

## **Matter 8 – Residential hinterlands**

Defining the very limited areas to the North, South and between the two broad development corridors as residential hinterlands in order to promote Policy 4.1 a)-f) is unsound and not an effective way of enhancing suburbia. The character of suburban neighbourhoods to be protected under policy 4.1 d) is much wider than shown even if the Corridors are redrawn to relate to a 12min walking distance. Nineteen twenties and thirties housing is clustered around nearly all the town, district and neighbourhood centres. Many of the Council's planning applications deal with extension to suburban housing and for division of the larger units into flats. Extra units result from this conversion. Plan makers may be required to ignore these increases when drawing up targets but public transport, social infrastructure and schools are still needed by the new residents. They are contributing to the housing stock, need policies and to appear in official statistics. Quoting an increase of 100 new homes is probably a significant underestimate of the capacity of hinterlands.

Policy 4.1 c) refers to 5 neighbourhood centres 3 of which are in the A40 Corridor according to Map 5 but measurement along roads show that the boundaries of the corridor are incorrect (Pitshanger Lane is 1.5 km from the A40 by road or public foot, Bilton Rd (called Perivale on map 5) is not within 1km of the A40 due to the barrier of railway lines and Northfields is not within 1 km of the Uxbridge Rd). The policy addresses problems which are common to the other neighbourhood centres including East Acton, Northolt, and South Ealing. Problems of empty shops and atmosphere of decline are more closely related to local access and competition from other centres or supermarkets than to location in a Corridor or Hinterland. The main difficulties are vacant shops and competition with supermarkets with car parks. Those centres where the council manages parking for shoppers tend to retain shops which are then available for people who walk or come by bus. This policy should apply to all the neighbourhood centres. The protected shop frontage policy in the UDP has helped to maintain retail use where the basic range of shops was in danger of disappearing.

**We therefore propose the following:**

- 1) a common shop policy similar to 4.1c) for all neighbourhood centres irrespective of their location in a corridor or hinterland**
- 2) the boundaries between hinterland and corridors shown on the sketch maps 2, 3, 4, 5 and 6 should be redrawn to agree with the text and reflect the barriers to walking of open space, railways and the complex street pattern.**

## **Issues and questions**

**1. Is development of the Greenford Depot proposed in Policy 4.3 pre-empting the West London Waste Plan and would this development compromise the ability of the Borough to deal with waste in the future?**

We regard the policy as a reasonable description of the problem of this depot. It is already too close to a school and housing as well as dominating the Brent River Park in one of its narrow sections. It is currently used for a wide range of Council and other services. But the recycling structures are too high and fencing is an eyesore. The wording could be interpreted to mean redevelopment with a significant amount of buildings to accommodate the extension of recycling, salt stores and a bus depot. There were policies in the UDP which guided development adjacent to MOL (Table 3A) but these have not been included in the Core Strategy and are ignored in the Initial Proposals of the Development Management Document. The supporting paragraph implies there is capacity for more development on the site. This would have an unacceptable impact on the MOL in a narrow section of the Brent River Park.

**We therefore propose that the words ‘optimum potential’ should be deleted and replaced by ‘any redevelopment should provide improved amenity for adjoining uses.’ The Inspector is requested to view the site.**

**2. The plan proposes to explore, investigate and further assess options, thereby providing little certainty that such options will be implemented. Is for example policy 4.4(b) (c) (d) and (e) akin to an issues and options paper rather than guiding development over the next 15 years?**

We are concerned about the lack of proposals for transport improvements. Policy 4.4b) (North –South links in the Borough) is inadequate and inappropriately located in this Hinterland Chapter which deals with E-W improvements as well as N-S.

Existing N-S road routes are inadequate especially the North Circular Road which is narrow and delays access to Park Royal. Bus priority measures are suggested but there is little space for these. Existing bus routes are delayed by minor changes needed in the road pattern varying from elimination of parking on feeder roads to the town centres to junction improvements.

In Policy 4.4 (c & d) the N&W London light Rail option (Dudding Hill Route) is not mentioned but the Council has passed a resolution that this should be considered (it would be a quarter of the cost per kilometre of the West London Tube supported under c)). Policy 4 d) support for Greenford to West Ealing line should be extended on a 5<sup>th</sup> track to enable the service to come to Ealing Broadway rather than West Ealing which would be more convenient for passengers. We query whether the West London Orbital Underground (page 4.9 third paragraph) is a commercial proposition.

**We object to the lack of clear proposals to improve orbital and N-S links in public transport because schemes for which finance has not been identified still need land safeguarding.**

**3. Is there a commitment from service providers to undertake any of the proposed north-south routes or is it only initial feasibility work that is emerging? Will the proposal offer support for investment in the Borough over the lifetime of the CS?**

Planning Policy

**Map 7** is a diagram of improvements to transport in the borough. These should be turned into clear proposals and related to the updated version in the Infrastructure Delivery DPD. Omissions in the Key make it particularly difficult to understand. LIP finance is very short term and provides limited improvement for the proposed population increase and sub-regional TfL proposals for West London seem very generalised.

**We consider that clear proposals are needed that relate to the Infrastructure Delivery Schedule where relevant.**