



**London Borough
of Hounslow**

QUESTIONNAIRE

Great West Corridor Plan consultation



Response from West Chiswick and Gunnersbury Society (WCGS)

We would like your views on the issues consultation paper for the Great West Corridor Plan, a partial review of the Local Plan. This plan will provide a vision of the area along the A4 known as the 'Golden Mile' over the next 15 years and provide for more employment and housing. At this stage we want you to have your say to help us decide what is most important in the Great West Corridor and to help us come up with solutions for the issues identified.

This consultation includes a **call for sites**. Please nominate any sites you think would be suitable for development. These may be for housing, employment, leisure or other uses.

Consultation is open until **Monday 22 February 2016**. Please ensure we receive your comments by **5pm** on this day.

Comments should be returned by email: LDF@hounslow.gov.uk

Or post:

Local Plan consultation
Planning Policy
Civic Centre, Lampton Road
Hounslow
TW3 4DN

The issues document and further information can be found on our website:
www.hounslow.gov.uk/.

This consultation is being carried out in line with regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. All responses to this consultation will be considered in the drafting of the next stages of the plan.

Contact details¹

¹ Please note comments will be published. All personal details (except your name and organisation) will be removed.

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Please tick if you would like to be:

- kept informed on the progress of this plan?
- added to the council's planning consultation database?

☒ YES

☒ YES

In addition to being kept informed of the next stages of this Partial Review, **we request that public meetings are held in relevant parts of the borough before the Preferred Options Consultation in June 2016.**

Questions

We have identified eleven? **ten** issues which we believe are important in the Great West Corridor. Each is listed below with questions to help you respond to the plan. **Abbreviations used in response include: GWC for Great West Corridor, ICD for Issues Consultation Document**

Issue 1: The study area and the extent of the Great West Corridor

1. Are there any other areas which you feel should be added to or removed from the plan area shown? If so, please provide a plan showing the area. **The Great West Corridor needs to be defined as a narrow corridor confined to the curtilage of the commercial buildings along the A4.**

It must not be allowed to extend eastward beyond the junction of the A4/M4 and the north Circular (A406) at the Chiswick Roundabout: ie the Chiswick Business Park, the Power Road estate and the residential streets (Thorney Hedge Road and Silver Crescent) which lie between them all need to be excluded. The residential areas to the north and south of the A4, including Brentford town centre and all the area along the river also need to be excluded. The so-called "**Kew Gate**" area must not be included in the Great West Corridor; it is not part of the A4 corridor and is not an area suitable for the type of transformation/scale of development envisaged for the corridor. The massive scale and very high density of the development associated with the Brentford Football Stadium was dictated by the need to pay for the stadium. The significant negative impact of this development on the surrounding heritage, low-rise residential areas, traffic and public transport was acknowledged but these Departures from the UDP were considered to be justified by the "community" benefit of the stadium. The stadium scheme was presented as an exception, a unique case; now the ICD presents it as a catalyst for yet more large-scale development between the Lionel Road South site and the Chiswick Roundabout. What is needed in this area is modest development that seeks to mitigate the harm inflicted by the stadium scheme,

that fully respects the sensitive, low-rise surroundings and heritage and seeks to redress the balance. Any such development should provide the social and community infrastructure sadly lacking in the stadium scheme.

2. Do you agree with the areas of transformation and consolidation? No.

“Kew Gate” Please remove this area as an area of transformation for the reasons given under Q1.

Chiswick Business Park Please remove this area as an area of consolidation. Note that text on page 8 of ICD indicates that CBP is “located beyond the eastern end of the corridor” yet it is included in shaded GWC area shown in the diagram on page 9. The 12 buildings of the CBP are now built and the business park is complete. It has already undergone intensification; the total business floor-space of the completed park is over 30% higher than the original threshold imposed. CBP is neither suitable for, nor in need of, “consolidation”. There is no planning rationale for including it in or linking it to the Great West Corridor.

Power Road Please remove this area as an area of consolidation. As indicated above, the Great West Corridor should not extend beyond the Chiswick Roundabout. While there may be some opportunities for modest regeneration in this area, the sensitive location and the presence of several buildings of heritage value make it inappropriate for inclusion as a “consolidation” area within the Great West Corridor. We will provide separate additional comments on this area (to follow).

