



London Borough of Hounslow  
Civic Centre  
Lampton Road  
Hounslow TW3 4DN

For the attention of Danalee Edmund  
(Head of Spatial Planning and Infrastructure)

23 September 2019

Dear Ms Edmund,

**Regulation 19 Consultation – London Borough of Hounslow  
Great West Corridor Local Plan review**

This submission from The Kew Society should be read in conjunction with our submission to the Consultation on the Preferred Options version of the Great West Corridor (GWC) and West of Borough (WoB) Local Plan Reviews, which took place from October to December 2017. This submission was published with the results of this consultation in the Local Plan Reviews Regulation 18 Version: Consultation Statement in June 2019.

The Kew Society supports the Strategic Objectives 1-18 set out on pages 30 and 31 of the Great West Corridor Local Plan Review. However, policy SV1 (Great West Corridor Plan) in the Local Plan states (2.8): *“There are however constraints on the corridor’s potential, including poor public transport connectivity and environmental challenges arising from the transport function of the A4/M4, whilst the proximity of heritage assets places limits on building heights”*.

We have particular concerns over these issues, which have formed the core of our objections to many of the schemes proposed or under construction in the eastern part of the Opportunity Area and its surrounds (e.g. some of the enabling developments of the Brentford Community Stadium, the Citroen Site redevelopment, 1-4 Capital Interchange Way, the Chiswick Curve). With the exception of the Chiswick Curve, these schemes are not geographically part of the Great West Corridor area as they are too far south of the M4, but when combined with the effects of some of the new developments which will arise in the Great West Corridor, they add to our concern over these issues.

The consistent theme of our objections is London Borough of Hounslow's perceived failure to consider the cumulative impact of the area's development plans, most particularly on (a) pollution, (b) heritage assets and (c) transport, leading to increased congestion on surrounding roads – which are already heavily congested (see below).



These concerns impact particularly on the following objectives:

- **Objective 6:** To mitigate the impact of **noise and air pollution** through the design and positioning of buildings and greening of the area.
- **Objective 11:** To establish a coherent and **high-quality environment** with distinct buildings and features along the M4 and A4 corridors.
- **Objective 12:** To protect and **make the most of our unique heritage and historic environment**, while encouraging innovations in building technology and improving sense of place.
- **Objective 14.** To **increase public transport options** by supporting the delivery of strategic rail networks, enhanced bus services and improved connections to and from transport hubs and key local and strategic destinations.

## **POLLUTION**

**GWC3: Health and Wellbeing:** We note that the whole of London Borough of Hounslow (LBH) has been designated as an Air Quality Management Area, due predominantly to the high level of NO<sub>x</sub> emissions, and that the highest levels of pollution in the borough are at the eastern end of the borough, close to the North Circular and the A4/M4. Some six percent of adult deaths in the borough (data as of 2013 and 2014) were attributable to PM<sub>2.5</sub> pollution. In its evidence to the Planning Inquiry into the Chiswick Curve development in August 2018, The Kew Society cited evidence that pollution levels at the Chiswick Roundabout were already significantly in excess of legal limits. The Draft New London Plan states (Sl1) that “*the development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral*”, and the GWCP states (GWC3(a)) that LBH intends “*to become Air Quality Positive by implementing measures across the area that will actively reduce air pollution, in order to improve the environmental quality of the area*”. Given the likely material increase in dwellings and jobs in and around the Opportunity Area, and in the absence of a confirmed increase and improvement in transport infrastructure (the planned Golden Mile station in Brentford for example has, we understand, not been confirmed), we see no evidence that pollution levels will be reduced to the extent that the borough can become Air Quality Positive. We note that LBH published an Air Quality Action Plan (2018-2023) in September 2018, but we would like to see its findings integrated into the GWCP, with a specific proposal on how and by when the Opportunity Area can begin meeting pollution regulations and become Air Quality Positive.

## **TALL BUILDINGS – HEIGHT AND MASSING**

**GWC5: Design and Heritage:** GWC5(c) states that LBH aims to “*conserve, restore and enhance designated and non-designated heritage assets giving great weight to the significance of designated heritage assets, including their settings.*”



LBH's Local Plan expresses a number of caveats over tall buildings (e.g. **6.10**: “Due to the relatively flat topography of the borough and its low, open landscape, **tall buildings are generally inappropriate** as they can dominate the skyline over a very wide area”; **6.11**: “The borough has a number of tall buildings that do not positively contribute to the townscape and their existence should not be grounds for the provision of more. The council also recognises that creating successful, vibrant urban environments is about compactness and density, not necessarily about height of buildings. The density and spacing of buildings and their architectural quality are important factors in creating well used public spaces and a coherent, attractive townscape”; **6.13**; **CC3(l)**: A tall building proposal should be “designed to give full consideration to its form, massing and silhouette, including any cumulative impacts, and the potential impact of this on the immediate and wider context”; and **CC3(p)**: “Take opportunities to **enhance the setting** of surrounding heritage assets, the overall skyline and views”).

**GWC5(h)** states that LBH expects development proposals to “respond to the area’s sensitive heritage assets and important views and accord with Great West Corridor Masterplan heights and design framework”. This clause goes on to identify three categories of building heights for guideline purposes: 14-24 metres, 40-66 metres, 61-82 metres. We note that these heights are, regrettably, greater than those in the Brentford East Supplementary Planning Document, which has been withdrawn. These guidelines need to be considered alongside provision h(i) which states that schemes should “**avoid any further harm** to the setting, views, significance, outstanding universal value, and buffer Zone of the Royal Botanic Gardens, Kew, WHS and other designated heritage assets and their setting in the Corridor and wider area,” and (k)(III), which states the schemes should “have full regard to the significance of designated and non-designated heritage assets including the setting of, and views to and from, such assets, clear and convincing justification for any harm and given greater weight for conservation and **greater weight for assets of higher significance**, and should comply with historic England guidance on tall buildings”.

We recommend that more formal, and measurable, guidelines be set out as to what constitutes an acceptable level of harm to heritage assets, to prevent the constant attrition of the vista from these assets as the impact of individual schemes is evaluated on a case by case basis. For example, 4.63 states, in relation to RBGK, that “*applicants will need to ensure that the design of schemes avoids any further harm to the setting, views including winter views, significance, outstanding universal value, and buffer zone of Kew WHS (by siting development on or below the tree/building line)*.” It is unclear how the statement in brackets is to be evaluated.

Clause 4.60 states “Any tall building proposal along the corridor will be required to be of the highest quality design and will need to demonstrate how its potential impacts on designated heritage assets and the skyline has been **tested, considered and appropriately mitigated**” - we believe this consideration needs to be widened to include an impact assessment of all



existing, approved and proposed schemes, in line with the Local Plan's comment about the importance of considering "cumulative impact" (see above).

## **TRANSPORT**

**GWC1: Employment Growth:** Subparagraph (1) states that "*The indicative guidelines for the OA set by the draft London Plan are that it should provide **7,500 new homes and 14,000 new jobs***", and on page 37 is the statement "***The Council will work with developers and key stakeholders to deliver 17,600 new jobs***". Whilst we support the promotion of businesses in the Opportunity Area, we are concerned that the implications of this for traffic growth - in the absence of confirmed plans, including timing, for adequate public transport facilities - have not been fully evaluated. We note that the stretch of the North Circular Road between Chiswick Roundabout and the Hanger Lane Roundabout has, for the third year running, been classified as the most congested in the whole of the UK. We would like to see evidence that the combined effects of the nearby developments we list above will not worsen the congestion to the extent that there will be a near-permanent gridlock in major roads in the east of Brentford, spilling out onto Kew Bridge and south of the river.

We note the ULEZ up to the North Circular Road is due to be introduced in October 2021. Almost certainly this will result in an increase in traffic through Brentford as drivers seek to avoid the additional charge.

The GWC Strategic Transport Study states (page 76) that "*whilst individual development transport assessments may not show a significant impact on a particular junction, the strategic implications of overall growth in the area illustrated by this study should be considered and **mitigations put in place to avoid potential significant increases in delay and congestion due to the cumulative impact of developments.***" We are concerned that, particularly in the absence of confirmed plans for improved transport hubs in the area, sufficient mitigants will be difficult to achieve and would like to see evidence of how they might be achieved.

We would be grateful if you would acknowledge receipt of this letter.

Yours sincerely,

John Ricketts  
Planning Trustee  
The Kew Society