

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

**01508/1-4/P6**

### **Comments from the West Chiswick and Gunnersbury Society (WCGS)**

#### **Summary**

**1. The West Chiswick and Gunnersbury Society (WCGS) considers that, while it might be acceptable to provide a bus garage on this site, to combine it with the quantum and nature of the “enabling” development proposed in this application is totally unacceptable. We request that planning permission is refused.**

2. Whatever the benefits of moving the bus depot from Commerce Road, the Local Planning Authority has a statutory duty to protect the quality of life of its residents and to conserve and enhance its heritage assets and those of neighbouring boroughs.

3. Co-locating a **bus garage** and large-scale residential development at this site raises a very serious concern as to the impact on air pollution in the area, which is already very high. WCGS requests that the proximity of a school, existing housing and consented large-scale residential development is fully considered. This consideration must include the cumulative impact on air quality of a bus garage and of the consented large-scale developments in this area.

4. A bus garage on this site might be acceptable with respect to air quality providing Conditions were applied requiring the operator to ensure that (1) all buses using the garage are either low-emission hybrid or electric and (2) all engines of buses inside or outside the garage, are switched off except when needed to move or test a bus (3) the system of ventilation for the garage does not increase air pollution in the vicinity. Other issues with respect to the bus depot are addressed below under Public Realm.

**5. The Society objects in the strongest terms to the mixed-use development proposed in this application.**

6. The expectation that this site can successfully and sustainably accommodate both a bus garage and sufficient “enabling residential development” to pay for it is totally unrealistic. The developer has, in effect, been set an impossible task, especially given the size and significant constraints [see Design and Access statement (D&A) 4.1] of the site. Driven by the cost of building the bus depot, the applicant has proposed providing 550 residential units in three densely-packed, high-rise buildings (all would be over 66m - taller than any other building in the vicinity, built or consented) in a very hostile environment (air pollution, dust and noise). Siting such massive buildings above the bus depot complicates the design and construction of both\* and adds significantly to the cost resulting in a vicious circle of spiralling cost and quantum of enabling development.

\*Planning Statement (PS) 6.1.39 The provision of the bus depot increases the complexity of construction. For example, the podium deck must be of extra thickness to support the towers above, and transmit the structural load down and through the

bus depot which requires minimal structural columns. In addition, other ancillary uses such as bicycle parking and plant must be provided in a large site-wide basement, which comes at additional cost and increased the build programme. The towers, by reason of their design, are more expensive to build than traditionally shaped buildings.

The result is that what is proposed is a scheme that fails to:

- meet the borough's needs for housing
- provide housing of an acceptable quality
- provide real public realm benefits
- provide the necessary infrastructure

which would have a negative impact on:

- neighbouring residents
- surrounding heritage
- public transport and traffic

and for which many of the benefits claimed would not be delivered.

These issues are discussed in the relevant sections below (paragraph 11 et seq)

7. The application is incomplete as it has omitted to include a proper consideration of the site's close proximity to the Lionel Road South scheme, in particular the Central Eastern and Capital Court sites. These two sites alone have full planning consent for five tower blocks with a total of 410 residential units. A further two blocks with 238 units are consented for the neighbouring Central Southern site together with the 20,000-seater stadium. Another three residential blocks with 262 units at the Duffy site to the west of the stadium have outline permission. The positions and heights (between 38 and 61m) of all these buildings are shown in the diagram on page 177 of the applicant's D&A statement. However, the application provides no further information, images or analysis of the interaction of the two schemes. There is thus no way of understanding or judging how the two schemes might work together, including how they would be seen in combination. The combined massing and the quality of the spaces in between the buildings is critical to judging the visual impact. **This major omission must be rectified and interested parties consulted before the application is presented to the Planning Committee.**

The Central Eastern and Capital Court buildings were shown in CGIs included as Figures 7 and 9 in the Planning Officer's Report, December 2015 for the Lionel Road South scheme. These images are reproduced here together with an annotated copy of page 177 of the current application (Appendix 2).

### **Relevant planning policy**

8. In seeking to justify his proposals for a large-scale, high-density, mixed-use development including three tall buildings, the applicant invokes regeneration of the Great West Corridor and makes frequent references to documents such as the Golden Mile Vision and Concept Masterplan (2014). The application is framed as though the nature of the regeneration had been determined and as though such documents form

part of the Local Plan. Policy SV1 of the Local Plan, however, commits the Council 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.” This wording was required in order to make the Local Plan sound. 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.’

9. The boundary of extent of the Great West Corridor has not yet been defined and the Partial Review is at a very early stage and yet the applicant’s proposals are based on an assumption that the site is within the corridor and that all the controversial issues identified as necessitating the Partial Review have been resolved. Such an assumption is extremely premature as are references to the Great West Corridor as a London Plan Opportunity Area.

10. As stated in the Report on the Chiswick Curve presented to the Planning Committee at its meeting on 12 January 2017:

- (para 7.8) The Local Plan Review is at a very early stage in its development and that severely restricts the amount of weight that can be attributed to it in the assessment of this planning application.
- (para 7.9) ...an assessment of these applications at this time needs to be made against existing policy and guidance, with weight attributed as appropriate to emerging policy. In the case of the Local Plan review, that weight is very limited by the early stage of its development.

11. As noted above (paragraph 9) the boundary of the Great West Corridor has yet to be defined. In responding to the Issues Consultation (ICD) WCGS commented:

- 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.

12. A paper entitled *Plan First*, which was discussed at the Resident Association Forum on 20<sup>th</sup> January 2017, details some of the problems that arise when major

development is brought forward in the absence of policy-based development briefs. It emphasises that:

- 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.

The issues raised in this paper are especially relevant to the current application and the paper is therefore provided as Appendix 1 to be considered as part of these comments.

## **Housing**

13. The applicant claims (PS 6.1. 33) that the site can deliver a large number of residential units and that this, coupled with the accepted need for housing, means that the site is highly suitable for such development. However, the application demonstrates that the proposed housing is not of the required tenure, size or type and is not of a satisfactory quality. To expect to provide 67% of the annual housing quota for the entire Borough together with a bus garage (PS 6.1.36) on a single compromised 0.84 hectare site is both unreasonable and unrealistic. Such a scheme would undermine the aspiration at the heart of the Council's Sustainable Community Strategy for the Borough "to be a place where people enjoy living and chose to stay".

14. **Density** The appropriate density range for this 'Urban' setting as referred to in the London Plan is 45–170 units per hectare (uph) and/or 200-450 habitable rooms per hectare (hrh). The applicant (PS 6.3.6) calculates the residential density as 655 uph and/or 1,597 hrh which is 3.8/ 3.5 times greater than the London Plan maximum. Moreover, the applicant's density figure is an underestimate as he has used the total site area of 0.84hr rather than the smaller area that would be obtained from subtracting the proportion of total floor space allocated to non-residential uses in accordance with the LHSPG for such mixed-use developments.

15. Such an excessive density complies neither with London Plan Policy 3.4 nor with Local Plan Policy SC3. It would be a "departure" from the Development Plan. References to Great West Corridor documents are not relevant (see paragraph 8 *et seq* above). The consequence of this excessive density is an unacceptable scheme which would create unacceptable living conditions for the new residents.

16. **Housing tenure** For such a large development to provide no Affordable Housing because of the cost of the bus depot would represent a very significant loss - 220 affordable units (40% of 550 units). The ES Chapter 6 records this as "a high impact resulting in a major-moderate adverse effect which is significant in the context of the need for affordable housing that is reflected in the Council's policy" and notes that "The lack of adequate housing in the area is frequently a component of deprivation and barriers to housing and services are one of the more significant components of deprivation in the LSOA (within the study area) in which the Application Site is located."

17. It would be impossible for the Local Authority to make up for this huge deficit from other, future developments, especially given the existing huge cumulative

shortfall of Affordable Housing from other schemes in the area. The analysis of cumulative effects in in ES Chapter identifies a total of only 114 affordable housing units in the 13 schemes examined. This is less than 6% of the 1,984 residential units that these schemes are estimated to provide. The proposed scheme would not deliver “sustainable, inclusive and mixed communities” as required by Chapter 50 of the NPPF.

**18. Housing type and size** Policy SC3 of the Local Plan has identified the mix of units to meet the needs of the Borough in conformity with London Plan policy 3.10. The mix of units proposed in this scheme is far removed from that specified in SC3 rather than “not being wholly in accord” as claimed by the applicant. Taking the total of 550 units, the proposed mix would represent a significant deficit of family units (a loss of 27 four-bed units and 96 three-bed units) and an excess of 165 one-bed units. This large excess of one-bed units would be particularly problematic given that 20% of these would be studios and given the over-provision of one-bed units in neighbouring schemes. Such a mix is likely to result in more transient populations with a loss of community cohesion; it would not “deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.”

