

Boris Johnson,
Mayor of London,
(London Plan Review Initial Proposals)
GLA
City Hall, More London,
The Queens Walk SE1 2AA

30 June 2009
BCC 453 dmb

By email: mayor@london.gov

Dear Sir,

**A New Plan for London, April 2009.
Comments by the Brentford Community Council (LB Hounslow.)**

1. Who are we.

Our comments come from a local amenity group set up in 1989 to provide a forum for those who live and work in the Brentford Area of Hounslow. We have continuously participated in the planning process at a time of change during which plans have been approved to double our population and change the character of what was once an historic centre in its own right.

2. Our view on the Adopted London Plan.

2.1. We welcomed the adoption of a comprehensive strategic plan for London. We considered that it gave a clear context for development.

2.2. Unfortunately guidance on density, local character, protecting the river have not always been followed either in the Mayor's advice on applications nor on the evidence available at public inquiries.

3. Omission in the Adopted London Plan.

3.1. The policies allowing/supporting very high buildings have not been related to urban design studies.

3.2. The Blue Ribbon Policy has not granted "Conservation Area" status to the river edge nor to adjacent areas, which are part of the river setting.

3.3. Policies on Airports have not been sufficiently robust, allowing the proposed further unacceptable expansion of Heathrow.

4.. A New Plan for London, Proposals 2009. Chapter 1. Context and Vision

4.1. We welcome the view that the plan should be a response to population growth, but consider that the London Plan should provide for extensive decanting to new

planned developments well beyond the M25 to ensure that growth within London can be contained in the limited sites available. Also growth should only proceed at a rate where infra-structure can be fully provided before additional development is approved.

4.2. Employment. We note that cities which have best survived slumps in the economy are those with a diverse range of employment. Plans for London should build up employment potential in sectors which are relatively weak.

4.3. Deprivation is partly an index of excessive densities and of limited employment opportunities. This emphasises 4.1 and 4.2 (above).

4.4. Climate change can be mitigated by reduced journeys to work/better public transport/shorter commutes as well as higher eco standards. It would be desirable to locate new communities (4.1 above) on high land and reduce reliance on the Thames estuary.

4.5 Consensual Planning. We would welcome strong clear London wide policies (ie to refuse consent before infra structure was in place, to control densities and to preserve the traditional idiosyncrasies) but believe that they must be interpreted locally.

4.6. The Mayor's Vision. We would wish to see the Mayor's vision modified so that while it plans for growth it resists excessive growth and rapid change and insists that development must neither be excessive, unsupported by the necessary infra structure nor allowed to remove the essential diverse character of London.

5.0 Chapter 2. London's Places

5.1. We welcome (para 84) the concern for policies to strengthen the local character of outer London and look forward to measures to: reduce maximum densities, preserve historic character and heritage including the Thames.

5.2. We are pleased to note that no "Opportunity Areas" are proposed in Hounslow.

5.3. We hope that the Mayor will promote sensitive plans for secondary town centres including Brentford, to reduce travel times and to increase the diversity of centres.

5.4. West London has magnificent parks which are an asset to the whole of London. More London resources are needed to protect them and policies to increase their enjoyment including restrictions on over flying to Heathrow would improve the quality of life for Londoners as a whole.

5.5. The Blue Ribbon network should be linked to the Thames Landscape Policies (Hampton/Kew and Kew to Chelsea and other strategies should be encouraged. Their policies should be regularly kept up to date so they are effective policy references in riverside applications. This will require the direct support of the Mayor. The object should be to ensure that the river becomes an ever more valuable asset. The Blue Ribbon network should have Conservation Area status.

6.0 Chapter 3. London's People

6.1. We are concerned that schemes are being approved which provide far less than 50% affordable housing. Until there are national policies to promote and subsidise a programme of public housing, London will depend on "affordable housing" to house those on lower incomes, including those who service the city. We think that where this cannot be viably provided development should be deferred. We note that the policy of requiring all new housing developments to be mixed tenure has been very successful and should be maintained at all costs. While there may be a case for some more flexibility in application the overall aims should not be lost nor should there be a return to the concentration of affordable housing on large estates.

6.2. We propose that the Mayor adopts The Parker Morris standard for all residential schemes.

7.0 Chapter 4. London's Economy

Please see comments in para 4 (above).

8.0. Chapter 5. London's Climate

In addition to comments above (para 4) please add:

8.1. Policies are needed to ensure that existing buildings are insulated. The Mayor should support and develop national initiatives to improve insulation and introduce chp and heat pump systems in parks to service existing estates.

8.2. Cycling should be encouraged by requiring 1 cycle space per bedroom in new schemes, We need to build complete cycle systems which may involve excluding cars, providing secure storage and changing/showers in all work places. The mayor should support the registration and insurance of cycles.

8.3. Waste should be moved by barge where possible. Waste transfer stations should be built on river and canal edge sites.

9.0 Chapter 6. London's Transport

9.1. We endorse the plan to re-locate Heathrow. It is essential that the proposed airport is located above future flood levels, is safely linked by high speed rail to the

transport system and is flexible enough to meet pressures to increase and/or to diminish capacity.

9.2. We consider that the present disability badge on cars should be extended to the immobile elderly and that all private personal transport without a badge should be excluded from congested areas. This would need to be accompanied by major improvements to public transport.

10.0. Chapter 7. Quality of Life.

10.1. We support the Mayor's intentions. The problem is to achieve them. Far greater effort will be required to plan and design the urban fabric so that the planning process is design led.

10.2 We are not convinced that the policies on heritage are sufficiently robust. The quality of London has been built up over centuries and requires protection. There should be a presumption that tall buildings or those which have a significant impact are not acceptable unless there is an adopted urban design in place which shows how the new buildings would "enhance" our heritage.

10.3. We do not believe that the plan can protect our parks and open spaces unless funding is made available to restore and maintain them without selling off open space for development. Gunnersbury Park (Ealing and Hounslow) is a current example.

10.4. We do not think the Mayor's policy (para 198) is sufficiently pro-active. We have seen the use of the Thames and the canals decline in the last 20 years. To restore it a raft of measures is needed including policies and budgets to open up draw docks, protect boat yards, encourage freight, re-open boat clubs and to support the Thames Landscape Strategies.

10.5. We are concerned that the plan does not explain how "precedents" are to be considered in preparing the plan. An example (page 72) is the Canary Wharf complex, which was resisted before the London Docklands were established, but has now become "a local context where tall buildings are appropriate" This is not forward planning. The Mayor should require that tall buildings are only supported in the context of an adopted urban design context.

11.0. Chapter 8. Monitoring

11.1. Monitoring must start in the Mayor's office. Only when it is universally believed that the Mayor's view on applications will accord with his own policies will others respect his office and believe that the making and reviewing of the London Plan will have a direct effect on the quality of life in their area.

We would be grateful if you can confirm receipt and let us know how you wish to respond to these comments.

Yours sincerely

Denis Browne
Chairman, Planning Consultative Committee, Brentford Community Council.

Cc: London Borough of Hounslow, Planning Department (Julia Worboys)
Cllr Barbara Reid, Executive Member for Planning, LBH.
BCC Web Site.