

Sadiq Khan, (Mayor of London).
New London Plan, GLA City Hall
By email

ref; BCC829
February 28 2018

Dear Mr Mayor,

**NEW DRAFT LONDON PLAN:
Comments Adopted by the Brentford Community Council**

The Brentford Community Council was established by Hounslow in 1988 to help Brentford residents convey their views on local matters, including development, before the Council made their decisions. The Planning Consultative Committee of the BCC meets monthly and reports their views to the Council and to you as appropriate. The BCC is now entirely independent.

I have been asked to send the following responses and I would be grateful if you would **acknowledge this email** (to browne_partnership@hotmail.com) and incorporate these changes in your document.

We would ask you to make the following changes to your consultation draft:

1. Policy GG2. (D) Making Best Use of Land. p15.
2. Policy GG4 (B) Delivering the Homes Londoners Need p19.
3. Great West Corridor Opportunity Area 6. p53
4. Policy SD8 Town Centres. p86
5. Policy D2 Delivering Good Design.
6. Policy D8. Tall Buildings.
7. Policy D6. Optimising Housing Density. p117
8. Housing Targets Table 4.1 p146
9. Policy H2, (F) Small Sites (1) p153.
10. Policy H15(A) Specialist Older Person Housing p186.
11. Policy S1. Developing London's Social Infrastructure. P202
12. Policy HC1. Heritage Conservation and Growth. P268
13. Policy G3 Metropolitan Open Land. p304
14. Policy SI 1 Improving Air Quality p320.
15. Policy T.1. Strategic Approach to Transport. P402.
16. Transport: Table 10.1 p 407.
17. Funding Transport Infrastructure Through Planning. p436

i.. MAKING THE BEST USE OF LAND. Policy GG”(D).

Plans to intensify the use of land should always include the allocation of sites for social infrastructure including schools, without permitting development on Green Belt or MOL. (see comments on Policy S1, below).

2. DELIVERING THE HOMES LONDONERS NEED Policy GG4(B).

The objective of setting a sustainable target for affordable homes will be directly undermined if the current practice of permitting housing development for the purpose of “enabling” non-viable assets to be created continues.

We request that the policy should read “The Mayor will and borough must refuse developments which are departures from the NLP even if they are promoted to support possibly desirable non-housing objectives”.

1, GREAT WEST CORRIDOR OPPORTUNITY AREA 6.

Opportunity Area 6 is shown on fig 2.10 as one of a number of opportunity areas related to the Elizabeth Line West.

We note that para 2.1.63 states that “the Mayor will therefore review and clarify the area’s potential growth when expansion proposals and their spatial and environmental implications are clearer”.

We understand that this paragraph refers to the anticipated completion of the Hounslow Local Plan Review, which is unlikely to be completed before the end of 2019.

The Review has so far set out a “preferred option” which was out to consultation in 2017. It is expected that this will be followed by an appraisal of the realistic possibilities for improving accessibility and connectivity, leading to revised and modified proposals, which will be submitted to an examination in public.

The BCC has submitted a response to the Local Plan Review (BCC820, attached). This took the view that access on the GWR is so poor that much commercial development with planning consents has not been built out. It was also the view that even if the proposed “game changing” rail links were operational early in the plan period, improvements to the PTaLs for the potential development sites would not be sufficient for the capacity of the OA to meet the Mayor’s target of 7,500 new homes (in addition to the 1,000 new homes which have received planning consent, but have not been built out).

Furthermore OA 6 is sited on major roads: The North/South Circular roads and the A4/M4 corridor. Although the London Plan does not promote increased traffic it is not likely that traffic flows will decrease.

Indeed, it is possible that the present levels of congestion on these roads will increase if the development shown on fig 2.10 is built, If the expansion of Heathrow does get approval, if the TfL superhighway 9 is built as proposed reducing road capacity or if clean air measures are taken, which lead to more unacceptable vehicles by-passing inner London on the A46.

We would submit that extensive residential development in an OA lining major roads would not meet the Mayor's policies on Air Quality or on accessibility and connectivity and that therefore applications for residential development on many of the OA sites should be refused.

Many of the proposed buildings within OA6 would be classified as "tall buildings" which can cause significant harm to heritage buildings. Tall buildings in OA6 have the potential to harm many heritage sites,, including The World Heritage Ste at Kew Gardens, Syon Park, Boston Manor Park and Gunnersbury Park as well as many listed buildings, locally listed buildings, conservation areas and defined character areas.

As an example the tower in the North West Quarter development now harms the view from Syon Park. Because OA6 is on rising ground the impact on the surrounding heritage sites can be severe.

We request the Mayor to consider removing OA6 from the list of OAs set out on fig 2.10.

4. TOWN CENTRES Policy SD8.

We support the intention behind Policy SD8(A) that Development Plans should take a "town centre first" approach, but consider that the policy needs to be expressed in stronger terms to achieve its objective.

We have noted that in the Brentford area of Hounslow consents have been given for retail outlets in Osterley and on the A4/M4 corridor so that there is significantly more retail outside the Brentford Town Centre than in it. Furthermore, the capacity of these retail outlets has been subsequently increased by consents for mezzanines within the buildings.

The current national policy to allow changes of use to residential has also led to the loss of diversity in our town centres.

We ask the Mayor to amend the policy wording to ensure that town centre uses are not permitted outside town centres.

We also note that Policy SD8 makes no distinction between different types of Town Centres. Brentford is a District Centre (see SD7). The London Plan should

not promote “higher density mixed use residential intensification” in District Centres.

We request that the policy should be so worded that it does not promote the densification of residential accommodation in District Centres.

5. DELIVERING GOOD DESIGN.

We support the intentions and many of the proposals behind this policy, but do not consider that it can be achieved without a radical review of current practice.

We therefore propose that the policy should incorporate the following additional wording:

(A) The Mayor will and boroughs should prepare Supplementary Planning Documents setting out the design concept and detail design guidance for all OAs, Areas of Supplementary Growth and for sites large enough to be referred to the Mayor or SoS.

The SPDs should show how the Development Plan objectives can be met in these local areas, how traffic and access issues are resolved and set out the urban design context for the whole area.

The Draft SPD should then be adopted for consultation and for the views of the Mayor (if appropriate). After adjustments have been made to following the consultation responses, the document should be adopted, together with planning briefs for the designated development sites within the SPD by the LPA,

(B) The Mayor will and councils should produce good design guidance prepared by independent teams. The guidance should be reviewed tri-annually.

(C) The Mayor will appoint an independent panel of architects and design professionals to advise him on the design quality of applications referred to him for decision or those which are referred to him after they have been approved by LPAs.

Similarly, boroughs should each appoint their own panels to advise officers and members before major planning applications are determined.

It would be desirable for panels to include at least one architect, one Urban Design practitioner, one Landscape Architect and one specialist

Conservation Architect. Panel members should not be members of practices who are involved in development projects in the area concerned.

(D) Councils should hold pre-application sessions on major applications in their area well before the application is submitted formally. LPAs should specify the amount of Design and Access information which is required so that members can appreciate what is proposed. Members should also invite the local Amenity societies to participate so that the members can see how the proposal might affect local people. The application should not be formally submitted until the applicant has had time to amend his scheme to meet these comments.

(E) The boroughs should review the training given to members of the planning committee which should be compulsory. LPAs should be required to employ at least one qualified and experienced architect in their Development Control section.

(F) Boroughs should be encouraged to hold public meetings before any major application is determined by the planning committee.

6. TALL BUILDINGS. Policy D8.

We request that the policy is amended to ensure that tall buildings should only be approved on designated sites in areas which have been the subject of SPDs or Planning Frameworks, which have been adopted after consultation with local residents.

7. OPTIMISING HOUSING DENSITIES. Policy D6.

The BCC fully appreciates that guidance on the appropriate density in new development needs be reviewed. It is also appreciated that the driving concern of the NLP is to increase the rate of housebuilding and that this may overall result in increased densities.

However, one of the problems with the draft is that it further weakens the ability of councils, residents or yourself to use density considerations as part of the evaluation of a development proposal.

This leads to at least three major problems:

1. Developments are proposed and executed by companies driven by the need to maximise profits. This may coincide with the community's need for local development or it may not. Governments, anxious to increase the rate of house building have sought to remove constraints on developers. The section on density in the draft has the same objective.

We believe that this approach is one-sided and makes it increasingly easy for developers to ignore local concerns. The Housing Act 2016 also moved the balance further in this direction, including a proposal for the approval of planning applications "in principle" As Mayor you should appreciate that this approach will also make it harder for Councils to object to developments which they know are sub-standard and/or at an inappropriate density.

2. The density matrix in the current London Plan gives clear guidance on density. While we understand that this was guidance and not a set of prescribed rules it, nevertheless, allowed Councils and residents to argue that the proposed density for a new development did not respect the recorded character of our local heritage assets.

3. The language of "optimisation" is likely to worsen the balance still further in the absence of clear guidelines. It is virtually certain that "optimisation" will be understood as "maximisation".

We request the Mayor to re-draft Policy DP6 to ensure that new development respects the scale, density and height of surrounding areas, particularly where they include World Heritage sites, the settings of Listed and Locally Listed buildings and designated Conservation and Character Areas. We also request that the policy gives a clear sense to the concept of "optimisation" by explaining the factors to be considered along with appropriate guidance on how the balance between them is to be struck.

We are also concerned that the plan should include guidance on densities In Opportunity Areas, preferably including an adjusted density/ptal matrix which the boroughs should set out in their SPDs for each OA.

We request the Mayor to retain the density/ptal/matrix in the NLP to guide applicants on development sites or through SPDS (see para 3 (A) and (B) above.

8. HOUSING TARGETS TABLE 4.1.

Based only on our understanding of the position in our borough, we think the housing target may not be achievable if all development was constrained by the policies in this plan.

In Hounslow developments required to meet the targets and the consequential infrastructure would need to include land in the Green Belt, land in MOLs and land where air quality is not suitable for residential

development. Land would also be required for schools and other social infrastructure to meet the needs of new residents.

