

Great West Corridor Local Plan Review: Volume 4 Pre-submission Regulation 19 Consultation

Comments from the West Chiswick and Gunnersbury Society

Introduction

1. The West Chiswick and Gunnersbury Society (WCGS) <https://westchiswickgs.org/> has a direct interest in the Local Plan Review for the Great West Corridor and requests permission to participate during the Examination in Public.



The Society participated fully in the preparation of the Local Plan between 2011 and 2015 including at the Examination in Public and regularly provides detailed responses to planning applications within or impacting on our area. WCGS has engaged with this Local Plan Review, participating in workshops and submitting comments at each consultation stage:

Issues Questionnaire February 2016

*Preferred Options December 2017

Brentford East Supplementary Planning Document December 2017

Comments submitted by WCGS at the above stages are provided as supporting documents to our response to the Regulation 19 consultation.

2. As is clear from the Council's Local Plan Reviews Regulation 18 Version: Consultation Statement, the Council has made very little substantive change in response to the majority of WCGS comments (or those from other community groups) on the Regulation 18 consultation document (*Preferred Options December 2017). In many cases the responses to our comments are to note them, admit to the problem raised (for example "Land of suitable size and position for residential development within the east of the borough is severely

constrained”) but then to suggest that the relevant policy “seeks to find a way”. Some changes that have been made have been in the reverse direction to that which we requested. **We would therefore request that the WCGS comments on the Preferred Options document are accepted as an integral part of our response to this Regulation 19 consultation together with the Background information provided by means of Appendix 1 to this response.**

Summary of WCGS View on Regulation 19 document

3. We fully endorse the comments submitted by the Brentford Community Council (BCC 863).

4. We consider that the draft Local Plan Review (LPR) of the Great West Corridor is unsound as it will not deliver sustainable development (good growth) in this part of the borough. We strongly believe that the amount of development to which this plan commits the Council is unrealistic and unachievable without inflicting significant and lasting harm on the existing communities and heritage assets of the surrounding areas. In the absence of secured infrastructure delivery the LPR will fail to meet the declared vision and objectives (03).

5. It is relevant here to recall that the reason for this partial review of the Local Plan arises from the commitment given in Policy SV1 of the Local Plan. The addition of this policy together with the removal of policy ED3 was required by the Inspector during the 2015 Examination in Public of the Local Plan in order to make the Local Plan sound (see Appendix 1 to these comments).

6. The Inspector required by means of Major Modifications (MM9 and MM1) (a) the removal of draft policy ED3, which would have committed the Council to amounts and types of development upon which there had been no public consultation and (b) the addition of policy SV1, which committed the Council to a Partial Review. The Inspector in his report section on the Great West Corridor (paragraphs 47 – 56) concluded (paragraph 54) that 'this Partial Review is necessary to settle locally controversial issues such as the provision of adequate transport and other infrastructure, suitable locations for taller buildings, and the area's suitability or otherwise for large scale residential development.'

7. While we recognise the pressures under which the Local Planning Authority operates, we strongly believe that the draft LPR fails to resolve the above issues satisfactorily and that, taken together, the policies within it are neither justified nor effective and therefore the draft LPR is unsound.

8. WCGS reiterates its view that:

- the GWC should not be designated as an Opportunity Area as it cannot sustain the quantum or type of development such a designation entails
- the GWC should remain essentially and predominantly an employment corridor
- the environmental constraints (especially the very high levels of noise and air pollution) make much of this area totally unsuitable for residential development of acceptable quality
- the housing targets of the London Plan are unrealistic for boroughs where potentially available brown-field sites are located in heavily polluted areas

- encouraging people to live close to their workplace in the GWC would, in many cases, place them in double jeopardy, with both work and home life confined to sealed, artificially ventilated buildings and moving from one to the other involving exposure to the hostile environment
- so much damage to heritage assets has already been done by tall buildings or is “consented” that there needs to be a greater recognition that we are at a “tipping point” – without a strong commitment to valuing and protecting the surrounding heritage assets, irreparable harm will be inflicted on them to the impoverishment of our lives and those of future generations
- developers should be expected to engage positively with the purpose and core principles of chapter 6 of the Local Plan as articulated in Our Approach to Policy CC1 and to Policy CC4 and in paragraphs 6.1, 6.12 and 6.13
- more account should be taken of the topography of the area and the open nature of the surrounding historic landscape – although the GWC may sit in the backdrop, tall buildings are highly visible and their impact felt over wide areas
- advertising signage should not be permitted on buildings that are solely or predominantly residential or on other buildings where they would have a negative impact on residential amenity
- significant portions of the open spaces in and surrounding the GWC also suffer from air and noise pollution from the strategic roads – this detracts from their role as spaces for active recreation and/or quiet enjoyment. Light pollution can reduce biodiversity as it can be detrimental to wildlife.

In the comments below we have focussed on certain key issues only; with respect to other areas of the draft LPR we place reliance on our 2017 comments on the Preferred Options document as requested under para 2 above.

Transport Infrastructure [04 Strategic Policies; GWC6]

9. Policy GWC6 is not positively prepared or justified and will not be effective; the draft LPR is therefore unsound. A major shortcoming of the draft LPR is the inability of the Council to ensure delivery of the necessary infrastructure, especially transport. We consider that delivery within the plan period of the major transport improvements (the Brentford to Southall Crossrail link and the West Orbital Line) on which the entire strategy for the GWC depends is highly unlikely. The Council is unable to give any assurance of delivery of this “game-changing” infrastructure as it is dependent on other bodies. The Council can only encourage, support and facilitate, not deliver. This is reflected in the strategic objectives given under GWC6.

10. While the Council now seems to be even less sure of delivery of major transport infrastructure than it was in 2017, it is committing to more development. The GWC6 section of the draft LPR has been “watered down” from the corresponding section (GWC5) in the Regulation 18 consultation. This is presumably in response to comments from TfL (see para 14 below). The Regulation 18 document emphasised the need for “game-changing infrastructure” and stated that without it the amount of employment and residential development would be reduced from that stated as the “preferred option”. Now, however, rather than a reduction, the figures for employment growth and housing growth given in

policies GWC1 and GWC2 in Regulation 19 draft LPR are significantly higher than those of the preferred option.

11. The local road network is already at saturation at peak times and there is frequent grid-lock at the roundabout. The cumulative impact of committed development in the area is such that congestion of the road network is expected to increase with significant impact on journey time reliability and on bus performance. This will have a negative impact for all using this section of the TLRN. The current traffic and transport situation in the GWC is so poor that, if development of the corridor goes ahead without significant strategic transport improvements, it will be impossible to meet the LPR's strategic objectives.

12. Furthermore, such an outcome would have a negative impact on the viability of existing businesses on the GWC. During preparation of the Local Plan poor transport was already recognised as a limiting factor in attracting new and retaining existing businesses. This has contributed to the GWC "under-performing". [At a meeting on Plans for the Great West Road, on 10 February 2014, Urban Initiatives consultant director Kelvin Campbell stated "Hounslow has always been a focus for London's blue chip companies but the single biggest issue has always been the saturated road network and poor provision of public transport"]

13. Such an outcome would also lead to a serious further deterioration in the environment to the detriment of the health and well-being of existing residents in the surrounding areas and of existing and new residents and workers within the GWC itself. Account must be taken of the current infrastructure deficit. This deficit is due to the amount of consented development completed or under construction, especially in the Brentford East and wider Brentford area that has taken place without the provision of supporting transport infrastructure (see page 3 of Appendix 1).

14. It is essential that any development in the GWC complies with Local Plan Policy IMP 3 (h) Ensuring that development does not proceed unless the delivery of critical and necessary infrastructure to support that development is **assured**." Our view that the essential transport infrastructure will not be delivered within the plan period is based on bitter experience and on the comments from TfL on the Regulation 18 document (taken from the Council's Consultation Statement):

TfL considers the conclusion that the proposed Golden Mile Station linking the GWC to Southall Crossrail and the Lionel Road Station linking the GWC to Old Oak Common as the most important infrastructure provision for the GWC is premature. TfL consider the role of the STS is to identify a package of transport measures and future connections needed to support growth. TfL consider that the draft GWC plan should clarify that these stations are at this stage neither committed nor funded, and funding and deliverability challenges associated should be highlighted, and reiterate the importance of investigating and supporting alternative interventions within the plan to reduce the reliance on supporting growth through infrastructure projects that the Council may find challenging to deliver.

15. Other interventions, while necessary and welcome, are not alternatives; they are ancillary to and dependent on these major infrastructure improvements. Many of them would not be possible without the reduced traffic congestion that would result from significantly improved public transport by rail. For example, the congested road network precludes improving public

transport by means of additional bus services or increased frequency of existing services. A 2014 TfL consultation <https://consultations.tfl.gov.uk/buses/routes-70-and-27> responded to a WCGS proposal to extend Route 70 beyond the northern end of the Chiswick Business Park by stating “Extending it would expose it to heavy traffic around Chiswick Roundabout which would affect reliability.”

