



**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"/>	Policy	<input type="text" value="CC3"/>	Figure/Site	<input type="text" value="Figure CC3.1"/>
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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.

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

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.

*(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.

“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.

CC3 b.

Omit this paragraph

CC3 k.

Add the text:

“as defined by the relevant Context and Character Area Studies”

*(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 text of the proposed policy wording

**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: