

Hounslow Local Plan Policy Options 2015/20130.**BCC. views****Ref LP 02.****July 2013.**

Note: The Comments refer to paragraphs in the Council document

INTRODUCTION.

- 1.2. The document does not make clear why development up to 2030 should be concentrated in Hounslow and Brentford. Brentford has already experienced significant growth (70% in the TW8 Area See our appendix 1). It is agreed that this growth in housing has been at the expense of local employment areas and has not been accompanied by the necessary infrastructure.

We believe that the infrastructure needs of Brentford and real measures to reduce noise and pollution should come BEFORE any further major consents are granted.

- 1.3. We regret the intention to scrap the BAAP, which could have been a model for further Action Area Plans across the borough.
- 1.4. We welcome the inclusion of development site allocations, although we note that in Brentford many are "opportunity sites" rather than proposals based on a Master Plan study. A number have already been granted consents.

We urge the council to prepare Master Plans for areas of change so that the full implications of site designations can be appreciated before they are adopted.

- 1.11. We have prepared a more detailed analysis of the problems of Sustainable Development as part of our comments on the current Brentford Community Stadium application. For The relevant Section see our appendix 2).
- 1.16. We accept that Brentford is less suburban than areas to the west. but it is important to recognise that Brentford has its own history and its own diverse character. Brentford is still basically an area of low rise terraces on parallel streets set between large historic estates.

Many Brentford residents wish to live in this environment and do not welcome the high rise blocks which have characterised recent schemes.

- 1.17. The Great West Road is not well serviced by public transport and has proved to be an unpopular location for offices. Many office buildings have remained empty. Successive applications for new offices have not been built out.

It was only when mixed development was permitted on the Alfa Laval and the North West Quarter sites that development started to take off.

The GWR still has important historic buildings which should be respected. New development should not be promoted until Public Transport Access is improved and the problems of noise and air quality are abated.,

- 1.18. The borough population figures suggest a school age population of about 50,000. We know that Brentford is already short of school sites.

In this situation it is not appropriate to designate truly available vacant sites for yet more housing when the schools sites are so problematic.

We do not feel confident that schools at Griffin Park (which has a housing consent) the Half Acre Police Building or the Commerce Road Bus Station can be relied on and in any event new school places are needed before the time shown in this plan.

We understand that the recently opened Kew House private school wishes to extend into the second building on Capital Exchange Way, but that this may be frustrated if the housing associated with the application for the Brentford Community Stadium is consented.

- 1.19 Brentford is already suffering from the rapid increase in the privately rented sector. This is tending to turn us into a "dormitory town". We have absent landlords and tenants who move often. Neither help us to form a sustainable community.
- 1.21. New development should not be promoted on the Great West Road until Public Transport, noise and air quality are improved.
- 1.22. A similar approach would encourage growth in other parts of the

Borough.

SPATIAL STRATEGY.

2.7/9. The period 2015/2030 described in this document must be seen in the context of the period of time before and after the plan period.

A plan which promotes development in Brentford and leaves most of the remainder of the borough as a continuing suburb neither enables Brentford to change slowly enough to promote a sustainable community nor does it prepare other areas for the growth which will inevitably follow if the population of Greater London continues to grow.

We believe that this document is not a considered plan for balanced growth, but an effort to solve all the problems of expansion in one place, destroying its unique character in the process.

2.11. Brentford Town centre has been the subject of successive studies by the Council, the BCC, The Brentford Chamber of commerce and the High Street Steering Group.

The result so far has been an application which was unanimously rejected at a large public meeting of residents and an apparent withdrawal by the applicant from the process of amendment and agreement which had been looked for.

It would appear that we cannot predict whether any progress in rebuilding our town centre can be made before or during the plan period. Any other developments which depend on the town centre being rejuvenated must also be suspect.

2.13. Expansion based on private sector renting does not provide a sustainable community (see i.18 above).

2.14 We agree that employment and homes should change together. However, this policy has not been followed in the past. Commerce Road was an employment site. Employment has gone and about 1000 flats are being built. The North West Quarter was the offices of SKB. Although it retains some non residential use it is predominantly a housing site with 750 flats.

2.15 We welcome the importance placed on character areas. We are dismayed that the Council's proposals for the Character

Areas on the Great West Road will not be available before the consultation period on this paper is finished.

As was seen in the recent Reynard Mills Estate PLI the Secretary of State places great importance of Character Areas. It was crucial at that inquiry that the residential character of the surrounding streets should determine the scale and character of the new development and NOT that of the adjacent Great West Road.

- 2.21. (See 2.11 above). It is quite possible that Brentford Town Centre can only be rebuilt during the plan period if the Council decide to use CPO powers.
- 2.22. Employment growth on the Great West Road has already been undermined by the failure to improve transport, by the failure of private investment and by the consents granted for residential development.
- 2.23. Brentford has major sites along the river, in the town centre, at Commerce Road and at Lionel Road where there is likely to be virtually no affordable housing and where the proportion of family accommodation is low.

To rectify this balance will require powers and finance which are not available and it therefore not appropriate to set unrealisable targets.

- 2.24. We welcome the proposal to adopt a policy for the location of tall buildings. This should be plan based and open to consultation.
- 2.25 See comments on paras 7.1/7.64 below
- 2.27. We need specific proposals. For example by fencing the M4 viaduct with sound barriers.

We need to know what the plan proposes when it states “ to prevent unacceptable risks.....”

BRENTFORD SECTION.

Brentford History and Context.

It is not correct to state “the town centre....and is flanked by new high density residential development.

Planned Growth.

The new Borough Plan should accord with the London Plan. New development should not exceed the Mayor's guide lines.

The proposed Brentford sites which do already have consents = 8,2 hectares for sites with a PTAL of 2 or 3 which equates to 574/1394 new units plus .

2.2 hectares for sites with a PTAL of 4 which equates with 154/574 Units.

Giving a total potential for new residential sites in Brentford of 728/1,968 units.

This figure should be compared with 1,486 units shown in the report.

The reference to improved Public Transport in Brentford is crucial. It has to come BEFORE additional new development.

Any proposals that are linked to Cross Rail must be programmed to follow the completion of those links.

We support the urgent provision of additional school places but note that the sites proposed are not immediately available (see 1.18 above).

We support the proposed move of the Brentford Football Club to Lionel Road, but we do not support the current outline application for a 160 bed hotel and 910 high rise flats at densities more than double those recommended in the London Plan and the UDP. We would welcome a more careful scheme which was better financed,

BRENTFORD DEVELOPMENT SITES.**Gillette.****(Non residential)**

This application was supported by the BCC but it has not been financed. The listed building is empty. It needs a new brief which can be funded.

Gunnerbury Park.**(Non residential)**

The proposal to fund some improvements by selling off land for Development was rejected by local residents. A new realistic scheme will be needed to secure this heritage site.

Reynard Mills.**(Possibly Residential)**

The BCC evidence at the PLI was in favour of sing the site to expand the adjacent schools (see 1.18 above). If this was not acceptable we wished to see any development include provision for the elderly (se.... above)and that the design respect the character and scale of the adjacent streets and not that of the nearby Great West Road.

Residential Site Area (if site not used for education or special needs (see above)	2.35	Hectares
	2	PTAL

Albany Riverside.**(Residential)**

The crucial constraint is that this site is directly opposite the Kew Gardens World Heritage site. Far too many unacceptable buildings have been permitted on the riverside sites and the status of Kew Gardens could be in doubt if it is not respected.

Brentford residents want to see the Waterman's Arts Centre incorporated into the plans for the Brentford town Centre. Brentford Diamond.

The current application is based on BFC business plan which shows that the club own most of the site but do not have the resources to build.

Consequently they are seeking consent for a hotel and for 910 Flats at densities which are more than double those in the London Plan and the UDP.

If a modified proposal which respects these standards can be agreed it may be possible to complete the development within phase 2.

Site Area	0,63	hectares
Thames River Path	0.1	hectares
Residential Area	0.53	hectares
PTAL	3.	
Density	(limited by impact on World Heritage/Kew)	

Griffin Park**(Non residential)**

We note that Griffin Park cannot be released until BFC has moved out. It would difficult to be confident that the site could be redeveloped and occupied in phase 1.

The site is surrounded by low rise terrace housing occupied by families and should be used as a school.

Brentford Police Station.**(non residential)**

The proposal to demolish the present building and replace it with a school would be welcome.

We are concerned that with our already increased population Police services should be improved, possibly locating them in the town centre.

Brentford Waterside**(residential and non residential)**

The Council, the BCC the Brentford Chamber of Commerce and the Brentford High Street Steering group have all promoted the redevelopment of the High Street. The site contains important historic features which need to be respected and it is located in an area where one to four storey development is appropriate.

The current application scheme was rejected by local residents and the developer, who may have funding problems, has not proceeded to amend his proposals and to seek a consent.

It is possible that the council will need to take CPO powers to ensure a satisfactory outcome.

Total site area	5.25	hectares
Residential site area	3	hectares
PTAL	3	

Morrison's Supermarket**(non residential)**

We would welcome investment in this site. Proposals for it were included in the Brentford Study which English Heritage commissioned from Kim Wilkie.

Summary on Brentford sites.

We note that Griffin Park is nominated for a school and for residential use. As there are not enough alternative sites we have asked that Griffin Park should be a school site if BFC move out.

We broadly agree the estimate for the capacity of these sites. However, given that most of them are in areas of open space deficiency it would be wiser to assume a lower figure to allow for this correction.

SUPPORTING OUR TOWN CENTRES.

- 3.1. We fully support Town Centre policies. Our concern is to re-establish a well financed and appropriate development in Brentford.
- 3.14 We accept the present Town Centre boundaries. It might be better not to set specific targets, but to have policies to ensure maximum variation of size and type of shop. It is important to encourage diverse services in the Lanes running down to the river.
- 3.15 Brentford TC has been in decline while population has grown so residents shop elsewhere. One problem is the enlargement of out of town shops (Tesco and Currys) taking trade from TC. We need to build up new Brentford shops slowly to re-establish TC.
- TC 6. We would support Brentford Waterside as phased development
We would be open to discussion on Morrison's expansion.
We would oppose retail on police site in Half Acre.
- 3.16 We support diversity at Brentford. New residents increase the need for a wide range of shops.
- TC7. We support the relocation of Waterman's in Brentford TC.
We do not wish to see other cinemas in the TC
We support a mix of shops/café/restaurants especially on The lanes and by the river.

3.19 Brentford Riverside is on the south side of the High Street so it is important that the design is sensitive, includes the historic lanes to the river and is low so as not to cast shadows over the High Street frontages.

TC8 We support all proposed policies.

PROMOTING ECONOMIC DEVELOPMENT AND INWARD INVESTMENT.

4.1/2 In Brentford we have progressively lost employment sites by:

Not improving access

Using employment sites as opportunities for new housing, eg:

Scottish Widows, Kew Campus, Commerce Road, Alfa Laval and North West Quarter are all ex-employment sites now in predominantly residential use

The remaining opportunities for retaining employment are at the Centaurs business Park, Gillette. Busch House, Reynard Mills Estate

It would be desirable to retain all these properties in employment use and to progressively fill the un-let office space. To achieve this it will be necessary to improve access (both by car and public transport, to up-grade obsolete buildings and to improve their setting including a massive tree planting and landscape programme. (We note the success of the Chiswick Park Estate where the landscape was laid out before the buildings).

4.7. We support the recognition of the Strategically Important Centre at Transport Avenue, but note that this paper contains no proposals for improving its potential.

ED2. We would oppose option 1 as too rigid
We oppose option 2. We cannot afford to release any employment sites as too many have been lost already (see 4.12 above).

Option 4 agreed

Option 5 rejected.

Option 6 agreed.

4.11 Brentford has many new hotels and more are proposed, mostly on sites on the A4 (Gilette, Alfa Laval. etc) We think that developers include hotels in their schemes because they can be located on the A4 (air conditioning can overcome poor air quality and noise problems), because they represent a semi-residential use, which can be accepted on sites formerly designated for employment and because, being tall buildings, they can be eye catching.

Few are located in town centres. Some have a select setting like that in Syon Park.

We think that hotel policy should be related to a policy for increasing the attraction of Brentford as destination with an active tourist policy and plans to improve the environment for visitors.

Among the ideas which might be promoted are:

Build a hotel on the Waterman,s site (Albany riverside)
Improve the riverside walk from Kew Bridge to Syon (Thames Landscape Strategy) and improve the Brent water edge.
Link the new Town Centre Watermans Arts centre to other Leisure facilities.
Re-opening the ferry to Kew Gardens,
Improving Access to Syon Park.
Include Syon Park in World Heritage site
Improve setting of Canal basin
Improve facilities for canal and river boats

This will need the active leadership of the Council and should be a feature of this plan. If it successful the need for hotels may Follow.

ED3. Neither policy is appropriate for Brentford. New hotels should be sited where they will maximise the number of people who come to Brentford as a destination.

4.14. We agree that we need more local employment. Also that traditional crafts (particularly river-related such as boat repairing) should be protected and encouraged. We have lost too many boat yards for high cost housing already.

ED4. We accept all options. But if small employment sites are not protected we will lose more local employment.

4.17. Brentford is blighted by the Haverfield Estate, which has failed to provide high class family housing for tenants on all incomes. Unlike the Syon Estate, which has been largely purchased by residents (right to buy) it fails to meet current needs.

High blocks in other parts of the country have been demolished.

We consider that this plan should include a Master Plan for the phased reconstruction of the estate in the plan period. The master plan should provide predominantly low rise family accommodation, together with schools, open space etc.

ED5. We support all options.

SUSTAINABLE MIXED COMMUNITIES.

The BCC has just produced on this issue in Brentford which is attached as Appendix 3

5.1/2 We agree with these objectives, but note that the plan proposal to concentrate new development for small households in high density development makes this objective unreachable in Brentford.

We need to ensure that all new development in Brentford is specifically designed to provide for a mix of incomes a mix of family sizes and that it contains local play spaces, leisure facilities, crèches, nearby primary schools, sheltered housing and homes for the elderly and those with dementia.

In schemes that are near to town centres the facilities for the elderly should be increased.

SC1. We do not accept that it is good practice to concentrate rapid urban expansion in limited parts of the borough for reasons set out in para 1.2 above.

We also do not agree that new housing in Brentford should exceed the density standards set out in the London Plan and The UDP and we note that some of the housing sites designated include other obligations. We therefore consider that the likely housing potential of new sites in the plan period would be less than shown in the schedule. (See para on Brentford: Planned Growth, above).

- 5.6. We accept the pressing need for affordable housing. We note that the document states that 50% affordable provision will “only be limited by viability”

We know:

That Commerce Road has funded the bus garage and has few affordable units

That the Town Centre proposal has viability problems and few affordable units

That the current application for the Brentford Community Stadium has no affordable units.

We also know that many of the riverside sites have few.

Viability tests continue to make affordable housing impracticable in Brentford. The plan needs a different mechanism if sustainable communities are to be achieved.

If it is not achieved it is likely that Brentford will see more high rise high density non family, non affordable housing owned by absentee landlords and occupied by a shifting population.

- 5.8 . We would oppose the proposal to charge developers of small sites to fund off site affordable housing. This would deter much needed investment in infill sites. It would also fail to increase affordable housing in Brentford, where there are no sites to build them.

- SC2. “Subject to viability” negates the policy in practice (see para 5.6)

We would support option 1a and 1b and reject 1c and 2.

But we confirm that based on current experience this will NOT achieve significant affordable housing in Brentford.

- 5.9 We note the borough wide view confirmed in Brentford that there is a greater need for larger family homes including larger affordable homes.

The current planning application for 910 flats associated with the Brentford Community Stadium is for 40% 1br, 40% 2br and 20% 3br
If granted this could deliver homes for over 3,000 people (8% of

our population) in non affordable, high rise, high density flats lacking in open space and infrastructure.

Clearly if the Council wants us to believe in its policies it must carry them through when making planning decisions.

SC3 (1). In view of the recent spate of non affordable non family size planning consents in Brentford, far higher proportions of family size and affordable housing will be needed than those proposed in the tables. It is not clear how the Council will achieve this in view of their history of consenting non affordable and non family housing.

(2) We support discouraging subdivision.

SC4 We support option 1b. Guidelines should relate to specific areas.

5.12 We support raising standards not only for the size and quality of housing but also for sun lighting (fewer single aspect flats) day lighting and privacy (greater distances between homes), play spaces. Families should not be brought up in high rise flats where children cannot play freely close to their parents.

SC5. We support option 1b, and for 2 whichever is the higher.

5.13 We concur with this concern.

SC6 We support option 1 and 2a.

SC7 We support options 1,2 and 3.

5.16. No mention is made of the current abuse of garden land where out houses are being let off to provide additional accommodation. Although this is first an enforcement issue
Its size will require plans to restore vacated property, to prevent further abuse and to deal with those evicted. As this is such a major problem it should be included in this plan.

SC8. We support option b. There may be a need for flexibility for example where larger gardens have a secondary frontage.

5.18 This is an important and growing need. But for many years the council has not refused consents to applications in Brentford which do NOT include special housing or old people's homes.

We look for a pro- active approach especially on sites like the Reynard Mills Estate, where there is easy access to town centres where the facilities that older people need are likely to be more accessible.

SC9. We support options 1,2 and 3 but consider that additional options are required to ensure provision for the elderly in care homes and sheltered housing in all major schemes.

SC11. We support these policies.

SC12. We support these policies and would add that student accommodation should be in small groups so it is mixed with standard housing.

LOCAL CHARACTER.

6.1. We welcome the importance given to character studies and the support the Secretary of State gave to it in his decision on the recent Reynard Mills pli.

We feel that it is unacceptable for the consultation on the proposed Character Studies on the Great West Road to come AFTER the consultation on this paper is complete. It is likely that some of the issues raised in the GWR papers will raise issues which need to be addressed in this paper.

6.5. The BCC welcomes the undertaking to “work with partners to secure exemplary design”.

For the last 25 years the BCC has been contributing comments on all major planning applications and policy documents and we have backed these views by being represented in numerous inquiries.

The BCC have recently produced a record of all the landmark and historic buildings. The planning department hold a copy and there have been discussions how it could be further worked up and there is the possibility that it might be used as a model for other parts of the borough.

The BCC was a founder member of the G15+ group, which now includes 19 local amenity societies across the borough who meet regularly with the Chief Executive and with planning officers. One offer this group has made is to provide a team of unpaid experienced professionals to support the design and conservation work of the council's Conservation Officer.

C1. We endorse these policies and look for a system to monitor how they are achieved.

C2 We endorse these policies.

6.6. It is important to note that Brentford remains predominantly an area of low rise terrace housing although a number of tower blocks have been permitted. The character of most building has a domestic scale built along parallel streets.

Policies should increase tree planting, reduce the visual impact of parked cars keep pavements in good repair and avoid waste collection systems which clutter small front gardens.

C3. The above polices (see 6.6) elaborate those in LC3.

6.9 The BCC regrets that the Council has NOT adopted a plan based policy for the location of tall buildings We do NOT consider that the descriptive criteria in LC4 sufficiently define the acceptable location for tall buildings.

The Council should prepare a plan based tall buildings policy document as part of the revised borough plan, so that it can be subject to consultation and be an effective tool at future planning decisions and appeals.

This is urgently needed in Brentford as the development Proposed in the plan period could destroy valuable parts of our character areas.

C4. These policies are NOT an acceptable alternative to a plan based high buildings policy.

Additionally 1. Is not acceptable as buildings fronting the A4 also affect the setting of residential areas nearby.

Policies 2 a/k are not acceptable because they are written in terms which cannot be used as a guide for developers or for those living within the environment they will effect.

6.13. We endorse the wide appreciation of Heritage assets. However, the Council should propose policies to protect listed and non-listed heritage buildings and features in this plan.

(See paragraph 6.5 above)

C5. This policy needs to be extended to cover all heritage assets identified in local studies (see paragraph 6.5 above).

C6. The policy should be extended to BAN all advertisements on trunk and motor roads,

GREEN AND BLUE INFRASTRUCTURE.

We welcome the inclusion of specific policies for Open spaces both for green spaces and water spaces. While we appreciate the general thrust of these policies and uphold them, a concern is the absence of specifically identified spaces and uses, whereby the general policies could be enforced in practical application of the policies to specific development proposals.

The relationship between 'Blue' infrastructure and the 'Green' open spaces has been properly acknowledged, but we would urge greater and more specific emphasis on this inter-relationship both in ecological terms and in the social value of green edged water space. We feel that too often the value of this is overlooked by reason of the present limited opportunity for many to experience the greenery that can so often be evident only by visiting from the water, and more public access by way of hire-boating and trip boats could help redress this lack of appreciation.

The policies for protecting the green spaces and the drawing of relevant boundaries would be greatly enhanced by embracing both green and blue areas within the relevant designations, accepting and acknowledging their essential inter-relationship. This is especially important in view of the attractiveness of such areas for residential developments.

We are concerned that the Council have designated only "some allotments" [7.14] as part of the designated MOL areas, whereas these in particular are an important facility that extends the value of the land for the community. In particular, we would welcome inclusion of the allotment on the Brent opposite Commerce Road and the Island behind the Butts, as being not only waterside but also of historic and literary interest. We are concerned that for this site in particular, due to its location, 7.32 alone might be insufficient protection.

