

\z\Great West Corridor Local Plan Review
Preferred Option Consultation Document
Consultation Response Adopted by the
Brentford Community Council.

BCC820

November 2017.

We would like to thank you for inviting us to respond to your proposal set out in the "Preferred Option, Consultation October 2017 document". **(POC)**

1. PREVIOUS CONSULTATIONS.

The BCC responded to the consultations on the 2015 Local Plan **(LP)** and gave evidence at the public inquiry. The Plan was adopted in 2015.

The Cabinet instructed two Local Plan Reviews and the Council produced a Consultation Issues paper in December 2015 for the Great West Corridor Plan **(CIP)**.

Planning Officers made a presentation on their Issues paper and questionnaire to the BCC in February 2016.

This was supported by the paper: The Golden Mile: The Strategic Case for Transport Investment January 2015 **(SCI)** by Steer, Davis Greave.

And a further supporting paper called: The Golden Mile Site Capacity Study plus an Executive Summary 2014 **((SCS)** by Urban Initiatives.

The BCC responded to the Issues paper and questionnaire and the presentation in January/February 2016. **BCC 757 and 758** (attached).

This paper is our response to The Great West Corridor Local Plan Review Preferred Options Consultation 2017. **(POC)** which has been written in the light of former correspondence and in response to the changes made in the Review documents since February 2016. (See **POC** page 6)

2. COMMUNITY INVOLVEMENT IN SHAPING THE GWC LOCAL PLAN.

POC Page 6 states "community involvement has been integral....."

In fact after the initial issues consultation the BCC wrote two responses (BCC757 and BCC 758, attached) and we were never advised whether they had been received or what effect their detailed comments had had on the development of the plan.

POC Para 1.27 states "a number of stakeholder workshops" One was held.

That “consultation was a short workshop held this year. Most of the time was allocated to the presentation of the Concept Design Drawing 01 revision A dated 16.03.2017. and material which had previously been presented in 2016 deriving from The Site Capacity Study dated 2014.

There was no early feed back to the responses following this workshop nor any further involvement with “stakeholders” until the **POC** document was put out for a six weeks consultation period, which coincides with the consultation period of many other documents of local importance.

Local Plan Policy (**LP**) SV1 states “we will work with residents and stakeholders to explore and identify the potential capacity for additional employment-led mixed use development....” Clearly this has not happened.

3. THE STUDY AREA BOUNDARY

Drawing no 4147_20170125 prepared by Urban Initiatives Studio on February 27 2017 shows a boundary for the Study Area, but does not state whether this is the proposed boundary for the Great West Corridor Local Plan Review.

Local Plan (**LP**) page 41 shows a Spatial Strategy for Brentford indicating that the whole of the corridor would be designated for Employment without specifying a precise boundary.

Local Plan (LP) page 10 Policy SV! Shows no boundary.

In February 2016 it appeared that most of Brentford might have been included within a proposals map.

The BCC and other local bodies constantly urged that the part of the Great West Corridor which was not in Brentford East nor in the Sky Estate should be restricted to the sites directly fronting the A4.

No explanation has been given why the present proposals should occupy the part of the Study Area as defined by Urban Initiatives.

We were pleased to note that the boundary of the study area shown on Fig 4.1 on page 38, excludes all the residential streets north of the A4. We assume that the boundary would follow the same line.

We are concerned that the boundary area shown on Fig 4.1 does include similar residential streets south of the A4 and north of the railway line. These streets have been the subject of Character Area studies and are candidates

for Conservation Area status, being contemporary with and similar in scale and character to the terraces included in the St Pauls CA.

Although it is understood that it will not be possible for the Council to consider designating new Conservation Areas before the Local Plan Review has been adopted it is necessary to ensure that the character of these streets is not harmed by development within the GW corridor.

The BCC requests that the boundary for the central section of the Local Plan Review should be drawn one block south of the A4 to exclude these residential areas.

In addition it will be necessary to ensure that any high rise development within the corridor is not sited so it can harm the character of the residential areas to the north and the south of the Review Area.

Specific policies to protect the scale and character of the residential streets north and south of the Corridor should be written into the Local Plan Review..

4. CHALLENGES FACING THE GREAT WEST CORRIDOR.

POC Para 2.16 correctly states "Any significant employment growth is dependent on significant improvements in public transport to access the area....."

The BCC has witnessed repeated employment planning applications being granted on A4 sites which have remained un-built or un-let as access is so poor.

The Great West Quarter site on the A4 was originally intended to be for employment uses only. The approved scheme with over 700 flats was nominally "employment led" as it included hotels and the developer's own offices.

(POC) Paras 4.72/4.78 describe the poor access in more detail.

The proposed remedies set out on **POC** page 71 are limited to the Council SUPPORTING action by others to improve public transport and access.

It is not clear what firm commitments there are to DELIVER transport improvements during the plan period 2015/2030.

It is understood that TfL are not presently able to give any commitment to fund and progress the transport initiatives proposed and that they might have to rely on money from developers generated by high density development. This was the method used to fund the extension to the Northern line extension from Kennington to Battersea.

In fact the nett effect of all the changes currently being proposed in the area could increase congestion, reduce accessibility and increase pollution. These include:

1. Proposals to reduce road capacity and to introduce cycle Superhighway 9.
2. Traffic increases on the north/south Circular Roads and A4 resulting from progressive increase of the Central London Clean Air Zone to the n/s Circular Road.
3. Extra traffic if 3rd runway is approved at Heathrow.
4. Delays already calculated by TfL following the build out of the Brentford Stadium + flats.
5. Concentrated development in Brentford East contemplated in the Brentford East SPD.

5. OPTIMISING HOUSING GROWTH.

POC Para 2.17 rightly states that “residential conversion of office buildings through utilising permitted development rights is a threat to the commercial activity in the area”.

The history of under-funded or un-let commercial buildings on the A4 makes it a very real possibility that planning consents for further office buildings granted before public transport has been substantially improved will lead to further conversions of commercial sites for residential uses.

The BCC considers the final Local Plan should state that sites which have low PTaL ratings at the time an application is lodged should normally be refused.

We note that “The London Plan requires Hounslow Council to ensure delivery of at least 822 homes per annum” (**POC** para 219) and it is not clear whether this requirement would be for each of the years 2017/2030 totalling 10,686.

The proposal to raise the borough target to 2100 homes per annum may not be realisable without still higher densities in areas like the GW Corridor and further incursions into the Green Belt and MOL.

It may be necessary for Hounslow Council to spell out their limited ability to house ever more housing in a built up borough and to urge the Mayor to seek

Regional policies to locate new development in planned urban expansion and New towns in the region.

In general terms the obligation on Hounslow to provide more housing sites can be met in many different ways. Before setting a target for new housing in any particular area the Council should demonstrate that suitable housing at reasonable densities for all incomes with all the facilities residents require can be provided in any area put forward.

There appears to be no demonstration that the Great West Corridor has the capacity to house specific population growth at acceptable densities together with all the requirements for infrastructure and social amenities which would be required.

POC Para 2,16 states "any significant employment growth is dependent on significant improvements to public transport to access the area".

The BCC considers that successful development will depend on and must only follow after access has been significantly improved.

We do not accept that there is a demand for "people to live close to their workplace" (see POC para 2.19 line 14) which would lead them to prefer a flat close to these major roads.

The applications which have been put forward are for studio and 1 or 2 bedroom flats, which are not defined as family accommodation in the London Plan. Family accommodation is what is needed, together with gardens or open balconies, parks, schools and shops.

It is recognised (see POC paras 2.20/23) that these major roads are the source of the highest levels of pollution in a borough where unacceptable levels of pollution prevail.

We do not accept that "design mitigation" see para 2.23 is an answer. It would require residents to live entirely within closed homes, which depend on forced ventilation. It takes no account of how people live. In reality people need to visit parks, schools, shops and neighbours in an unpolluted atmosphere.

The BCC considers that sites close to the north/south Circular Road and the A4/M4 Corridor are unsuitable for residential development.

6. PROMOTING HIGH QUALITY URBAN DESIGN AND CONSERVING HERITAGE

POC paras 2.26/29 rightly praises those Art Deco buildings which have survived. It does not go on to propose that the scale and mass of these buildings are as important as their decorative features, nor to propose that new buildings which could affect their setting should be subservient to them.

(POC) para 2.30 correctly states “Modern tall buildings... (could adversely effect)... vistas from Kew Gardens...”

In our view this has already been demonstrated by the tower in the North West Quarter, which “harms” views from Kew and Syon Park, both Grade I heritage assets.

The BCC would object to any policies which promoted tall buildings which could harm views from listed buildings or Conservation Areas.

The importance of preserving the setting and the view out from and towards listed buildings was brought out in the consideration of the listed Gillette building. This issue is relevant to all development in the Review Area and should be protected by specific policies.

7. ADDRESSING CHALLENGES

POC para 2.31 lists 5 challenges without suggesting how any of them could be met.

1 & 2.. It is not clear how “public realm improvements” could remove the dominance of the car nor how ribbon development along a major radial road could have “attractive frontages”.

We recognise that when a greatly improved public transport system is in place less journeys need to be taken by car. But we also appreciate that the A4/M4 is the major west radial to Heathrow, the Golden Triangle and the west. It is likely that more development will result in more vehicles. even if major measures to transfer journey modes can be achieved within the 2015/2030 plan period.

Short of measures, like putting the A4/M4 into tunnel, any development along the Great West Corridor will have to find design solutions which accept that they are the modern equivalent of ribbon development.

In our view the most successful building in this regard is GSK, which is set back from the highway behind multi-level parking and landscaping. To follow this example would require lower density development.

3. Creating a distinctive arrival experience.

A number of new buildings have been built along the A4/M4 corridor which each seek to grab the attention of passing motorists. In addition, these roads are now overwhelmed by excessive advertising, which is high enough to be seen from the M4 viaduct.

What is needed is a coherent design code for new buildings so that they respect our heritage and accept an agreed design discipline.

The concept of a Gateway Feature has been used by every applicant for a major development. It should NOT be an objective in this plan.

4. Celebrating Heritage.

We support this objective. It can best be achieved by ensuring, through the plan's policies, that new buildings are subservient to heritage buildings and do not adversely impact the settings and views of heritage assets.

5. Network of Spaces.

We support this objective. However, the Great West Corridor should be seen as part of Brentford. The network of spaces should relate each part of the Corridor to Brentford Town Centre.

Local Plan (LP) policy TP2 specifically seeks to regenerate Brentford linked to broader regeneration.

The BCC look for the connectivity proposed in this plan to radiate from Brentford Town Centre.

8. TRANSPORT AND CONNECTIVITY.

We note the reference to the report by Steer Davies Gleave (SDG) which also said: (Executive Summary) Only 40% of the net development potential can be accommodated by the current and planned transport network. The remaining 60% ..is dependent on enhanced transport capacity..." The report is referring to the potential for a Shuttle connection to Cross Rail.

In our view a comprehensive programme for transport improvements is needed. This would include a cycle Superhighway incorporated into the A4, a rebuild of Gunnersbury Station, a major increase in local bus services and a two way link to Cross Rail, extended over the A4 to a new station in

East Brentford and/o a further rail link to Old Oak Common, operating before new development.

The progressive effectiveness of the improved transport network would improve the PTaL rating of development sites.

The BCC asks that a specific policy is included in the final plan to ensure that applications do not normally exceed the densities set out in the London Plan appropriate for the site's PTaL at the time of the application.

We are concerned that, as (POC) para 2.38 makes clear, the "strategic infrastructure projects are only now "being assessed for viability and feasibility" It is not clear how much time would be needed to progress this project. Our concern about TfL's ability to fund this work is set out in para 4 above.

We have been advised that the proposed Shuttle might be a tram which would require lighter rolling stock which might also reduce the cost of doubling the track and/or extending it over the A4.

We have also been advised that the boroughs are working together to promote the proposed Orbital Route to Old Oak Common. As rail investment priorities do not favour London schemes it was not clear whether it would be possible to open this services before 2024 which is thought to be the earliest possible date.

The major roads in the Corridor study area are already heavily congested. If road capacity is reduced, or traffic demands increase gridlock will follow.

It is of paramount importance that new developments are NOT approved BEFORE actual PTaL levels have been improved.

9. THE SPATIAL VISION.

We ask that the Spatial vision should include a specific reference to Brentford Town Centre.

Plans for development along the Great West Corridor can have a crucial impact on the successful regeneration of Brentford Town Centre. See (LP) Local Plan Policy TC2.

At the moment there is more retail space along the A4 than there is in the town centre. If you include Tesco, which is on the edge of the Corridor, the major centre is Tesco. With Morrison's due to close in 2018, Brentford will be increasingly dependent on Tesco in the next few years.

After that the new shopping on the South Side of the High Street and on the rebuilt Morrison site needs to be reinforced by policies in the Great West Corridor area which support the regeneration of Brentford Town Centre as a priority.

(POC) page 38. We are concerned that these objectives may lead to the removal of the substantial industrial estates north of the A4 which provide services to this part of West London.

We understand that the Preferred Option envisages rebuilding these estates with housing above the industrial and warehouse sheds.

In our view light industrial estates, which are of great importance to the area are incompatible with residential development.

We note the list of objectives set out on pages 38 and 39, but we do not see any policy commitment to ensure that they are achieved BEFORE new development is permitted.

10. SPATIAL POLICIES: HOUSING.

(POC) Para 4.7 states that the "Great West Corridor has been identified as a potential "Opportunity Area (OA) or an "Intensification Area".

At the present time the area is not included in the 38 Opportunity Areas across London nor in the 7 Intensification Areas.

Nor does the corridor have the capacity required if heritage assets are to be respected, if homes were provided which do not depend on artificial ventilation and if housing accorded with densities which pay due regard to realistic PTaLs.

These constraints would restrict the capacity of the corridor so that it would not reach the targets set by the London Plan for Opportunity Areas which are defined as:

"Opportunity Areas are London's major source of brownfield land which have significant capacity for development such as housing or commercial use – and existing or potential improved public transport access.

"Typically, they can accommodate at least 5,000 jobs, 2,500 new homes or a combination of the two along with supporting facilities and infrastructure.

The Great West Road Corridor area has no brownfield land apart from the area being developed for the Brentford Community Stadium for which detail planning consent has already been granted.

Nor does it have any firm plans for improving public transport access within the plan period.

Nor would it have the capacity for the minimum development requirements for an Opportunity Area if due regard were had for the limitations which respect for heritage, regard for pollution and a proper relationship between realistic PTaLs and density were observed.

Intensification Areas are defined as:

“built up areas with good existing or potential public transport links and can support development at higher than existing densities.

“They have significant capacity for new jobs and homes at a level below that which can be achieved in an Opportunity Area.”

It is noted that there are no specific criteria for Intensification Areas. It is therefore suggested that a full description of the seven Intensification Areas in London should be included as an annexe to the plan to demonstrate that the Great West Corridor could meet the real criteria which have been met in each of these areas.

(POC) Para 4.9 refers to the need for affordable housing. It should be noted that virtually all the housing which has been given planning consent in the Corridor Area in the last few years has not included any affordable housing. This has come about because the area includes major schemes like the Brentford Football Stadium. The Planning committee has decided that “on balance” the omission of affordable housing was appropriate because valued market housing could cross subsidise the stadium. Clearly, if this practice continues, little provision will be made for affordable housing.

We understand that the Mayor has now established a unit to check that where less than 35% of housing is affordable is proposed the quantum is acceptable.

(POC) page 49 states “We will seek to optimise the supply of housing in appropriate locations”

The wish to secure housing in “appropriate locations” cannot be relied on as government policy allows unsuccessful office schemes to convert to housing as a right.

Nor is the word “optimise” appropriate if due regard is had to the views we have set out in Para 10/2 above. What is needed is a balanced assessment of each site’s development potential in line with Development Plan policies.

(POC) Page 49 para c states “....minimum target of 4,800 sustainable new homes over the plan period...”

In para 5/4 (above) we have estimated that the GLA target for Hounslow over the whole of the plan period would be 10,686 new homes. We would like confirmation that this figure is correct. This was based on 822 units p/a. If the target is agreed at 2100 p/a the problems will be further aggravated.

Even assuming 822 is correct and the proposal is that the Great West Corridor would provide 45% of all the new housing in the whole borough over the plan period it needs to be demonstrated that the GW Corridor has the capacity required.

In view of the size of the borough and the limited area available for development in the Corridor we would look for a full justification for that target. There is none.

Assuming that 4,800 new homes were built in the Corridor by 2030 we estimate that would add 12,000 additional people to the population of Brentford in the Corridor alone.

In addition, other development in Brentford, which is in the planning system now could add to this figure.

Among the major Brentford development sites not in the Corridor which may be built out before 2030.

