



Part B - Please use a separate sheet for each representation

Name or Organisation: Brentford Community Council

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="checkbox"/>	No	<input type="checkbox"/>
ii) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
iii) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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 policy fails to conform to the requirements of the London Plan, despite making reference to it and to the BRN policies.

BRN Policy 7.24 gives the strategic aim for the Blue Ribbon network of *“prioritizing uses of the waterspace and land alongside it safely for water related purposes.”*

There is nothing in GB5 that encompasses this prioritisation; there is only a general indication that proposals will be assessed in line with the London Plan.

BRN Policy 7.25 says that LDF’s *“should indentify locations that are suitable for passenger, tourist or cruise liner facilities.”*

There is no such identification of facilities within GB5. Opportunities for identifying such locations exist, especially on the Thames waterfront within the Borough’s control, and yet the policy fails to apply this recommendation.



BRN Policy 7.26 states that LDF's *"should identify locations that are suitable for additional waterborne freight."*

This opportunity also, has been lost in GB5, which has no mention of waterborne freight whatsoever, even within the generalised statements of support for water related uses. The failure in this regard has already seen the loss of most of Brentford's prime locations.

BRN Policy 7.27 states that LDF's *"should identify the location of waterway facilities and any opportunities for enhancing or extending facilities . . ."*

GB5 is most disappointing in this respect, by way of stark contrast to the BAAP which did identify specific locations and uses. The policy fails to adhere to the London Plan in this respect. Specific identifications are crucial to the successful implementation of the BRN policy and conformable LDF's.

BRN Policy 7.28 states that LDF's *"should identify any parts of the Blue Ribbon Network where particular biodiversity improvements will be sought . . ."*

GB5 supports the aims of the London Plan in this respect, but again fails to identify specific areas. As with the other policies, the specific locations and uses must be expressly and clearly identified for there to be any teeth to the policies. Expressions of general support are inadequate. This would be improved by direct reference [as with GB4] to the **Hounslow Biodiversity Action Plan 20112-2016**.

BRN Policy 7.29 states that LDF's *"should identify a Thames Policy Area . . . and formulate policies and a strategy for this area . . ."*

It is noted that identification of the Thames Policy Area is attached to GB5, but specific formulated policies and strategies are absent. It is insufficient to merely refer to expectations that development proposals will be *"consistent with the Character and Context Study and Thames Landscape Strategies."*

BRN Policy 7.30 states that LDF's *"should identify any local opportunities for increasing the local distinctiveness and use of their parts of the Blue Ribbon Network."*

There is nothing in GB5 that complies with this requirement. As with the rest of the BRN's, the GB5 policy has reference only to the most general of aspirations. Local distinctiveness and use requires specific analysis and description, otherwise the entire point of the policy is lost, and there will be nothing to rely on in respect of challenge to any planning proposal.

(Continue on a separate sheet if necessary)



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.

GB5 b.

Replace the text:

“Assessing proposals for development within, over or adjacent to waterbodies for their impacts on the waterbody and waterside environments, in line with the London Plan and guidance from the licensing stakeholder;”

With the text:

“Requiring proposals for development within, over or adjacent to waterbodies to prioritize uses of the waterspace and land alongside it safely for water related purposes, in line with the London Plan and guidance from the licensing stakeholder;”

GB5 d.

Replace the text:

“Protecting water-related uses and related infrastructure that supports the active use of Blue Ribbon Network, ... “

With the text:

“Protecting existing water-related uses and related infrastructure and identifying new locations that support the active use of Blue Ribbon Network, ... “

GB5 e.

Replace the text:

““Promoting opportunities for improved access to waterways, ...”

With the text:

“Promoting opportunities for improved access to and use of waterways, ...”

GB5 g.

Add the text:

“identify those parts of the Blue Ribbon Network where particular biodiversity improvements will be sought in compliance with the Hounslow Biodiversity Action Plan 20112-2016, and”

(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 policy wording as proposed.

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: