

**2 Larch Drive, Chiswick W4 5QL**

**0158/2/P3 and 01578/2/AD4**

**Comments from the West Chiswick and Gunnersbury Society**

### **Summary**

**The West Chiswick and Gunnersbury Society (WCGS) objects strongly to the development proposed within this application and requests that planning permission is refused.**

In comments submitted on the Brentford East SPD, WCGS stated “The character of this area should be focused on bringing the qualities of the Metropolitan Open Land (MOL) to the north into Brentford East and linking these green spaces to that of the Chiswick Roundabout. The isolation and constraints of the “Gunnersbury peninsula” are such that the vacant triangular site at the Chiswick Roundabout and that currently occupied by B & Q should be considered holistically as one site. Otherwise, the ability to deliver a Gateway Landmark at the southern tip without compromising the potential of the B & Q land immediately north to provide high quality public space and buildings will be severely restricted.”

We consider that the scale, height and density of the proposed development is far too high, the location of much of the residential unacceptable and the viability of the technology showcase, high-end retail and hotel questionable. The height and scale of the buildings will cause harm to the surrounding heritage assets, both built and natural and to the townscape of nearby residential communities. This harm will be increased by the proposed design of the Technology Showcase and intensified by the signage zones proposed for its outer facades.

The constraints of the site include the air pollution and noise generated by the major roads on the site boundaries, the capacity of these roads and local public transport, the sensitive heritage assets and residential communities in the surrounding area and the sensitive green space immediately to the north of the site. We do not consider that the proposed scheme addresses these constraints adequately.

We believe that the proposed development does not comply with key policies of the NPPF, the London Plan and the Local Plan. These include, but are not limited to:

*heritage and townscape*, NPPF para 17, 193 London Plan 7.1, 7.4, 7.6, 7.7, 7.8 and Local Plan CC1, CC2, CC3, CC4 and CC5.

*residential* London Plan 3.4, Local Plan SC3, SC4 and SC5

*green spaces and biodiversity* Local Plan GB1, GB2, GB7 and GB 9

*infrastructure* Local Plan IMP3

**Note:** In considering **cumulative impacts** on various aspects including heritage and daylight, sunlight, light spill and glare, the applicant includes the consented Citadel on the site immediately south but provides no alternative assessment with the Chiswick Curve in place. The Citadel was given consent in 2002 and it was made apparent during the Public Inquiry on the Curve in 2018 that the Citadel is most unlikely ever to be built. While the Chiswick Curve was refused by the Secretary of State in 2019, the refusal is currently under appeal at the

High Court. It surely should have been considered as a possibility. At twice the height of the Citadel and being primarily residential the impacts would be significantly different.

### **1.Scale/Height/Layout/Uses/Context**

We request that the scale and height of all the buildings is reduced in order to lessen the harm to the surrounding heritage assets and residential communities and in order to provide a less dense residential development suitable for the family homes needed in this area. The inclusion of commercial uses to shield such homes from the major roads on *both* sides of the site, would permit realisation of the real potential of this site south of the MOL.

1.1 While this site is within the East section of the Great West Corridor (Brentford East) as defined by the Local Plan Review, it is on the eastern edge. Immediately east of the site boundary on the North Circular the townscape is a mix of low-rise residential and mainly low rise commercial/light industrial buildings within the Power Road LSIS. East of the Chiswick Roundabout, a mix of low to medium-rise residential and commercial buildings along the Chiswick High Road form the gateway to Chiswick Town Centre. Chiswick Tower (the "BSI" building above Gunnersbury Station) is recognised to be an aberration – an unfortunate mid 20<sup>th</sup> century mistake. [Local Plan Policy CC5 6.2 The borough has a number of tall buildings that do not positively contribute to the townscape and their existence should not be grounds for more." ] The surrounding residential areas are within Conservation Areas.

Some Art Deco buildings within Power Road are Locally Listed. An 8-storey office building has consent for the corner of Power Road at 250 Gunnersbury Avenue. While taller than other buildings within the LSIS it is some distance from residential properties and marks a prominent corner. The proposed design of this building relates well to its context and surroundings and care has been taken to reflect the architectural style and features of the Art Deco commercial buildings on Power Road.

Development on the application site needs to fully respect this context and mediate sensitively between it and the emerging high-rise townscape to the west around Capital Interchange Way and Lionel Road South. Rather than mediate, the current proposals seek to replicate the scale and character of Capital Interchange Way and thrust an intrusive cluster of tall buildings towards the predominantly low-rise historic townscape of Chiswick.

We recommend that the building heights are reduced to no more than 30 metres for the highest elements and that those on the sensitive northern boundary should be stepped down towards it and set further back. The B&Q building is between 15 – 20 metres tall. *See also Annex 1.* Terraced town houses (as eg Goldsmith Street in Norwich) or mansion blocks or a mix as in the Chiswick Gate development near Hogarth roundabout would provide the size and type of housing needed in the borough and could take proper advantage of the neighbouring green and open space of the cemetery and the park without compromising their character.