**19. Housing Quality** The Society considers that the density of the proposed development, the design of the buildings and their proximity to other consented schemes and, especially in the case of the Northern building, to the A4/M4 would deliver a large number of poor quality residential units. These units would fail to meet many of the standards in the London Plan, as detailed in the London Housing Supplementary Planning Guidance (LHSPG). The applicant’ suggestions for further potential mitigation for future “consideration/implementation by the community” serve to demonstrate some of the unresolved negative features of the development:

- ♣ applying titanium dioxide on the external shading of the northern tower to reduce airborne pollutants from the motorway.
- ♣ motorised mirrors reflecting patches of sunlight into the public space
- ♣ incorporating bio-air filters vegetation along the fence separating the bus terminal from the railway\* to remove air pollutants from bus exhausts.

The consented residential buildings of the Central Eastern site of the Lionel Road South scheme are sited along the railway (see paragraphs 41 - 44 below).

20. Across the three buildings, the majority of the units are **single-aspect** and a high proportion of these are **north-facing**. This is unacceptable and yet the ES does not appear to comment on this aspect of quality. The relevant London Plan/ LHSPG Standard states “Developments should avoid single aspect dwellings that are north facing (or) exposed to noise exposure categories C or D”. In an effort to deliver this standard for the high-density residential towers of the Lionel Road South scheme, a Condition of the outline planning permission allows no more than 10% of the total to be single-aspect, north-facing (91 of 910 units). Moreover, within the buildings so far consented in this latter scheme, 4% is expected to be achieved.

21. The **Northern** and **Central Towers** are designed with up to 16 residential units on each floor, whereas the relevant LHSPG Standard states “In terms of the number of homes per floor, groups of 2-8 dwellings are usually desirable.” and “Each core should be accessible to generally no more than eight units on each floor.”

22. Within these buildings, to be constructed of glass, aluminium and steel, the residential units are to be accessed from shared galleries open to the central atrium. Rooms within the units will abutt the gallery and may have glazing/internal windows to improve light levels (levels of daylight and sunlight are low for some rooms). Little detail of this aspect of the design is provided, for example the varying distances across the atrium on different floors. It is apparent, however, that such a design would give rise to serious issues with respect to noise, disturbance, privacy, security and safety and would fail to deliver “homes as a place of retreat”. **The Northern Tower is, in effect, a massive glass and steel tenement rolled in on itself.**

23. With its lack of private *outdoor* amenity space, its pedestrian residential entrance on the A4 and all the units being single aspect and a high proportion being immediately adjacent to and facing the A4/M4 to the north, we consider that this building is unacceptable for residential use. The noise and pollution from the M4/A4 road network mean that the facades facing the roads on the Northern Tower cannot have external openings and the building will rely on mechanical ventilation. To prevent overheating, comfort cooling systems will also be needed. These features will increase the energy requirements and therefore the carbon footprint of the building. Waste heat vented from the building could have a negative impact on the surroundings.

24. We submit that any building on the northern edge of the site should be entirely non-residential and should provide a barrier to protect other buildings and open spaces from the noise and air pollution of the A4/M4.

25. **Outdoor amenity space** As noted above, many units will have no private *outdoor* amenity space due to the high levels of air pollution, dust and noise. Having a slightly extended internal living area is no compensation. For other units, open balconies (inset or bolt on) are proposed. However, the application indicates that none of the proposed facades on any of the three buildings meet the guideline external noise level of 55 dB LAeq, daytime for balconies due to road traffic noise. Communal roof gardens are therefore proposed on each of the three buildings as they “are likely to be relatively quieter than the majority of balconies. The roof gardens have *the potential* to meet the external noise level guidelines, through the implementation of noise barriers (for example glazed barriers).” Whether such roof gardens will be successful as communal open space is questionable as, in addition to noise and wind effects, they will not be “overlooked by the households that share the space, engendering a sense of ownership among residents” as advised by the LHSPG.

26. The **Podium Park** is intended to provide the residents of the 550 units with communal open space including play areas. However, the park is also promoted as providing publicly accessible space (see below). This shared use together with a very challenging environment (noise, air pollution, wind, limited sunlight, especially in afternoon) would seriously undermine the Podium Park’s ability to provide suitable outdoor amenity and play space as would its proximity to the Lionel Road Stadium. The application does not address the impact that frequent use of the stadium would have on residents’ quality of life including their ability to enjoy the park. The impact on the surrounding streets is such that the park will be closed to the public whenever the stadium is in use for matches. The marshalled pedestrian route from the stadium

will use the new bridge immediately to the south of the application site and Capital Interchange Way (see Figure 7 in Appendix 2). The measures proposed to mitigate the elevated road noise will not provide protection from noise generated at the nearby stadium and on the routes to and from it on match days. While residents will, in effect, have exclusive use of the park at such times, it is unlikely that this will be of any real benefit.

