

Denis Browne, Chairman
Chatham House
15 The Butts
Brentford
Middlesex TW8 8BJ

Chris Smith, Policy Planning Unit
REDe. London Borough of Hounslow
by email

DRAFT revised 29 01 16

BCC 757 February 2016

Dear Chris Smith,

THE GREAT WEST ROAD CORRIDOR PLAN. ISSUES PAPER DECEMBER 2015

Thank you for presenting the Issues document and background papers to the BCC on January 11th 2016. We have now adopted the following views which we ask you to incorporate into the next stage of the emerging plan.

At your request we have also completed your questionnaire so that our responses should be read with this paper.

GC.1.General Comments.

GC.1.1. As stated in the introduction (page 5, para 3) "These ten issues do not stand alone, they interact and are often dependent on one another" and they must be seen in the context of the adopted Local Plan.

Our comments have, therefore, started with our general view.

GC2. The Relationship of the Corridor Review to the Borough Local Plan.

GC.2.1. Policy SV1 in the Local Plan (2015) states "that we will work with residents and stakeholders to explore and identify the potential capacity for additional employment and mixed use development along the Great West Corridor and co-ordinate its regeneration.

GC.2.2. The Local Plan also states at para 2.37 that one of the eight objectives of the plan is "to maintain our town centres as a focus for the community and to attract investment, through an improved retail and service offer, new leisure and cultural facilities and new residential quarters. Advanced public realm and environmental improvements will also help to build their identity".

The spatial strategy for Brentford (Local Plan page 40 para 2.52.2) states that "we will achieve this by Regenerating Brentford Town Centre as a vibrant district centre, reconnecting the High Street with a wealth of historic assets....."

GC.2.3. The Spatial Strategy diagram on page 41 shows all Brentford retail located in the High Street and the whole of the Great West Corridor lined with employment sites (with no residential or retail proposed).

GC.2.4. It is noted that although the Council own much of the site for the first phase of the South Side of the High Street development and planning consent for retail and residential development there has been granted there are no signs that this scheme will be built out soon.

GC.2.5. it is understood that the only super market in the High Street may close.

GC.2.6. Meanwhile retail outlets proliferate on the Great West Road. These include a recently revamped Home Base, a super Tesco, enlarged with a mezzanine, carpet and car outlets and a Curry store, again with a new mezzanine.

GC.2.7. Clearly there is far more retail on the A4 than on the Brentford High Street. So it is not surprising that Brentford "underperforms" (see policy TC2 para 3.8)

Before any plans for developing the Great West Road further are adopted the Council should demonstrate its real determination to make Brentford "a vibrant district centre" by prioritising it over further development on the Great West Road.

GC.3. General Response to Corridor Issues Paper.

GC.3.1. It has been made clear that sustainable development depends on the inclusion of significant residential development to "enable" viability to be achieved. This has been demonstrated by the recently approved Brentford Football Club scheme and from the draft proposals for the adjacent mixed development, which includes the proposed bus garage.

GC.3.2. However, the plan area includes some of the highest pollution levels in the borough (issue 6). The papers do not show how these high levels of pollution can be reduced to acceptable levels before further residential is built.

We consider that the present high pollution levels makes all the A4 sites unsuitable for residential development, particularly those in or close to "Kew Gate"

GC.3.3. Reliance on "winter gardens.... or buffers for amenity space... or green walls.." (page 18 para 3) will not provide a pollution free environment for children who go to school locally or for their parents who need to shop and move round the area freely.

GC.3.4. **The Site Capacity Study** indicates that up to 1560 new flats could be provided, adding a further.4,000 to the population of Brentford of which about 400 might be school age children.

GC3.5..It now appears that pre-application discussions are proceeding for further residential developments which would further increase the residential population. This would further increase the need for infrastructure.

GC.3.6. But the only potential school site indicated is a possible 6FE school on isolated land north of the A4, presently occupied by industrial premises and a waste disposal plant. This would need to be relocated in another, unspecified, part of the borough.

GC.3.7. Nor is it clear where the local shops and facilities could be located. Brentford is already seriously short of services and amenities. The Site Capacity Study proposes to demolish most of the existing provision so that they can be re-built in high density mixed development schemes. This would deprive residents of more facilities while these developments are re-built.

GC.3.8. Nor how vehicles could move or be parked if any new development was permitted before the transport improvements proposed in the issues paper and in the quoted (p 16 para 4) **Strategic Case for Transport Investment Study**" are in place. It is already clear that traffic movement is difficult and sometimes grid-locked.

GC.3.9. No proposals are included in the plan for improving the capacity of junctions or major roads which can be achieved during the plan period.

GC.4. Overall Conclusion.

The plans for the Great West Corridor have not been properly balanced with those required to ensure that Brentford becomes a vital centre.

The plan proposals are unsustainable and would not form the basis for co-ordinated development which could be secured in the plan period 2016/2030 because;

Commercial development must **follow** major transport improvements which will require most of the plan period to complete.

Any residential development must **follow** improvements to air quality, infrastructure and facilities, transport capacity and additional schools which will all take a substantial period to complete

And that life in and around Brentford will be unsustainable for existing and new residents and enterprises if development is permitted before the necessary measures are in place.

Turning to the specific issues:

Issue 1. The Extent of the Great West Corridor.

1.1. The corridor should be limited to the sites required for Commercial development adjacent to the A4. It should not extend west of Syon Lane nor east of Power Road. It should not include the low rise, terraced, residential areas north and south of the A4 nor Brentford Town Centre.

1.2. We accept that areas outside the limited corridor may be affected by the development plans and due regard should be had to any adverse effect corridor development may have on character areas, conservations areas, the setting of listed and locally listed buildings, more distant historic estates like Gunnersbury, Boston Manor, Syon or Chiswick House, the World Heritage Site at Kew nor the area around Brentford Town Centre.

1.3. Development outside the immediate A4 corridor should preserve the predominantly Victorian street pattern and grain. The plan should ensure safe and easy movement across the A4.

1.4. We reject the suggestion that the Council should urge the Mayor to nominate any part of the study area as a potential Opportunity Area.

Issue 2. Strategic Vision and Key Diagram.

The Brentford Spatial Strategy Diagram includes all the area identified within the boundary set out as issue 1 except for Brentford Dock, which is an essential part of the context for Brentford Town centre.

We note that the diagram shows:

2.1. The A4 lined with employment sites. We endorse the exclusion of residential or mixed uses as the sites are so polluted (issue 6). We understand that the background employment paper will not be ready for consultation before February 22 so it is not possible to comment on the demand for employment development nor the amount of land that may be required during the plan period.

2.2. We know from past experience that office development on sites like Alfa Laval and the Great West Quarter were found not to be viable as access was so poor. Turning to the background document: **"The Golden Mile, Strategic Case for Transport Investment"** page 27 para 5.22 the PTAL with scenario C(A+B) is stated to be:

Blue Sky	existing ptal 1	final ptal 2
B Lock north	" " 2	" " 3
Kew Gate	" " 3	" " 4.

It appears that the extensive work proposed under issue 4 may not improve PTAL ratings enough to encourage sustainable development on all the proposed employment sites.

2.3. We are concerned that parts of the existing residential areas are shown in pink, while others are not. If the intention is to indicate that the Syon estate, north of London Road and parts of the residential area east of Ealing Road should be demolished and redeveloped at higher densities we would ask that this intention should be dropped and that all existing residential areas in this diagram should be shown un-coloured.

2.4. We note that no school sites are shown. School sites in Brentford were shown on the draft versions of the borough Local Plan. Unfortunately Griffin Park was omitted in the adopted plan. It should be reinstated here. Opposition to a school site on the Brent Lea Rec was aired at Cabinet and the Scrutiny committee, but no alternative site is shown. The established school site at Commerce Road is also omitted. Although the background paper on schools in the Great West Corridor area will not be available before February 22.

it is clear that there would be a demand for additional schools in the plan period which should not be sited on POS or MOL at a time when most new homes will be in high rise flats. (See para 8.4/10 below).

2.5. We note that no open space is shown south of the A4 where most Brentford people live.

The plan should show St Pauls, Waterman's Park and Brent Lea Rec as POS and should examine areas of open space deficiency and make proposals for additional open space to meet London Plan guidelines.

2.6. Heritage: The plan shows Gunnersbury House and Boston Manor House, but fails to show the Steam Museum (Grade 1) or the buffer zone of the Kew Gardens World Heritage site.

Further heritage assets like CAs, listed and locally listed buildings should be indicated on an appropriate map and policies should ensure that their character and setting are fully protected.

2.7. This diagram should include the Gillette listed building as its tower is an important landmark which should not be compromised by any high buildings which would affect it's setting.

2.8. The marking of pedestrian routes is welcomed. It should be noted that the numerous crossings of the A4 at grade will further delay traffic and reduce the capacity of the corridor. Additional delays will occur on match days when 20,000 fans arrive at and leave the stadium.

2.9. Para 1 refers to the Vision behind this plan. While it is widely recognised that visionary plans like Brasilia or Chandigarh capture the imagination around the world, a vision which is not based on a real understanding of what is required and what will be appropriate in a particular location can be more of a liability than an asset. There seems to be a real possibility that the vision behind the Great West Corridor is faulty, given that it proposes high density development when public transport is so poor, where air quality may pose a threat to the lives of children and where the demand for new commercial development requires such extensive promotion.

Issue 3. Achieving Economic Growth.

3.1. The background paper on employment will not be available for consultation until after February 22 so any comments made at this stage may be premature.

3.2. The Great West Corridor includes valued employers like Glaxo Smith Kline and Sky, which local residents would wish to see expanded as sustainable Brentford enterprises. It also includes many small scale workshops and warehouses north of the A4 which are apparently threatened by this plan.

3.3. ***The BCC would hope that the plan could be modified so that both elements could be retained.***

3.4. It is noted above that the PTAL would remain low/medium even after all the improvements proposed at issue 4 (below) have been completed and that office sites for other enterprises would probably not be sufficiently accessible to encourage investment, given the poor history these sites have had.

3.5" Page titled: "Delivering For London"states "The Golden Mile Site Capacity Studys: "Approximately 17,782 new jobs in addition to 12,,058 existing jobs (HCA Employment Densities Guide Second Edition 2010..." The source quoted is not among the consultation papers and it is not clear how "new" and "existing" jobs are defined.

3.6. The employment benefit attributable to this plan might be clearer if a comparison was made between the employment which will be generated from the consents already given (including the outline consents for the Sky campus) and the additional jobs which would be created by 2030 if the plan was approved and built out. In making this calculation it would also be necessary to deduct the jobs relating to the existing employment sites including the small industrial units and the many car outlets which are to be demolished and re-built.

Issue 4. Creating Transport Connections.

4.1. Para 1 of the issues paper emphasises that public transport (PTAL) is poor or very poor. It is noted in para 2.1 (above) that after all the proposed transport improvements have been completed the PTAL would only slightly improve to give poor to medium.

4.2. It would therefore seem inappropriate to call the proposed transport investment "game changing".

4.3. None of the transport improvements described are under the control of Hounslow Council and none can be totally relied on. The plan period is from 2015 to 2030 so that transport improvements would have to have been completed well before the additional workers/residents are there to use them.

Building new employment or residential development before the transport infrastructure is in place would cause serious congestion which would be unacceptable to existing residents and to the emergency services.

4.4. It is noted that the proposed terminal for the Skyline link service would be located north of the A4. While this may be convenient for both Sky and Glaxo staff it is not easily accessible for most existing residents nor for workers in the proposed "Kew Gate developments.

It is suggested that the line should be continued south of the A4 with a terminal west of Commerce Road near to London Road.

4.5. The advantages of linking the Great West Corridor to Old Oak Common are set out in the issues paper and in "The Strategic Case for Transport Investment". However the WSP paper, which considers the possibility of running four trains per hour on this line, is not available for consultation at this time.

4.6. We would support, in principle, any proposal to make it easier for staff at Sky to walk to the Piccadilly line. It is also understood that there are plans to improve the capacity of the over-crowded Piccadilly line trains which serve all the Heathrow terminals.

4.7. We welcome, in principle, improvements to the cycle ways along the A4 especially if this improvement would be an alternative to earlier plans to introduce cycle routes through Brentford Town Centre.

We would ask that special care is taken in the design of these routes as there was a fatal cycle accident when a motorist on the A4 turned off and hit a cyclist coming along the cycle route in the opposite direction.

4.8. Item e (issue 4) talks of "improvements to the transport infrastructure", but these are not clear. The back up paper "Strategic Case for Transport Infrastructure" page 33 "Constraints Identified in Transport Assessments" shows pinch points on the A4 and at Chiswick roundabout. However, it does not show the numerous at grade pedestrian crossings shown on the Brentford Spatial Strategy diagram (issue 2) nor is special note taken of the effect on traffic of the patrolled crossings at Chiswick roundabout on match days. But the papers also make no mention of the congestion problems which already exist at the intersection at the approach to Kew Bridge. This junction will be increasingly effected by the high density housing for St George, St James, BFC and others who already have planning consents and will be exacerbated by any further development in east Brentford.

Issue 5. Achieving Additional Housing Growth.

5.1. This issue is supported by "The Golden Mile Site Capacity Study, Final Report" which clearly states that it is "envisaged to become a new Opportunity Area for London".

5.2. The Mayor defines Opportunity Areas as "a major source of brown field land which has significant capacity for development, such as housing or commercial use and existing or potentially improved public transport. Typically they can accommodate at least 5,000 jobs, 2,500 homes or a combination of the two, along with other facilities and infrastructure"

5.3. The much quoted Old Oak and Park Royal OA with access from HS2 and Crossrail has an approved framework for 65,000 new jobs and 25,500 new homes.

5.4. Comparing the Mayor's typical expectation for OAs it is clear that The Great West Corridor is in another league. There are no brown field sites without planning consents, the PTAL would remain low/medium even if all the transport investment is completed. The job and new home increases which would not come forward without the plan are minimal in comparison to his targets.

5.5. Sky. Page 14 of the study shows housing on the north side of the railway behind the A4 frontage. This small site would be isolated. Access to shops and schools would be difficult.

5.6. Brentford Lock North (page 20). The plan shows the Commerce Road Isis development (under construction) and further housing north of the railway line. Again this is a small isolated development, but if the bus depot/ school proposal is realised there may be an accessible school and some corner shops for these residents.

5.7. It is not clear whether there are realisable plans to demolish the existing industrial and commercial buildings between Commerce Road and the rail embankment.

5.8. The aerial view of Brentford Lock north shows the recently renovated high rise "Great West House" at the SW corner of Boston Manor Road and the A4 being demolished to make way for a much higher tower (possibly in the order of 35/40 storeys. It has already been demonstrated that the 22 storey oval tower in the nearby Great West Quarter is visible from great distances and is causing "harm" to the setting of the Grade 1 Syon Park.

The proposal to rebuild Great West House would be totally unacceptable as it would cause further material harm to the setting of the Butts CA/listed buildings and by virtue of its height would also be affect the setting of many other CAs and listed buildings (probably) including Kew Palace and Gardens, Syon Park, Boston Manor and Gunnersbury.

5.9. The "Visualisation" for Brentford Lock North appears to show the view looking east along the A4 just west of the existing bridge over the Brent. As the proposed train terminal (see para 4.4 above) is just off the left side of this view the area would have to accommodate the main access from Brentford to the new station passing under the A4 unless the suggestion (also in para 4.4 to extend the line south to Commerce Road) was accepted.

5.10. The para "Towards Delivery" refers to the "initial consultation with stakeholders...." It should be made clear that these consultations were only held with companies (listed in Appendix 01 Site Capacity Study) who might be interested in investing in the area and very deliberately excluded rate-paying residents.

