



Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s) Policy Figure/Site

4. Do you Consider the Local Plan is:

(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="text"/>	No	<input type="text"/>
ii) Sound	Yes	<input type="text"/>	No	<input type="text" value="XXX"/>
iii) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="XXX"/>

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The wording of the policy anticipates and promotes extensive further growth and development.

These proposed developments will only be sustainable if prospective employees and residents can access them via a mix of public and private transport.

The draft Local Plan is proposing to disproportionately locate these developments in the Great West Road which has a low PTAL for most of its length, is already subject to high levels of road congestion, and has high levels of air and noise pollution.

The wording of the policy is unsound because it fails to either quantify or refer to these existing constraints on development outside the designated higher level town centres and in locations away from key public transport nodes.

Road Congestion

The stretch of the Great West Road (A4) between Boston Manor Road (A3002) and the North Circular (A406) is operating at above capacity levels with extensive tailbacks and congestion during the morning and evening peaks. The A4 is a priority route and its traffic lights are subject to real-time computer control by TfL in order to maximise its capacity at peak hours.

No evidence has been provided to demonstrate that any material increase in peak hour vehicle movements can be achieved. The policy must therefore be considered unsound.



Local Bus Network

TfL Buses recently presented evidence to Ealing Council's Transport Scrutiny Panel in which TfL rejected modest local extensions to two existing bus routes. TfL based their rejection on their cost-benefit model.

No substantive evidence has been provided to support the aspiration in the draft Local Plan of new and/or additional bus services designed to service the proposed additional office capacity along the Great West Road. To be credible, such evidence would need to be validated by TfL Buses and demonstrate that it complied with their cost-benefit criteria.

Air and Noise Pollution

The Great West Road has high air and noise pollution caused by vehicle movements. It is unsound to promote developments which would result in additional vehicle movements and exacerbate air and noise pollution.

Duty to Co-operate

We cannot locate supporting documents which evidence detailed discussions with TfL Underground and/or TfL Buses as to current capacity constraints in the local area and/or the quantification, together with an indicative timescale and costings, of any measures necessary to ameliorate them. Nor can we locate a quantification of the potential additional passenger movements which might result from the growth aspirations contained in the draft Local Plan.

6. Please set out what modification (s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. *(NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).* You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We believe that the "We will achieve this by" section of Policy ED1 needs to be amplified by the following sub-paragraph.

"Growth and Development can pose particular peak hour strains and pressures on the road network, the underground and rail network and bus services. Employees and residents can also exacerbate air and noise pollution."

"We will therefore require all new developments to demonstrate that surplus peak hour capacity currently exists on the road and public transport networks. We will also require new developments to demonstrate that any additional pressures resulting from a development will be fully remedied prior to the occupation of each new development."

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.



7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination.

YES

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

XXXXXXXXXX

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:

Date: