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By email

**Great West Corridor: Local Plan Review:  
Regulation 19 Consultation.  
Response by The Brentford Community Council.**

Ref: BCC 863  
20 September 2019

## **THE BCC.**

The Brentford Community Council was originally set up by Hounslow Council in 1988 as one of a number which would give local resident's views on forward plans and applications before they were considered by standing committees.

Since then the BCC has evolved into an independent non-political body which regularly contributes views on plans and developments in the Brentford area of the borough.

## **CONTEXT.**

1. The BCC has examined the proposal in detail and prepared detail comments set out in our paper BCC 862a, attached.
2. **We can set out the context of our conclusions as follows:**
3. The Great West Corridor is identified as **Opportunity Area 6** in the draft **London Plan 2016**. It is one of 8 OAs associated with the Elizabeth Line West. **(See page 52, Fig 2.10.)** The diagram shows potential links from OA6 to the Queen Elizabeth Line.
4. **The London Plan (Page 51 paras 2.1.63** 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".
5. **Para 2.1.64** Restates that the A4/M4 corridor has "links beyond London's boundaries into a Strategic Infrastructure Priority network" **(illustrated I Fig 2.15(11) on page 64.**

6. **The Local Plan Review 2017 (preferred option) Para 2.16** states "Any significant employment growth is dependent on significant improvements in public transport to access the area" and
7. **At Para 2.20** "meeting the demand for housing, in particular affordable housing, is a challenge in the context of infrastructure and viability"
8. **At page 35. Strategic objective 8** states the need for "strategic and game-changing infrastructure to unlock development and increase PTALs in the area."
9. **At page 44.** Considers the "alternative policy option". Stating "without game-changing infrastructure, particularly the Brentford-Southall Crossrail link the council will seek a lower amount of employment floor space. Development will need to be phased in accordance with soft measure transport improvements, including improved bus services, enhanced existing rail services and enhanced pedestrian access along the corridor to ensure that existing infrastructure is not overburdened with growth".

## ISSUES

In considering whether the Review is truly sustainable we suggest that it should demonstrate that it meets the following criteria:

(References are to The Great West Corridor Local Plan Review Vol 4, unless otherwise stated)

1. **Secure Funding**
2. **Reaching Targets**
3. **Controlling Phasing**
4. **Protecting Heritage Assets**
5. **Health and Wellbeing.**
6. **Improving Brentford.**

### Issue 1: Secure Funding.

**Page 64 Para 6.5** States "Securing funding and finance is critical for timely delivery of infrastructure". Which means that forward funding will be required to ensure that it is in place before new development is operational. But goes on to state that "such provision will be secured through a workplace parking levy which has yet to be approved and developer contributions"

These "contributions" will be in addition to CIL, S106, SME subsidies, and a requirement for 50% affordable housing.

It is understood that if the parking levy was adopted the earliest date that the shuttle might be operational is post 2024.

No reference is made to committed forward funding by TfL.

**It would appear that there is as yet no guarantee that forward funding will be available which will ensure that infrastructure can be financed, designed and constructed in advance of development.**

### **Issue 2. Reaching Targets.**

**Page 29 Fig 3.1.** Restates the Mayor's targets as 7,500 new homes, 17,600 new jobs.

It has been clarified that these target figures would include any schemes consented within the corridor since January 2019.

It is understood that the Review targets will continue until 2035, five years beyond the life of the adopted 2015 Local Plan.

It appears that 6,800 new homes would be built if all the corridor sites in the Site Allocations (Vol 2) were constructed to the capacity numbers given.

This leaves a shortfall of 700 new homes,

However, the Site Allocation numbers are minima and clearly do not give a realistic assessment of the way these sites are to be developed, their actual densities, their potential impact on heritage assets or their appropriateness in relation to their PTALs.

**For the sake of clarity and to ensure that the proposed developments are sustainable the figures given for each site should be maxima**

We have also noted development proposals which would contravene the policies in the Review, which should not be promoted.

**A realistic estimate of the development capacity of the corridor sites would appear to fall short of the Mayor's objectives.**

### **Issue 3. Controlling Phasing.**

**Page 34. Fig 4.1. The Overall Strategic Strategy.** This plan clearly shows the extensive spread of the Corridor along the A4. The area includes development proposals in Osterley, Brentford and West Chiswick which each require secure separate forward Infrastructure investment.

**The Strategic Transport Study Page 76 para 3.** States “The Southall Rail Link West London Orbital Rail and BRT schemes are therefore considered important potential medium to long term schemes”. It is unlikely that either would be operational before 2024.

**This realistic assessment demonstrates that significant elements of the crucial infrastructure improvements cannot be operational in the short term.**

**Page 45 Fig 4.4. Housing Trajectory.** Shows completions between 2021 and 2027 which could mean that housing completions would precede the infrastructure work and lead to increased congestion and potential grid lock.

**As the A4 and the A406 are strategic roads, increased congestion would have adverse effects beyond the corridor and would be unacceptable.**

#### **Issue 4. Protecting Heritage Assets.**

**Page 69. Para 4.53.** States that NPPF identifies that “good design is a key aspect of sustainable development” and seeks to ensure that “(c) new developments are sympathetic to local character and history including the surrounding built environment...”

There are some listed buildings, including the iconic Gillette building, which is the defining structure at the western end of the GWC area.

Representations have been made to the Council which resulted in the refusal of a planning application for a 13 storey tower in Syon Lane on the grounds that it was not subservient to the parapet level of the main Gillette block.

We note that proposals for sites 2, 3, 4, 5, 6, 8, 9, 10, 11, 12 and possibly others would “harm” heritage assets within and outside the corridor if they were developed following the guidance in the **Site Allocations** report and that set out in the **Masterplan and Capacity Study page 129 fig 7.13**.

**We consider that new structures should respect the design, style and scale of heritage assets and should not dominate them.**

#### **Issue 5. Health and Wellbeing.**

**Page 52 Para 1** states that “Air pollution is a serious issue” **The Masterplan and Capacity Study Page 57 Fig 2.27** show areas of exceptionally poor air quality along the whole of the A4 and the A406 within the **GWC** area. Additionally, **page 58 Fig 2.28** shows that the same areas experience high levels of noise pollution.

**Strategic Objective 6 (Page 52)** is to mitigate the impact of noise and air pollution through the design and positioning of buildings and greening of the area.

**Policy GWC3 (I) ill. Page 54)** states the Council will expect development proposals to locate sensitive uses away from existing or planned sources of air and noise pollution, including through siting of less sensitive non-residential uses adjacent to the A4/M4 to act as a physical barrier between the road and more sensitive uses to the rear.

**We consider that this desirable policy should include all the sites adjacent to the A406.**

**Policy GWC3 (I) IV** requires "the use of greenery to act as a buffer along the A4/M4 corridor and other streets.

**We note that the Site Allocations descriptions envisage built development up to the north side of the A4 instead of reserving the land for the planting required to mitigate pollution.**

#### **Issue 6. Improving Brentford.**

**Neither Policy GWC1 nor Policy GWC2** include any reference to the impact these proposals could have on the existing population of Brentford.

If the Mayor's targets are achieved within the plan period the population of Brentford would increase by 40/50% and the workforce by a similar amount.

**The Local Plan Review is a review of the 2015 Local Plan and should include policies to integrate new development and the expanded population.**

Specifically policies should be included in the Review to support the **2015 Local Plan Policy TC2.**

**These should include re-consideration of the proposal to relocate the Tesco superstore closer to Brentford town centre and proposals to include additional retail outlets within the GWC area.**

Brentford Station serves both the Town Centre and the central area of the GWC. Half Acre provides an inadequate link.

**Policies should be included to improve the access and setting of Brentford station and to widen the pavements of Half Acre with extensive planting.**

## SUMMARY AND CONCLUSIONS

**We note that the proposals for the Great West Corridor rest on a series of assumptions which may not be achieved.**

1. Funding is not in the control of the LPA.
2. The GWC is not on the Queen Elizabeth Line, but can be connected to it by rail projects which might be operational in the medium to long term.
3. The development sites are spread out (east/west) so that the various sections would each require infrastructure to be operational before that section could be developed.
4. The capacity of the sites within GWC area falls short of the Mayor's targets if all the acceptable schemes were built to the figures given.
5. If due regard was paid to the need to avoid harm to heritage assets some of these sites would have less floorspace than that shown.
6. If no residential development was permitted on sites adjacent to the A4 and A406 there would be a further loss of residential capacity

**We conclude that the sustainable capacity of the GWC is significantly below the target set by the Mayor and that by virtue of its position it would require extensive infrastructure investment which might not be justified if targets were not met. As a consequence, we submit that the proposals, as they stand are not sustainable and the plan is unsound.**

Yours sincerely

BCC 862a, 820 attached

Denis Browne,  
Chairman, Planning Consultative Committee  
Brentford Community Council