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October 5 2011

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Dear Sir:

**Hounslow Core Strategy: Preferred Strategy  
Consultation Draft, July 2011.**

The Planning Consultative Committee of the Brentford Community Council adopted the following comments on this document. We would be grateful if you can take note of these views in revising the draft.

**Page 13. Sets out 8 Objectives:**

The following comments refer to each objective:

**Objective 1. Town Centres**

Yes. But we note that Brentford has been allowed to decline to the point where it needs to be given equal priority to the Hounslow Metropolitan Town Centre if it is to be successfully rescued.

**Objective 2. Commuting.**

Yes, But to be effective policies to provide full local amenities in each area are required. Based on our recent experience this may not be realistic and a policy of flexible provision may be required.

We consider that it must be recognised that the borough boundaries of Hounslow were drawn around an artificial amalgam of disconnected sub-centres which have more in common with other local centres outside the borough than with more distant sub centres within our boundaries.

The BCC wish to emphasise that any amendment to the BAAP should reflect the decisions the Council have taken which do NOT conform to the adopted plan and not to those development decisions which have been deferred for financial reasons.

We also believe that where proposed development places excessive pressure on infra-structure it should not be approved. In our view there has been excessive development in Brentford and the situation would have been worse if all the consented schemes had been built out.

The tentative signs that Brentford Town Centre might be developed soon are welcome. So also are the possible signs that the innovative Brentford High Street Steering Group proposals might receive active support both from the Council as LPA and as partial site owner and from the developer.

It is essential that the unique historic and geographic qualities of the site are brought out so that Brentford becomes a vibrant community focus and a destination for visitors. We continue to believe that the Canal Side Conservation Area should be extended to include the South side of The High Street as Mr Jordan suggested at the Isleworth and Brentford Area Committee would be explored a few years ago.

### **Objective 3. Housing.**

Yes, But the capacity for additional housing should be constrained to ensure the historic character (particularly within or close to Conservation Areas) is preserved. It is also important to retain the suburban density and life style preferred by most of the residents in the borough, and to ensure that they are not diminished by over-development.

It is essential to provide employment, schools, health and library facilities and provision for the elderly, police, etc BEFORE expanding housing provision. Where the actual provision of these facilities is not possible before housing is built specific adequate sites should be allocated and protected until development finance can be secured and spent.

### **Objective 4. Local Character.**

Local character and density should be respected and preserved In any new housing development, especially within or close to Conservation Areas.

It is noted that the Council has failed to achieve this objective in granting consents within Brentford.

**Objective 5. Carbon Emissions/Pollution etc.**

We support this objective and ask the Council to apply more stringent standards when considering applications in areas of high pollution such as the Great West Road.

**Objective 6. Reduce Commuting.**

This objective reinforces objective 3. See comments above.

**Objective 7. Local Provision.**

See our comments under objective 3 above.

The Council has failed to achieve this objective in Brentford. We consider that this objective can only be achieved if housing is delayed until provision for essential infrastructure is firmly committed.

**Objective 8. Green Spaces.**

We support the retention of all existing open spaces. However we note that the Council has failed to secure funding to properly maintain important green spaces notably Gunnersbury Park.

We also note that there are significant areas of open space deficiency. Sites for new open spaces should be identified and protected from development to eliminate deficiencies.

**Further comments on paragraphs in Section 8 Spatial Strategy****Paragraph S 1..2. Hounslow Town Centre.**

Hounslow Metropolitan Town Centre is an artificial creation which competes for the support of residents in eastern Hounslow with Ealing and Richmond outside the borough and with Chiswick.

The concept that each borough must have a Metropolitan Centre has led to a centre in our borough which is not based on realistic catchment areas. The Metropolitan status of Hounslow should be reviewed as should policies which have displaced financial support from the lesser town centres to the "centre". The future growth of the smaller centres should be the priority at a time when High Streets are under increasing pressure with excessively high rates and business taxes and reducing trade.

**Paragraph S 1.4. Brentford Town Centre.**

We are pleased that the Council has adopted the Brentford Action Area Plan and linked it to this document. Although it was only adopted in 2009 significant non conforming development has since been approved in Brentford which underlines the need for consents to conform with current area plans. It also demonstrates the need to regularly update Policy and Area Plans.

The document talks of replacing the BAAP already, which is a considerable cause for concern. The BAAP should continue to sit with the core strategy collectively making up the Local Development Framework (LDF).

The development of the South Side of the High Street should proceed on the basis of the present BAAP which seeks to retain the important historic Brentford urban structure including the former Ridgeways boat yard as agreed after extensive community involvement and the detail preparatory work in the report of the High Street Steering Group (2007) and the Prince's Foundation for the Built Environment (2010).

The BCC wish to emphasise that any amendment to the BAAP should reflect the decisions the Council have taken which do NOT confirm to the adopted plan and not to those decisions which have been deferred for financial reasons.

We also believe that where proposed development places excessive pressure on infra structure it should not be approved. In our view there has been excessive development in Brentford and the situation would have been worse if all the consented schemes had been built out.

The tentative signs that Brentford Town Centre might be developed soon are welcome. So also are the possible signs that the innovative Brentford High Street Steering Group proposals might receive active support both from the Council as LPA and site owner and from the developer.

It is essential that the unique historic and geographic qualities of the site are brought out in the proposals so that Brentford becomes a vibrant community focus and a destination for visitors. We continue to believe that the canal side Conservation Area should be extended to include the South side of the high Street as Mr Jordan suggested at the Isleworth and Brentford Area Committee would be explored a few years ago.

**Paragraph S 1.5. Feltham Town Centre.**

The London Borough of Hounslow should plan for potential scenarios where Heathrow's hub status goes into decline whether it is through the Mayor's proposals to re-locate Heathrow in the estuary or another airport growing in size.

We need to plan ahead now to attract alternative employment, skills and housing to ensure that Feltham residents have a better environment and secure alternative employment prospects.

**Paragraph S.2. The Golden Mile.**

The Council has failed to protect the employment potential of the Great West Road by allowing residentially led development instead of promoting the significantly improved public transport needed for commercial properties. The decisions made on the Wallis House and Alfa Laval sites have provided in-appropriate precedents for other sites in the area; and the lack of more substantial investment in transport infrastructure raises a real risk that business headquarters will leave the Golden Mile .

Instead, without the benefit of any overall plan, the quality of the Golden Mile has deteriorated into a series of buildings and advertisement features each designed to compete for the attention of passing motorists.

The result has been to sever north Brentford by a traffic corridor which is unfriendly and unsafe for nearby residents.. The Council should urgently consider what measures can still be taken to restrain further unwelcome development and advertising, improve landscaping and contain the pollution

Improvements could be made by side screening the M4 viaduct and by other measures to preserve the quality of life for residents close to the A4/M4 corridor.

If, never the less, A4 development was to be encouraged it should follow significant public transport improvements with new and enhanced bus routes to link the whole area to the local rail and underground stations.

Any development should follow clear guidance as to the height and density of developments both on the frontages facing the elevated M4 and to a more domestic scale to all other frontages as demonstrated in the recent Alfa Laval application.

*The need for this clarification was exemplified in the recent Reynard Mills application, where the developer sought to justify an application of excessive height and density, claiming that the Great West Road "gateway" LOCATION CRITERIA SET OUT IN BAAP Policy". V and the eight criteria set out in BAAP Policy 4 – Great West Road, were supportive of the application. (See Reynard Mills Planning Statement page 17 paras 4.66-70)*

**Paragraph S.3.1 Heathrow.**

Please see our comments on paragraph S.1.5. We welcome the Council's careful approach. We feel, however, that the Council should fully support the Mayor's proposals and plan for a Heathrow without an airport or one that is substantially reduced. The Council should prepare contingency plans for a possible local economic future in which the airport is reduced or removed to meet national policies.

**Paragraph S.4.1.**

We are concerned that the borough has so great a housing problem although we think this should be seen in regional rather than borough terms.

In the very long term the possibility of massive new housing on the Heathrow sites would alter the character of west London.

In the short term we do support a programme of carefully planned new housing especially if funds are available for housing schemes with a very high proportion of housing for large families, low income families and starter homes.

Our experience in Brentford is that much of our local urban quality has been compromised by recently approved developments and that a cautious planned approach would be needed before any further redevelopment was proposed.

Additionally the population of Brentford has vastly increased in the last 20 years without the necessary jobs for local people. A successful example of a new local employer that has worked hard to recruit locally is the Waldorf Astoria, Syon Park. This endeavour should be recognised, celebrated and followed.

Already housing development has got ahead of the provision of schools, health facilities or housing for the elderly.

**Paragraph S.5.1.**

We regret the omission of any reference to Conservation Areas in this section.

**Page 21.**

*We suggest you print the map over 2 pages as it is un-readable*

**Page 22**

We do NOT agree with the preferred policy which is not based on past experience nor on a realistic assessment of the likely financial climate in the plan period.

**Section 9 Economy and Jobs.**

**Paragraph 9.2. Heathrow.**

The statistics show how important it is to plan for a scenario in which Heathrow shrinks as this would fundamentally change the character of West London.

**Employment Questions (page 33)**

**1. Proposed Approach.**

Yes we do agree that public transport needs to be improved. Improvements should include a bus network linking residential areas to rail, cross rail and underground stations and to town centres.

Past proposals for a tram down the Great West Road should be explored. It could be a better route for a West London tram.

**2. Town Centres.**

In an uncertain economic climate where retail sales are loosing out to on-line services shopping investment should be carefully tailored to the needs of individual centres and a very varied approach would be appropriate.

At **Feltham** long term plans should take account the additional economic risks which could be presented by the Mayor of London's advocacy for the long term relocation of Heathrow.

At **Hounslow** We are concerned that support for an unrealistic growth agenda may be provided at the expense of other parts of the borough.

At **Chiswick** we can see the success of a shopping centre which serves a high income area well. We agree that improvements to both public transport and short term car parking are needed.

In **Brentford** the town centre has struggled severely for many years and many independent businesses are constantly on the brink of collapse with owners often surviving on meagre incomes or by subsidising their businesses from family savings.

The Council needs to work even harder with the local community and the developer on the basis of the present BAAP and the 2007 report of the Brentford High Street Steering Group. It is important to ensure the survival of existing shops during redevelopment by planning for continuity of trading during reconstruction both physically and by realistic low rents and taxes.

The new scheme should not repeat the standard High Street pattern dominated by national chains, nor ignore the special river edge location and the unique Ridgeways boatyard, but build on its special historic character with small lock up shops, a low rise High Street frontage of varied domestic scale design, narrow lanes, and shopping arcades to make Brentford a true shopping destination. Links to Kew Gardens and to Syon Park and to local hotels should also be promoted.

### **3. Great West Road.**

The Great West Road is not in a town centre, has lost much of its éclat as the Golden Mile and is not a protected employment site. Poor public transport has added to its problems and consents for employment uses have not been financed and built out.

The road suffers from excess through traffic, high pollution, over competitive designs and the lack of a positive design led planning policy.

Before any new development is promoted the Council should ensure that the M4 viaduct is screened on both sides, that a robust landscape and tree planting scheme is in place, that advertisement features are progressively eliminated, that public transport, parking cycle tracks and well lit, crime free pedestrian routes are established with frequent crossing points across the A4.



When this is in place a review of alternative strategies for medium rise developments for varied uses with improved links to Brentford Town Centre, Gunnersbury, Boston Manor and Syon Parks should be planned and put out to consultation before being adapted as a basis for future investment.

### **3/4. Employment Land.**

We support the Council's initiative to review Employment land. We consider that the policy to protect employment sites should be maintained until the current review is complete.

Any new policy should identify existing and new employment sites which are well located and are suitable for 21<sup>st</sup> c uses. Only when this policy is in place should any employment sites be released for non employment development.

We are concerned that too many true employment sites have been used for mixed development both because this limits the range of employment uses in a rapidly changing economic environment, and because mixed use can provide poor quality housing. The under-use of housing space over shops and restaurants has been noted in plans all over the country.

We are concerned at the unplanned loss of employment sites in Brentford at Commercial Road, Kew Campus and possibly at Reynard's Mill. We feel these decisions suggest that employment protection policies are not effective and we look for policy led and design led decisions on future applications.

### **5. Hotels.**

***We would like this section to be extended to deal with areas which could be developed as tourist destinations as we think this could be the case in Brentford.***

In the plan period Brentford town Centre and the adjacent Commerce Road sites should be redeveloped. The Master Plan for Kew Gardens could be implemented with the opening up of the gardens to the river over Queen Elizabeth's Lawn. The rejuvenation of the Brentford river side by The Thames Landscape Strategy would compliment these improvements and could link Brentford both by a ferry to Kew Gardens and by a Thames path to Syon. The designation of Kew Gardens as a World Heritage site has increased visitor numbers and the possibility that the World Heritage designation could be extended to Syon would put Brentford at the centre of Kew Palace and Gardens and Syon and its park. Further links to Boston Manor could make Brentford a star visitor attraction.

So far the Brentford hotels have not been effectively related towards the town centre. Most of the recent proposals are predominantly located on the A4.

Some smaller hotels including the Holiday Inn and the new hotel in Syon Park suggest there may be scope for further attractions within the new town centre, which would be welcome and could be the basis for future visitor expansion .

## **6. Work Prospects.**

We are not convinced that the core strategy would help more people into work without a significant improvement in public transport.

### **Housing Questions. Page 42.**

#### **General Response,**

We consider that the Preferred Approach considers the housing issue from the wrong end.

The land in the borough is, in our view, already heavily developed and is appropriately allocated between employment and residential sites.

Policies should seek to protect employment sites and open spaces and there is clearly a need to provide more land for schools. It follows that increased housing would come mostly from increasing density in existing housing areas by sub-division or redevelopment.

New housing is also likely to have lower space standards, lack infra structure, as we have seen in Brentford, and increase open space deficiencies.

While we accept that there may be some scope for increasing housing provision within the borough without these penalties we would expect the borough to progressively fail to meet its housing targets as opportunity sites are developed.

We consider that the borough should not accept the Mayor's targets, but seek to protect and improve the living standards of existing residents, many of whom live in over-crowded conditions..

#### **1. Should we exceed targets .**

No; for reasons given above.

**2. Affordable Housing.**

No. We consider that the Council should promote a policy to encourage a sustainable mix of family sizes and family incomes, which will probably produce different targets in different parts of the borough.

**2. Back Gardens.**

No. Sub-dividing gardens may be acceptable in some cases. We would look for policies which tended to discourage, but not prohibit sub-division.

**3. Specialist Housing.**

Generally yes. Policies should reflect the needs of specialist groups and the ability of the community to absorb them.

On this basis the provision of care homes, sheltered housing and accessible housing has probably been under-provided and has led to fragile people being isolated from their friends and families. We would also look for innovative solutions like “granny flats” which allow more elderly people to remain in their own community.

Brentford has no recent experience of housing travellers.

**Environmental Challenges Questions Page 51.****General Comment.**

The questions posed do not go far enough. They are based on the assumption that a local planning authority can achieve higher standards by making general statements like “good design” without the resources to prepare design led guide lines for all sensitive areas in the borough and the skills to establish, achieve and monitor design performance.

It is appreciated that the borough does not presently have these resources and that the urban quality of the borough is declining in many areas.

We consider that the Council should seek to redress these problems before advancing further policy statements which cannot be realised.

**1. Building for Life.**

We support the policy but doubt if it can be achieved.

## **2. Carbon Emissions**

Yes.

## **3. Standards**

Yes, but doubt if it can be achieved. See reasons above

## **4. Other Measures to Mitigate Climate Change.**

The Council should continue to resist any efforts by BAA to expand Heathrow and plan for a future in which the Mayor successfully re-locates London's hub airport in the estuary. This would eventually lead to the removal of aircraft pollution and the decrease in traffic pollution. The re-development of Heathrow would give major new opportunities and challenges for Feltham as it responded to a new urban complex built to the highest possible 21<sup>st</sup> century standards.

## **5. Flood Risk.**

Yes. We also support the proposals put forward by the Thames Landscape Strategy to incorporate flood meadows in river bank areas.