### **Public Realm/permeability**

27. The provision of “high quality comfortable, safe and attractive public realm, improving the access through the site” (PS 6.1.60) is claimed to be a major benefit of the scheme. This public realm would be provided by means of the **Podium Park**. In addition to the three towers, the park is expected to contain a multiplicity of structures (including café, office pods, wind baffles). It is difficult to see how in these circumstances, it can successfully accommodate the range of proposed features such as play areas, water, planting, paths to create a harmonious and tranquil space. Future occupants of the residential towers and members of the public will neither need nor wish design features of the park (airplane-shaped wind baffles) or of the buildings (propellers as cladding) to remind them of their proximity to Heathrow Airport.

28. The application admits that the location of the Podium Park is in an environment characterised by high levels of noise and air pollution. For example “existing external noise levels across the publically (sic) accessible open space exceed the guideline values; however this is likely to be relatively quieter than the majority of balconies. The ‘soundscape’ of the publically (sic) accessible open space includes water features which will help to offset some of the ‘unpleasantness’ of the elevated road noise in the spaces leading to a tranquil space dominated by positive sound sources.”

29. The **Podium Park** is promoted as providing publicly accessible space for existing residential communities and future residents of the neighbouring blocks of the Lionel Road South scheme (648 units consented). Provision of a new “park” would be welcome as the area to the east of the Chiswick High Road has a public open space deficit and there is a shortfall of both private and communal outdoor space within the tightly-packed blocks of the Lionel Road South scheme. The applicant admits, however, that “the extent to which these facilities will benefit the wider existing community in the study area is limited by the barriers to pedestrian movement that surround the Application Site (railways and roads and non-residential land uses).” A further serious barrier will be introduced whenever matches are played at the Lionel Road Stadium (see paragraph 32).

30. In addition, as noted above, the Podium Park is also intended to provide communal outdoor space and play areas for the over 1000 new residents on this site (many of whom will have no private outdoor space). Such shared use could lead to overuse and conflict. It is seriously doubted whether the podium park can serve both purposes satisfactorily.

31. The LHSPG states “Urban spaces are most successful when it is inherently clear who is meant to use them. It is important to ensure that outdoor spaces are inviting and accessible, and that they engender a sense of ownership amongst the people who are intended to use them. There should also always be clear distinctions between spaces that are for public and private use.”

32. The need to close the Podium Park to the public before, during and after matches at the stadium is understood but a park whose access is dictated by football and rugby fixtures is of limited value as public realm. With the stadium hosting both football and rugby matches, a total of 46 - 57 matches is predicted per season. This will mean the park being frequently closed to the public on weekend afternoons for nine months of the year. A park that is inaccessible to the public and unusable by the residents for prolonged periods at weekends during much of the year will not meet the needs of either.

33. **Street scene** The site has only one street frontage along Capital Interchange Way and the ground floor footprint is maximised along this site boundary. The applicant's attempt to accommodate a wide range of street-level functions associated with both the bus depot and the residential buildings, along this singular frontage, has resulted in an extremely poor street scene. It does not deliver "ground floor activities that provide a positive relationship to the surrounding streets." (London Plan 7.7). The design at street level would present people with a massive (2-storey high) blank barrier constructed of rock-filled gabions running the length of the site and including entry/exit doors for bus depot, residential vehicles and refuse/recycling etc (see figures page 161 and 183 of D&A doc; latter included in Appendix 2).

34. This section of Capital Interchange Way will be a significant part of the pedestrian route to Gunnersbury station for many future residents in the area including those of the high-density South Lionel Road development (in particular those in the 181 units of the Central Eastern tower blocks). It is therefore important that it provides a welcoming street scene – one that compensates for that offered by the next section of the route along the A4/M4 to the Chiswick Roundabout (see images in Annex)

35. Using the podium park as an alternative route would involve two sets of stairs or lifts and, in any case, this option would not be available when the podium park is closed to the public - after dusk and before, during and after matches at the stadium. The marshalled pedestrian route from the stadium will use this section of Capital Interchange Way, which has also been designated for stadium coach parking for away supporters. The LHSPG states "In mixed use development, non-residential ground floor land uses should provide active frontages when facing publicly accessible space. In contrast, when public spaces are flanked by extensive windowless elevations, exposed undercroft parking or refuse and cycle stores, this is at best a missed opportunity, and at worst a catalyst for anti-social behaviour."

### **Social Infrastructure**

36. A mixed-use development of the scale proposed would add unacceptably to the pressure on community/social infrastructure. So much major development has recently been built or is in the pipe-line in Brentford and Chiswick, that no more should be built until the necessary social and transport infrastructure (see relevant section below) is in place. There is now a critical need for an "infrastructure catch-up" before any more development is allowed in this area and appropriate amounts of Borough CIL should be assigned for this purpose. We therefore object strongly to the applicant's suggestion (PS 6.1.41) that the bus depot might be considered an 'Infrastructure Payment in Kind' for Borough Community Infrastructure Levy (CIL)

purposes, allowing the money that would otherwise be paid for Borough CIL to be used to increase the viability of the scheme and possibly permit some affordable housing to be included. This would be to rob Peter to pay Paul. London Plan Policy 3.7 recognises that large residential developments (more than 500 dwellings) have a particular role in the provision of social, environmental and other infrastructure.

36 (b). Paragraph 6.8.3 of the applicant's Environmental Statement states "Using the same ratio of people to housing units (1.91) as has been applied for the Proposed Development, the resident population of the housing in these 13 cumulative schemes is estimated at approximately 3,790, nearly seven times that of the Proposed Development.". This statement is incorrect due to the confusion between residents and residential units; "nearly seven times" is wrong and the correct value is "approximately 3.6 times". 3790 (the residential population of the 1984 units of the 13 schemes) is approximately 3.6 times 1050 (the residential population of the 550 units of the proposed scheme). This error could lead to an underestimate of the extent to which the proposed development would exacerbate the social and transport infrastructure deficits acknowledged in 6.8.3 "The cumulative developments do not include public educational, health or other community infrastructure."

37. **Health and education facilities** While the applicant's planning statement is silent on the issue of such facilities, the ES-NTS indicates (6.2.6) that the increase in local residents is likely to put additional pressure on local health and educational services, although "these effects are anticipated to be minor and could be further reduced through developer contributions to local infrastructure which remain to be negotiated with LBH" (but see paragraph 36). **Health** Chapter 6 of the ES estimates the additional "health demand" to be for an extra 0.6 GPs. **Education** It anticipates that the child yield will be low and can be accommodated within the current school expansion programme but that the projected shortfall in provision of free childcare may pose a challenge to LBH in their statutory duty to secure early education places.

38. **Cumulative (intra-project) impact** The ES-NTS (6.2.7) indicates that the scale of additional housing planned for the local area through a number of cumulative developments (13 schemes within 1 km of the site) is likely to increase demand for local health and education facilities further, and therefore **significant adverse effects** have been attributed to this aspect due to uncertainties in relation to increases in provision.

- **Health** Chapter 6 of the ES states that there is no GP practice within 1 km of the site. It indicates that, once operational the cumulative schemes, including the Proposed Development, are likely to generate demand for 2.7 further full time GPs in the area. There is limited additional capacity in some local GP practices but since there are no committed plans for additional GP provision, this represents a high impact and a moderate-minor effect which is adverse and significant.
- **Education** Chapter 6 of the ES assesses the cumulative schemes as generating the need for • 144 pre-school; • 294 primary school; and • 76 secondary school places but assumes that "committed developments have been taken into account in projections for school place requirements". It indicates that the cumulative effect will be moderate-minor, adverse and significant.

## Impact on Neighbours

### Existing low-rise residential areas to east and south-east

39. **Visual amenity** The proposed residential towers are totally out of character with the townscape to the east and south east in terms of scale, height, massing and density. In these areas much of the local townscape comprises the residential streets of the several Conservation Areas (see comments under heritage). The proposed development should seek to counter not increase and intensify the influence of the consented Lionel Road Scheme. Instead it introduces three more towers, all taller than the tallest in the latter scheme, into the settings of these Conservation Area. The towers by virtue of their height and bulk, would be highly visible from many locations within these areas and would impinge on views from well beyond them. The design and materials chosen for the external facades of the towers would intensify their dominant and negative visual impact on the townscape. The towers would be visible from many locations in the Wellesley Road CA, including homes, gardens and streets within this residential area of predominantly 2-storey Victorian houses. They would appear alien - demeaning and belittling the intimate, human scale of our neighbourhoods and destroying our sense of place.

40. **Other impacts** There will be other adverse impacts on the quality of life of existing local residents. ES-NTS includes:

- 6.13.2 Local residents, workers and schools are likely to experience temporary adverse cumulative effects from construction traffic, construction plant noise and dust. These effects will be significant but will be temporary during the construction works.
- *WCGS response* Taken together with the construction works for the Lionel Road South scheme, including the stadium, this “temporary” period will be very long.
- 6.13.4 There will be adverse effects to these same receptors as a result of increased pressure on **local health, education and public transport services**, particularly at Kew Bridge and Gunnersbury Rail Stations.
- *WCGS response* See comments in other relevant paragraphs.
- Increased traffic associated with the Proposed Development will also result in adverse effects with respect to **noise, traffic and air quality** although these will be reduced to below significant levels in 2025.
- *WCGS response* **Air quality** This conclusion appears to be based on very rash assumptions about the volume of traffic, the technical capabilities of vehicles and the strategies/tactics adopted by their manufacturers and the efficacy of any measures to improve air quality.

### Consented residential blocks of Lionel Road South Scheme

41. A very significant issue which the applicant has inadequately addressed is the application site’s close proximity to the Central Eastern and Capital Court sites of the Lionel Road South scheme. These two sites have full planning consent for five tower blocks with a total of 410 residential units. A further two blocks with 238 units are consented for the neighbouring Central Southern site together with the 20,000 seater

stadium. Another three residential blocks with 262 units at the Duffy site to the west of the stadium have outline permission. The Central Eastern and Capital Court buildings are shown in CGIs included as Figures 7 and 9 in the Planning Officer's Report, December 2015 for the Lionel Road South scheme and the positions of all the buildings are shown in the diagram on page 177 of the applicant's D&A statement (these are reproduced in Appendix 2).

42. ES-NTS 6.13.9 states "The Proposed Development is expected to have significant adverse effects on the nearest neighbouring blocks associated with the Development at Lionel Road South" but seeks to justify these by adding "although this is not uncommon in a dense urban environment such as is proposed for the Great West Corridor, in line with emerging LBH policy. It does not state the nature of these adverse effects but ES-NTS 6.10.6 refers to significant effects on daylight and sunlight on a number of elevations of the Development at Lionel Road South."

43. The Local Planning Authority needs to give very careful consideration to any adverse effects on the tower blocks on the Central Eastern site since these would have a major negative impact on future residents at this site. These buildings already offer a poor quality of accommodation due to their closeness, location and orientation. Any further worsening of the situation could represent a tipping point beyond which the quality would be rendered unacceptable and the viability of the scheme placed in jeopardy.

44. The outlook of some of the units on this site is compromised by very tight distances (9m) between sections of blocks. These blocks are marooned on an island, squeezed between the converging railway tracks and the stadium with the only access being over the new bridge to Capital Interchange Way (see Figure 7, Appendix 2). Access to and from the 181 residential units on this site will be severely compromised on match days. Pedestrian and cyclist use of the new bridge will be difficult since the bridge will serve as a pedestrian route to and from the stadium's East Stand, which, for football will be used principally by away team supporters.

### **Impact on surrounding heritage**

45. The starting point for any assessment of the application must be the statutory requirements of the Town and Country Planning (Listed Buildings and Conservation) Act 1990 including the requirement for the Local Planning Authority to give great weight to the preservation of the setting of the adjacent designated heritage assets. The NPPF (Section 12) sets out how planning authorities may fulfil their statutory duties with respect to the Act. These are elaborated in the policies of the London Plan (Chapter 7) and Hounslow's Local Plan (Chapter 6).

46. The location of the site and the scale, height, massing and design of the three towers of the proposed development are such that they would be prominently visible from within the surrounding area, especially from the north, east and south-east. The historic landscape and townscape of this area contains a wide range of designated heritage assets including Gunnersbury Park, the River Thames and its environs, the World Heritage Site at the Royal Botanic Gardens Kew and several Conservation Areas in both the London Borough of Hounslow and the London Borough of Richmond. These assets are of immense architectural and historic significance. They

contribute enormously to the cultural richness and quality of life of this part of London. They are valued and enjoyed by large numbers of people including local residents and visitors from other parts of the borough, London and further afield. These are precious, irreplaceable assets to be treasured, protected and enhanced in conformity with national, London and local planning policy.

47. Having studied the application, including the Townscape, Heritage and Visual Impact section of the ES, the Society refutes the applicant's assessment of the impact of the proposed development on local and strategic views as "Minor adverse to minor beneficial heritage effects, and beneficial townscape and visual effects some of which are deemed significant given the enhancement of the skyline". We consider that the proposed development would inflict lasting harm, including severe harm on on the setting of and/or views from, a range of the above designated heritage assets in contravention of the Act. The development would not comply with the NPPF or with the policies of the London and Local Plan and would therefore be a departure from the Development Plan. The advice provided by Historic England on this application concludes that "the proposals would clearly result in serious harm to a range of designated heritage assets, through alteration of their setting, resulting in their significance being reduced."

48. The harm that would be inflicted can be seen in the views provided in the ES. While many of these views demonstrate harm, we would draw attention to the views provided for the Strand on the Green CA, for the Katyn Memorial within the Kensington Cemetery (part of the Gunnersbury CA) and to those for Wellesley Road CA. In each of these cases, we consider that the harm would be severe. For impacts on Gunnersbury Park, on Kew Gardens and on the listed Buildings within them, please refer to the advice from English Heritage. Other views of real concern to us are views 6 and 12.

***Strand on the Green Views 11 and 26*** The impact on these views is catastrophic and cannot be reconciled with London Plan policies nor with the Thames Landscape Strategy. In assessing the cumulative impact of the development, full weight must be given to the acknowledged harm to this and other views that will be caused by the neighbouring Lionel Road South scheme. Using a thin blue line to show the latter scheme in the "cumulative" view rather than combining the relevant CGIs is totally inadequate to demonstrate this harm.

The overall negative impact along the ***Thames riverbank***, including within the Arcadian Thames stretch (views 17 and 22) would be to diminish the significance of this unique landscape and hence its enjoyment by the many who walk the Thames Path along this beautiful stretch. Damaging an asset of such high public value should be strongly resisted.

***Katyn memorial/Gunnersbury Cemetery View 5*** The cemetery is within the Gunnersbury CA. The impact on this view is catastrophic and cannot be reconciled with London Plan policies. The cemetery with its memorial is a place where visitors come for quiet contemplation and in times of bereavement and remembrance. This view shows how much of the open space and, in particular, how the sombre but elegant memorial would be completely dominated by buildings of an alien scale and nature. The buildings respect neither the heritage value nor the primary purpose,

context or character of the cemetery nor the cultural significance of the memorial. The cemetery is also Metropolitan Open Land; this requires rigorous application of the policies in Chapter Seven of the Local Plan: Green and Blue Infrastructure to protect its openness.

**Wellesley Road CA Views 7, 8 and 9** [Note that View 8 is incorrectly given as Wellesley Road, it is Clarence Road.] The effect of the proposed development on **View 7** is to draw the eye upwards to the M4 viaduct and away from the attractive houses, trees and the more human scale of the Chiswick High Road. The severance caused by the major road network in this area is such that we do not want it to be the defining feature of our neighbourhood.

The pedestrian crossing in **View 9** is located at the end of Wellesley Road and similar views would be experienced from many other locations within the residential streets of this CA. The impact on this view is catastrophic and cannot be reconciled with London Plan policies. In assessing the cumulative impact of the development, full weight must be given to the acknowledged harm to this and other views that will be caused by the neighbouring Lionel Road South scheme. Using a thin blue line to show the latter scheme in the “cumulative” view rather than combining the relevant CGIs is totally inadequate to demonstrate this harm.

49. It is evident from these examples that the developer has not engaged positively with the purpose and core principles of chapter 6 of the Local Plan as articulated in Our Approach to Policy CC1 and to Policy CC4 and in paragraphs 6.1, 6.12 and 6.13. Attempting to claim that the clearly significant impact is beneficial on the basis of the architectural quality of the design and the scheme’s contribution to urban intensification conflicts with these core principles. Development within this part of the Borough should be heritage-led and should 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”. Promoting multiple gateways and landmarks debases these once useful urban-design concepts.

The development at the Chiswick Roundabout (the Chiswick Curve) raised similar issues with respect to its impact on heritage and was refused recently on such grounds, amongst others (see **Land at Chiswick Roundabout, Great West Road, Chiswick**

#### **00505/EY/P18 and 00505/EY/AD22**

London is of national and strategic importance as our capital city. Its natural and historic environment is too important to be treated in this cavalier fashion. A significant part of the “pull” of London is the great variety of what it has to offer in terms of its built and natural environments. It is essential that development enhances and maintains this rich tapestry rather than leads to a dis-jointed assortment of high-rise follies, competing for attention as they dominate the skyline.

#### **Design**

50. A high-level strategy of the London Plan is that London will be “A city that delights the senses and takes care over its buildings and streets, having the best of modern architecture while also making the most of London’s built heritage, and which makes the most of and extends its wealth of open and green spaces, natural environment and waterways, realising its potential for improving Londoners’ health, welfare and development.”

51. We consider that the design team’s stated commitment to “an architecture of delight and enjoyment” (D&A) is belied by their proposals for three idiosyncratic towers that fail to relate positively to each other and which show no respect for the surrounding heritage. We have not been able to judge how they might relate to neighbouring consented schemes as this relationship is not shown in the application (see paragraphs 41 – 44).

52. The attention-grabbing “shock and awe” design of these buildings with their disparate and fussy façade treatments, is totally inappropriate and out-of-place for residential buildings, on a site surrounded by heritage in the predominantly low-rise Outer London Borough of Hounslow. Taking the aeroplane as a design cue for the façade cladding of one of the buildings is particularly insensitive. Future occupants of the residential blocks will neither need nor wish the design of their buildings to remind them of their proximity to Heathrow Airport.

53. The buildings might be seen as amusing or interesting additions by those to whom they are an occasional, brief encounter when travelling on the M4. To those who would have to live with them on a daily basis, they would be seen as an alien and alienating, out-of-scale, overbearing intrusions as they would to those for whom they would appear as a totally incongruous element on the skyline.

54. A further problem is that the complicated design approach is likely to increase the cost of the buildings (see also paragraph 6). In this context it is noted that plans for a waterfront building in Liverpool were scrapped in 2004 due to rising costs, design changes and potential planning problems. The Cloud, a 10-storey globe, designed by Will Alsop, would have been the "Fourth Grace" on the city's Pier Head, joining three others landmarks, including the Liver building, known as the Three Graces.  
<https://www.theguardian.com/uk/2004/jul/20/europeancityofculture2008.arts>

**55. Advertising Screens** The addition of large, LED-lit advertising screens on the façade of the Northern Tower will further compromise its design quality and conflict with its predominantly residential use. They would also increase the harm to the cemetery and the Katyn Memorial, especially in winter.

### **Impact on public transport and traffic**

56. Adding more vehicles to the strategic and local road network and more users to the local public transport system will have significant negative economic, social and environmental impacts (see photos on pages and). The Council is well aware of the negative impact on the local transport system arising from the increase in commuters in recent years and of the pressure that will be exerted by other major developments in the pipeline, in particular the Brentford Football Stadium and its 910 residential units. Despite the very large amount of committed development in the area (recently

completed, under construction and in the pipe-line), no significant transport improvements have been obtained. Existing local residents and businesses on the Great West Road 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 including the Royal Botanic Gardens, Kew and the London Museum of Water and Steam.

### **Public transport**

57. The applicant's expectation that "the majority of trips are expected to be undertaken via public transport" is unrealistic. The applicant makes reference to the proximity of various means of public transport such as rail and underground stations. However, the PTAL of the site at 3 is only moderate and, in any case, PTAL values only reflect proximity and frequency of service. Station access and capacity are of equal importance. The nearness of a station is immaterial if it cannot cope with demand. Both Gunnersbury Station and Kew Bridge Station have significant access problems and Gunnersbury Station also has severe capacity problems.

58. As the Council is well aware, 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 full occupation of Building 7) and other significant developments in the area. These numbers will be augmented by residents from other consented developments including the 910 units in the Brentford Football Stadium scheme in Lionel Road South and the station is also expected to handle large numbers of football and rugby supporters from the new stadium.

59. 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 (see Annex below).

### **Traffic**

60. The local road network is already at saturation at peak times and there is frequent grid-lock at the roundabout. The cumulative impact of committed development in the area is such that congestion of the road network is expected to increase with significant impact on journey time reliability and on bus performance. Any increase as a result of this large-scale mixed-use development will have a very negative impact for all using this section of the TLRN.

61. While restricted parking for the proposed development may reduce car ownership and result in fewer private car journeys by residents, account needs to be taken of the resulting increase in journeys to and from the site by taxis, mini-cabs and delivery vehicles.

Note: Annex attached and Appendixes provided as separate documents.

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**Annex: Applicant's Claims:** (PS 6.4.1) The Site is well connected in terms of access by public transport and cycle, located in close proximity to a number of designated cycle routes and rail and underground stations. (PS 6.4.6) Excellent pedestrian infrastructure in the vicinity of the Site is of good quality, with pedestrian walkways and crossings in general of good quality.

## **The Reality**

### **Route to Gunnersbury Station**

Pavement and cycle lane at corner of Capital Interchange Way and A4



## Chiswick Roundabout



Corner of Wellesley Road, opposite Capital Interchange Way

**At Gunnersbury Station**  
AM peak: TfL management



For those travelling from the station this now results in being denied access to the platform for longer intervals.

AM peak: TfL management



For those arriving at the station this now results in being caught in the crush to leave the platform.

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