16. Attention is drawn to the following extracts from Draft London Plan July 2019 (underlining is ours) with which GWC6 does not appear to be consistent. The putative designation of the GWC as an Opportunity Area is also undermined by TfL’s comments on the Regulation 18 document.

Draft London Plan July 2019

Chapter 1

1.2.4 Making the best use of land means directing growth towards the most accessible and well-connected places, making the most efficient use of the existing and future public transport,

Policy GG2 Making the best use of land

AA prioritise sites which are well-connected by existing or planned public transport.

Chapter 2

2.0.4 (Opportunity Areas) Infrastructure is key to this delivery and will require major investment in transport, with Opportunity Areas clustered into growth corridors; and proper planning of utilities and communications capacity and the social infrastructure that supports the day-to-day lives of Londoners, well in advance of new development. Opportunity Area Planning Frameworks and Local Plans should have clear strategies for their delivery.

Policy SD1 Opportunity Areas

A To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will: 4) ensure that his agencies (including Transport for London) work together and with others to promote and champion Opportunity Areas, and identify those that require public investment and intervention to achieve their growth potential.

2.1.10 The Mayor’s Transport Strategy seeks to ensure that public transport and walking and cycling provision are at the heart of planning for Opportunity Areas. It sets out that the Mayor will support growth in Opportunity Areas through transport investment and planning, and commits to the setting of ambitious mode share targets.

2.1.11 ...Where development proposals are emerging and transport investment is not yet fully secured, delivery of the long- term capacity for homes and jobs will need to be phased in a way that maximises the benefits from of major infrastructure and services investment whilst avoiding any unacceptable effects on existing infrastructure before schemes are delivered.

Heathrow/Elizabeth Line West growth corridor (GWC is within this)

2.1.63 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. This will include reviewing the housing and jobs targets for opportunity areas and working with boroughs to support more detailed plans, such as through Opportunity Area Planning Frameworks or Local Plans.

17. In conclusion Policy GWC6 is unsound as it will not deliver a sustainable local transport network that is essential to support the proposed development.

Other Strategic Policies

GWC1 Employment Growth

18. We are broadly supportive of the range of employment proposed. Our main and serious concern is with the quantum of development which we believe is unsustainable for the reasons already described in our comments on Transport Infrastructure. **Policy GWC1 is therefore unsound.**

There appear to be anomalies in the number of jobs indicated – the numbers given in Policy GWC1 (c) 16,300 + 340 plus (g) 340 do not add up to the total 17,600 stated under (a); this total is also significantly higher than the 14,00 given under Para 1.

19. Co-location of residential with B1 uses (b) may be satisfactory in certain limited locations with the provisos stated but the suitability of the site for residential use should be the determining factor in where residential development is sited rather than the need to support employment development. The damaging consequences of basing the location and quantity of residential development on a perceived need for “enabling” other development are clearly illustrated by the Brentford Stadium scheme. Employment uses should also front the noisy and polluted North Circular (A406; Gunnersbury Avenue) as in Policy P3 (f).

We are aware of the Agent of Change principle within the emerging London Plan but we consider that **co-location of residential with industrial uses** within the constraints of sites in the GWC is most unlikely to lead to a satisfactory outcome for either the industrial business or the residents. This aspect of the policy is unsound.

GWC2 Housing Growth

20. We remain convinced that there is very little scope for acceptable residential development within the extremely hostile environment of the GWC (see first five bullet points under para 8 and para 19 above). In the absence of guaranteed strategic public transport infrastructure to reduce the traffic, the environment will become even more hostile. **Policy GWC2 is therefore unsound.**

21. The unit sizes and tenures of these high-density developments will not reflect local need. As with other high-density schemes already built or under construction there will be an over-supply of small (1-bed and studio) units and an under-supply of larger family units. Where residential is used to enable other development there will be a serious shortfall of Affordable

units. This will not create vibrant and stable communities. **Policy GWC2 is therefore unsound.**

GWC3 Health and Wellbeing

22. We welcome this new chapter. It makes it clear that “Where we are now” is a very bad place in terms of air and noise pollution and very poor levels of physical activity. The most important “overarching” Strategic Objective, however, is missing. It should be “To reduce significantly levels of air and noise pollution”. Mitigation of the impact of pollution (SO 6) by itself will not achieve the desired health and wellbeing outcomes. This is especially so when levels of pollution are likely to rise in the absence of measures to reduce the sources (see paras 11 to 13 above). The desired outcomes require the significant reduction in traffic that can only be brought about by delivery of strategic public transport infrastructure. **Policy GWC3 is therefore unsound.**

We will achieve this by:

23. (c) to (f) As with transport there is already an infrastructure deficit due to the amount of consented development completed or under construction, especially in the Brentford East and wider Brentford area. This cumulative deficit needs to be recognised and factored into the amount and timing of delivery of health and leisure facilities. Policy GWC3 will be ineffective in this respect. Supporting and promoting the delivery of the necessary facilities will not be sufficient to ensure their delivery. Without such facilities it will not be possible for the Council to enable active and healthy lives, improve mental and physical health and well-being and reduce health inequalities. **Policy GWC3 is therefore unsound.**

24. (c) I and (f) Delivery of additional health and leisure facilities by redevelopment and expansion of existing facilities is fraught with difficulties. We believe that the needs deriving from new development should be met primarily by new facilities within the GWC.

Chiswick Health Centre The need for redevelopment of this centre to provide adequate services to the current practices and their patients has been recognised for some years. No satisfactory solution has yet been found as to where the existing GP practices would be relocated for the lengthy time that would be required for the redevelopment to be carried out. <http://www.chiswickw4.com/default.asp?section=info&page=conhealthcentre07.htm> In addition, if the centre is to cater for some of the additional GPs and services needed by development of the GWC, significant expansion will be required. The centre in Fishers Lane is some distance east of the Chiswick Roundabout. It is questioned how practical/acceptable use of it would be for residents within the GWC.

Brentford Fountain Leisure Centre The Brentford Fountain is a widely used and much needed centre. Provision of a new and expanded leisure centre is a priority both because the present centre is nearing the end of its useful lifespan and in order to cater for the already increasing population. Ensuring continuity of use of a leisure centre in this locality is essential in order to combat the worryingly low levels of physical activity in the Borough. The draft LPR is silent, however, as to how such continuity will be achieved if this new centre is to be provided on the site of the current one. Depriving existing residents of a leisure centre for a period of years will have a major detrimental impact on health, wellbeing and social interaction.

GWC4 Open Space and Green Infrastructure

25. We strongly support the aims and strategic objectives of this policy. High quality open space and green infrastructure is essential in order not only to encourage active lives and contribute to mental and physical health and well-being but also to help combat climate change and mitigate its impact. We have serious reservations, however, as to whether the objectives can be delivered. We share the Council's concern (3) that the levels of growth planned will increase the pressure on existing open spaces. This is especially true where residential development has inadequate private and/or communal outdoor space either because it is high-density or because the external environment is so polluted (air and noise) or both (for example, residential associated with Brentford Football Stadium).

26. It should be pointed out that significant portions of the open spaces in and surrounding the GWC suffer from air and noise pollution from the strategic roads. This detracts from their role as spaces for active recreation and/or quiet enjoyment. A CPRE Report provides noise maps for all of Hounslow's parks; these show high levels of noise for the parks in or near the GWC. Providing tranquillity is therefore challenging.

<http://www.cprelondon.org.uk/news/item/2401-london-parks-oases-of-calm-or-noisy-and-polluted-places-to-avoid?highlight=WyJwYXJrcyIsIidwYXJrcyIsInBhcmtzJyJd>

27. In improving the facilities and range of offer (e) it will be essential to strike an appropriate balance between different activities. Insensitive "improvements" for one use (eg sports facilities) may, inadvertently, harm a different use (eg nature area). External sources of funding should be actively explored but great care should be exercised to ensure that such funding does not compromise the function or character of the open space or its value to local residents. Enhancing open spaces should be carried out in full consultation with users of the open space, including "friends" groups, amenity and local residents' groups and individual residents.

28. Siting of residential developments near open spaces important for nature can have negative consequences for wildlife. Light pollution can reduce biodiversity as it can be detrimental to wildlife.

29. We agree that developers should contribute to the delivery of high-quality publicly accessible squares and open spaces (k) but draw attention to the severe challenges described in para 4.50. Recent experience suggests that what will be provided will be too little and too late. The following extract from WCGS comments submitted recently on the planning application for the final (Duffy) phase of the residential development associated with the Brentford Football Stadium illustrates this point.

Public Park/Play space

8. We object strongly to the absence within this application of the design and other details of the public park containing a Local Area of Play (LAP) which is required to be provided within/adjacent to the Duffy site. The play area is shown as (18) in the "concept sketch" under section 5.2 of the Design and Access statement. It is not acceptable merely to state here that "This forms part of the Section 106 masterplan

works and the detail of this space sits outside of this planning application, but will relate to the design intent of the Duffy scheme.” The design of the two elements needs to be considered holistically to avoid, for example, siting the car park entrance and service entrance (3) immediately adjacent to the play space.

9. This LAP, measuring 380sqm, is required to provide the play space for 5 – 11 year olds from across all the residential elements of the stadium scheme (of over 1000 residential units) and the public park is also essential to provide some open space within the very dense development.

10. Several of the residential blocks are now under construction (Central Eastern and Central Southern) with occupation expected to commence in 2021/22. There will thus be a considerable gap between completion of these blocks and completion of the Duffy site. Throughout this time there will be no suitable play space for 5- 12 year olds. It is essential that the public park is provided at the latest at the same time as the Duffy residential.

11. We request that the details for this vital element of the scheme are submitted and considered as part of this application. To ensure that there is no delay in providing the park, we also request a Condition that the park be constructed and open for use before any of the residential units on the Duffy site are occupied.

GWC 5 Design and Heritage

30. This section and policy is of fundamental importance. So much damage to heritage assets has already been done by tall buildings or is “consented” that there needs to be a recognition by all involved in the planning process that we are at a “tipping point” – without a strong commitment to valuing and protecting the surrounding heritage assets, irreparable harm will be inflicted on them to the impoverishment of our lives and those of future generations. **It will be essential that full weight is given to these policies and that pressure to justify departures from them in order to deliver unrealistic growth targets is resisted.**

31. In order to make this policy sound, we recommend the following changes:

(f) The wording of the second sentence appears to invite developers to submit damaging proposals and assists them in justifying the harm. We request that it is changed to read: “Proposals harming the significance of a designated heritage asset will normally be refused.” The interpretation of this policy and the circumstances in which harm might be justified are best considered during the planning process.

(h) III Amend 81 metres (AOD) to 70 metres (AOD) in line with P3(m) III.

I, II and III more explanation of the way heights are stated should be given:

For I. general building heights of 12 to 24 metres **above ground level**.

For II and II provide a note to indicate that building heights above ground level will be less than the AOD figures given depending on the ground level of the particular site. The topography of the GWC is such that ground levels range between approximately 10 and 30

metres AOD. It would be helpful to give the ground level of the specific focal building sites here and to include the ground level in all relevant site allocations.

(n) We request that this clause is deleted and that clause (p) from the Regulation 18 Preferred Options document is re-instated. In commenting on the Regulation 18 document WCGS strongly supported the inclusion of clause (p). We asked for it to be strengthened by the addition of:

advertising signage should not be permitted on buildings that are solely or predominantly residential or on other buildings where they would have a negative impact on residential amenity

32. The aim of this policy, as of the overarching policy CC5 in the Local Plan, is to ensure that advertisements do not have a negative impact on amenity and/or public safety. Beginning clause (n) by “Deliver ... signs and advertisements...” could be interpreted as encouraging developers to propose advertisements on the GWC. They need no such encouragement and (see para 2). We question, in any case whether there are any circumstances in which advertisements could make a positive contribution to public safety. We recall that similar attempts to modify policy CC5 were made at a late stage in the preparation of the Local Plan. However, the Inspector did not find the modified policy sound and required that it be changed..

Extract from Inspector’s report: 163.Main modification MM19 would therefore amend Policy CC5 to make it sound by concentrating on amenity and public safety to ensure consistency with national policy and the scope of the advertisement regulations.

Places Policies [05]

P3 GWC East

33. **This policy is completely unsound** as sustainable development on the scale envisaged therein cannot be delivered within the timeframe of the draft LPR. This area is already subject to high-density development on a massive scale. Please see WCGS comments on this section of the Preferred Options document.

34. The Vision refers to significantly enhanced public transport infrastructure but none of this is secured (see comments on Transport infrastructure above) and comments on Gunnersbury station below.

(a) I and II the numbers of residential units are far too high.

(d) and (j) see comments in para 24 above.

(l) the size and location of these public open spaces is such that they will fail to provide high-quality public spaces; their timely delivery by developers is also an issue - see para 29 above.

(m) I, II and III More explanation of the way heights are stated should be given as recommended for Policy GWC5 in para 31 above.

(s) **Gunnersbury station** There is an urgent need for significant enhancements but delivery of any improvements at this station has an extremely poor track record. The Society has been campaigning for enhancement to access and capacity at Gunnersbury Station for nearly 20 years. <https://westchiswickgs.org/gunnersbury-station/> and was instrumental in the setting up of the Gunnersbury Station Action Team. At our AGM in February 2018 it was reported that the Action Team had met in January. Platform improvements had been delayed by TfL's shortage of funds, but the work was expected to be done this year. At our AGM in February 2019 it was reported that there was still no progress on the re-positioning of the waiting room. Even these agreed minor improvements have still not been carried out.

WCGS

September 2019