We therefore ask the Mayor to consider other ways of meeting housing need in the next ten years. These might include promoting a national bill in Parliament to enable further New Towns to be built to assist urban overspill.

Or seeking powers to require boroughs to designate areas of intensification, which would lead to the demolition of privately owned property for comprehensive re-development using CPO powers as required.

We ask the Mayor to consider all options for meeting housing need which fully respect the policies in this plan.

We would seek clarification. Are the targets set for the amount of planning consents granted or for housing completions?

We would also ask the Mayor to have regard for the further expansion of housing need beyond the period of the ten year targets set out in the 2017 London Plan. We believe that his plans for the first ten years will lead to the need for further house building, As this second period comes within the time scale of the plan it should have policies to meet the continuing need.

9. SMALL SITES Policy H2 (F)

Our borough is experiencing difficulty in regulating back development on enclosed sites leading to outbuildings being used as unplanned additional units, known as “beds in sheds”

We request that section F of Policy H2 is extended to exclude additional housing units within fully enclosed residential sites.

10. SPECIALIST OLDER PERSON HOUSING Policy H15 (A)

As people live longer and as many in old age suffer from dementia and other disabilities, the need to allocate sites for specialist housing is increasing. This type of housing is best sited within town centres or on bus routes (with easy access doors or wheelchair ramps).

Boroughs should calculate the need for specialist housing in each part of their areas and designate sites in or easily accessible to town centres. Planning consents for other types of development on these sites should be refused.

We request that the policy is amended to ensure the designation of sites for specialist housing for older persons within or easily accessible to town centres.

11.. DEVELOPING LONDON'S SOCIAL INFRASTRUCTURE. Policy S1.

We consider that social infrastructure will not be achieved unless this policy is strengthened.

We request the Mayor to ensure that borough's local plans designate sites to meet the projected needs for education and other social infrastructure without including sites where air quality is unacceptable or any sites in the Green Belt or on MOLs.

12.. HERITAGE CONSERVATION AND GROWTH Policy HC1.

We welcome the plan's policy for an evidence-based understanding of London's heritage assets. However, we consider that new development should start from a respect for our heritage.

This will include the immediate settings of listed and locally listed buildings and include the more distant effect new development may have on views out of World Heritage sites, Protected Landscapes, Conservation Areas and Character Areas. Particular care is needed to avoid any new buildings which break into existing skylines.

We request the Mayor to begin Policy HC1 with a statement that new development must start from the premise that it should enhance the area in which is to be built, having special regard to World Heritage Sites, Listed and Locally Listed buildings, Conservation Areas and Character Areas.

Para 7.2.4. should require Councils to include policies in their Local Plan policies to ensure that applications which adversely impact World Heritage Sites are refused . The Mayor should underwrite this requirement by indicating in this plan that he will refuse such applications.

We would ask that the Civil War Battle of Brentford should be suitably recognised and protected.

13.. METROPOLITAN OPEN LAND Policy G3.

MOLs in our borough are under threat from development, including social infrastructure development and we anticipate that this threat will become stronger as housing densities rise during the plan period.

We request the Mayor to define “inappropriate development” to include social infrastructure development.

14. IMPROVING AIR QUALITY Policy SI1.

We support the measures the Mayor has taken to improve air quality but we believe that there are certain areas where it will be exceptionally difficult to achieve air quality suitable for housing, parks and schools. These include areas close to major radial and orbital roads and airports.

We request the Mayor to amend policy SI1 to:

Include a requirement that residential land, parks and schools should not be developed in areas where air quality does meet the standards he seeks.

re-word (2) to require that residential development in Opportunity Areas meets his standards without relying on artificial ventilation, sealed windows and winter garden balconies.

15. TRANSPORT. Policy T1.

While we support the Mayor's Strategic Objective to reduce reliance on cars we note that the proportion of elderly and disabled people, some of whom have Blue Badges, is increasing as lifespans lengthen.

We request that the Mayor's transport policies should take specific note of the needs of the elderly and disabled.

16. TRANSPORT. Table 10.1

We note that the proposed rail links from the Great West Road OA6 to Cross Rail are not included in the Indicative List of Transport Schemes. If this scheme cannot be funded in the plan period there would be even more need to omit OA6 From the list of OAs as proposed in para 3 above.

**17. FUNDING TRANSPORT INFRASTRUCTURE THROUGH PLANNING
Policy T9.**

We are concerned that the improvements to transport infrastructure required to enable PTaLs to be improved to permit densification should not be financed by permitting “enabling development” at even higher densities

This process almost guarantees that such areas will be built to excessive densities, incompatible with a proper regard for context and heritage.

We request the Mayor to re-word Policy P9 to clearly state that transport improvements should not be provided by permitting “enabling development”.

In conclusion we would like to thank you for consulting us on this document.

We anticipate that significant changes in the wording may be appropriate. If that is so, you may wish to have a further period of consultation before the revised document is submitted for an examination in public.

Sincerely,

Denis Browne
Chairman, Planning Consultative Committee
Brentford Community Council

Cc: LB Hounslow Planning Department
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Ruth Cadbury MP
Chair BCC/ website.

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