

Hounslow Local Plan – Draft in consultation

Summary of Observations by the Brentford Community Council

(In response to Consultations on the LOCAL PLAN, PROPOSED SUBMISSION 2015/30

Volume 1 and 2. March 2014.)

(Local Plan Summary BCC obs 2014.doc)

Town Centres

Policy: TC1

We support the intention of policy (TC1) to “maintain a network of successful town centres”, but consider that such a policy will only be sound in practice if it is given priority over other policies which do not support the primacy of the town centres as the focus for new investment.

In the case of Brentford, which is expected to be redeveloped during the plan period it would be essential for the local plan policies as a whole to support the unique character and sustainable vitality which will be needed if Brentford is to contribute to the borough’s network of Town Centres.

In particular:

- Growth of retail outlets at Osterley, on the GWR or elsewhere in the catchment area need to be restrained to give priority to Brentford Town Centre.
- Provision should be made for offices and a hotel in the Town Centre,
- Brentford needs to be a destination of choice with improved links to Syon, along the river edge to Strand on the Green and across the Thames to Kew Gardens.
- Development should follow a master plan designed for both the north and the south sides of the High Street to respect and enhance the historic layout of ”lanes” and passages, the river side location, the setting of both the St Lawrence tower and the St Paul’s steeple and the scale and character appropriate for a District Centre.

Suggested modifications:

Policy TC1 should be amended to state:

“We will positively maintain a network of successful town and local centres each with their own function and character to provide the shops, services and facilities needed to meet the needs of Hounslow’s population.

We will positively seek to locate a variety of retail outlets in the Town and District Centres by restraining retail growth outside their boundaries within their catchment areas.

We will positively manage the development of town and District Centre to enhance their individual character and to ensure that they provide a variety of employment opportunities and that they become destinations of choice.”

Policy TC2

“Our approach” does not carry on the aim of the BAAP to make Brentford a destination of choice by using its unique historical character and its location near Kew Gardens, Syon House, and the Thames river-side.

Policy TC2 b.

The policy does not promote office development nor accommodation and facilities for tourists and visitors.

Add to the text

“The district centre should include a cultural and social focal point at the centre of the site which should include the Waterman’s Arts Centre if relocated, the Brentford Library if relocated, a bookshop/art gallery/café facility and toddler play space.

Replace the text “Improvising links from the High Street to GWR”

With the text:

“Pedestrian links along the Canal and Half Acre (to Brentford Station and the GWR) should be improved by generous pavements, seating, tree planting and good signage without destroying the traditional scale and character of the area. These links should be extended by ferry or footbridge to Kew Gardens and by a Thames-side path to Kew Bridge and to Old Isleworth as proposed in the Thames Landscape Strategy.”

Economic Development

Policy ED1

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.

Policy ED2

We are concerned at the loss of "ordinary" employment sites which lack SIL or LSIS status.

We have witnessed the repeated loss of such sites after what can, at best, be described as token marketing exercises.

We are aware of local employers who wish to expand in Brentford, but are being out-bid by developers willing to pay "housing" prices for what are currently employment sites.

We therefore believe that the marketing provisions in the draft policy need to be strengthened as suggested below.

Suggested modifications to the text:

Policy ED2 d.

Add the text: "Active marketing must include the marketing of the site for redevelopment as a B1a, B1b, B1c, B2 or B8 employment location. The marketing of the existing buildings unimproved for sale and rent will not be considered to be sufficient evidence of active marketing."

Policy ED3

This policy, with its far reaching implications, has not had adequate consultation. No similar policy existed in last summer's 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.

Policy ED3 a.

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

Policy 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.

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.

Policy ED 3 a

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

Policy 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.

Policy 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.

Policy 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.”

Sustainable Mixed Communities

Policy SC1 a.

The words "high quality" are subjective and functionally meaningless in the context of this policy.

Policy SC1 e.

The number of dwellings expected in the Plan from small infill sites is 2644. Education, health, amenity and transport facilities for this additional population should be provided for in the plan, and it is unsound for the mechanism not to be explicit. The words "manage the cumulative impact" do not commit the Borough to achieving this.

Policy SC1 g.

Education, health, amenity and transport facilities have longer lead times than housing, both in planning and in construction. The planned delivery of these facilities is necessary to prevent inadequate resources for the new populations. The plan is unsound in not providing for this.

Policy SC1 h.

The policy does not explicitly require new development proposals to comply with the existent supplementary guidance documents of the UDP. (See also our comments on Policy SC4).

Compliance with design guidelines is a different matter from the further infrastructure necessary to achieve sustainable development. This warrants a separate Policy section.

The word "infrastructure" is not a defined term of the Local Plan, and has different meanings in different contexts. The provision of education, health, amenity and transport facilities for this additional population should be made explicit.

Suggested modifications:

Policy SC1 a.

The last phrase should read "that offers a choice of homes meeting Policies SC4 and SC5.

Policy SC1 e.

The last sentence should read "In doing so we will monitor the cumulative impact of development and reserve sites adequate to provide education, health, amenity and transport facilities for this additional population."

Policy SC1 g.

The phrase "and adequate education, health, amenity and transport facilities." should be appended to the last sentence.

Policy SC1 h.

The policy should read:

Comply with the design standards of the Local Plan, the Mayor's Supplementary Planning Guidance (SPG) documents, and the Borough's Supplementary Planning Guidance (SPG) documents.

(Provision of infrastructure should be a new policy section, see below.)

A new Policy Section should be inserted as follows:

To be completed in balance with existing infrastructure and contribute to the provision of further education, health, amenity and transport facilities necessary to achieve sustainable development;

We are extremely concerned that draft policy SC 8 on Garden Land development in last summer's consultation version of the Local Plan has not been carried forward into this round of consultation.

We have examined the schedule of Regulation 18 responses and cannot find any justification for this deletion.

While the officer comments against the submission by respondent 2273 says, "A 'presumption' was not generally supported", this is misleading as the majority of respondents commenting on options "a" or "b" supported option "a". Option "a" proposed the introduction of a general policy presumption against new development on back garden land.

The introduction of a presumption against garden land development in the Local Plan is consistent with the guidance provided by both the NPPF and the London Plan.

Paragraph 53 of the NPPF invites planning authorities to bring forward policies to resist development of residential gardens.

Paragraph 3.34 of the London Plan supports policies in Local Plans which contain a presumption against development on back-gardens. The London Plan also states, "Such a

presumption has been taken into account in setting the Plan's housing targets". A similar statement is contained in paragraph 48 of the NPPF.

We are further concerned by the insertion of the following addition to draft Policy SC 1 in this consultation, where the reference to small sites could invite garden land developments:

- b. Supporting proposals for new development and conversions on other sites, including small sites, in the context of the presumption in favour of sustainable development;

An additional concern is that according to Table SC 1.1 nearly 20 percent of the borough's housing growth will be delivered on small sites.

It therefore seems highly likely that there will be increased pressure to develop back garden sites during the life of the Local Plan.

Reintroduce a policy expressing a presumption against back garden development and to amplify this with local supplementary planning guidance.

Such a policy should both reflect and be in conformity with the NPPF and the London Plan

Policy SC4

"Our approach"

The words "high quality design " are subjective and functionally meaningless in the context of this policy and the words "responding to local context and character" not explicitly require new development proposals to respect the pattern and grain of the existing buildings as required by Policy 7.4 of the London Plan

Policy SC4 b.

The words "high quality" are subjective and functionally meaningless in the context of this policy.

Policy SC4 c.

The words "help guide" would allow the density ranges of the London Plan to be ignored.

Policy SC4 d.

Details of why we consider the Local Plan is unsound:

The words "elaborated upon" would allow the supplementary guidance documents to be ignored.

Policy SC4 e.

The words "respond to" rely on subjective architectural opinion, and do not require development proposals to respect the urban character of its area as defined by the Context and Character Study.

The first sentence of "Our Approach" should read "We will ensure the scale and density of new housing development balances the need to make efficient use of land and comply with adopted planning guidance documents, whilst respecting the urban character of its area as defined by the Context and Character Study and protecting existing residents' amenity."

Suggested modifications:

Policy SC4 b.

Replacing the words "high quality" with the word "compliant".

Policy SC4 c.

Replacing the words "help guide" with the word "control".

Policy SC4 d.

Replacing the words "elaborated upon within detailed" with the word "the".

Policy SC4 e.

Replacing the words "respond to" with the word "respect".

Policy SC5 g.

No policy should allow proposals that compromise other policies. The words "exemplary design" rely on subjective architectural opinion, and allow non-compliance with other objectives of the Local Plan.

This Policy section should be deleted.

Policy SC8

This policy does not appear to be based on statistical evidence of the rapidly growing proportion of the population of advanced age who are vulnerable or suffering from dementia to the point where they require special accommodation.

While we agree that those who can be supported in their own homes and who wish to remain independent should do so we consider that the policy is not written in a way which will ensure that the increasing number of dependent elderly have a real choice of provision.

We would suggest that the policy be rewritten to ensure that the numbers of Hounslow residents requiring nursing homes, dementia homes or specialist housing, including accommodation with wheelchair access, are regularly monitored, and that these figures are used to predict future demand

All housing schemes over 100 units should be required to provide specialist housing and nursing homes to meet the assessed need.

Context And Character

“Approach”

The words "high quality" are subjective, and meaningless for development control.

Policy CC3 b.

The text and the map (Figure CC3.1) are too imprecise and designate much of Brentford as an “Area with medium suitability for tall buildings”. The area so designated includes River Thames landscape, parts of Gunnersbury House Grounds, parts of three conservation areas and the environs of many Listed buildings. This is not consistent with Policy 7.7 of the London plan, nor with the emerging Brentford Context and Character Area Study, which identifies much more limited zones as suitable for tall buildings.

This approach in favour of tall building departs from the consulted and tested policies of the BAAP without justifying the change from those.

The effects of tall buildings on areas of Brentford are already apparent in Kew Bridge Rd and the Great West Rd, which have both suffered loss of their original character, and loss of visual amenity from recent over-tall development both within those areas and to adjacent more sensitive areas.

Paragraph 6.8 is incorrect in its statement that “The majority of buildings above 20m are located in.....Brentford.....town centres.” There is currently only one in Brentford Town Centre, being the redundant Police Station that stands out as a concrete example of the damage that an insensitive tall building does to a character area. Brentford Town Centre is not a place of tall buildings.

Suggested modifications:

“Approach”

Replace the existing text with the text:

“We will support tall buildings only in identified locations, which contribute to the regeneration and growth of that area in accordance with the principles of sustainable development, and which respect the relevant Context and Character Area Studies.

Policy CC3 b.

Omit this paragraph

Policy CC3 k.

Add to the text: “as defined by the relevant Context and Character Area Studies”

Policy CC4

In the list of heritage assets, there is no mention of other landscape assets such as Gunnersbury Park, which is at considerable risk of harm from development along the A4,

or the Thames Landscape, which is perhaps the most significant heritage asset in the area. Although these open spaces may be considered in other policies relating to open space, they should also be identified as heritage assets, and therefore included in paragraph 6.11.

There is no reference to the identification and recording of heritage assets or the maintenance of a “local list” of buildings and structures of Townscape Merit.

Policy CC4 a.

Add the text: “by identifying and recording heritage assets in the Borough and maintaining a “local list” of buildings and structures of Townscape Merit

6.11 Add reference to Gunnersbury Park and the Thames Landscape

Policy CC5

This policy is not sufficiently strongly worded to resist the commercial pressure for advertising on the A4 corridor.

Since the illuminated signs along the A4 are designed to be seen from the raised motorway flyover, they tower above the adjoining streets. They currently have a harmful effect on visual amenity of the small scale surrounding streets, and disturb the sleep of residents there.

The policy should be worded to resist the further proliferation of advertising in areas of high demand, such as the A4 corridor in Brentford. This could be included in the opening paragraph of CC5, as follows

Policy CC5 b.

Replace the text: “A proliferation of stand-alone advertisements and billboards will be resisted;” with the text: “Stand-alone advertisements and billboards will be resisted;”

Policy CC5 d.

Replace the text: “and resisting adverts that will cause severe harm” with the text: “and resisting adverts where they have a harmful effect on neighbouring residential streets”

Green And Blue Infrastructure

Policy GB5

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 water space 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 identify 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.

Suggested modifications:

Policy GB5 b.

Replace the text:

"Assessing proposals for development within, over or adjacent to water bodies for their impacts on the water body 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 water bodies to prioritize uses of the water space and land alongside it safely for water related purposes, in line with the London Plan and guidance from the licensing stakeholder;"

Policy 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, ... “

Policy 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”

Community Infrastructure

Policy CI2

Before commenting on the soundness of these policies the Brentford Community Council took advice on the current level of education provision in Brentford. This advice was that, like Central Hounslow, Brentford was a “hot spot” where despite every effort to make the maximum use of existing school sites, provision of school places was already inadequate. The planned expansion of the Brentford residential population in the plan period to 2030 would greatly increase the number of pupils with a statutory right to primary and secondary education, and increase the need for further education and training. The Borough relies on open market provision of new schools such as Academies or Free Schools. Unfortunately, such provision cannot match the site value of speculative residential development. However, none of the Site Allocations where education is a possible use allocate Education as the only use.

In particular Site Ref 16, Commerce Road, is the only place in the East of the borough with secondary school potential, but is described as “mixed” with education as only a possible rather than a required use.

Policy CI2 b.

“Other school providers” only support single sex or faith schools in the east of the borough. There is no plan for provision of mixed schools for those of no faith, although this is the greatest unmet demand.

Policy CI2 d.

Mixed use sites are untried in the borough. No assessment has been made of the obvious disadvantages of education and residential uses on the same site, such as noise, vehicular

traffic generation, and safety of children. For these reasons it is particularly unsuitable for nursery and primary school provision.

Policy CI2 e.

This may refer (inter-alia) to the West London University in Brentford which has been crowded into high rise accommodation adjacent to the M4 and which has no room to expand. No sites are identified, or are likely to become available in the plan period.

Policy CI2 f.

The council has recently sold off a pre-school centre and we are concerned that the number of places available to working parents may be diminishing. This policy is unsound because there is no plan for increasing provision to keep pace with the needs of our rising population. The sites allocated are inadequate to meet the growing needs for education places. The demand for competitive uses reduces the land available and tends to further increase site costs.

The Council does not have, nor can have secure funding to ensure that any proposals can be securely funded without recourse to Free Schools and Academies over which it has no control.

Suggested modifications:

Policy CI2

“Our approach” add the text “In line with the phased expansion of residential accommodation we will designate sites for pre-school, primary, secondary and further education use only together with the necessary secure finance to ensure that places are available before new residents occupy their new homes.”

Policy CI a.

add the text “with preference for provision of mixed schools for those of no faith or with regard to the type of unmet demand if appropriate.

Policy CI2 b.

add the text ”In the event that it proves impossible for statutory education obligations to be met we will seek to defer additional residential development until sites and finance are available.”

Policy CI2 d.

Replace the existing text with the text:

“Assess the mixed-use of sites which are suitable for delivering secondary and tertiary education facilities for their impact on the other uses such as residential, to enable the provision of needed school places within the borough;

Policy CI2 e.

Omit this Policy

Policy CI f.

Add the text “and require large residential development sites to provide on-site provision of these facilities.”

Environmental Quality

Policy EQ1

The government has set a target to reduce the emissions of greenhouse gases (CO₂) in the UK by 80% from 1900 levels by 2050. This means that emissions must, on average, be reduced by 80% in each local authority area. There are also interim targets recommended by the Committee on Climate Change. We see nothing in the LP that explains what part LB of Hounslow will play in achieving these targets.

Part 1 makes only general references to climate change, and to the government target. But there is no indication of what contribution Hounslow intends make or of how much emissions are estimated to arise as a result of other policies in the LP.

The Sustainability Appraisal (SA) has only qualitative references to climate targets, and does not commit the council to quantifying the effect of the LP policies on future emissions of greenhouse gases.

Many sources of emissions are outside the control of the council. However, LP policies will affect emissions, notably house-building, transport and spatial planning generally. The SA should be showing what effect LP policies will have on what components of the borough’s emissions and what components of emissions are outside its control. In this way one could actually assess the impact of the LP.

It is stated in 10/10.4 (page 69) that Options 1 and 2 are “predicted to lead to significant positive effects in terms of climate change ..” without specifying what the “positive effects” would actually be.

The quantitative information on emissions on page 30 only gives per capita emissions, and only historical data. There is no projection of future emissions for the borough.

The LP is unsound because it fails to assess Hounslow’s contribution to UK emissions and its contribution to the UK target of 80% reduction by 2050.

Suggested modifications:

“Our approach”

Add the text: “We will set a target to reduce the emissions of greenhouse gases (CO₂) in the borough by 80% from 1900 levels by 2050”

“We will achieve this by”

Add the text:

“Monitoring the effect LP policies have on the borough’s emissions alongside those emissions are outside our control. “

Policy EQ4

Some 4,000 Londoners a year die prematurely from causes related to air pollution. Air pollution contributes to many health problems including asthma, heart disease and lung disease and lung cancer. The ‘Public Health Outcomes Framework’ estimates the

“fraction of mortality attributable to particulate air pollution” in LB of Hounslow as an astonishing 7.1%.

