

Appendix 1 to WCGS comments on Great West Corridor Local Plan Review: Volume 4 Pre-submission Regulation 19 Consultation

Background Information

1. 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 to the Local Plan together with the removal of policy ED3 was required by the Inspector during the Public Inquiry in order to make the Local Plan sound.

2. WCGS participated in the Examination in Public held between February and April 2015. Our view (see extract below), which was shared by other resident groups, was upheld by the Inspector who, in order to make the Local Plan sound, 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.'

Extract from WCGS response of April 2014 to London Borough of Hounslow Local Plan Proposed Submission (submitted on Local Plan publication stage representation form)

3. ED3 (p 80-83)

Promoting the Great West Corridor for employment growth is premature and unsound. Sustainable development will not be deliverable within the plan period because the transport infrastructure needed will not be in place. As recognised in paragraph 4.7 “there are major environmental challenges associated with the transport function and public transport

connectivity is poor”. The existing problems need to be resolved before adding to the pressures.

4. ED3 a. Developing an appropriate **Area Action Plan** will itself take a considerable amount of time. The “Golden Mile Vision and concept master plan” has not yet been provided to residents - who are essential public stakeholders. A first draft of the Context and Character Study for the Great West Road (an important part of the evidence base) has only recently been issued for comment.

5. ED3 b. The Council is very heavily dependent on other bodies (such as TfL) to deliver improvements in **transport infrastructure**. It is unrealistic to state “We will achieve this by ... “co-ordinating public and private investment...”. Statements concerning transport

improvements (EC 1 and 2) are long-term aspirations/wish-lists rather than firm policies

6. ED 3 f A policy of promoting **residential development** along the Great West Corridor conflicts with policy EQ4 b “encouraging air-quality sensitive development to be located in the most appropriate places”. The Great West Road is recognised as having very poor air quality (paragraph 9.8). Such a policy is also incompatible with:

Advertisements and Lighting The Great West Road cannot be considered in isolation; it passes through or close by many sensitive receptors including residential areas, heritage landscapes and nature conservation areas. The nature of modern advertisements and lighting features (size, height, luminosity, frequency of change etc) is such that they can have a highly negative visual impact on receptors and represent major sources of light pollution. The negative effects can be far-ranging including at locations in the neighbouring boroughs of Richmond and Ealing. Stating that such elements are expected to contribute towards the (as yet, unknown) regeneration objectives of the Great West Corridor is unsound as it is likely to seriously undermine policies intended to protect and enhance the quality of life, including, but not limited to Policies CC4, CC5, and EQ6.

7. Figure ED 3.1 Promoting the area named as **Kew Gate** as a regeneration node (paragraphs 4.9, 4.10 and “Supporting facts”) is completely unsound. To direct further development to this area on the Brentford/Chiswick boundary and close to Kew Bridge and the River Thames is inconsistent with achieving sustainable development, is a most inappropriate strategy which would be incompatible with many of the other policies in the Local Plan and is, in any case, undeliverable over the plan period. There is no evidence of co-operation with the borough of Richmond on this.

8. The Council's recent approval of the Brentford Football Club Stadium and "enabling" residential development, despite its non-compliance with significant parts of the Development Plan, was justified as an exception based on the claimed community benefit that the Club/stadium would provide. This exception must not be allowed to act as a catalyst for further degradation of historical and natural heritage assets and harm to the quality of life of local residents. As can be seen from the Report provided to the Planning Committee in December 2013, the high-rise, high-density residential clusters (910 flats*), together with the 20,000** capacity stadium will result in substantial negative impacts on the surrounding heritage assets and residential areas in both Hounslow and Richmond. The cumulative negative impact of the stadium scheme and other developments in Brentford and Chiswick on traffic, air-pollution and public transport are such that no further development in this area should be considered. The following extracts are taken from the GLA planning report (D&P/3111a/02, February 2014, paragraphs 59 – 66):

"Given the level of predicted vehicular trips within an already congested highway network, the applicant was advised to undertake area wide modelling. Using TfL's corridor VISSIM model, the applicant was recommended to consider the morning and evening network peak periods for a match day and non-match day, although only the latter was modelled. The modelling results indicate that the proposed non-stadium elements of the scheme will produce significant and noticeable increases in journey times on non-match days on the Transport for London Road Network (TLRN) at Kew Bridge, Kew Bridge Road and Gunnersbury Avenue. For example, the time for an evening peak journey along a kilometre section of Gunnersbury Avenue, Chiswick roundabout to Chiswick High Road would increase from 3.52 to 7.39 minutes; more than double. If the cumulative impact of committed development is modelled, the impact on journey times through the Kew Bridge area is greater and overall will have a significant impact on journey time reliability and on bus performance."

"Subsequent discussions with the applicant have led to some acknowledgement that the proposals will increase highway congestion. In response, they have offered a S106 contribution of £35,000 to fund a study investigating potential improvements that could address the traffic consequences of comprehensive development in Brentford.... Whilst such measures and obligations are a step in the right direction, they are only a minor element of what would be required in order to minimise additional congestion on this part of the network. No physical highway mitigation has been identified nor is any likely to be accepted given TfL's desire to improve this part of the network for cyclists. Given the scale of this development and the existing conditions of the road network in this part of west London, impacts on the operation of the highway network are unavoidable."

9. Even if one discounts the traffic problems raised above and the resulting increase in pollution, the potential for sustainable development within the node marked as “Kew Gate” in Figure ED 3.1 is extremely questionable. It is a very sensitive location being surrounded not only by established residential communities but also by architectural and natural heritage assets of local, regional, national and international significance. Indeed, as shown, “Kew Gate” includes within it significant residential areas to the south and east of the Chiswick roundabout, including parts of the Wellesley Road and Strand on the Green Conservation Areas, and abuts the Thorney Hedge CA to the north east. It also includes a newly established school and an important community facility, the Brentford Fountain Leisure Centre, together with parts of Gunnersbury Park and Cemetery. With the exception of the Allocated site of Wheatstone House, between the Leisure Centre and the Chiswick roundabout, the area contains no identified development potential.

10. The Chiswick Business Park should not be considered to be part of the Great West Corridor (4.7) and the Local Plan should not seek to connect the Golden Mile growth to the business park (2.38). To do so would be in conflict with policies in Chapter Six, Context and Character since the Thorney Hedge CA and parts of the Wellesley Road CA lie between the Chiswick roundabout and the business park. The amenity and outlook of these high-quality residential areas needs full protection.

11. As indicated, it is considered that including this policy in the Local Plan at this stage is premature. It is not possible to suggest modifications to the wording that would make it sound. It should be withdrawn, subject to full consultation (including residents) together with the evidence base and considered for inclusion in a future revision of the Local Plan.

12. If the policy is retained, however, it is requested that account is taken of the above comments and that all references to “Kew Gate” as a regeneration node are deleted.

*now increased to over 1000

** now reduced to 17,250

WCGS

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