



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)	<input type="text" value="4.7 - 4.10"/>	Policy	<input type="text" value="ED 3"/>	Figure/Site	<input type="text" value="ED3.1"/>
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4. Do you Consider the Local Plan is:

(Please tick as appropriate)

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

This policy, with its far reaching implications, has not had adequate consultation. No similar policy existed in last summers consultation, or in the earlier rounds of consultation.

The Council’s evidence base acknowledges that the Great West Road is the subject, and cause, of excessive and unacceptable vehicle congestion, air and noise pollution. Paragraph 4.7 on page 81 of the draft Local Plan states:

“there are major environmental challenges associated with the transport function, and public transport connectivity is poor, which all constraints the prospects for growth and quality.”

The policy proposes additional development which will increase congestion and pollution.

ED3 a.
The policy omits any reference to residents and the local schools in its definition of stakeholders.

ED3 b.
The text lacks implementation plans with agreed dates, which quantify the additional peak hour passenger movements they will generate



The “Golden Mile Vision and concept masterplan (2014)”, has not been published by the Council, or consulted upon. It is not shown that the policy will be justified or effective.

The map in Figure ED 3.1 is attributed to the unpublished study. However the supporting analysis has been omitted from the evidence base.

The pink shaded M4 Gateway corridor shown on this map extends across school sites, Gunnersbury Park, Carvill Park North and areas of low rise housing. This map did not form part of the earlier policy options consultation, and the residents affected have not been consulted.

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.

This draft policy should be deleted from the Local Plan and be brought forward as a freestanding Area Action Plan at a later date. When consulted and presented, the following revisions would need to be made to the draft text.

ED 3 a

The word “residents” needs to be inserted. The draft wording only refers to public and private sector organisations.

ED 3 b

Developments will only be allowed to proceed once the proposed improvements in public transport have been implemented, and that these improvements are demonstrated to resolve existing and expected transport problems.

ED 3 f

Advertisements and Lighting Proposals will only be acceptable at low level and where they will directly face vehicles travelling along the M4/A4. Advertisements or Lighting must not be visible from residential side streets.

Figure ED 3.1

This map, and its implications should be deleted from the Local Plan and deferred until public consultation takes place on the area action plan referred to in paragraph ED 3 a.

ED3

Add the text:

“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.”

(Continue on a separate sheet if necessary)



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, 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:

To explain the negative consequences of the text of the proposed policy wording

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: