mayor's Practice Note November 2018, "Industrial Intensification and Co-Location through Plan-led and Master Plan Approaches" considers the basic planning processes required but does not extend to detailed design issues. There are very few examples of successful co-location and we are concerned that the GWCP should rely on co-location to achieve its objectives.

The case for a residential development (screened from the polluting A4 by an office development) on the west side of the campus would have greater validity, being adjacent to the Horizon Court offices now being converted for new residential. In turn they would require local shops and facilities, being cut off from Brentford Town Centre by the A4.

We are also concerned about the proposal to move Tesco to the Homebase site. Tesco on its present site with its sales mezzanine has proved a major obstacle to the plans for creating a lively town centre in Brentford. Tesco is in effect Brentford Town Centre. The unfortunate timing of the proposed re-build of the Morrison site may make it more difficult to re-establish the town centre. It would help if the size and goods range of any re-built super-market on the Homebase site was limited in size and in parking area.

We accept that if Tesco did leave their present site it would give a valuable opportunity for new housing away from the polluting A4, although the housing would be under the flight path to the third runway if it is built.

Agree. We wonder about the impact of the mooted high-rise building on the Homebase site

**Page 90 Vision para 3** states “the West area will enjoy significantly enhanced Public transport access (when) with a new Golden Mile Station...” However It appears that funding for these transport links is not assured and that the plan proposes that the station would be constructed by the developer.

Agree. There is currently no commitment to/funding for the Golden Mile Station.

**Page 91 Para (a)**. In view of the need to limit development in this area to respect heritage assets and the objections to the proposed Golden Mile tower set out above) we do not expect these targets to be achievable.

We support **Policy P1** (b), (d), (e), (g), (h), (j), (k), (l), (m), (n), (o), (p), (r), (s), (t), (u), (v), (w), (x), (y).

We are concerned that policy P1(a) does not require the scale and design of buildings close to these heritage assets and to Gillette are not required to be lower and subservient to them.

**Policy P1 (c)**. We are concerned at the proposed over-development of the West Cross Campus sites. The present users on these sites provide a valuable service to our community. New development has to meet the real needs of these businesses. Any housing should meet the full requirements set out in the Mayor’s London Guidelines.

We suspect that the West Cross Campus is an attractive option because it has a single owner.

**Policy P1 (f)** raises significant difficulties set out above.

**Policy P1 (i)** Does not ensure the suitability of this proposal for family housing.

**Policy P (q)** Sets out excessive heights.

**Page 93. Para 5.14.** The total number of residential units shown in the GWCP Site Allocations falls well short of the 7,500 target. As these are figures are “minimum” the target can only be reached if they are exceeded. It is not clear whether greater densities could be achieved if an assessment of PTALS for these sites could be measured taking into account a realistic assessment of the funding and phasing of the necessary transport improvements. Nor is it clear whether greater densities would result in unacceptable harm to heritage assets.

It is not clear how other commitments/likely developments have been treated in the housing trajectory e.g. Brentford Community Stadium, Citroen site.

#### 14. PLACES POLICIES 05: GREAT WEST CORRIDR CENTRAL P2.

**Page 96 Para 5.24.** This paragraph should emphasise the importance of Brentford Station and its connection to the town centre. Brentford Station Forecourt needs to be re-designed to make access from the Corridor and the town centre more attractive. There is scope for some development, for new paving and a generous landscape.

Strongly agree.

It would also be desirable to upgrade Half Acre. The narrow pavements are discouraging and dangerous. The possibility of making Half Acre and South Ealing Road one way streets should be considered following the principles of The Healthy Streets Approach. The wider pavements could be re-paved to extend the improved paving in Brentford High Street and there would be scope for extensive landscaping to mitigate pollution.

Strongly agree. Not sure about the idea of one-way streets.

**Page 96. Para 5.28.** We note the comments on the adverse effect of the railway with its over-bridge and the M4 viaduct. We would propose that the plans include a new cycle and foot bridge over the railway to protect these users from vehicles passing over the road bridge with its poor sight lines, relocation of the cafes/shops north of the bridge and screen fencing to the M4 to shield the area from through traffic on the viaduct.

**Page 99 Paras (a) I.II & (b). Retail should not be included in this sector, which is close to Brentford Town Centre.**

Strongly agree

**Page 99 (a) I,II. Housing and Page 100 (o) I.** Development between the railway and the A4 west of Boston Manor Road should be limited to 3 floors to preserve views from Brentford town centre to the Glaxo building.

**MASC Page 119 Fig 7.9 and Site Allocations: site 6, Profile West and Site 15 (covered car park). These sites should remain undeveloped with an open landscape setting to the A4.** As shown in MASC fig 7.9.

**Page 103 Fig 5.6. Proposals to rebuild the Great West Tower or the Mille building would be acceptable if this resulted in higher quality buildings suitable for modern use. However, the dominant structure should be the Glaxo building in its landscaped setting which sets the standard for this quarter. Higher buildings nearby would not be appropriate.**

Agree.

**Page 99 Para (f).** A policy to promote further car show rooms would appear to be inappropriate when the Mayor is proposing to reduce private car ownership drastically. It is also noted that even electric cars will not reduce pollution on busy roads to meet acceptable standards.

Yes. Note the recent decision by Hyundai to pull out of their plans for the Alf Laval tower.

**Pages 99 & 100.** Policies do not include sustainable proposals for servicing the buildings fronting the A4. It may be necessary to introduce a back service road which would need to be compatible with pedestrian/cycle routes parallel to the A4.

### **15. PLACES POLICIES 05: GREAT WEST CORRIDOR EAST P3.**

We believe that it would make good sense, in land use planning terms, to seek to develop the B&Q site and the site of the Chiswick Curve as a single parcel of land. This approach would offer the possibility of improved arrangements for the junction between the A4 and the A406. This junction is forecast to be operating significantly over capacity by 2031.

It would also remove the fragmentation implicit in the separate development of the two sites.

**MASC Page 111 Fig 7.6** is the key diagram preserving the concept worked out in the Draft Brentford East SPD. This policy was supported by the BCC. (See BCC..... attached). The policy would protect residents from the worst levels of pollution (see MASC Fig 2.27) by screening frontages to the corridor with non-residential buildings.

The Mayor's policy to extend ULEZ to the A406 during the plan period is welcome. However, it is likely to increase polluting traffic using the north/south circular road to bypass the restricted area, which will attract heavy fines. It would therefore be desirable to site non-residential buildings along the A406 frontages from Power Road to Kew Bridge.

Yes. Note the current proposal for 226 co-living units at the junction of Power Road and 250 Gunnersbury Avenue.

**MASC Page 97 fig 6.4.** It is noted that the concept diagram does not follow this principle, permitting residential development adjacent to the A4. The site allocation (27) shows a minimum of 440 flats which is unacceptable.

**Page 111 fig 5.8.** diagram shows three "landmark" buildings FB5 and FB6 with a minimum height of 60m (20+ storeys). There appears to be no justification for the excessive heights of these buildings.

**Page 111 Fig 5.8.** The diagram for the Spatial Strategy shows little resemblance to the MASC diagrams which should prevail.

**Page 111 Fig 5.8.** The diagram shows a complex mix of uses on sites 35 and 34, (34 was recently refused consent by the SoS on appeal). Together these sites have an improved potential for development on land facing both the A4 and the A406. A new proposal to move Larch Road to the north boundary would clear the way for an integrated plan which could include office space and possibly single aspect purpose built residential units facing into a central open space.

**Page 106. Vision.** We understand that no public funds are available to improve Gunnersbury Station, which is already overloaded and which will have to provide transport for further development in Brentford East and a significant part of the 17,500 fans at the Brentford Community Stadium in 2020.

**Page 107. Para (a), I,,II & III.** It should be noted that these targets are in addition to the units already approved in Brentford East and those which may receive planning consents before this plan is adopted.

**Yes.**

**Page 107 Para (d).** While it clear that some local facilities will be required in Brentford East it should be noted that a new supermarket is about to open in 2020 and further retail may not be sustainable. Any additional facilities should be limited so as to enhance those provided in Brentford Town Centre in accordance with Local Plan Policies TC2 and 3.

**Strongly agree.**

**Page 107 Para (j).** We understand that Fountains Centre needs to be replaced with a new structure and that further facilities will be required to meet the needs of an expanding population and workforce. The plan should not show the centre re-provided on its existing site as this would mean that there were no facilities for several years. It is also noted that the construction of an appropriate new centre would require public funding as it would not be possible to fund it entirely by building “enabling” development on the same site. The plan should include an alternative site for the centre in Brentford or Chiswick and should be able to rely on sufficient public funds to ensure it could be built and maintained.

**Pages 107/108. Para (I).** The location of the “high quality open spaces should be shown on the Master Plan, endorsed by specific policies and included in the “Site Requirements” for the appropriate allocated sites.

**Page 108. Para (m) III.** We do not support the proposal to build “Focal” buildings rising to 66 meters or more, which will increase the cumulative density of development in Brentford East beyond the capacity of the improved public transport system.

**Page 108 (q).** We support the proposal to have a consistent public realm landscape. We suggest this can best be achieved by the Local Planning Authority commissioning a landscape plan and palette for **the** whole area and including a Site Requirement on all development sites to work to the adopted plans and specifications.

**Page 108 (t).** We support this policy and look to the LPA and TfL to put forward specific plans for improved bus services phased to be in place before each additional major development reaches completion.

**Page 109 Para 5.42/2.** The statement quotes Local Plan Policy SV1 stating the need to “improve linkages to Brentford town centre through public realm improvements” without saying what these improvements are or how they might be funded and constructed.

**Page 109 Para 5.42/5.** We welcome the policy is that “employment and commercial buildings should front onto the Great West Road”. It should also apply to the A406 for reasons given above. It will be necessary to amend MASC Figs 6.4 and 7.6 to support the policy.

**Page 110. Para 5.42.** The funding of “key transport improvements” cannot rest on developer contributions alone. The plan should demonstrate that the necessary funding for these key improvements is available before this Review is approved and before planning consents are given to any major developments.

## **16. DELIVERY AND MOITORING. 06**

This policy reiterates the critical importance of ensuring that transport and other infrastructure is timely, and sufficient, to support development and growth in the GWC.

In view of the scale of growth envisaged in the Plan we would urge very strongly that CIL receipts arising from development in the GWC should be entirely ring-fenced for use in the wards affected i.e. Brentford, Syon, Osterley and Spring Grove, and Turnham Green.

**Page 115. Para 6.0.** The need is not to “balance the priorities” but to ensure that no further development is built in this over-crowded area until significant public transport improvements are operational.

This places the need for urgent action on those providing the key improvements so that “all parties” (can work to meet) “the targets set in this plan”.

If this approach can be agreed and followed we support Strategic Objective 19.

Strongly agree. This policy reiterates the critical importance of ensuring that transport and other infrastructure is timely, and sufficient, to support development and growth in the GWC.

**Page 115 Our Approach (c )**. It is not clear how the council as LPA can “ensure developments are planned and phased....” We agree this is essential but it will require policies which require refusal of premature development which will be rigorously followed by the LPA and consistently supported on appeal.

**Page 115. Our Approach (I)** Based on our experience with the Brentford Community Stadium we would be very cautious about the use of further “enabling” work. That scheme failed to produce any affordable housing despite the fact that the total number of detail approvals exceeded the number in the original outline consent.

**Page 116. Para 6.1. There needs to be a policy which states: Planning Applications within GWC will not be consented until there is clear evidence that sustainable infrastructure will be operational before new developments are occupied.**

**Page 115. Para 6.5.** To make sure that infrastructure is in place in advance of new developments it will be necessary to have a central fund for the forward processing, design and construction of infrastructure. The developer can then be required to reinstate the cost of the specific infrastructure required for each individual development.

It is also possible that schemes which are not viable if they are required to reimburse these costs may need to be supported with alternative finance where viability could only be achieved for an unacceptable design solution.

**Page 120 Health Facilities**. The Master Plan should show where the Health Centres will be located and policies should safeguard land for them. The “Brentford Group Practice” i.e. Brentford Health Centre, is identified in the Site Allocations volume.

We cannot determine whether or not the provision of 2,045 sq. m. of floorspace at Brentford Health Centre will meet the floorspace requirement there. In view of the poor public transport provision for east-west movement along the GWC at least one additional site would be required, perhaps in GWC East. Figure 6.1 indicates that there will be one new health centre in Brentford and another in Chiswick but it is not clear if both of these will take the form of the redevelopment/upgrade of existing facilities.

**Page 120 Leisure and Community Facilities.** The Master Plan should show the new site safeguarded for the replacement of the Fountains Centre and GWC policies should safeguard a site large enough for the new Fountain Leisure Centre to meet the expanding needs of an enlarged population emphasising the importance of exercise.

A new site will be required as if the centre is rebuilt on its present site there would be no facilities for several years at the very moment when new residents will be moving in. Also the present site is not large enough.

The Infrastructure Delivery Plan (IDP) is a key document. It provides a baseline for existing infrastructure capacity and assesses future needs. Amongst other things this highlights the need for residents in the GWC to have access to high quality education services.

**Pages 123/131.** Generally, the infrastructure projects need be carried out in the early phases of the plan period and housing development needs to be delayed to follow. In view of the complex proposal for funding infrastructure it is likely that it will not be possible to fund, design, build and bring infrastructure to fruition quickly. This may delay its completion which should in turn delay consents for development applications.

Policies are required to ensure this process works smoothly. The Delivery Schedule will need to be updated regularly.