



Part B - Please use a separate sheet for each representation

Name or Organisation: Brentford Community Council

3. To which part of the Local Plan does this representation relate?

Paragraph(s)	<input type="text" value="a, e, g, h"/>	Policy	<input type="text" value="Policy SC1"/>	Figure/Site	<input type="text"/>
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4. Do you Consider the Local Plan is:

(Please tick as appropriate)

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

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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.

(Continue on a separate sheet if necessary)

6. Please set out what modification (s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. *(NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination)*. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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;



(Continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination.

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To explain the negative consequences of the policy wording as proposed.

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:

Date: