

**Planning Inquiry January 2020**  
**Citroen site, Capital Interchange Way, Brentford, London TW8 0EX**

**APP/F5540/V/19/3226900**  
**LPA Ref: 01508/A/P6**

**Introduction**

1. I am Marie-Louise Rabouhans, the Chairman of the West Chiswick and Gunnersbury Society (WCGS). I have been chairman of the Society since being elected in February 2013, having served on the committee since 2004. I have lived in Gunnersbury for over 38 years.
2. The Society has about 140 members and is governed by a constitution. The Society is active in a number of spheres affecting the quality of life of local residents including planning (building development and planning policy), and environment (streets, traffic and public transport) and citizen engagement. We respond to Council consultations and/or initiate activities.

**Background**

3. In addition to responding to planning applications for developments which would have an impact on our area, WCGS engages constructively with the Council on planning policy. We have contributed significantly to:

the establishment and extension of Conservation Areas and their current appraisals  
the Context and Character Study  
the Local Plan, all stages, including attendance at the Public Inquiry  
the Great West Corridor Partial Review  
the Brentford East SPD  
nominations for additions to the Local List (buildings of townscape character)

4. The area covered by WCGS includes the appeal site. As a society, WCGS not only tries to protect and enhance the quality of life for those who live in our area, but we also take a lively interest in the broader community and our shared environment. We love our part of London and wish all those who live and work here or visit to be able to enjoy and celebrate its rich heritage and natural assets.

**Appeal subject of this Public Inquiry**

5. WCGS objected strongly to the planning application. The Inspector has our detailed objections, based on planning policy, which were submitted to the Council in January 2018, those submitted to the GLA in June 2018 and our comments submitted to the Planning Inspectorate in June 2019. We maintain those objections.

**6. Heritage and townscape** We endorse the case made by the Council and those made by Historic England and the Royal Botanic Gardens, Kew with respect to the proposed building's impact on a range of heritage assets including those within the World Heritage site of Kew Gardens and Strand on the Green Conservation Area.

6.1 In addition we consider that the development will have a negative impact on the setting of the Wellesley Road Conservation Area. Many of the streets within the western section of this CA are very close to the appeal site.

6.2 It should be noted that a revised appraisal for this CA has been published (2019) and several buildings or groups of buildings within this CA have now been included in the Borough's revised Local List (2019). When these buildings are added to the 2019 CA appraisal map, this will better reflect the quality of this CA.

6.3 The proposed residential towers are totally out of character with the townscape to the east and south east in terms of scale, form, massing and density. The change in scale from the 2-3 storey buildings of this existing townscape is brutal.

6.4 Heritage and Townscape issues may seem somewhat academic and an analysis of visual impact on "receptors" may seem cold and abstract. However, I would like to take a little time to explore the value of heritage assets and of townscape character and the impact of the proposed building from a human perspective - whether that of local residents or of the many visitors to the wider area. In doing so, I would suggest that maintaining and enhancing people's quality of life lies at the heart of the planning system. Certainly, the overarching vision of our Borough's Local Plan and of its Sustainable Community Strategy is "the aspiration for the borough to be a place where people enjoy living and choose to settle and stay." (Local Plan 1.12 -1.13). Our part of the borough is such a place – a place where people put down roots and become embedded in the community. In order for it to remain so, we need to nurture these vibrant and stable communities by protecting the attractive character and other positive attributes of the area.

6.5 Heritage is our inheritance – it is the visible link with our history – it connects us to where we live and contributes enormously to our collective sense of place. The townscape is where we live — our streets and homes and the ultimate "receptors" are people - us. The views assessed in the ES provide "snap-shots" from a specific point but the impacts would be felt over a wide area. People move and how they experience their surroundings is dynamic; these very tall buildings will not suddenly disappear as people move from the chosen view point to walk down their street, relax in their garden, look out from their window, stroll through the park, across the green, along the river or visit the cemetery.

6.6 We request that due weight is given to the **cumulative harm** to existing townscapes and heritage assets and to the amenity and quality of life of the existing residential communities of the proposed scheme and others recently built, under construction or consented in the East Brentford/West Chiswick area.

6.7 We consider that the starting point for considering major developments in this area should be that, so much damage has already been done by tall buildings or is "consented", the area is in general an unsuitable location for any more. There should be a clear acknowledgement of the damage done by recent tall buildings such as Kew Eye in the Central Section of the Great West Corridor. Rather than using the existence of such intrusive buildings as a justification for more, there should be both a recognition that we are at a "tipping point" and a strong commitment to valuing and protecting the surrounding heritage assets. Without such a commitment irreparable harm will be inflicted on these heritage assets to the impoverishment of our lives and those of future generations.

**7. Other Cumulative Impacts** A mixed-use development of the scale proposed would add unacceptably to the pressure on infrastructure – health, education, community/social and transport. 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 community and transport infrastructure is in place. There is now a critical need for an “infrastructure catch-up” before any more development is allowed. In assessing infrastructure needs, it is essential to consider the cumulative deficit arising from all the relevant developments in the area.

7.1 In this respect, I would like to highlight the situation at **Gunnersbury Station**. 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.

7.2 For clarification, for safety reasons these “control measures” comprise TfL staff holding those wishing to access the platform in a queue at the gate. This has a serious and disproportionately negative impact on local residents attempting to use the station to travel to work. Providing TfL with the financial resources to apply additional control measures will not provide a satisfactory solution. Holding more residents at the gate will mean longer queues and exacerbate an already unacceptable situation.

**8. Nursery** We consider that the provision of a nursery in a position where it will be exposed to high levels of air and noise pollution is unacceptable and certainly cannot be described as a public benefit. The nursery will require both mechanical ventilation and NO<sub>x</sub> filtration. The applicant’s Air Quality Assessment indicated that additionally, a high specification of air tightness on the windows and doors should be incorporated. “This ensures that the windows will remain openable at the affected areas and provides freedom of choice over whether natural ventilation is preferable during certain periods. The high specification of air tightness will also ensure that when the windows are shut, the nursery will be well ventilated by the mechanical ventilation systems. The key to reducing exposure using this method is to ensure occupants are informed over the potential risks associated with prolonged exposure to elevated pollution levels. As such, it may also be possible to provide future users with a welcome pack containing air quality information which will allow them to follow appropriate advice on protection against high concentrations during certain periods.” I would ask the Inspector to consider the following questions: Are users expected to perform a risk/benefit analysis before opening windows? How and by whom will decisions be made for the highly sensitive occupants of the nursery? If this level of control is necessary to maintain satisfactory air quality within the nursery, access to gardens and outdoor play space will need to be similarly restricted. This will be especially detrimental for children who should be encouraged to play outdoors but who are at greater risk from air pollution, both in terms of development and immediate and long-term health.

## **Conclusion**

WCGS disagrees fundamentally with the overall position of the appellant and the GLA that the development would deliver public benefits that would outweigh the harm. What is at stake is what will be lost - an open skyline, a river view – or diminished - the essence and spirit of a place – and these will be lost or diminished forever.

The Society earnestly requests the Inspector to recommend that the Secretary of State refuse planning permission for the amended application.

Marie-Louise Rabouhans,

WCGS

14<sup>th</sup> January 2020