## **4. Pollution.**

No. The statement "Env 5.1" talks of promoting development first and then seeking to protect or enhance environmental quality. If the Council wishes to achieve better standards and enhance the health and well being of present and future residents it must set enhanced environmental standards FIRST and then ensure that no long term residential accommodation is permitted which fails to meet these standards.

## **5. Mineral Extraction.**

We have no views on this issue.

## **Page 64. Local Infra Structure and Services.**

### **General comments.**

It is clear that the Core Strategy is based on inadequate funding for public transport, highways and other improvements during the plan period. In our view this should lead to the scaling down of new development targets, particularly housing, until this can be remedied.

## **1. Sustainable Transport.**

Yes we accept this as an interim policy provided it is accompanied by a reduction in development targets.

We welcome plans to improve facilities for cycles and note that TfL standards will require provision for additional cycles in every new development.

We consider that improvements could be made to the bus service at modest cost to ensure that it connected up town centres, major work destinations and tourist attractions to underground and rail stations

## **2. Procuring Communal Facilities.**

Our experience over the last 23 years in Brentford is that the population has more or less doubled and would have increased even more if all the approved schemes had been built. But there has been an insufficient and slow corresponding increase in service provision so that residents are short of school places, health care, provision for the elderly and police services. While this is not the fault of the Local Planning Authority it is a failure of public services. It would appear that the only remedy open to the LPA is to halt housing development until service improvements can be funded and provided.

Our views on shopping provision are shown under our comments on Town Centres.

### **Schools. (INF 7)**

No, we do not agree with the Council's approach to the provision of school places. We have had discussions with the director and her staff over an extended period and it was clear to us that no adequate planning was being done to protect education sites

Brentford already has a need for a new Primary School. We now hear that there is a possibility that a school site could be provided if the bus depot at Commerce Road were re-located. While this proposal would be welcome it gives no confidence that forward planning is effective.

Additionally Brentford needs a new secondary school. The Council has quite rightly followed policies to encourage family housing, but the planning consents to pursue this policy have not been followed by plans for additional school places. It is likely that a mixed sex secular school would be most appropriate.

Again the lack of forward planning has led to opportunist proposals. One might be to extend existing schools on the Brentford Ealing boarder by incorporating the land at the Reynard Mills Industrial Estate.

Brentford will not become a settled community unless families are able to bring up their children and live out their lives here.

### **3. Green Infra Structure and Blue Ribbon Policies.**

**Green Infra Structure.** We broadly support the Council policy. We note that there are significant areas of open space deficiency which should be eliminated before any increase in housing density near these areas is considered.

We propose that where the survey(s) of open space referred to in paragraph 5.6.2 on page 20 and in paragraph INF.11.1 on page 61 of the consultation draft indicate that there may be surplus open spaces, that the most careful consideration be given to ways by which these spaces could be made more accessible to the public before any consideration is given to releasing these spaces for development.

At present access to some open spaces is restricted, for example where they are the property of clubs or schools. In these instances priority should be given to providing full or partial public access rather than permitting development on them.

#### **Blue Ribbon Policy.**

We support the summarisation of the Blue Ribbon Network policy thrust. We believe it would be appropriate to include a reference to the fact that in seeking to achieve the goals enumerated The Blue Ribbon Network policies speak of the relationship of buildings to the water's edge, in terms of style, sizing, compatible uses and physical proximity.

We welcome the final paragraphs and thoroughly endorse them.

**Other Matters.**

We are not sure where you might include more reference to the elderly and disabled. In collating this response we have been reminded of the growing number of people living longer and of those who are disabled. We would like to see more reference to their needs.

Some examples might be more seats and shelters near shops, bus stops, health centres, playgrounds and parks, more sheltered accommodation, well sited close to town centres and more disabled access to public buildings starting with Kew Bridge Station.

**Summary:**

As Brentford is likely to develop further during the plan period we consider that it vitally important that the Core Strategy is closely related to the aspirations of the community and the constraints of the likely financial climate.

The BCC asks the Council to consider these views and to revise their document where appropriate.

Yours sincerely

Denis Browne,  
Chairman, Planning Consultative Committee

Cc; Brentford Web site  
Local Ward Councillors  
Local Amenity societies.