

1-4 Capital Interchange Way, Brentford, London TW8 0EX

WCGS Comments: Appendix 1

G15+ Paper for consideration at Resident Association Forum on 20th January 2017

Plan First

While this paper has been written from an east of borough/Great West Corridor Partial Review perspective, the main issues apply also to the west of Borough Partial Review area and more generally across the borough where significant development is proposed or consented.

Introduction

1. The quality of our changing environments depends almost entirely on the quality of our Local Plan, the integrity of the plan making process and the planning decisions of the Local Planning Authority which follow.

2. Borough residents have no right to appeal planning decisions. Only the Mayor of London and the Secretary of State have a right to intervene and usually do so only when wider issues are at stake.

3. We are therefore keen to continue to work with the Council and its officers to ensure that the Local Plan, together with its supporting Supplementary Planning Documents (SPDs), is robust and comprehensive, that planning decisions are consistent with it and that departures are not permitted. Our specific objectives are given on page 3.

Local Plan

4. We have a recently adopted Local Plan (adopted by the Council in September 2015). It

- was adopted following public consultation
- is consistent with the London Plan and the NPPF
- is considered sound, following a rigorous Public Inquiry and a comprehensive Inspector's Report
- represents the considered view of the Council as the Local Planning Authority (LPA)

5. It has as its overarching vision that

- The quality of life and health of residents will be improved by the provision of supporting infrastructure and high quality and responsive design that respect and enhance local character. Significant local character, natural and heritage assets will be protected and enhanced to maximise their benefits to local residents and businesses.

6. The Local Plan identifies the need for it to be complemented by two Partial Reviews (policies SV1&2) and a range of Planning Briefs, Master Plans (policy IMP

2) and Supplementary Planning Documents (SPDs) (policy IMP3) in order to be robust and comprehensive. SPDs to which reference is made in the Local Plan include, for example, a Heritage Strategy and an update of the Residential Extension Guidelines published in 2003.

7. Work on the two Partial Reviews has started but is seriously behind schedule and unlikely to be completed before autumn 2018 at the earliest. Nothing has been published in relation to Planning Briefs, Master Plans or to the many SPDs, other than that on Noise.

8. Meanwhile planning applications are being submitted for major schemes in the absence of these important adjuncts to the Local Plan.

Planning Applications; the current situation

9. Certain major development projects in our borough start with a Cabinet resolution to approach a developer partner to secure the provision of an item deemed to be of public benefit with minimal cost to the Council (see Annex). These projects are to be achieved by inviting a developer to put forward a scheme which achieves viability without significant Council expenditure. Inevitably the scheme is guided more by its business plan than by the Council's Local Plan and the planning process is harnessed to justify departures from the Development Plan. Gradually departures become the norm and the Local Plan ceases to be the real planning policy.

10. Other major schemes at excessive densities are being put forward by developers encouraged by such departures and by "vision" documents promoting massive development in parts of the borough, such as the Great West Corridor. These vision documents, which only became apparent during the preparation of the Local Plan, were created without any community consultation or input. The Local Plan (as required by the Inspector at the Public Inquiry) commits the Council (Policy SV1) to "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 co-ordinate its regeneration." Policy SV2 requires the same approach for the West of Borough. As noted (paragraph 7) these reviews are behind schedule. Meanwhile developers are submitting *ad hoc* proposals for individual developments of a scale and nature that presumes that, despite all the controversial issues identified by the Inspector, the "vision" will be translated into policy within the Local Plan. The controversial issues identified by the Inspector included 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.

11. In both situations the community suffers as

- gradually "departures" become the norm and the Local Plan ceases to be the real planning policy
- the validity of the Local Plan is further undermined when major changes in the character of an area are proposed without an area Master Plan
- the borough's built and natural environment and its heritage assets are harmed
- the quality of life of existing residents is diminished
- there is no plan in place to provide the needs of the burgeoning population

- the new residential developments do not meet the housing needs of the borough in terms of housing size and type or affordability

Our Objectives

12. Our objective is to ensure that all applications are determined in accordance with the adopted Local Plan. We wish to ensure that the Partial Reviews of the Local Plan and the necessary adjuncts to it (see paragraph 6) are prepared, subjected to consultation and adopted BEFORE major developments within the areas subject to the Partial Reviews are initiated or encouraged by the Council.

13. The Council, as Local Planning Authority, must uphold the Local Plan by its decisions and by its authority. We appreciate that the Council cannot prevent developers from making applications for major schemes within these areas. We also understand that, once an application is submitted, the Council is obliged to determine it within a set timetable. It could, however, desist from approaching developers in relation to such schemes and make it clear to any potential applicant (before or during any pre-application discussion) that any application will be assessed against existing policy and guidance, with weight attributed as appropriate to emerging policy. In the case of the Local Plan Reviews, that weight is currently very limited by the early stage of their development. A suitable statement could also be published on the planning pages of the Council website.

14. Such an approach would discourage developers from submitting inappropriate applications based on assumptions about the outcome of the Partial Reviews (see paragraph 10).

15. Once the Partial Reviews are completed, they must be supported by site specific Urban Plan studies for areas of change and for the sites where the Council may wish to promote development. Site development briefs, which are consistent with the appropriate Master Plan, would allow developers to know how the adopted policies apply to the site in question. They could then make realistic business plans with confidence.

16. Site development briefs would enable Development Control to make recommendations to the Planning Committee based on comparing the applicant's proposals with the planning brief. This would enable a robust and transparent decision-making process.

Annex attached below

Annex: East Brentford

A1. As noted, for some of the projects the Cabinet has endorsed no detailed planning studies were done first and the Council has not adopted an agreed master plan for that area. As a result there was no clear planning brief in place at the outset.

A2. The recently submitted application for a bus depot and (550) "enabling" housing units at Capital Interchange Way is an example. The applicant told members of the Planning Committee last August that he was involved in the development because the Council had approached him. It was clear that the enabling housing development was included to ensure that the development would be viable at no cost to the Council. Viability prevailed over the Local Plan.

A3. In contrast the Cabinet decision REG365 to replace the Fountains Leisure Centre with a new building in association with London and Quadrant, who own adjacent sites, requires "a wider master planning approach for major regeneration in the area" It is noted that within their defined boundary this master plan would include housing already approved in the Brentford Community Stadium complex as well as the site of the proposed bus depot at Capital Interchange Way.

A4. The cumulative effect of the present position is that in an area for which a Local Plan Partial Review is in progress there has also been an absence of local Master Plans. In that same area the Cabinet has identified specific problems which need to be redressed like the proposed bus depot and the Fountains Leisure Centre. In order to resolve those problems without excessive cost to the Council they have endorsed arrangements with developers to promote schemes funded by "enabling" development (housing) which will inevitably result in major departures from the Local Plan.

A5. The result could be unplanned chaos. The area of East Brentford has no agreed plan for such concentrated development and we must expect increasing gridlock and that the living conditions for new and established residents will become more and more unacceptable. There is also a failure to provide much needed affordable housing in scheme after scheme.