

## **HOUNSLOW LOCAL PLAN: EXAMINATION IN PUBLIC**

**Matter 5: Transport, Communications and Connectivity Transport** (Wednesday 28<sup>th</sup> January)

**Statement of Marie Rabouhans on behalf of the West Chiswick and Gunnersbury Society (WCGS) (REP 048)**

11<sup>th</sup> December 2025

### **Transport with particular reference to the Great West Corridor**

#### **Background**

*WCGS has been actively involved in Hounslow's Local Plan commenting on every consultation and participating in the Examination in Public of the current plan in 2015, and the partial review in 2021.*

1 We have stated consistently throughout the process that a major shortcoming of the Plan is the inability of the Council to ensure delivery of the necessary infrastructure, especially transport. We consider that delivery within the plan period of the major transport improvements on which the entire strategy for the GWC depends is highly unlikely. The Council is unable to give any assurance of delivery of this “game-changing” infrastructure as it is dependent on other bodies. The Council can only encourage, support and facilitate, not deliver.

2. We consider it necessary to remedy the existing transport, deficiencies *before* any further growth is considered. The Council must desist from yielding to the temptation to put the cart before the horse. Existing businesses on the Great West Road and local residents are already struggling with the inadequacy of the existing transport network. This issue also affects other local businesses, including many SMEs and major employment sites such as the Chiswick Business Park.

3. Significant growth will not be sustainable. Existing transport is already a limiting factor in attracting new and retaining existing businesses.

#### **4. Gunnersbury Station**

4.1 Gunnersbury Station is of strategic importance to the development potential of the whole Borough of Hounslow, given that it acts as a transport hub, providing a railhead to the District Line and London Overground via TfL bus services and Sky TV shuttle buses from a wide area across Brentford, Isleworth and along the Great West Corridor. Station users are not simply residents from and workers in the local (800 m) area.

4.2 The overcrowding at the station is such that TfL at times 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. Residents who miss trains by being denied access to the platform may suffer the consequences of late arrival

for work. Similar problems arise when there is a home match at the Brentford Football Stadium (capacity 17,250) and station closures may occur.

4.3 Major enhancement is needed now to accommodate the significant increase in usage over 25 years due to the development of the Chiswick Business Park (now 10,000 capacity), the Brentford Football Stadium (capacity 17,250) and other significant developments completed, under construction or in the pipeline. The importance of improving Gunnersbury Station to the Council's ambitions for the Great West Corridor was recognised by the Inspectors at the aborted Examination in Public of the Local Plan reviews in November 2021 and a report was provided at the Inspectors' request.

4.4 WCGS has been campaigning for enhancement to access and capacity at Gunnersbury Station for over 20 years. <https://westchiswickgs.org/gunnersbury-station/>

## Issue

5 We do not believe that the DPD is positively prepared in terms of its strategic approach to transport. Any transport policy that fails to give high priority to the improvement of an existing station which, while a transport hub for the eastern end of the Great West Corridor, is unfit for purpose, is unsound. The approach is neither justified nor effective. "Our approach" under Policy EC1 Strategic Transport Connections does not even include Gunnersbury Station within the 14 listed enhancements whereas it is included under Policies P1 (c) Great West Corridor East, point H of "Proposals should plan". Table EC1.1 under Access improvements to rail and tube network states that "Funding has been identified to enable step-free access at...and Gunnersbury stations." What is the source and amount of this funding? The Council should be requested to provide an update of the report referred to under 4.3 (see Appendix 1 provided as separate attachment).

## Inspectors Questions

### Question 2

6 Statements concerning transport improvements (EC 1) are long-term aspirations/wish-lists rather than firm policies. It would appear from the Infrastructure Delivery Schedule included as Appendix A to the Infrastructure Delivery Plan (EB1D1)) that there is no secured funding for the planned transport improvements listed under this question. At best funding is anticipated and there are significant funding gaps. These gaps are meant to be met by bodies such as TfL whose finances are stretched and have been severely depleted by the coronavirus pandemic.

(e) **Gunnersbury Station Improvements** There appears to be little possibility of the major improvements needed to this station being delivered within the plan period. TfL and Network Rail suggest that 25 years is a realistic timescale for these vital improvements. This would imply delivery by 2051.

7 A 25-year safeguarding of land that would be needed for the improvements will be included in the Legal Agreement for the development of Chiswick Tower (the building that sits above the station) the planning application for which was approved by Hounslow Council's planning committee on 4 December 2025. This period was requested by TfL the station manager and Network Rail the station freeholder. "Due to the lack of funding and our own internal funding cycles, TfL and Network Rail propose a 25-year safeguarding period of land,

with a trigger point of 13 years to establish a design for the scheme.” [Report to committee, 4.7 <https://democraticservices.hounslow.gov.uk/mgChooseDocPack.aspx?ID=13637> ]

8 How woefully inadequate the current facilities are, including when judged against TfL/NR specs, is shown in the Feasibility Study provided by the Chiswick Tower applicant. The need for major enhancements to Gunnersbury Station has been recognised for more than 25 years. The urgency of this need was endorsed by the planning committee at the meeting on 4 December. As WCGS Chair I spoke at the meeting; an extract from the item on the Society’s website is provided as Appendix 2.

### **Questions 3 and 4**

9. See para 2 above. A major problem with the designation of the Great West Corridor as an Opportunity Area is the absence of assured delivery of the transport infrastructure needed to support the quantum of development. There is no adherence to Policy IMP3 (of either the current Local Plan 2015 - 2030 or that now under examination.) Point H states “Ensuring that development does not proceed unless the delivery of critical and necessary infrastructure to support that development is assured.”

10 It is not clear on what basis projects are considered to be critical infrastructure as opposed to essential or important. Some major projects, spanning more than one borough and requiring *inter alia* new stations, such as the West London Orbital are designated as critical (potential cost £800m). Improvements to existing key stations such as Gunnersbury, however, are not deemed critical, although they would provide significant transport uplift and would cost much less and are therefore potentially easier to deliver. While focussing on areas with poor PTALs is understandable, PTAL is a crude measure of accessibility. Living within 50 metres of a station is of no avail if you are unable to reach the platform.

”The “circumstances” (Q4) already exist to the detriment of the quality of life for those residing or working in the area. In the 10 years since adoption of the current Local Plan considerable development has taken place in the Great West Corridor East with no improvement to transport. Our comments on Policy PC1 Great West Corridor submitted in October 2024 (provided as Appendix 3) give a clear explanation.

WCGS

12<sup>th</sup> December 2025

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### **Appendix 2**

#### **Hounslow Planning Committee meeting on 4 December.**

#### **WCGS Chair’s presentation [Relevant Extract from item on WCGS website]**

Marie then went on to say that what she really wanted to talk about was:

#### **Gunnersbury Station.**

Since Chiswick Tower sits on top of the station, you cannot consider one without the other.

Here is what she said. [The proceedings can be watched on the Council's You Tube <https://www.youtube.com/watch?v=TCTsdmGV6W8> ; Marie's presentation begins at approximately 51 minutes. There are also items on the Chiswick Calendar and Chiswick W4.]

“We are pleased that the land needed for expansion of the station has been identified and will be safeguarded within the Legal Agreement. It is good to have this long-term protection. But I ask you:

**are we expected to accept a wait of 50 years from the opening of the Chiswick Business Park?**

**are the Inspectors of the Local Plan likely to find this a sound approach to the provision of strategic infrastructure?**

**We are dismayed, that TfL and Network Rail suggest that 25 years is a realistic timescale for these vital improvements.** The Chiswick Business Park has already been in operation for 25 years and the obligation to improve the station stemmed from the outline planning permission for the park granted in 1991.

When some changes to the station were approved in January 2012 and partially delivered in 2018, it was recognised that they were inadequate to resolve the real problems of access and passenger safety at the station. How woefully inadequate the current facilities are – including when judged against TfL/NR specs – is shown in the Feasibility Study provided by the applicant.

*In January 2012 I asked:*

**as lowly Gunnersbury residents, is wanting to go “upstairs and downstairs” too much to ask? Are we getting ideas above our station?**

**Now it appears that waiting for a satisfactory upgrade to Gunnersbury is like waiting for Godot!**

*Back to the future* – we have examined the Feasibility Study – and we like what we see – especially the enhanced design ...if only it could be delivered.

We recognise that amassing sufficient funding is the main impediment to delivering the necessary station improvements. We are aware from the report presented to the Cabinet in February 2025 by Councillor Tom Bruce that the large-scale developments that have taken place recently in the surrounding area have generated a significant amount of CIL.

Our plea is that the Council commit to allocating some of this CIL to augment the s106 funds already legally assigned to Gunnersbury Station. Such a combined sum could be leveraged against TfL and Network Rail investments to enable this unique opportunity to improve the station to be realised.

**Councillors – Please make a strong recommendation to the Cabinet to allocate a significant amount of CIL for Gunnersbury Station improvements without delay.”**

In replying to questions put to her, Marie agreed that this was the best deal in terms of what you can expect this developer to provide towards the station. She was able to elaborate on the

reason why it was now or never – this was the first opportunity to do something because for the first time an owner of the tower had shown willing to give up any land. She finished by saying:

We have a station, we have tracks, we have trains – we just need to access them!

By the end of the meeting, when the Chiswick Tower development was unanimously approved, we believe that committee members were in no doubt as to the need for the Council to allocate some of its CIL to the station.

## **Appendix 3**

### **WCGS Comments submitted in October 2024**

#### **Local Plan Reg 19 Consultation; Single Local Plan**

##### **Q1 Policy P1 Great West Corridor and P1 {C) Great West Corridor East**

##### **Q2 b) sound – No**

##### **Q3 Background**

1. The reason for a Partial Review of the Local Plan for the Great West Corridor arose from the commitment given in Policy SV1 of the Local Plan. The addition of this policy together with the removal of policy ED3 was required by the Inspector during the 2015 Examination in Public of the Local Plan in order to make the Local Plan sound. This partial review of the Local Plan for the Great West Corridor has thus been in preparation for nearly 10 years.

2. The surge of developer interest in the East section of the GWC made the need for the review urgent and led the Council to draft an East Brentford Planning and Design SPD (published for consultation in October 2017) to provide interim guidance. Most regrettably, this draft SPD was not progressed in light of developer objections. Further delays to providing the GWC partial review have seriously undermine its effectiveness in providing policies for development in the corridor, especially in GWC East. Development on several major sites in this area has already been completed or is under construction, others are consented and applications for more are in progress.

##### **Comment**

3. When in December 2023 we endorsed combining all four volumes into a single, consolidated Local Plan, we did not expect major parts of the GWC DPD, as presented to the Examination in Public in late 2021, to be removed. We appreciate that, within the consolidated Local Plan, repeating what is in policies that apply to all of borough should be avoided. However, we consider that removal of text has gone too far and important focus on GWC specific issues has been lost. These include impact on sensitive heritage [Design and Heritage, GWC5], hostile environment (air and noise pollution) [Health and Wellbeing, GWC3]\* and poor transport [Connecting People and Places, GWC6].

**Our reaction could be summed up as “Ten years in the making and this is all we get?”**

\*See our separate comments on Spatial Strategy

4. Within our responses to questions from the Inspectors for the Examination in Public in late 2021, we stated:

We believe that the GWC DPD serves the purpose envisaged in the conclusion of the Inspector's Report (para 54). However, while addressing locally controversial issues, we believe that it has yet to settle them in a fully justified and effective way.

We believe that the overall strategy and strategic policies of the GWC DPD are within the scope and spirit of Policy SV1 although, as indicated in our relevant comments for this EiP, we do not believe that those policies as currently drafted are sound.

5. WCGS has stated consistently throughout the consultation on the GWC DPD that a major shortcoming of the draft DPD is the inability of the Council to ensure delivery of the necessary infrastructure, especially transport. We consider that delivery within the plan period of the major transport improvements on which the entire strategy for the GWC depends is highly unlikely. The Council is unable to give any assurance of delivery of this "game-changing" infrastructure as it is dependent on other bodies. The Council can only encourage, support and facilitate, not deliver.

6. We consider it necessary to remedy the existing transport, deficiencies *before* any further growth is considered. The Council must desist from yielding to the temptation to put the cart before the horse. Existing businesses on the Great West Road and local residents are already struggling with the inadequacy of the existing transport network. This issue also affects other local businesses, including many SMEs, major employment sites such as the Chiswick Business Park and major visitor attractions such as the Royal Botanic Gardens, Kew and the London Museum of Water and Steam and the Musical Museum in Brentford.

7. The main issue with respect to Policy P1(c) is that there has already been so much development in this area in the last 10 years that there is not much left for these policies to apply to. Developments already built, under construction or with permission granted fail to meet many of the policies.

8. Comments submitted by WCGS as our September 2019 response to the Regulation 19 consultation on the GWC DPD are provided as a supporting document. It is recognised that certain statements within these comments may no longer be relevant due to the passage of time. For example, we are pleased to note that the new Chiswick Heath Centre is under construction (paragraph 24 of our comments) However, it is still relevant to point out that "The centre in Fishers Lane is some distance east of the Chiswick Roundabout. It is questioned how practical/acceptable use of it would be for residents within the GWC".

**Q4** not possible to provide detail of modifications needed in order for the Plan to be sound.

**Q5** Yes, I wish to participate in hearing session(s)

**Q6** because WCGS participated fully in the preparation of the Local Plan between 2011 and 2015 including at the Examination in Public and regularly provides detailed responses to planning applications within or impacting on our area. WCGS has engaged with this Local Plan Review, participating in workshops and submitting comments at each consultation stage:

Issues Questionnaire February 2016

Preferred Options (Reg 18 Consultation) December 2017

Brentford East Supplementary Planning Document December 2017

Reg 19 Consultation September 2019

Examination in Public, comments and participation October – December 2021

Reg 18 Consultation on Focussed Issues Review of Local Plan – November 2022

Reg 18 Consultation on single, consolidated Local Plan December 2023

WCGS 28 October 2024

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WCGS

12<sup>th</sup> December 2025