Brentford Town Centre Please remove this area as an area of consolidation. Brentford Town Centre is a separate area for which the spatial strategy is already defined within the Local Plan.

Surrounding residential areas and public open spaces and Important historic and natural areas with statutory designated areas that must be respected Inclusion of these under “areas which appear more suited to consolidation rather than transformation” is, at best, very confusing and, at worst, deeply worrying. Policies to respect, protect, conserve and enhance the borough’s built and natural heritage and to maintain and, where possible, improve its open spaces and the quality of life of its residents are included in the Local Plan adopted in September 2015. These policies apply to any development within the borough, including any within the GWC, as indeed does the Local Plan as a whole.

Expanding the “GWC” to absorb large parts of the surrounding area as proposed under Issue 1 goes far beyond what the Inspector intended by calling for a Partial Review. In order to make the Local Plan sound, the Inspector required by means of Major Modifications (MM9 and MM1) (a) the removal of draft policy ED3, which would have committed the Council to amounts and types of development upon which there had been no public consultation and (b) the addition of policy SV1, which committed the Council to a Partial Review. The Inspector in his report section on the Great West Corridor (paragraphs 47 – 56) concluded (paragraph 54) that ‘this Partial Review is necessary to settle locally controversial issues such as the provision of adequate transport and other infrastructure, suitable locations for taller buildings, and the area’s suitability or otherwise for large scale residential development.’ He did not suggest that the Partial Review was an opportunity to exclude the GWC from compliance with major sections of the

Local Plan or that such sections should be rewritten to accommodate unfettered development in the GWC.

Issue 2: Strategic Vision and key diagram for the Great West Corridor

3. What do you like and dislike about the area? These comments relate to the narrower GWC as we have defined it above. Like: The remaining Art Deco buildings - including the refurbished Wallis House, the GSK building - a modern building of high architectural quality which, while large scale, is well landscaped and set in a large space, and the relief provided by the low-rise buildings and the open spaces in between buildings fronting the A4. The mix of type and scale of employment, including medium and small-scale enterprises. World-class companies providing local employment and high-skilled jobs such as Brompton Bikes. Seeing the elegant campanile of the “Steam Museum” – a favourite landmark. As one approaches the end of the corridor travelling east, arriving at the large green space of the Chiswick Roundabout with its informal tree cover. This signals a change of scale and character to those approaching from the high-rise commercial sector of the Golden Mile to the West. It tells them that, at the roundabout, they are entering a different zone - a mosaic of low-to-medium rise commercial/light industrial properties and mainly Victorian residential properties (including two conservation areas) leading towards Chiswick town centre. It tells us that we are arriving home!

Dislike: The heavy traffic, noise and air-pollution, inadequate pedestrian crossings, poor provision for cyclists and general low quality of the public realm along the A4. The degradation caused by the proliferation of advertising on buildings and free-standing structures, especially the high-level, large, brightly-lit, LED digital media screens. Those on the Chiswick Roundabout are especially intrusive and inappropriate in this location and detract from the positive attributes of the roundabout (see Likes). The recent 25-storey Great West Quarter tower, which dominates the low-rise residential areas to the south and which is seen as a large, alien element from many locations in the surrounding area. It has a negative impact on a variety of heritage assets and their settings, in particular Syon Park and Gunnersbury Park.

Note: While the GWC/Golden Mile is to be celebrated, it is not, and must not become, the defining feature of the wider area. The big attraction of this wider area for visitors as well as those who live and/or work here is that, while easily accessible from Central London, it has significant heritage landscapes and a beautiful stretch of the Thames which, together with its predominantly low-rise buildings give much of it a generous, open, almost rural feel. This is complemented by its compact townscape of predominantly Victorian and Edwardian terraces, providing homes to its well-established, thriving residential communities. The special appeal (**the big Like**) of both is that they provide respite and retreat from the urban environment.

4. Are there additional priorities, the Council should be focussing on in the scope and content of the vision for the Great West Corridor? **Balancing the Council's aspirations for growth with the reality of the current infrastructure deficit and the extremely poor environment of the GWC. No longer yielding to the temptation to put the cart before the horse. Complying with Local Plan Policy IMP 3 (h) Ensuring that development does not proceed unless the delivery of critical and necessary infrastructure to support that development is assured.**"

Issue 3: Achieving economic and employment growth **More attention needs to be paid to creating the conditions necessary to retain current employers and to maintain a healthy mix of employers, including a wide range of SMEs. It is to be deeply regretted that Brompton Bikes has found it necessary to leave Brentford in order to expand. This award-winning manufacturer provides a wide range of jobs including highly-skilled ones. It is precisely the kind of company that we need both for jobs and to maintain the status of the Golden Mile** <http://www.theguardian.com/business/2015/aug/17/brompton-bicycle-factory-expansion>.

