

## **Great West Corridor Local Plan Review: Preferred Options Consultation**

### **Comments from the West Chiswick and Gunnersbury Society**

*These comments should be read in conjunction with those submitted on the Brentford East Supplementary Planning Document.*

#### **General**

We object strongly to the designation of the Great West Corridor (GWC) as an Opportunity Area as we do not believe that it can sustain the quantum or type of development such a designation entails. This objection is strengthened by the inclusion within the Brentford East section of peripheral areas not part of the core corridor. While some of the sensitivities of these peripheral areas are addressed within the draft Brentford East SPD, we fear that such distinctions would be overridden by the Opportunity Areas imperative to deliver very high levels of development and its promotion of tall buildings (1.12)

Additional tall buildings should be discouraged from much of the GWC and, with the exception of the Eastern Gateway Landmark and the two Corridor Landmarks, excluded entirely from the area covered by the Brentford East SPD. See our detailed comments on the draft SPD.

#### **01 Introduction**

1.13 The explanation of the eventual composition of the Local Plan once the two partial reviews are completed is helpful. It is recommended that, when Volumes 3 and 4 are incorporated, a statement is provided within a revised Introduction to the Local Plan to clarify that development in the areas covered by either Volume 3 or 4 is still subject to the over-arching policies in Volume 1 and that Volumes 3 and 4 provide supplementary policies appropriate to the specific area.

#### **02 Setting the Scene**

2.0 For “Power Road” read Chiswick Roundabout”. Power Road falls outside the core Great West Corridor. As a peripheral area it is not considered suitable for the type of transformation/ scale of development envisaged for the main corridor. See our comments on 3. Study area of the draft SPD.

**Challenges** We would agree that there are many serious challenges to development in the GWC.

**Economic Growth** We endorse the points made in paragraphs 2.12 – 2.14 concerning economic resilience and the need to provide flexible and affordable work space for SMEs.

A major challenge with respect to the Hounslow economy and employment to which no reference is made is that of the **impact of the UK leaving the EU** (Brexit). As noted (2.15), large companies are footloose and those in sectors with major European and global markets may consider it advisable to relocate some or all of their UK

operations in order to remain within the EU trading and harmonised regulatory system. For example, following the recently announced relocation of the European Medicines Agency (EMA) from Canary Warf to Amsterdam, companies such as GSK may need to consider their position.

[http://www.ema.europa.eu/ema/index.jsp?curl=pages/news\\_and\\_events/news/2017/11/news\\_detail\\_002857.jsp&mid=WC0b01ac058004d5c1](http://www.ema.europa.eu/ema/index.jsp?curl=pages/news_and_events/news/2017/11/news_detail_002857.jsp&mid=WC0b01ac058004d5c1) That such consideration is necessary is demonstrated by a quick perusal of the detailed guidance provided by the EMA to pharmaceutical companies, [http://www.ema.europa.eu/docs/en\\_GB/document\\_library/Other/2017/05/WC500228739.pdf](http://www.ema.europa.eu/docs/en_GB/document_library/Other/2017/05/WC500228739.pdf)

We strongly endorse that “Any significant employment growth is dependent on significant improvements in public transport to access the area.”(2.16).

**Housing Growth** We agree that conversion of office buildings for residential use is a serious threat to the commercial activity of the GWC (2.17). Suggest this point belongs under Economic Growth. It also represents a very serious threat to the Council’s ability to control the quality of accommodation.

Should reference be made here to Article 4 Direction which will come into force in January 2018?

We consider that the GWC should remain essentially and predominantly an employment corridor (2.18); it should support rather than compete with or draw custom away from the local town centres. The immediate, working-day needs of businesses in the GWC for cafes and restaurants etc should be provided within the commercial quarters/campuses (as, for example, in the Chiswick Business Park). A more extended leisure offer is best provided by better access (especially on foot) to the existing/future leisure offer in Chiswick and Brentford town centres.

Providing residential development where it can be “sheltered from the adverse impacts of the strategic roads” (2.18) by placing it behind a protective barrier of commercial buildings might offer a solution on certain sites where the site area and configuration permits.

We believe strongly, however, that the very high levels of noise and air pollution make much of this area totally unsuitable for residential development - as is shown in the following section on Environmental Quality 2.21 – 2.24. We do not agree that design “mitigation” such as sealed windows, mechanical ventilation, winter gardens and locating residential uses above a certain height offers an acceptable solution. See our comments on paragraphs 3.8 and 3.9 of draft SPD.

We believe that the housing targets of the London Plan (2.19) are unrealistic for boroughs where potentially available brown-field sites are located in heavily polluted areas.

Encouraging people to live close to their workplace (2.20) in the GWC would, in many cases, place them in double jeopardy, with both work and home life confined to sealed, artificially ventilated buildings and moving from one to the other involving exposure to the hostile environment.

**Environmental Quality and Open Space** It should be pointed out that significant portions of the open spaces in and surrounding the GWC also suffer from air and noise pollution from the strategic roads. This detracts from their role as spaces for active recreation and/or quiet enjoyment. Light pollution can reduce biodiversity as it can be detrimental to wildlife.

**Promoting High Quality Urban Design and Conserving Heritage** We strongly endorse the need for such promotion and agree with the paragraphs 2.27 – 2.32.

It should be emphasised that the prestigious and attractive pre-war buildings (2.29) achieve their “landmark” status not by their height but by means of their restrained elegance and their nuanced designs. New buildings on neighbouring sites must pay full respect and be subservient to these classic buildings.

While it is essential to consider the impact of development on important site lines and vistas from major historic open spaces (2.31), consideration of impacts should not be confined to these. Part of the value of the built and natural heritage is in the assemblage. Views assessed with respect to a particular site-line or vista provide snap-shots from a specific point but the impacts of tall buildings are felt over a wide area. People move and how they experience their surroundings is dynamic; a tall building will not suddenly disappear as people move from the chosen view point to walk down their street, stroll through the park, across the green, along the river tow-path or visit the cemetery.

We recommend the addition of “Developers should be expected to engage positively with the purpose and core principles of chapter 6 of the Local Plan as articulated in Our Approach to Policy CC1 and to Policy CC4 and in paragraphs 6.1, 6.12 and 6.13.”

**Transport and connectivity** We agree strongly that providing transport infrastructure is critical (2.33). We consider it necessary to remedy the existing transport, deficiencies *before* any further growth is considered. See our detailed points on this aspect provided in our **General** comments on the draft SPD. We note that the analysis of the current road capacities (2.35) and of PTAL (2.36) supports our position.

As far as the first two necessary “game-changing infrastructure” projects are concerned (2.39), we are pleased that the Council and key stakeholders have “begun to assess the viability and feasibility”. It is clear, however, that these projects, even if agreed, would not be delivered within the time frame of the GWC Plan. Project 2, which, even if it met the viability/feasibility hurdles “would not commence until at least 2025” is essential to support any significant development within Brentford East.

### **03 Vision and Objectives**

#### **Strategic Objectives**

**Optimising Housing Growth** We do not believe that **Objectives 3 and 4** can be met.

- In terms of number, we believe there is very limited scope for residential development of acceptable quality (see comment under Housing Growth above).
- In terms of type of property and mix of dwelling sizes there is a massive oversupply of studio and one-bedroom flats within the recently built and consented schemes in Brentford East and surrounding area. What is needed is family houses but the GWC is not a suitable location for this type of housing.
- In terms of affordability, there is a huge deficit of affordable housing in the Brentford East area; for example, currently none of the consented 910 units within the Brentford stadium scheme are affordable and the proportion in other major developments is very low. Development in the GWC is unlikely to reduce this deficit.

**Design and Heritage Objective 15** This objective appears to only address the historic environment and heritage assets within the GWC. We request that it is brought in line with paragraph 2.31 by the addition of “within the GWC and the wider area” before “and ensure new...”.

#### **04 Spatial Policies**

**Introduction 4.3** We recommend amending the 2<sup>nd</sup> sentence to read “Hounslow Local Plan 2015 sets out the overarching thematic policies for the borough. The policies in this section (GWC1 – GWC5) must, therefore, be read in conjunction with the Local Plan.”

**GWC1 Employment Growth; Our approach (b)** The suitability of the site for residential use should be the determining factor in where residential development is sited rather than the need to support employment development. The damaging consequences of basing the location and quantity of residential development on a perceived need for “enabling” other development are clearly illustrated by the Brentford Stadium scheme.

**(f)** Retail provision should be very limited to avoid competing with town centres. See comment under Housing Growth (2.18) above.

**(k) i.** as (b).

4.15 “this sector is expected to be stable” - see comments concerning the impact of the UK leaving the EU under Economic growth above.

**Alternative Policy Option** We believe that it will be necessary to adopt this option as it is clear that it will not be possible to *deliver* the game-changing infrastructure projects within the time frame of the GWC Plan.

**GWC2 Housing** We do not support this policy on principle. The environmental constraints are such that only very limited residential development should be contemplated within the GWC. See comments under Housing growth above. The target of 2300 units in the East section is unrealistic and unacceptable.

**Alternative Policy Option** We believe, in any case, that it will be necessary to adopt this option as it is clear that it will not be possible to *deliver* the game-changing infrastructure projects within the time frame of the GWC Plan.

### **GWC3 Design and Heritage**

**Key Issues 2** We agree that this is a key issue and would recommend adding that “The topography of the area and the open nature of the surrounding historic landscapes means that, although the GWC may sit in the backdrop, tall buildings are highly visible and their impact felt over wide areas.”

**Our Approach** We support the overall policy approach.

Under “The Council will expect development proposals to:” we request addition of:

“(g) demonstrate that the developer has engaged positively with the purpose and core principles of Chapter 6 of the Local Plan as articulated in Our Approach to Policy CC1 and to Policy CC4 and in paragraphs 6.1, 6.12 and 6.13.”

with changes to the letter assigned to subsequent requirements.

(j) (iii) We request amendment of “to signify arrival into inner London” to read “to signify ‘arrival’”. Hounslow is an Outer London Borough.

(l) Delete “and height” in first line and edit text (of building at each landmark site etc). Height is quantitative rather than qualitative and is controlled for the different sections of the GWC by means of Places Policy.

(p) We strongly support the need for this requirement but would request addition of a statement to the effect that advertising signage will not be permitted on buildings that are solely or predominantly residential or on other buildings where they would have a negative impact on residential amenity. This will be an important consideration if the GWC is expected to accommodate residential uses.

We recommend that Policy CC5 of the Local Plan and GWC3 would benefit from the provision of an Advertising SPD to provide further guidance taking account of the significant changes to the scale of adverts and the technology employed (eg large-scale LED-lit digital media screens).

**Alternative Policy Option** We believe that it would be totally unacceptable to adopt the alternative option of a “scattered approach” for the reasons given.

So much damage has already been done or is “consented” by using the scattered approach to tall buildings, that there needs to be a recognition that we are at a “tipping point”. Without a strong commitment to valuing and protecting the surrounding heritage assets, irreparable harm will be inflicted on them to the impoverishment of our lives and those of future generations.

The big attraction of the wider area for visitors as well as those who live and/or work here is that, while easily accessible from Central London, it has significant heritage

landscapes and a beautiful stretch of the Thames which, together with its predominantly low-rise buildings give much of it a generous, open, almost rural feel. This is complemented by its compact townscape of predominantly Victorian and Edwardian terraces, providing homes to its well-established, thriving residential communities. The special appeal of both is that they provide respite and retreat from the urban environment.

#### **GWC4 Environmental Quality and Open Space**

**Key Issues 5 and 6** It should be pointed out that significant portions of the open spaces in and surrounding the GWC also suffer from air and noise pollution from the strategic roads. This detracts from their role as spaces for active recreation and/or quiet enjoyment. Light pollution can reduce biodiversity as it can be detrimental to wildlife.

**Our approach** We applaud this very much needed policy.

(a)and (g) We question the practicality and viability of planting *mature* trees.

#### **We are taking this approach because**

This section shows clearly how bad the environment of the GWC is and even how taking the desperate measures described will not necessarily provide acceptable living conditions.

**4.32** We question how “*external amenity*” can be provided within the *internal* spatial environment. If such external amenity implies enclosed balconies/winter gardens it is no substitute for *outdoor* space.

**Implementation** We would like to suggest that as an additional measure to support implementation and raise the profile of the policy the Council gives its support to making London a “National Park City” <http://www.nationalparkcity.london/>

#### **GWC5 Transport and Connectivity**

**Our Approach** The real problem with respect to the major transport improvements on which the entire strategy for the GWC depends [(a) i. and ii.] is that the Council is unable to give any assurance of delivery as it is dependent on other bodies. The Council can only support and facilitate, not deliver.

We recognise that delivery is often very complex with many stakeholders involved but the Council’s track-record on supporting/facilitating is poor. Its approach is one of approving development and then failing to follow through on the associated transport improvements identified as necessary. The continuing absence of the footbridge between the Chiswick Business Park and Bollo Lane and the time taken to extend bus services to the business park provide stark evidence of the Council’s inability to deliver essential infrastructure in a timely manner. The need for the footbridge was recognised as early as 2001 and planning permissions have been granted in 2007, 2012 and 2015. [Note: Work commenced in August 2017 but completion is not expected until late 2018]

(g) “ensuring connectivity is prioritized and delivered along with any new development”.

**Alternative Policy Option** Alternative transportation strategies would not be able to deliver a sufficient improvement to allow more than very modest levels of development. Significant growth would not be sustainable. Existing transport is already a limiting factor in attracting new and retaining existing businesses.

Considering the heavy congestion on the road network, improvement to bus services will be very challenging. It will depend on being able to offer both frequent and *reliable* services.

If the Council finds it necessary to adopt this alternative policy option, it will also need to adopt the alternative policy options applicable to growth.

## **05 Places Policy**

Either reliance should be placed on the statement in 5.2 of the Introduction to this section or a cross reference to relevant policies of the Local Plan and of Section 4 of this document should be included consistently within policies P1, P2 and P3. See, for example, the differences in West Place Policy P1 (i) and (j), Central Place Policy P2 (g) and East Place Policy (f).

*We have focussed our attention on the East Place Policy.*

### **P1 Great West Corridor West Place Policy**

**Our approach** With the exception of the quantum of growth given, we broadly support the approach described in this section.

**Alternative Policy Option** We believe that it will be necessary to adopt this option as it is clear that it will not be possible to deliver the game-changing infrastructure projects within the time frame of the GWC Plan.

### **P2 Great West Corridor Central Place Policy**

**Overview/vision** Is promoting a cluster of car showrooms the appropriate response to the “car-dominated” and hostile nature of the area? Does this not detract from the key objective of weaning people from their cars and encouraging them to adopt an active mode of travel? Perhaps Brompton Bikes could be persuaded to renew a presence in the borough with an “iconic” bike showroom - displaying a golden Brompton for the Golden Mile.

**Alternative Policy Option** We believe that it will be necessary to adopt this option as it is clear that it will not be possible to deliver the game-changing infrastructure projects within the time frame of the GWC Plan.

### **P3 Great West Corridor East Place Policy**

*This section of our comments should be read in conjunction with our comments on the draft Brentford East SPD.*

**Our approach** We disagree strongly that this section of the GWC provides an opportunity for high-density, mixed-use development. The massive scale and very high density of the development associated with the Brentford Stadium was dictated by the need to pay for the stadium. The stadium scheme was presented as an exception, a unique case; it must not be used as a catalyst for yet more large-scale development on neighbouring sites. What is needed in this area is modest development that seeks to mitigate the harm inflicted by the stadium scheme, that fully respects the sensitive, low-rise surroundings and heritage and seeks to redress the balance.

(d) We request insertion of “extended” before “modern” as simple re-provision of the current facilities will not be adequate to serve the significant recent and projected increases in the population in the wider catchment area of the Fountain Leisure Centre.

(f) We request that this paragraph is amended to read:

Supporting new development with building heights that respond to... a general range of heights of between 12 to 16 metres at the lower end, between 16 to 24 metres at the higher end; at the two sites designated within the East Brentford SPD a Corridor Landmark building of maximum height 48 metres and an Eastern Gateway Landmark building of not more than 60 metres. Design of landmark buildings ... exemplary standard (and follow ...CC3).

These maximum heights are supported by the East Brentford Capacity Study

We would emphasize the conclusion of the Capacity Study that:

**Only the lowest height scenario (59m) is judged as not having a significantly adverse impact on the heritage setting within the tested sensitive views.**

*See our detailed comments on building heights in our comments on the draft Brentford East SPD.*

**Alternative Policy Option** We believe that it will be necessary to adopt this option as it is clear that it will not be possible to deliver the Overground Old Oak Common or other game changing infrastructure within the time frame of the GWC Plan. Increasing bus services in this area is likely to be very challenging because the road network is at capacity and congestion will impact reliability.

**We are taking this approach because**

**5.34** The massive scale and very high density of the development associated with the Brentford Stadium must not be used as a catalyst for yet more large-scale development on neighbouring sites. See above under Our Approach.

**5.35** Further intensifying the “urban feel” that will be introduced by the stadium scheme, will undermine the special appeal of the wider area which is that it provides respite and retreat from the urban environment.

**5.36** The benefits of outlooks over Gunnersbury Park for residents must not be at the expense of harm to the character and value of the park. The area around the Potomac Lake and southern boundary mature trees is one of the most important in terms of nature conservation and biodiversity; see GWC4 (i). Biodiversity can be negatively impacted by loss of light/sun during the day and/or light pollution at night. Unlike commercial premises, large residential buildings – assuming they are occupied – create light spillage and light glow since the internal lighting of residential buildings is difficult to control.

**5.37** See our comments on GWC2 above.

**5.38** We strongly endorse giving heights in *metres* for clarity. See our detailed comments on the draft East Brentford SPD. The general equivalence given in parentheses here could be included for information at the beginning of any relevant section. In addition to commercial and/or residential storeys, the overall height of a building will depend on the inclusion of other elements such as undercrofts, podia and roof plant.

## **06 Delivery and monitoring**

**6.0** Note the typographical (Great *Wet* Corridor Plan) and editorial (this *Heathrow* Opportunity area) errors (or Freudian slips, perhaps).

**6.10, 6.13** The cumulative amount of recently built and consented development in and around the Brentford East area is very significant and has taken place without any real infrastructure improvements. This lack of essential infrastructure, especially transport, already has a negative impact on the quality of life of those living and/or working in the area. The completion of the consented schemes will worsen this impact.

The Council must desist from yielding to the temptation to put the cart before the horse. Early development is not supported. Any more major development in this area will be unsustainable unless and until the necessary infrastructure has been *delivered*.

Policy IMP3 (h) states “ensuring that development does not proceed unless the *delivery* of critical and necessary infrastructure to support that development is *assured*”. Without such a commitment, development on the scale envisaged will be unsustainable. It certainly will not support “vibrant and healthy communities” (2.2) within the new developments. Moreover, it will undermine these attributes of the established communities in the surrounding area and their ability to enjoy the “natural, built and historic environment”.

### **Appendix 1 Site Allocations**

The potential capacity of all these sites and the phasing of their development will need to be adjusted depending on the policy options adopted.

**110 Power Road** We agree with the proposed uses but would ask that the potential capacity is also reviewed in light of the restrictions placed on the height and scale developments in Power Road by means of the draft Brentford East SPD (4.30) and adjusted, if necessary. In commenting on 4.30 of the SPD, we stated:

We endorse the overall approach proposed for the height and scale of buildings in the Power Road estate. We strongly agree that the relatively fine grain and intricate character of this area should be respected and that the impact on the residential properties of Thorney Hedge Road must be limited.

serious access and capacity issues at Gunnersbury Station.

**27 Great West Road and 1053 Great West Road** The context and constraints should include reference to the Brentford Stadium and associated residential towers to be built immediately across the railway line to the south. Any residential component of development at this site will need to take account of the impact of the stadium scheme on views toward the Thames. Issues of noise and light pollution will also need to be addressed for such sites.

**Kew Bridge Distribution Centre** See comment on 27 Great West Road and 1053 Great West Road.

**Units 1- 4 Capital Interchange Way** The potential capacity for this site is too high irrespective of which policy option with respect to growth is adopted. See our comments on **P3 Great West Corridor East Place Policy**.

The context and constraints include reference to the Brentford Stadium scheme. It should indicate the site's close proximity to the Central Eastern and Capital Court sites of his latter scheme. These two sites alone have full planning consent for five tower blocks with a total of 410 residential units.

WCGS December 2017