5.11. There has been much local annoyance that this part of the plan has been called Kew Gate. It clearly stands between Brentford and Chiswick and should have a name appropriate to a site north of the Thames. One possibility might be "East Brentford"

5.12. The "Kew Gate" proposals are not centred around Kew Bridge Station, which is at the southern edge of the area. Perhaps the centre is the proposed "Eye Space" east of the new stadium site. We understand that the site immediately west of the "Eye" will be a new bus garage rather than the residential "petals" shown.

5.13. It is understood that the plan proposes to demolish the existing Fountain centre/pool and to replace it in a larger mixed use building. It is not clear whether the expanding population will enjoy more facilities than now exist nor what facilities will be available during the period this complex building is built.

5.14. The para "Indicative Urban Structure" describes "improved public transport including..." The Golden Link . The proposed rail terminal is north of the A4 about a mile to the west (see para 4.4 above), A new Lionel Road Station appears to be on the site of the BFC hotel and is not included in the list of "new transport connections" set out in "issue 4" and "improvements to Lionel Road South which already have planning consent.

5.15. The first visualisation (from a point shown on the plan) appears to mis-represent buildings which now have detail planning consent. It would help if they could be shown correctly. The location of the second is not clear.

5.16. The para on "Heights" is not clear. It suggests that "taller buildings are proposed to mark prominent gateways" The term "gateway" has been used by every applicant for planning consent. Clearly it would have value if its use was very limited and if a real transition in urban grain took place at the gateway.

5.17. "The new Icons" Some of the buildings in the A4/M4 corridor are distinguished by good design like the Glazo-Smithkline HQ. Nearly all these buildings suffer from having no urban design context. It would appear that if this plan was implemented the new buildings would each seek to grab attention from its neighbours and the plethora of advertisements. What is needed is not "new icons" but an urban design of quality.

5.18. "Mix of Uses". We would agree that it is normally desirable to create urban spaces which are not "deserted in the evening" but in this location "air quality is a particular constraint" (see issue 6 page 18 para 2 and page 19 diagram). It is not a suitable location for housing, schools or amenities.

5.19. The concept of a "Development edge" which acts as a protective barrier" is not sustainable. In real life people use their homes, their balconies, their parks, their schools and their amenities. If these are in a highly polluted area ingenious designs will not allow them to live a full life and bring up their children in safety.

5.20. "Taking advantage of fantastic views across Gunnersbury Park" also means that the many users of Gunnersbury Park, which is undergoing a costly restoration scheme promoted jointly by Ealing and Hounslow, will be unable to avoid the new buildings which do not enhance the park.

A better policy would be to keep all buildings facing the park to the height of mature trees.

Issue 6. Environmental Quality and Enhancing Open Space.

6.1. The paper identifies air quality as a "particular constraint", but then proposes development where both workers and residents would be exposed to unacceptable conditions unless they always remained inside air conditioned buildings. But the plans show amenity areas, open spaces and facilities which must be reached outdoors on foot. There must be a particular concern for children growing up on these conditions.

6.2. Additional development will lead to additional movement. While it could be true that "improved public transport" (para 2) may reduce (the additional) pressure on the highways network" it is unlikely that the proposals will result in a net decrease. The consequence of additional traffic is a further reduction in air quality. This consequence would be likely to continue until large numbers of vehicles (understood to be less than 1% in 2016) are converted to electricity. There appears to be no evidence to show this could occur in the plan period.

6.3. The suggestion that "the use of winter gardens on the facades of buildings adjacent to the elevated M4 to provide a buffer as well as amenity spaces for residents" (para 2) would be a sufficient measure to allow development close to the corridor is clearly ludicrous. These flats will be used everyday by families with young children who will need to be protected from the effects of poor air quality inside and outside their homes.

6.4. Para 3 describes the open spaces close to the A4. It is certainly true that the Thames edge and Gunnersbury Park are valuable assets. It is to be hoped that the Thames Riverside Path (see Brentford Spatial Strategy Issue 2) will be completed during the plan period and connected through Syon Park to Old Isleworth. Connections to Gunnersbury Park involve at grade crossings of the A4, which is a 40mph 6 lane dual carriageway. Because of these access difficulties much of the plan area is in an area of public open space deficiency.

The plan should plot the deficiency areas and show proposals which would eliminate them.

6.5 We understand that the Brentford Town Centre scheme includes a district heating system which could be expanded.

Issue 7. Promoting High Quality Design and Conserving Heritage.

7.1 Para 1 refers to the history and character of the Great West Road. The vision of re-building large parts of the GWR sites with higher buildings could conflict with the character, scale and setting of the former "art-deco factories" which remain.

It is very important that any new structures conform to an urban design concept which retains these buildings and complements them with new structures which remain secondary to them.

7.2. "the road sits within a historically sensitive part of the borough" and should include a map marking all the listed, locally listed buildings and estates and conservation Areas as well as the buffer zone for the Kew World Heritage Site.

No development should harm CAs or the setting of listed buildings. In the case of very high schemes (see para 3) the "harm" may occur at a considerable distance from the site.

Issue 8. Community Infrastructure and Local Services.

8.1. Before any consideration is given to the need for additional infrastructure a review should be undertaken of the needs of the existing population and workforce. The BCC has long been arguing that recent planning consents may have provided financial support but not land to enable adequate shops and services, health, education, police, open space, leisure, fitness, cultural and transport needs to be met.

Sites needed to remedy these existing defects need to be identified in the plan review and be protected from other development.

8.2 Additionally we support (para 2) the statement "that to be a successful place to work, live or visit it must have the right mix of community infrastructure to serve its residents, worker (and visitor) population.

8.3. It should be noted in the plan that Brentford could become "a destination of choice" as it already has a number of hotels, museums, river and canal side amenities and that it is surrounded by high quality open space.

The plan should promote the river path, include a footbridge to Kew Gardens at Ferry Lane, support the extension of the World Heritage Site to include Syon Park and add to amenities in the town centre.

These should include a re-designed phase 1 of the development on the south side of the High Street, which includes a state of the art Centre to replace Watermans, providing cafes/restaurants/art gallery/library/bookshop/youth club and, if possible a skating rink next to the main supermarket so that it was fully integrated into the new town centre from the outset.

8.4. Reference is made to the need for school sites and we await the paper (in February) which may supply more details. Brentford has recently benefitted from emergency measures to enlarge existing schools so further places will need to be provided on new sites. The unresolved debacle over Brent Lea Rec (and the recent agreement to allow a 6FE school in Osterley) show how difficult it is to plan for the additional school sites which will be needed during the plan period.

8.5. ***The BCC believes that it should now be possible to assess the need for additional school places generated by new housing schemes which have already received planning consents plus any additional housing development which may included in the Review Plan.***

This would be the basis for an estimate of the growth of the school age population during the plan period.

8.6. It is clear from the debates in the Cabinet and Scrutiny Committees that the additional school sites should not be on public open space (POS) or on Metropolitan Open Land (MOL) and therefore sites which have housing consents or which might be suitable for future housing proposals should be designated for future schools and be identified and reserved in this plan.

8.7. In order to meet this need some compromises may be necessary such as providing schools on twin sites (like St Paul's Primary) or providing school sites which cannot provide on site recreation, if off site facilities are close by, as might be the case with Aston Lodge (school buildings) and Brent Lea (recreation).

8.8. Griffin Park (assuming the CPO for the new stadium is confirmed) should be available for development in the Plan period.

We propose that this site should be reserved for a new school.

8.9. The Commerce Road bus depot site is expected to be released during the plan period. If phase 3 of the approved (outline) scheme was modified it should be possible to enlarge the school site so that it could accommodate a new secondary school.

8.10. When the need for school places is known, a third site may be required. One possibility might be to review the preliminary development plans for the former Police Station site and for the Morrison's supermarket site together with the bus standing area and the adjacent 4 floor maisonettes to produce a single development strategy including a site for a new school.