5. Do you think the digital and media sector should be prioritised in the Great West Corridor? If so, what can the Council do to support and encourage growth and spin off benefits? **This sector should be encouraged and supported but not prioritised. Over dependence on one sector or on a small number of large global employers is a high-risk strategy. Need to retain, attract and support SMEs offering a wide range of employment types and skill levels. Need to encourage all employers to recruit locally (to reduce commuting into and out of borough) and provide training to address the skills gap.**
6. Do you think other industrial uses, such as those along Transport Avenue, should remain a part of the employment mix in the corridor? **Yes, the borough needs to retain a wide range of employment types. Over dependence on one sector or on a small number of large global employers is a high-risk strategy.**
7. If you work in the Great West Corridor, in what location do you work? What do you like or dislike about working in the area? **N/A**

Issue 4: Creating new strategic transport connections and improving ease of movement around the area

8. What should be the priorities for improving access to and from the area? **To remedy the existing transport deficiencies before any further growth is considered - by improving public transport and making walking and cycling more attractive.**

The real problem with respect to transport improvements on which the entire strategy for the GWC depends is that the Council is unable to give

any assurance of delivery as it is dependent on other bodies. The projects in the ICD, like the statements in the Local Plan policies EC1 and 2 are long-term aspirations/wish lists rather than firm policies. Only two improvements in Table EC1.1 are “planned”. One is the Piccadilly Line upgrade for which the start date is to be confirmed (anticipated early 2020s). The other is the current District Line upgrade; although in principle an improvement, the increased train capacity may well exacerbate the station capacity problems at Gunnersbury (see below). **The Council can only support and promote, not deliver. We recognise that delivery is often very complex with many stakeholders involved but the Council’s track-record on supporting/promoting is poor.** Its approach is one of approving development and then failing to follow through on the associated transport improvements identified as necessary. The continuing absence of the footbridge between the Chiswick Business Park and Bollo Lane and the time taken to extend bus services to the business park provide stark evidence of the Council’s inability to deliver essential infrastructure in a timely manner. The need for the footbridge was recognised as early as 2001 and planning permissions have been granted in 2007, 2012 and 2015. See, for example, Report to Planning Committee for 10 December 2015. Extension of the Route 27 bus service, originally announced for Spring 2009, finally started in late 2012; there is still (Feb, 2016) no convenient bus stop at the Chiswick High Road end of the park. Extension of Route 70 to the park was delayed from May 2015 until January 2016 because the bus-only barrier was wrongly sited.

9. Which of the listed projects (or other ideas you have) should be the priority?
Of the listed projects, (c) The Boston Boardwalk, (d) the Great West Cycleway and (e) improved road infrastructure, especially improved pedestrian crossing facilities would, perhaps, have the best chance of delivery within the plan period. While these improvements would help to reduce the current dependence on private motor vehicles, they would only be a minor element of what is required.

It is questioned whether, even if all the proposed strategic transport improvements (a) to (e) were to be delivered, this would provide the “game-changing” transport necessary to support anything like the scale of development envisaged for the GWC. The current PTAL for many parts of the GWC is very low and the likely increase resulting from the proposed projects would still not bring it to a good level. In any case PTAL values only reflect proximity and frequency of service; station access and capacity are of equal importance. Both **Gunnersbury Station** and **Kew Bridge Station** have significant access problems and Gunnersbury Station also has severe capacity problems. It is questioned why neither of these stations feature in the transport improvements.

The use of **Gunnersbury Station** has increased significantly in recent years due to the Chiswick Business Park (currently approx 7000 workers rising to approx 10,000 on occupation of Building 7) and other significant developments in the area. Businesses such as Sky on the GWC already run private bus services to ferry employees to Gunnersbury Station. User numbers at this transport hub will be augmented by employees and residents

from other consented developments including the 910 residential units in the Brentford Football Stadium scheme in Lionel Road South; the station is also expected to handle large numbers of football supporters from the new stadium. The overcrowding at the station is such that TfL currently operates crowd control measures during peak hours. This is necessary because of the conflicting movements of local residents entering the station and local business employees leaving the station during the morning peak and vice versa in the evening. The conflict is caused by the constricted size and shape of the ticket hall, the limited number of ticket gates and, especially, the narrow, two-way stairway to the single island platform, serving both Underground and Overground trains.

10. What do you think are the main barriers to movement within the area? The grid-locked road network is one of the main barrier to movement. This impacts both east < - > west and north < - > south movement. A secondary, “vicious cycle”, effect is that the congested road network precludes improving public transport by means of additional bus services or increased frequency of existing services. A recent TfL consultation <https://consultations.tfl.gov.uk/buses/routes-70-and-27> responded to a WCGS proposal to extend Route 70 beyond the northern end of the Chiswick Business Park by stating “Extending it would expose it to heavy traffic around Chiswick Roundabout which would affect reliability.” The hostile environment of the A4 for pedestrians and cyclists (see Q3 Dislikes) is a major barrier to a modal shift to active travel modes.

Issue 5: Achieving additional housing growth

11. Should we look at the Great West Corridor as a location that could further help meet the borough’s housing supply? **No The GWC is, in principle, totally unsuitable for residential use because of the levels of air and noise pollution.** For the foreseeable future, any further development in the corridor should be non-residential. The local road network is already at saturation at peak times. This heavy traffic is the major cause of air and noise pollution and makes for a very hostile environment for pedestrians and cyclists. The entire borough is an Air Quality Management Area (AQMA) for NO₂ and PM₁₀ and the Council’s maps of Air quality and Noise (ICD, page 9) shows that the A4/M4 corridor suffers from some of the highest levels of air and noise pollution in the borough. The serious health impacts of such pollution are well known and acknowledged in the Local Plan. The cumulative impact of development in the surrounding area (completed, under construction and in the pipe-line) is likely to significantly increase air pollution. With respect to a recent planning application for the site at Chiswick Roundabout, the applicant’s Environmental Statement ES (Section 7) includes data showing how bad the air pollution already is and that is likely to be getting worse. For example, the “objective level” for annual mean NO₂ (40µg/m³) has been significantly exceeded in all years shown from 2010 to

2014 with the most recent value (61.4µg/m³) being the highest. ES 7 argues that the development is acceptable in air quality terms because its projected addition to the existing high pollution will be negligible. **In view of this situation, we strongly urge the Council to use its power, as the Local Planning Authority, to designate the GWC as an area where no new residential development will be permitted.** [See also Q 14 and 15]

12. What sort of housing would you like to see here? **None until external air quality and noise levels are shown to be consistently within objective levels required by European Union limit values /WHO recommendations.** [See Q11]
13. How can we better plan for housing and employment space to coexist? **Not relevant in view of response to Q 11 and 12.**

Issue 6: Environmental quality and Enhancing open space

14. What do you consider to be the main environmental issues in the corridor? **Very poor air quality, noise and light pollution. All three issues militate against residential use in the corridor and air quality and noise also detract from the corridor's appeal as an employment location. In addition, air and noise pollution impact negatively on the nearby open spaces as spaces for active recreation and/or quiet enjoyment and light pollution can reduce biodiversity as it can be detrimental to wildlife, especially invertebrates, bats and birds. Any further development in the corridor before major improvements in transport infrastructure will lead to a further deterioration in air quality and noise.**
15. Do you think development in the Great West Corridor would benefit from further policies and guidance to address environmental issues, beyond those already in the Local Plan? **We recognise that the Council, acting alone, cannot reduce the unacceptably high levels of air and noise pollution associated with the major road network in this area. **It is questioned, however, whether its air pollution approach “we regularly review and monitor the quality of air in the borough because of its poor levels” is sufficient.**** We note with concern that the recently published Air Quality Update and Screening Assessment for 2015 indicates that even this monitoring function has not been progressed satisfactorily. The assessment states (page 7 and see also Table 1.2). “The recommendation to undertake a Detailed Assessment of hourly mean NO₂ within Hounslow was made in the 2011 Progress Report (London Borough of Hounslow, 2011), the 2013 Progress Report (London Borough of Hounslow, 2013) and the 2014 Progress Report (London Borough of Hounslow, 2014). Following these recommendations, the LB of Hounslow is in the process of amending its AQMA order to include the 1-hour objective for NO₂ across the borough.” **In view of this situation, we strongly urge the Council to use its power, as**

the Local Planning Authority, to designate the GWC as an area where no new residential development will be permitted. To introduce new “receptors” into such a highly polluted area would be a dereliction of its public health duties under the **Health and Social Care act 2012**. Section 12 of the act (which came into force on 1st April 2013) introduced a new duty for all upper-tier and unitary local authorities in England to take appropriate steps to improve the health of the people who live in their areas.

Design mitigation, including “innovative ways” to mitigate air and noise pollution such as fitting non-opening windows and replacing balconies with winter gardens and/or locating residential units on upper floors of buildings, only addresses the internal environment of residential units. Whenever residents leave the building they will be exposed to the unacceptable external environmental conditions. This will militate against the residents adopting active, healthy lifestyles including active travel modes (walking, cycling) or engaging in social interaction. The application of such extreme measures leads to the concept of developments where residents are encouraged to remain confined indoors (by eg provision of broadband internet to every dwelling to enable home working, online shopping). Leading the sedentary, socially isolated lives thus envisaged will be detrimental to the physical and mental wellbeing of residents and to community cohesion. How can our Council reconcile such a dystopian forecast of life in the 2020s with the overall vision of our recently adopted Local Plan?

What evidence does the Council have for (1) the effectiveness of **Green Walls** in capturing particulates (2) the viability of green walls in locations such as those presented by sites adjacent to the A4, especially when near/underneath the overhead section of the M4.

16. What would the priorities for enhancing open space be if resources were available? **The overall priority for open space is keeping it open.** Not allowing building within open space (other than, exceptionally, very modest structures associated directly with recreational/biodiversity use of the space). Not allowing building in the surrounding area that would detract from the openness of the space. Open spaces can be significantly impacted by developments on or close to their boundaries; the larger the scale of a development, the wider the surrounding area that will be impacted. The open spaces in the vicinity of the GWC and in the surrounding area are particularly vulnerable for example, Gunnersbury Park and Gunnersbury Cemetery. Their protection will require rigorous application of the policies in Chapter Seven of the Local Plan: Green and Blue Infrastructure.

Enhancing open spaces should be site specific and carried out in full consultation with users of the open space, including “friends” groups, amenity and local residents’ groups and individual residents. Open spaces have a variety of uses and an appropriate balance needs to be achieved. Insensitive “improvements” for one use (eg sports facilities) may, inadvertently, harm a

different use (eg nature area). External sources of funding should be actively explored but great care should be exercised to ensure that such funding does not compromise the function or character of the open space or its value to local residents.

Issue 7: Promoting high quality design and conserving heritage

17. How can we respect the historic context of the Great West Road whilst providing the potential for growth? Development should be heritage-led; the potential for growth should be determined by what can be achieved while conserving and enhancing the heritage of the GWC. If, as a borough we are to exploit the Great West Road's strengths, we need to ensure that any new buildings and their branding: (1) pay full respect to and subservient to the elegant and restrained Art Deco buildings; (2) are of the highest quality; (3) contribute to a coherent sense of place along the GWR; (4) contribute positively to the experience of travelling along either the M4 or A4; (5) maintain a varied skyline with a significant proportion of low to medium-height buildings and open spaces providing relief from the existing high-rise structures; (6) avoid creating a canyon; (7) showcase innovation without descending into "theme-park anarchy" with each new building competing to be the most prominent, showy or wacky iconic "landmark" or "gateway" (cf the Great West Quarter Tower, the "Octopus", the "Hive", and the current proposal for a 32-storey tower at the Chiswick roundabout). Promoting multiple gateways and landmarks debases these once useful urban-design concepts.
18. What are the most significant aspects of the surrounding heritage assets and how best can these be conserved? The Design and Conservation background paper has described many of the surrounding heritage assets. It is not considered realistic to attempt to identify the most significant aspects within this response. It would be over-simplistic, in any case, to reduce consideration of the impact of development to particular assets or views. Part of the value of the built and natural heritage is in the assemblage. See note under Q3.

The assets can best be conserved by the Council scrupulously applying the full suite of policies in Chapter Six of the Local Plan: Context and Character. The Council needs to ensure that developers engage positively with the purpose and core principles of this chapter as articulated in Our Approach to Policy CC1 and to Policy CC4 and in paragraphs 6.1, 6.12 and 6.13. Developers must not be allowed to consider sites in the GWC in isolation and narrowly define the context, taking cues from, and respecting and responding only to the immediate environment. They must fully assess the impact on the surrounding heritage and on local residents in terms of the overall character of the wider local environment, visual amenity and light pollution/spillage. The

larger the scale of development the wider the surrounding area that needs to be considered.

In commenting on the Context and Character study in January 2013 we emphasised that no Character or Study Area should be viewed in isolation. Each area will have impacts on, and in turn be affected by, its neighbouring areas. This is especially relevant where the character changes abruptly from one area to another. Area J is an example of a Character Area that is significantly affected by its neighbouring Areas in the Chiswick Study Area: C, E and I. Character Areas in the west of the Chiswick Study Area, such as I, J and N are on the boundary with the Brentford Study Area and this needs to be taken into account during assessment. In assessing the Great West Road Area, great care needs to be taken not only in relation to the coherence of its appearance and impact in relation to those travelling along either the M4 or A4 it but also with respect to those living alongside. The negative influence of, for example, tall buildings and advertising structures can extend far beyond the immediate vicinity. The proximity of the River Thames and of heritage assets in Hounslow and Richmond, including the World Heritage site of Kew Gardens needs to be taken into full account, when drawing up design guidelines for this area. Residents in the surrounding areas of Brentford and Chiswick do not want the A4/M4 and its flyover to be the defining feature of their neighbourhood (see comments on area J below).

19. Have we identified the right constraints on sites for tall buildings (please see Design and conservation background paper with further questions)? **No.** Limiting consideration to significant views from major heritage sites is too restrictive an approach. We consider that the starting point should be that so much damage has already been done by tall buildings or is “consented”, that the GWC is an unsuitable location for any more.

One of the problems with stating that “the area around the GWC does contain a number of locations with ‘some suitability’ for tall buildings” is that this encourages developers to make inappropriate proposals. Another problem is that the definition gives no upper limit; any building over 20m is a tall building. The GWC already contains a number of tall buildings, including several over 60 m. Policy CC3 clearly states (para 6.10) why tall buildings are inappropriate and recognises the sensitivity of the heritage assets in Brentford, Chiswick and Kew. The Council is fully aware of the negative impact on these assets and on residential communities of existing (“inappropriate” cf 6.11) tall buildings (including the recent 25-storey tower (75m) in the GWQ) and the further significant harm that will be inflicted by consented schemes, especially residential elements of the Brentford Stadium Scheme. In these circumstances, application of the criteria in CC3 might identify a limited number of sites in the GWC where a tall building of say between 20 to 40m would be acceptable but no more tall buildings above 40m should be allowed.

Note: Historic England’s Advice Note 4 (December 2015) replaces earlier CABE/English Heritage guidance.

Issue 8: Community infrastructure and local services

20. What will the corridor need to support the growth in employment and housing? There should be no housing growth in the GWC (see Q 11, 14). Community infrastructure is required, however, to provide for the increased population

resulting from developments already built, under construction or in the pipeline in the Brentford and Chiswick area.

With respect to growth in employment, the immediate, working-day needs of businesses in the GWC for cafes and restaurants etc should be provided within the commercial quarters/campuses (as, for example, in the Chiswick Business Park). A more extended leisure offer is best provided by better access (especially on foot) to the existing/future leisure offer in Chiswick and Brentford town centres. The GWC should remain essentially an employment corridor; it should support not compete with or draw custom away from the local town centres.

21. How and where can new school places be provided? New school places are needed for residential developments already built, under construction or in the pipeline in the Brentford and Chiswick Area. They should not be built in the GWC (our definition) for the same reason that residential development should not be built there (see Q11 and 14).

Issue 9: The need for an Interim Planning Framework for the Kew Gate area

See our response to Q 1 and 2. Any changes to policies of the Local Plan should be subject to the full consultation process, inspection and adoption. Meanwhile, any application for a site within the so-called “Kew Gate” area should be assessed against the policies in the current Local Plan as adopted in September 2015 and should conform with the London Plan and the NPPF.

22. Do you have any comments on the Interim Planning Framework, the design principles it contains or the evidence documents it is based upon? This document is not yet available. We reserve the right to comment within a reasonable time of it being made available.
23. What aspects of the Interim Planning Framework should we take forward into the Local Plan review? This document is not yet available. We reserve the right to comment within a reasonable time of it being made available.

10: Making it happen

24. Do you think any of the Local Plan site allocations should be changed?
25. Do you think any further sites in the corridor should be allocated too?
For each site please provide reasons and if appropriate a map.

26. What planning 'tools' would help implement the Plan, in particular the 'game changing' transport proposals?

27. Is there anything else that you would like to mention? **In conclusion we consider that the constraints identified under issues 4, 6, 7 and 8 preclude the possibility of the growth proposed under Issues 3 and 5. Expanding the "GWC" to absorb large parts of the surrounding areas as proposed under Issue 1 is totally unacceptable. Planning policy relevant to these areas is provided by means of the adopted Local Plan as supported by the detailed Context and Character Study.**

By way of summary, we have added our comments to Local Plan Policy SV1; see below.

In addition to being kept informed of the next stages of this Partial Review, **we request that public meetings are held in relevant parts of the borough before the Preferred Options Consultation in June 2016.**

Thank you for taking the time to have your say.

Policy SV1**Our approach** We will work with residents and stakeholders to explore and identify the potential capacity for additional employment-led mixed use development along the Great West Corridor and coordinate its regeneration. **There is no potential capacity for any additional development until current major transport infrastructure deficiencies are met. Any development thereafter to exclude residential use. Regeneration means sensitive development that recognises and respects the existing assets and character of the GWC not that eclipses and engulfs them. In celebrating the "Golden Mile", it is essential to maintain a sense of proportion. This important employment area of the borough is only one of its assets; it must not be allowed to dominate and devalue the surrounding areas with their rich heritage and thriving residential communities.**

We will achieve this by Progressing a partial Local Plan review which will:

(a) Identify the extent of the Great West Corridor; **confine to a narrow corridor comprising the curtilage of the commercial buildings along the A4.**

(b) Determine the location and sustainable quantum of additional employment and residential development above existing Local Plan levels for implementation through new site allocations; **the inadequacy of transport infrastructure is such that there is no sustainable quantum of any additional development above existing Local Plan levels; there is no sustainable quantum of residential development on environmental and social grounds.**

(c) Coordinate the delivery of public and private investment in transport infrastructure throughout the Great West Corridor as identified in policy EC1; **this needs to be progressed before any further development is contemplated and delivery must be assured before any development is begun as in policy IMP3. Otherwise there is a real risk of losing existing businesses.**

(d) Progress the designation of the Great West Corridor as an Opportunity Area through the review of the London Plan; **the location, size and the environmental conditions of the GWC**

are such that such a designation is entirely unacceptable; it would also be incompatible with its designation as a SOLDC.

(e) Support the growth of the media and digital sectors in line with the London Plan's identification of the area as a Strategic Outer London Development Centre; **provided this is not at the expense of maintaining a healthy mix of types of employment and size of employer.**

(f) Improve linkages with Brentford town centre through public realm enhancements and improved connectivity and access to amenities and facilities for the businesses and workforce in the area; **yes, this should be a priority**

(g) Identify sites with suitability for tall buildings following further urban design work; **the work done so far supports our view that there are none.**

(h) Review existing employment designations, including the Locally Significant Industrial Sites, through an Employment Land Review and other appropriate evidence; **suitable industrial employment, especially by SMEs, should be retained and supported and new employers encouraged at appropriate sites.**

(i) Explore opportunities for mitigating and reducing the impact of noise and air pollution for existing and future residents; **mitigation by design only addresses the internal environment and will not deliver sustainable development; the borough has been a AQMA for over 10 years so why is it still at the exploratory stage in seeking solutions?**

(j) Review local infrastructure requirements through the preparation of an area-specific Infrastructure Delivery Plan; **this needs to be progressed before any further development is contemplated.**

and (k) Proceed with initial informal public consultation commencing before the end of 2015 issuing the consultation on 21 December 2015 met this deadline but at the expense of community engagement* and a target for adoption by the end of 2018.

*** e-mail correspondence on behalf of G15+ during November requested that any consultation period should exclude the Christmas/New Year.**