Site	Approx No Homes	Residents
South Side of High Street	900	2250
Morrison’s Site	100	250
Watermans rebuild	300	750
Griffin Park	100	250
Commerce Road	300	750
Totals	1,700	4,250

Assuming all the consents are built out during the plan period the number of new homes in Brentford would increase by 6,500 and the population would increase by 16,250.

There are no figures to show what the additional school population would be, but it could be in the order of 1,625, requiring an additional 54 classrooms.

The Golden Mile Site Capacity Study 2014 prepared by Hounslow's consultant Urban Initiatives identified capacity for residential development as:

Blue Sky	150 new homes		
Brentford Lock North	560	“	“
Kew Gate*	870	“	“
			* Now called Brentford East
Total	1580 new homes.....	3,950 additional residents	

In the event that pollution levels can be effectively reduced during the plan period it may be possible to accommodate 1,580 new homes and the education, recreation and other facilities they will require.

There is no explanation in the Preferred Option document why the capacity figure for new homes in the Corridor has been increased by three times from 1,580 to 4,800. Nor is it clear what heights and densities would be required to achieve this goal on sites designated for new residential. Nor does the plan show the land required for the educational, recreational and other needs of the new population.

We are additionally concerned that further residential will be built on sites not designated for that purpose under government legislation. This may be expected to occur as developers exercise their right to convert non-residential sites to residential. If this does occur it will place further pressure on schools and medical facilities.

11. ALTERNATIVE APPROACH

(POC) Page 48 suggests that an alternative approach could be considered If “the game-changing infrastructure” is not operating within the plan period.

It explains that in that event the reduced capacity for development will be determined by “The Transport Impact Assessment”

This document is not available to us during the Consultation period (October/November 2017) so it is not possible to understand what might be proposed as the “reduced capacity” of the sites in the Corridor.

Our understanding is that if the Great West Corridor is designated an "Opportunity Area" the possibility that the Assessment Study for the single rail shuttle link to Crossrail could be progressed in TfL has the necessary funds. This could lead to a programme of investment by TfL which might result in the shuttle being operational before 2030.

If this were to happen it could be followed by planning consents for commercial and housing projects at densities which are presently unknown in Brentford and which would be more appropriate in the City or in Docklands.

And these developments could be occupied well before the improved transport system was in place.

The result could be that Brentford would be dominated by intensive development, gridlock and, higher levels of pollution.

We would suggest at a public inquiry that such a proposal would be unsound.

The Alternative Approach may also be impracticable if the Transport Impact Assessment" leads to land use proposals which do not conform with the Planning policies set out in the London Plan and the Local Plan adopted by Hounslow in 2015.

12. EMPLOYMENT GROWTH

The BCC has continuously backed the expansion of the Sky developments

We have also supported non-residential development in other parts of the corridor where they adhered to London Plan and Local Plan standards.

We would also wish to support further employment growth which followed these standards and respected actual PTALs.

However, there are no proposals in (POC) paras 4.22/25 (pages 50/55) to show how these objectives could be met if the "game changing infrastructure" (see para 11 above) was not operational before 2030 as these await the Transport Impact Assessment, which is not available during this consultation period.

13. DESIGN AND HERITAGE

(POC) Para 4.34 rightly describes the study area as disjointed. The study area consists of sites which are separated from each other by a six lane 40 mph highway, which is one of the major radials on the west of London.

Inevitably it will be divided into sections which are poorly connected. Any efforts to treat the frontages of these road edge developments as though they fronted onto a city street will only lead to chaos.

(POC) Para 4.35 rightly states that “..the corridor sits in the backdrop of .. sensitive views and development...”

The A4 rises towards Gillette Corner. The road is parallel to the northern edge of Kew Gardens + Kew Palace. Developments like the Northwest Quarter have already caused considerable harm to the WHS. Any further buildings which passed the existing sky-line could only do more harm.

The Great West Road Corridor Review Plan should include a specific policy to ensure that any development which crosses the existing skyline seen from Kew Gardens should normally be refused.

We do not accept either the “scattered” approach or the “co-ordinated” approach in these circumstances (described on (POC page 63). Neither is appropriate where buildings cross valuable skylines.

(POC) Para 4.36 describes the unacceptable clutter of advertisements. (LP) Local Plan policy CC5 is clearly not protecting the Corridor area from a plethora of advertisements, many won on appeal. There is now a prospect of much larger Lazer screens.

The BCC urge the Council to adopt a more rigorous policy than that proposed at (POC) page 59 para (p) which would have the effect of restricting consents to small screens on modest structures with low levels of illumination.

(POC) Para 4.45. We note these policies are based on detail studies and background papers. Many have not been made available during the consultation period and clearly need to be shared as they are the basis for proposed policies.

(POC) Para 4.49. Notes the lack of local open space. Much of Brentford is in an “ Open Space Deficiency Area”. The plans ought to show new public open spaces to meet the standards set in the London Plan.

(POC) Para 4.51. refers to **(LP)** policy SV1, but does not refer to Policy TC2 which (para 3.6) identifies the measures needed to promote the rejuvenation of Brentford Town Centre.

In our view much of the emphasis on the Great West Road has been to the detriment of Brentford Town Centre.

We consider that far too much retail and all of the office development which should have been located at the centre have been built in, or close to, the corridor.

The emphasis of this plan could further jeopardise the future commercial success of our centre, which could end up as a new housing development with failing retail frontages.

It is necessary to include policies and plans to support the centre. They should include:

1. Restriction on retail in the Corridor
2. Upgrade Half Acre and Brentford Station approaches.
3. Re-structure bus services to link in the town centre on more routes and connect the centre to the proposed Shuttle terminal.
4. Route cycle superhighway up A4 with a link to the town centre.
5. Promote office uses in the town centre.
6. Support designation of Syon Park in WHS.
7. Support pedestrian bridge to Kew Gardens.

We are particularly concerned about the adverse impact of these proposals on Gunnersbury Park. Hounslow and Ealing Councils are currently leading a £50m restoration of the park which is becoming an increasingly valuable open space adjacent to the Great West Corridor.

We would oppose any development in Gunnery Park and the Brentford Parks And this restriction should include any proposal to site school buildings there.

The BCC requests that the plan includes a specific policy opposing any development including schools in our Public Open Spaces.

In addition development near Gunnersbury Park and the Brentford Parks should be of limited height and bulk to ensure that no “harm” is done.

14. ENVIRONMENTAL QUALITY AND OPEN SPACE

(POC) Paras 4,53/55 well describe the problems of pollution and noise.

We anticipate that even if many journeys can be undertaken by public transport on foot or on a cycle or on electric vehicles, the location of the A4/M4 corridor will make it inevitable that traffic levels will remain high and could increase during the plan period.

Factors which make this more likely include;

1. Any reduction in road capacity
2. The completion of buildings which already have planning consent.
3. Further development to the west of Hounslow/Heathrow
4. Approving construction in the corridor before the Shuttle connection to Cross Rail is open.

In our view the plan should restrict residential development in the corridor to sites which are sufficiently free of pollution so that they do not rely on pumped air systems.

The London Plan sets space standards for balconies and open spaces and these should be as free from pollution as our homes.

We think that sites which could be suitable for residential development could be identified where they are;

1. Fully protected from highway pollution by long frontage buildings and extensive planting.
2. Deferred to the end of the plan period, by which time electric vehicles may become the norm.

We welcome the concern for open spaces, which will become an even more important resource if the work force increases and new residents will be housed in flats.

We think that the plan should set out specific policies including:

1. Reducing traffic speeds on the A4 to 30mph.
2. Introducing more traffic controlled pedestrian crossings
3. Ensuring that no schools are built in any of the open spaces or close to the corridor.
4. Redefining the boundary of the Grand Union and Boston Park CA.
5. Supporting the completion of the Thames River path with S106/CIL
6. Supporting proposals for pedestrian bridge to Kew.

15. TRANSPORT AND CONNECTIVITY

We endorse the key issues **(POC)** paras 4.72/75. However ,they do not state that acceptable development in the corridor is totally dependent on significant improvements in PTaLs

As is made clear on (POC) pages 71/72 the Council can only "support" these improvements. The project depends on them.

Even when the Shuttle is running we doubt whether the PTaL in the corridor would support the density of development proposed as “the preferred option”

Unless this can be demonstrated the Review Plan may be considered to be unsound.

To avoid this outcome the plan proposes an alternative policy option **(POC)** Page 75. This proposes increasing bus services and a cycle route.

These measures would be welcome.

However, until the Transport Impact Assessment is open for consultation we cannot evaluate how much additional development could be accommodated in the corridor.

16. PLACES POLICIES

(POC) Fig 5.3 (page 81) clearly shows a complete misunderstanding of the role and function of the Great West Corridor. The illustration shows a city road with 4/5 storey buildings facing onto it. It shows a bus lay by, which would cause havoc at every bus stop. It shows cycle routes, which are not protected from traffic turning off the road and it shows no way pedestrians can cross a six lane highway.

The design of the A4 frontages is in our view far more complex.

If measures can be taken to significantly reduce traffic volumes then it could be possible turn the A4 into a street. Those measures would be pretty drastic and very costly and we do not think they could be achieved before 2030.

A much more realistic scenario would be to set back buildings so that the full roadway made provision for:

1. Sufficient capacity for approved vehicles
2. Bus lay bys,
3. One segregated two way cycle superhighway
4. Two lines of mature trees and under planting.
5. Two footpaths with frequent signal controlled crossings
6. Service access to frontage buildings.

It is likely that this proposal would reduce the amount of land left for new development.

In our view the “approach” outlined on (POC) pages 82/84 is unrealistic.

17. EDUCATION AND INFRASTRUCTURE.

We note that a number of small sites are shown on the plans for schools.

The preferred option calls for 4,800 new homes in the plan period which could accommodate 16,000 + new residents. Up to 1,600 of whom could be of school age, depending on a number of factors. They could require over 500 new class rooms.

It is not clear what school population the plan is aiming to provide for.

In selecting school sites a number of criteria should be met including:

- 1, Suitable size sites for teaching and playgrounds
2. Site free from pollution
3. Safe access for local children
4. No sites on MOL or POS

The BCC looks for a clear demonstration that the school requirements are set out in the plan and that the proposals demonstrate how they are met.

In order to provide a full life style for the new residents a whole range of facilities from open spaces, fitness centres, police and medical support, shopping and services need to be provided.

The plan should show what is needed and how the facilities can be provided in a way which supports residents close to their own homes AND draws them into Brentford Town Centre as the focal point of the community.

18. CONSULTATION ON THE DRAFT LONDON PLAN 2017

This document was published a few days before the BCC adopted these views on our Local Plan Review.

It is understood that this plan will be subject to extended consultation during 2018 and be presented for a public inquiry in 2018/9.

The detail work of preparing the final draft of this Local Plan Review should give our Council and the local Amenity societies in the borough an opportunity to consider whether the proposed designation of the Great West Corridor as an "Opportunity Area" is capable of sustaining the high density targets proposed in the draft 2017 London Plan Review.

19. CONCLUSIONS:

The Preferred Option seeks to achieve the "Vision" with up to 4,800 new homes, with all the facilities required, to maximise employment space for up to 5,000 new jobs in a new "Opportunity Area" (to meet GLA criteria). and preserve and respect the historic heritage.

The document does not demonstrate that there is the physical room to achieve this objective.

The proposal depends on links to Cross Rail extending the existing single track link to a robust rail line over the six lane A4 to a new station near Lionel Road and/or a second rail link to Old Oak Common .

This would be a complex and expensive enterprise, which could substantially raise PTaLs on development sites and support some increase in densities.

However, it is understood that high priority will not be given to this investment unless national priority is given to development in the London Area and the area is declared an "Opportunity Area" and TfL have the resources to complete the work early in the plan period.dd

If it is declared an OA the Council would have difficulty in restraining high density development in advance of any transport improvements.

As the improvements have only reached Assessment stage in 2017 it is unlikely that they could be fully operational much before 2030.

There is a real possibility that development built in advance of transport improvements could lead to gridlock, higher pollution and slums.

The Plan also proposes an alternative approach (see para 11 above) where there are no rail links to Cross Rail, but a significantly improved local bus service and a cycle superhighway.

The plan indicates that the capacity of this scenario will depend on a Transport Impact Assessment, which is not yet available for consultation.

If this approach were to be followed PTaLs would only increase marginally and the development potential would be heavily restricted.

In both cases the BCC considers that the current draft Great West Corridor Plan fails to demonstrate that it can reach its objectives.

Yours sincerely

Denis Browne
Chairman, Planning Consultative Committee
Brentford Community Council