The 'Green Grid' and corridor policy is welcome, and we would point out that while the first of the four key elements [7.37] is identified as "*London's river and other key landscape corridors including the Thames*", mention of the canal system is missing, which is of particular importance in linking more 'inland' urban areas.

The sections on Biodiversity and Tress are fully supported.

The Blue Ribbon Network section is likewise welcome, with the following comments:

We particularly commend 7.58 with its emphasis on the **pro-active role** that must be taken to maximise the potential of the waterways; the inter-connected nature of a system that joins several different boroughs must be appreciated in this context, and the realisation factored in that no one authority can be expected and/or relied upon to deliver the desired goals. It is noted that the existing British Waterways and Transport Act legislation always provided for local authority intervention to positively improve the waterways in their patch, and the newly emplaced change in status to the Canal & River Trust specifically encourages borough and public participation; it would be good to have this acknowledged within the Council's policies.

The reference in 7.60 to "*existing facilities*", while very welcome, vitally omits any reference to refurbishment of decayed infrastructure and the establishment of new infrastructure, in an environment where so much has been allowed to be destroyed &/or abandoned. The BAAP had specific site policies enumerating facilities in need of refurbishment such as the slipway and tidal grid in Ridgeways, as well as the offline serviced moorings. Additional slipways and drydocks exist both in Ridgeways The 'Island' and Johnson's Island which should be identified, and no development allowed that did not encompass refurbishment and improvement. There is in fact little "active use" to qualify for continuation, whereas the Council could readily promote this by favourable enforced policy decisions.

It needs to be recognised that there has been a failure to properly protect existing boatyard structures and facilities generally, and the destruction of the hugely important dry-docks of Lot's Ait is a signal example - as has been the failure to ensure that all access routes to the island boatyard are kept open and unobstructed.

On the subject of the BRN policies of the London Plan in this respect, it is highly desirable that the Council take up the challenge to follow the Mayor's lead in identifying and protecting waterside facilities such a wharves and trans-shipment sites however minor, regardless of any immediate planned

use. This forward-looking aspect of the BRN policies has been overlooked by both the local authority to date and the Secretary of State Inspectors – without vigorous and clear specific site identification for protection - for future as well as present uses - the accelerating loss of waterside facilities will end in an ultimately sterile environment contrary to the stated aims of this section.

Active canal/river use could be promoted further by extending the time and routes of access to and from the River Brent/Grand Union Canal and the Thames. It should be made specific policy to re-open the long-inoperable sluice gates at Johnson's Island so that this alternative access route was available at all suitable states of the tide. It is not a matter of requesting CART's co-operation – the Council are empowered to demand re-opening through the courts if necessary [but voluntary compliance would be preferable].

One of the most immediately beneficial amenities that would open use of the waterways for wider public use would be a trip boat and hire boats. Locations suitable for these are most obviously the Fellows, Morton & Clayton finger dock, and the wet/dry dock at the back of "The Island" – both immediately above the Gauging Locks.

The policies should also insist on use of the waterways for transport of building material and rubbish disposal in all waterside developments – a BRN policy that has been ignored in every suitable development in Hounslow since the London Plan was published

A failure/weakness in the proposed policy options [relevant to No:3] is the absence of recognition that inappropriate adjacent development always has deleterious impact upon waterside uses – very significantly in cases of more industrial waterside uses such as boatyards and wharves, but increasingly so with respect to leisure and residential moorings. The Council should take note of the current GLA Report into London Moorings being undertaken, which has been provoked by clamour from closely situated land-based homes alongside the canal in Islington. It could be hoped that positive pre-emptive proposals for peaceful co-existence between land and water uses/homes were introduced to prevent such disputes arising in this borough. There has been but a single Council contributor to the fact-collecting for the GLA Report, indicative of lack of appreciation of issues surrounding the rising uses of our waterways.

The Evidence Base References fail to include important but long-forgotten previous policy documentation such as the once-incorporated "London Canal Committee Guidelines" and the British Waterways "Waterways & Development Plans". These are ever-more pertinent policy advice documents as waterside development continues to overshadow the water and preclude vital uses and facilities.

DELIVERING THE COMMUNITY INFRASTRUCTURE.

8.1. We support the wide definition. We attach as an appendix our July 2013 paper on the state of infra structure deprivation in Brentford. We make proposals to ensure that land is reserved for infrastructure projects even where this draft paper shows all residential development.

See above for comments on Spatial Development in Brentford.

C11. The problem is not only to resist the loss of existing facilities but to create new ones. This plan NEITHER shows how the LAND or the FINANCE will be deployed so that present deficiencies are eliminated and additional infrastructure is provided BEFORE further housing is built.

C12. Policy 1. We would support this as far it goes. However to be realistic developers or the council have to identify finance AND land to achieve this objective.

C13. We endorse these policies, but are concerned that the places which are needed now all depend on present users leaving, demolishing their premises and building and setting up new schools.

Griffin Park is still occupied by BFC
The Police still occupy their Half Acre premises
The Bus station in Commerce Road is operational.

The proposal for a Green School for Boys appears to have no site as yet.

The new private Kew House School will not be able tot expand if the current Brentford Community Stadium application is granted.

8.14. Brentford is identified as an area where health provision needs to be improved. We also note the rising proportion of those over 85. Taken together with the 70% increase in the TW8 population (see paragraph 1.2 above and appendix) Brentford is clearly facing a crisis which could have been predicted and addressed before now.

C14 We support all these policies but we ask that no major new residential schemes are approved until there are significant improvement in the present provision of health care.

8.20 We welcome the proposal to provide a sports hub in Gunnersbury Park.

- 8.22` We note the appreciation of the importance of the Waterman Art Centre. We believe that it should be relocated within the rebuilt Brentford town Centre and that it should be linked to an expanding range of leisure facilities there including a book shop and library which would help our expanding population, particularly those for whom English is a second language.
- C.15 We strongly support option 2.
- 8.25. Brentford has many open space deficiency areas and many blocks of flats which lack play spaces close by.
- C.16 We endorse these policies. It would be preferable if all new developments exceeded the Mayor's standards until the borough deficiency is redressed.
- c.17. We endorse these policies. Implementation is likely to require capital investment and organisation. If the council can provide this support it is more likely to be achieved.
- 8.37. We agree thse designations in Brentford. It may be desirable to recognise the shops in Ealing Road.

CLIMATE CHANGE.

- EQ1. We support these policies and would like to see the work towards district heating progressively expand. A central plant in the town Centre development could serve Commerce Road, The Dock Estate, Brent Lea and other developments if plans were laid .in advance to make this possible.
- EQ2. We support the recommendations towards higher BREEAM Standards.
- EQ3. We support the options.
- EQ4. Many residents are aware that in storm conditions raw sewage passes into the Brent and the Thames. We are concerned that so much new development is proposed in the plan period before major improvements to the London sewage system are operational.
- 9.33 It is understood that asthma is prevalent in Brentford and so polices to REDUCE Air pollution are needed now.

- 8.37. The A4 is a source of high noise pollution. The borough plans should prohibit residential building exposed to high noise levels.
- 8.38 New development should not increase light pollution. It appears that if BFC move from Griffin Park the present nuisance will be replaced by similar problems in Lionel Road.
- EQ5. We support these policies including option 4b.
- EQ6 We support these policies.

CONNECTIVITY.

- 10.4. It is accepted that Hounslow as a whole has good connections, but severe daily congestion problems already exist in significant areas in Brentford. For example of the Chiswick roundabout and Kew Bridge
- 10.6 The paper lists a number of possible traffic improvements which are un-programmed and un-funded. We would hope that the planned developments on the Great West Road will not be consented until the necessary transport improvements are operational.
- EC1 These policies are all intended to “promote” Development which depends on them must be programmed to follow their completion.
- 10.13. The plan should include improvements to the A4/M4 corridor by a series of measure which might include:
- Lining the whole of the A4 with trees and a carefully designed landscape setting.
 - Screening the M4 viaduct with noise barriers
 - Banning advertisements.
 - Introducing screens so some footpaths were separated from the carriageway.
 - Improving cycles routes and signage (in preference to Brentford High Street)
 - Improving paving to footpaths and street lighting
 - Re-designing the underside of the M4 viaduct.
- 10.15 We support the type of improvements listed but note that they

are not firm proposals within the plan period. The reality is that many residents are complaining that streets are poorly maintained, pavements can be dangerous and repairs are done with unsuitable materials.

Even in times of financial difficulty it is important to progressively upgrade the public realm. There is a correlation between the vast increase in visitors to the South Bank and the quality of its river walk.

EC2. We support these policies including 9b.

EC3. Our preferred policy is to relocate flights away from Heathrow and to develop the site as a major New Town.