Parts of Hounslow regularly breach UK and EU limits, set to protect human health. The World Health Organisation says both short- and long-term studies have found adverse health effects at concentrations that were at or below the current EU limit values. Leading scientists say there is evidence for a long-term effect of NO₂ on natural mortality as high as that of PM_{2.5}.

London has the highest levels of NO₂ of any capital city in Europe and the UK has the highest proportion of zones breaching legal limits. Information obtained from Mayor Johnson shows that exhaust emissions from passenger cars (including private hire vehicles) of NO₂ and dangerous airborne particles (PM_{2.5}) are expected to rise from 39% and 49% of transport exhaust emissions respectively in 2010 to 47% and 54% respectively in 2015

The LP recognises that air pollution without quantifying it.

The SA states (page 9 of non-technical report): “Significant negative effects are predicted in terms of air quality (on the basis that sensitive land uses will be directed to areas of poor air quality)”.

The EU has recently launched the first stage of legal proceedings against the UK for persistent failure to address the air pollution limits in London. The process could result in large fines, which may be passed down to the London Mayor or the boroughs. It would be hard for LB of Hounslow to defend such action, given the lack of quantification and the lack of positive policies to reduce air pollution.

The LP is unsound because, while it recognises air pollution as an issue, there is no quantification of the issue in terms of pollution levels and there is no assessment of the health impacts of LP policies. This will make it hard for the borough to rebutt accusations that it has failed to address the problem and would make it hard to argue it should not be fined.

Suggested modifications:

The SA should estimate the increases in air pollution due to new development, including that from the resultant road traffic. It should also estimate the existing and increased numbers of people exposed to the high levels of air in the areas of new development.

The LA should then, as necessary, control development to mitigate the problem.

Policy EQ6

Light pollution is indicative of developments which are not sustainable in their use of energy resources.

It also is a matter of considerable annoyance to nearby residents.

In the case of the Great West Road, the land rises to the north where our residents’ association is located. This means that light from taller buildings in the vicinity of the Great West Road is not screened by the intervening buildings and trees.

We are particularly concerned by proposals in **Policy CC 5 b** which appear to be intended to encourage the installation of illuminated advertisements and lighting features on taller buildings. We are opposed to this and propose the additions below.

Suggested modifications:

“We will achieve this by”

Add the text

“d. On the GWR, Refusing proposals for lighting features, illuminated advertisements, signage and shrouds, that will be visible from the residential neighbourhoods which lie to the north and south of the M4/A4.

“We will expect development proposals to”

Add the text:

“i. with enclosed recreational spaces such as winter gardens, to be illuminated with inward facing light fittings and be controlled by either sensors or timers so that they are not illuminated while they are unoccupied.”

Connectivity

Policy EC1

Policy EC1 states “ we will work with partners to secure investments...”

These investments are in fact vital to the implementation of the plan in Brentford. Without their being put in place early in the plan period the Public Transport Accessibility Level will remain so low that the development envisaged in Brentford in the plan cannot be achieved sustainably, and the Brentford part of the Local Plan will remain unsound.

Clearly the policy relies on:

- (a) Supporting planned upgrades for the Piccadilly Line (now near capacity).
There is no indication of timetable/funding/consequential PTaL improvements.
- (b) Promoting...links to Southall/Crossrail.
There is no indication of the Crossrail timetable, the level of services to the Southall interchange, the timetable/funding for the proposed link to Brentford (north of A4 only) nor of plans/programmes/funding for a new Shuttle station + access, nor for the timetable and level of improvements to the current low Brentford PTaLs.
- (c) Promoting.... Rail connectionfrom Hounslow, to Willesden Junction via Old Oak
- (d) Common with services calling at Isleworth, Syon Lane and Brentford.
Table EC1.1 on page 210 shows no proposals as to how and when such a link could be operational and reduce PTaLs during the plan period.
- (d) Promoting... improved bus services.
There are no specific proposals for improvements to bus services and so it is not possible to confidently plan for any development in Brentford on the assumption that relevant PTaLs will be significantly improved.

The BCC has been calling (without success) to get the private, and often empty, Sky/Northfield shuttle buses to be available to the public, to re-route the 65 to Brentford Town Centre, to extend the E2 and E8 routes through Commerce Road to Gillette corner and to increase the frequency and quality of the H61 service for many years.

(e)improving access to Turnham Green...”

