



OWGRA

Osterley & Wyke Green Residents' Association

LONDON BOROUGH OF HOUNSLOW

GREAT WEST CORRIDOR LOCAL PLAN REVIEW

REPRESENTATIONS FROM OWGRA (Osterley and Wyke Green Residents Association)

September 2019

1. **Support for other Residents Associations comments.** OWGRA have worked with other Residents Associations in our analysis of LB Hounslow's Local Plan Review for the Great West Corridor. We have not repeated the points made by them in our response; however we strongly support the comments that have been submitted by other RAs such as Brentford Voice (BV) and Brentford Community Council (BCC).

This response should be treated as including the responses from other RAs such as BV and BCC as well as the points detailed below.

2. **Dependency on unrealistic transport improvements.** The Plan recognises that the current transport infrastructure is at, or near to, capacity in this area. As examples
 - a. Syon Lane and Brentford train stations are already dangerously over-crowded at rush hours, with substantial queues of people to get on and off the stations at these times taking minutes to clear
 - b. The one bus service in this area is full at rush hour
 - c. Other public transport services (e.g. Underground services) are a substantial walk away
 - d. Cycleways are not well designed, cross busy roads and as a result are limited in their usefulness
 - e. The Great West Road itself is a major arterial road in West London, which is also close to capacity at rush hour with most of the traffic being through traffic (and therefore outside the control of this Local Plan). Any restriction to traffic flows at these times (e.g. a breakdown or accident reducing the number of carriageways) immediately results in tailbacks of a mile or more.

It is important to realise this when considering this plan. The existing transport infrastructure is quite simply operating at capacity.

The Plan does recognise that substantial enhancements will be required to allow it to be able to support the scale of development proposed in this area and details these in Policy GWC6. **However funding for these various transport** proposals is not in the control of LB Hounslow, e.g. the Queen Elizabeth Line and any spur connection at Southall to Brentford, enhancement of railway stations e.g. Syon Lane, Brentford and Kew, plus (already badly-needed) more frequent rail services to Waterloo or a new tube station at Boston Manor/ Great West Road on the Piccadilly line. OWGRA cannot imagine that the substantial expenditure required would be

made available early in the lifetime of the Plan, if at all. For example, some 15 years after it was proposed, it was only in 2019 that a planning application for a passenger lift at Osterley Station was submitted for approval. We question the realistic prospects of all these projects coming to fruition in the next 25 years. In addition many of the housing and commercial developments are proposed to happen in the first 10-15 years of the Plan – but they require the availability of these transport improvements for transport in the area to remain viable. The effect of this could be long-term blight, the last thing we want for the Great West Corridor.

The Plan appears to be proposing to allow the transport developments and the other developments to proceed on two separate time tracks, without recognising the dependency between them. As a result we do not believe that the Plan is sound.

The plan should be revised to recognise the dependency of the housing and commercial developments on the associated transport improvements and to therefore require that these developments are only permitted to proceed as and when the transport developments are delivered.

3. **No coordination between developments.** The plan proposes a number of discrete developments. **There are 37 individual proposed projects for the Great West Corridor**, and these all appear to require their own infrastructure given the spread east/west along a narrow corridor rather than physically being grouped together as logical, sustainable combinations. There is no clear attempt made to synchronize the provision of infrastructure in an area to the implementation of the associated housing and commercial developments in that area. As a result this means **infrastructure** needs to be in place before projects can begin, or needs to be provided as a part of each project.

The plan needs to be revised to synchronize the delivery of the required infrastructure for each project with the project itself.

4. **North-South connectivity missing.** There also appear to be no firm proposals to **connect each side of the Great West Road with the other.** While there is an overhead foot bridge close to GSK, it is not pedestrian-friendly and this makes its use hazardous and unpleasant. Even worse is the existing pedestrian tunnel under the Great West Road at Gillette Corner, again distinctly unfriendly and hazardous given that using it means one is not visible to others. As a result the existing Great West Corridor is essentially split into a North and South section, with connections across them being by car or via pedestrian-hostile routes (traffic light crossings across a major arterial 3-lane dual carriageway, underpasses, etc.). Much is made in the Plan about improving connectivity; yet OWGRA are disappointed that new initiatives have not been included in the Local Plan in this important area. As such we do not see how the objective of improving connectivity in this area can be delivered under this plan.

The Plan should be revised with specific initiatives to improve the North South connectivity for pedestrians, cyclists and public transport.

5. **No assessment of the impact on Brentford Town Centre.** The NPPF (chapter 7 paras 85-90) appears to seek an impact assessment as to the effect on **Brentford Town Centre** but this does not seem to have been done. Brentford is recognised in LB Hounslow's Local Plan as being an important District Town Centre and the Plan proposes to promote it and increase the retail of-

fering there. Yet this GWC Local Plan, for an area immediately adjacent to Brentford Town Centre, includes no assessment whatsoever as to its impact on it. OWGRA's impression is that the draft Local Plan Review has not been fully thought through and is as a result not complete in this respect.

The Plan should be revised to include a clear impact assessment of the GWC Plan on Brentford Town Centre and the required actions and amendments to the Plan to ensure the impact is in line with LB Hounslow's Local Plan objectives for Brentford.

6. **Unrealistic and incomplete basis for housing allocation.** Policy GWC2 detailing the principle of locating housing close to commercial activity sounds like a good idea for people to live and work in the same area. However the Integrated Impact Assessment (P36) does not provide a proper justification for it. In addition the Plan does not account for the reality that people do not make a decision on where to live based on proximity to work only; many other factors come into play (local schools, local sports and other infrastructure availability, local shops, quality of life, etc.). At present the GWC area is deficient in essentially all of these, and as a result currently has very limited housing provision. We believe that, to be complete, the Local Plan should detail how it will all work in practice with new proposals for education, social and health services as well as shopping and leisure facilities, plus walking, bus and cycling routes as well as any new (and again badly-needed) bus routes through the area. Otherwise the Plan will result in the delivery of substantial amounts of new housing without the supporting infrastructure to make this new housing attractive and viable for people and families to make their homes there.

The Plan needs to be revised to include details as to how all the support required to provide attractive and viable housing (education, social and health services, public transportation, walking and cycle routes, etc.) will be provided in line with the new housing.

7. **Unrealistic timeframe for new housing.** The Mayor for London seeks 7,500 homes to be built in this designated Opportunity Area. The draft Local Plan Review provides for some 6,800, a potential **shortfall**, but all within 10 years of the approval of the plan. We do not believe this to be realistic given the slow implementation of existing, outstanding planning consents over the last 10-15 years, particularly in the Brentford Town Centre area, e.g. south of the High Street leading south towards the river Thames. Furthermore it is important to realise that none of the proposed sites is currently vacant. All of them currently have businesses, etc. operating from the sites. As such we believe the timeframes do not represent a realistic plan of what should, can or will happen; rather they are what LB Hounslow would like to happen. This brings into question the whole validity of the plan timing; if the housing delivery occurs over a very different timeframe to that in the plan, then all other aspects of the plan will be out of sync. A plan whose timing is not realistic is not, we believe, a sound plan.

The timings for the delivery of the homes on each of the sites should be revised to reflect what can be delivered based on realistic expectations and past experience.

8. **Inadequate Design and Heritage provision.** Policy GWC5 covers the provision of high-quality design for new developments in the area and the protection of existing heritage assets in the area. There are a number of nationally-listed assets as well as locally-listed ones in the area;

plus, given its location, high-rise developments in this area would have a highly-detrimental impact on heritage assets outside this area (e.g. Syon Park).

OWGRA were therefore alarmed to find within Environmental Impact Assessments Scoping Reports for the current Tesco and Homebase sites (sites 2 and 11 in this Local Plan Review – Volume 2 – Site Allocations) proposals which would cause very significant **harm to local heritage assets**. The Scoping Reports state that the EIA should assume buildings in size of up to 16 storeys, and very high densities of housing and commercial projects. These would appear to tower over and swamp local heritage assets e.g. the Grade II-listed Gillette building, the sports pavilion at Goals Soccer, the Adini building and the Syon medical centre, all of which are listed. The site allocation in the Local Plan review seeks a minimum of 350 flats for each site, which we accept will mean several storey-high buildings but, at the Tesco site for instance, the number of homes proposed is 4 times the minimum recommended. In addition, OWGRA's impression is that these homes will be of minimal size, unsuitable for families, whose needs are not being met in Hounslow generally.

Given this, it is clear that Policy GWC5 is not sufficiently clear as to what is acceptable development for the area, as the above proposals do not appear to align at all with the policy.

Policy GWC5 needs to be revised and strengthened to allow it to deliver on its objectives

9. **Site Allocation guidance is insufficient.** With regard to the two sites mentioned above, The Tesco site (Site 2 in the Site Allocations volume) is stated as being targeted for 350 residential units (“minimum development quantile”) whereas the EIA Scoping Reports from the developer are targeting closer to 1,700. In a similar vein, but relating to **site allocations outside the GWC**, Osterley Station Car Park (site 98) is listed as capable of accommodating 40 homes; however the most recent proposals for Osterley Station Car Park are for 72 flats at up to 6 storeys right next door to the nationally listed Osterley Station and close to 2/3 storey suburban homes, way above the 40 recommended. We believe that these clear ambitions to double or even quadruple the numbers need to be discouraged, here as elsewhere, given the obvious harm they would cause to the living conditions of neighbours and to the nature of this area that the Local Plan claims to seek to protect. As such we believe the guidance in the Site Allocations (Volume 2) is insufficient and needs to be strengthened.

The Site Allocation volume needs to be revised to make it clearer to developers what the development envelope for each site is that will allow the development potential of the specific site to be maximised whilst also ensuring that all the other objectives of the Local Plan are met.