8.11. ***The plan must review all infrastructure deficiencies (see 8.1 and 8.2 above) and identify and protect land required to meet them during the plan period.***

Issue 9 Interim Planning Framework for Kew Gate.

9.1. Residents are concerned that the Council is considering "Interim Planning Frameworks" for any part of the Great West Corridor area. The basis of good planning is to propose area plans, which are set in the context of national,

London and Local Plans. The London Plan (FALP) was only recently approved and the Council adopted the Hounslow Local Plan in September 2015. Now 3 months later an Interim Plan is proposed.

9.2. Our understanding is that the GWR review is being carried out as a planned sequence to the Local Plan. In contrast the Interim Framework is effectively only a "planning brief" exercise which will have little or no weight when decisions on individual sites, which will be departures, are being considered by committee or on appeal. Furthermore when the public inquiry is held into the GWR plan the Inspector will be asked to require the Council to ignore the Interim Plan.

9.3. As the GWR Issues paper make clear successful development within the review area will depend on reduction of pollution, improvement of PTALs and provision of infra-structure before new development is approved. If the Interim Planning Framework is approved it may increase the probability that developments, which does not accord with the London Plan or the Local Plan are put to the council, the Mayor and the Secretary of State despite the clear fact that they are significant departures from plans adopted last year.

9.4. However the consequences of approving the Interim Framework and/or individual projects which do not accord with recently adopted plans not only prejudices the whole planning process, but it also establishes precedents. We appreciate that all applications are judged on their merits, but if adjacent developments are rejected they will be hard to defend on appeal if a similar scheme has been approved next door unless there is a fully established contextual plan which defines that high development will only be approved on specific landmark sites is in place.

Issue 10. Making It Happen.

10.1. The plan review is expected to call for more intensive development along the A4/M4 corridor. To make this happen the boundaries should be clearly drawn close to the A4 so as to ensure that no intensification is proposed in the residential areas to the north and south.

10.2 It will then be necessary to identify sites which meet open space deficiencies (relating to the existing and proposed population), to identify sites for schools (see paras 8.4/10 above) and for other infra-structure needs.

10.3 It will then be necessary to put into action measures which will significantly reduce pollution and improve air quality BEFORE any residential development is approved.

10.4 It will then be necessary to support early transport improvements. The PTALS are poor or very poor now. This might be achieved by adding bus routes, improving bus frequencies and linking as many routes to Brentford town centre as possible. Early development will otherwise increase reliance on cars and increase congestion which would be unacceptable to new and existing residents and to the emergency services.

10.5. When transport improvements have been put in place the PTALS of affected sites should be re-calculated and densities should accord with London Plan guidance related to the improved PTALS.

10.6 When these stages are complete the list of site allocations should be reviewed so that it could include sites for commercial development as well as open space, schools, infrastructure and any residential which should only be provided when pollution levels have been significantly reduced

Conclusions.

The Background papers to the Issues paper propose developments for the Great West Corridor which are inconsistent with the London Plan (FALP) the Local Plan for Hounslow 2015 which should therefore be rejected.

The proposed Interim Planning Framework provides an unacceptable basis for applications which would be "departures" from the approved FALP and Local Plan (2015).

Proposals to enable the Great West Corridor Review Plan to be achieved in the plan period will totally depend on improvements to public transport being in operation before any additional development is occupied.

Proposals to enable residential uses to be included in the plan will totally depend on significant improvements to air quality being achieved before any residential development takes place.

Proposals to include tall buildings within the Great West Corridor Area must be so designed that no harm is caused to listed and locally listed buildings and their setting, to conservation areas and historic estates as well as the World Heritage Site at Kew and more distant heritage assets.

Please will you read these comments with our response to your questionnaire.

Yours sincerely

Denis Browne
Chairman, Planning Consultative Committee
Brentford Community Council.

copies to:

Christopher Smith LBH
Brendon Walsh LBH
Members of Isleworth and Brentford Forum
Members of Hounslow Planning Committee
Members of G15+ Group of Hounslow Amenity Societies.
Ruth Cadbury MP.