It is understood there are no plans to alter access to Turnham Green before 2020

(g) “...South West trains...in particular on Sunday.

No timetable or details are given. Improved Sunday services, while welcome are not likely to improve PTaLs, help commuters or significantly reduce congestion levels at Kew Bridge/Chiswick roundabout.

Many station platforms remain inaccessible to the disabled.

Promoting improvements to the highway network....”

In the 1990s Hounslow Council commissioned Martin Vorhees Associates (MVA) to prepare a plan to divert commuter traffic from Brentford High Street to the A4 to allow better access to new developments on the High Street.

The Council has since approved or has in their planning pipeline further developments accessed from the High Street including units as follows:

Kew Bridge 1 and	300
St James 1, 2 and 3	600
Lionel Road Enabling Housing	900
Holland Gardens	250
Ferry Quays	200
Albany House	150
Goat Wharf	170
Brentford Town Centre	900
Commerce Road	900
Total	4370

Incomes and car ownership, are rising, putting more cars owned by new and old residents and by commuters onto the road system. This is increasing congestion, delays, higher air and noise pollution and the danger that emergency vehicles cannot reach victims quickly.

The inter-relationship of the problems associated with over-development with poor access are already apparent. It is understood that Transport for London have delayed support for the proposed Brentford Waterside because access problems extending to Kew Bridge and Chiswick roundabout are proving hard to resolve.

It is clear that Brentford already has a problem. East/west traffic can only use the A4/M4 corridor and Brentford High Street which also has to serve a cycle super-highway and the pedestrian focus for a community of 30,000+

The parts of the proposed Local Plan concerned with development in Brentford during the plan period are fundamentally unsound because they depend upon transport improvements which cannot be relied on as they are not specifically programmed nor securely funded.

Suggested modifications:

Before the text “We will work with partner to secure..... “

Add the text:

“We will control further developments in the Brentford area of Hounslow to ensure that the necessary traffic and transport improvements are in place before they are occupied.”

Policy EC2

Paras a, b, refer to “promoting”. They are not sound policies which can secure the necessary network.

Para c refers to “preparing briefs”. This is a limited objective to help manage the under-provision of parking and by inference of road space. It is not a sound policy “to secure....”

Para d only describes the management of London Plan policies

In summary the policy is unsound because it fails to address the fundamental problem that the transport system is NOW unfit for purpose in many areas and that further development in the affected areas should be preceded by well funded and securely programmed improvements.

Suggested modifications:

After the para:

“We will strive to secure a more sustainable..... “

Add the text:

“so that PTaL levels can be improved for Brentford sites before further development proceeds.”

Implementation

Policy IMP 1

The policy sets out a vague approach, which despite the claim in “Our Approach” is not planned. In particular, the policy does not provide realistic guidance on bringing forward housing development in Brentford in tandem with the sites required for the infra structure needed by the new population.

IMP1 b.

would allow planning permissions to be granted even where the policies (in this plan) are not implemented or are out of date. This leaves the validity of the whole of this plan in doubt as this policy would allow it to be ignored.

Suggested modifications:

The Local Plan should be amended to remove the line on the key diagram (page 31) showing the whole of the Brentford area as an “Area of significant growth, investment and regeneration” and instead should identify in Volume 2 (page 238) sufficient sites to allow housing at densities consistent with the London Plan to meet the FALP targets together with sites to meet the full sustainable infra-structure needs of a growing population in each phase of the plan period.

and

The plan should not include policy (IMP1 as proposed) which promotes development anywhere in the borough without any reference to specific policies in this plan and which would allow the council, as the LPA, by inference, to alter the Site Allocations in this document without the changes being processed as “departures”.

Policy IMP2

The policy does not require that applications for housing and other development are not consented until realistic sites and funds are allocated for all the infra structure which will be needed as the population expands.

Suggested modifications:

“Our Approach”

Replace the text:

“... contributes towards the provision of infrastructure needed to support growth.”

with the text:

“... only proceeds when it includes the provision of the infrastructure needed for sustainable and holistic communities.”

“We will achieve this by”

Add the text:

- h). Ensuring the realistic delivery of infrastructure before granting consents for development applications.
- (g) Monitoring applications and real building programmes to ensure that infra- structure is fully operational before new residents or occupants move into new developments.

“We will expect development proposals to”

Add new para

“Make provision for the infrastructure needed for sustainable and holistic communities.”

Denis Browne
Chairman, Planning Consultative Committee
Brentford Community Council

2014.