1.2 All units bordering either the A4/M4 or the North Circular should be non-residential. A mix of flexible work spaces, moderate-sized conference facilities, hotel accommodation/serviced apartments and some limited A1 and A3 would be suitable. Buildings with residential units facing in towards the central open space (other than on ground floor) and non-residential on the outer elevations would provide a suitable solution for the relevant parts of the site. *See also Section 3.1 below.*

## 2. Technology Showcase

**2.1 Function** While we support non-residential use of the part of the site bordering the A4/M4, we have serious concerns with the proposed “technology showcase”. While “It is envisaged that the scheme will become London’s hub for automotive technology” no evidence is presented to support such an ambition or to demonstrate that such a concept would be either viable or sustainable. As indicated in the applicant’s Planning Statement (7.15) the Great West Corridor is already well-/over-supplied with car showrooms. It is difficult to understand why major manufacturers/distributors with their own brand showcases would wish or need to rent a display box in the proposed building. Would there be a sufficient demand for such display boxes from start-ups and entrepreneurs and a sufficiently large client base to sustain that demand?

The Council has declared a **Climate Emergency** and is preparing a Climate Action Plan. We would seriously question whether a new development focused on the motor industry and including 300 car-parking spaces for showcase/retail use is compatible with the Council’s stated aims with respect to reducing car use across the Borough as part of its action plan. *See also Section 5.1 and Annex 1 comments on car showrooms.*

The ability of the **hotel** to attract visitors and of the **retail units** to attract “high quality global brands” will depend on the success of the technical showcase. These parts of the scheme are so closely linked to the technical showcase that the viability of the entire development is dependent on this highly speculative element. There is a real danger of the retail units either being unoccupied or attracting businesses that would be in direct competition with those of the town centres of Chiswick and Brentford contrary to Local Plan policy TC2.

**2.2 Access** If successful, the technical showcase would be expected to attract high numbers of visitors (1.5 -2 million people per year). This constrained site in a heavily congested area would be totally unsuitable for such a venue. The target visitor numbers would have a major negative impact on traffic and public transport in the surrounding area. *See under section 5 below.* This would impact negatively on local businesses, residents and the established major visitor attractions in the area, including the Royal Botanic Gardens, Kew and the London Museum of Water and Steam. In addition, full account needs to be taken of the emerging context. The new Brentford Stadium (17,500 capacity) located close to the site will be holding football or rugby matches throughout the season and Gunnersbury Park will be holding major events including festivals attracting approximately 100,000 over three days.

**2.3 Design** We request that the scale and height of the building is reduced; *see under section 1 above and section 4 below.* Boxes appearing as “a seemingly random assortment of framed displays, angled inbound or outbound to respond to sightlines and views of passing traffic” over floors 3 to 7 of this large glass and steel building would result in a fussy, cluttered façade with poor legibility for drivers on the M4 at whom these displays are targeted. The design would also detract from the amenity of residential properties in the surrounding area, especially if, as likely, the display boxes were illuminated. The negative impact for drivers and residents would be compounded by the two massive internally illuminated digital media screens (signage zones) embedded within the façade. Moreover, by competing with the show cases for attention, these advertisements would undermine the purpose of the building. The

design of the upper floors is predicated on them being redundant with respect to show casing as they will not be clearly visible to passing motorists. They will, however, be visible from surrounding heritage including in key views of Strand on the Green CA where their “industrial” design/materials will increase the harm caused; *see section 4 below*.

**2.4 Advertising** WCGS objects strongly to the proposal to locate two very large embedded digital media screens on this building. It is recognized that there are already lit structures along the M4/A4 corridor; their negative impact should not be intensified. Our objections are on amenity grounds, although we would suggest that there might also be public safety grounds in view of the complex nature of the road network and the proximity of existing large digital advertising screens, especially the Chiswick Towers on the roundabout itself (granted on appeal in 2012).

The proposed advertising would not comply with Local Plan policy CC5. We fully support the Council’s approach to advertising for the reasons explained in paragraph 6.14 of the policy. The Society has been working with the Council for years to achieve these objectives, supporting the Council at several public inquiries and advocating for their retention and reflection in the policy in the Local Plan. The location and topography of the borough and the location and nature of its strategic road network are such that advertisements have the potential for major negative impacts on the built and natural heritage assets, the public realm and the residents of the borough (and those of neighbouring boroughs). Full account must be taken of the increasingly residential nature of the area around the site with several large residential buildings under construction and others consented. Account also needs to be taken of the possibility of large digital media screens on the Chiswick Curve at the neighbouring site, should planning permission be granted for this latter development (refusal under appeal at the High Court).

The applicant states that Signage Zone A and B have been sized and located in order to remain out of the ‘Strand on the Green view from Kew’. While this *may* be so for the specific view shown on page 220 of the Design and Access statement, Zone A would most likely become visible as the viewer moved east of this viewpoint. The two zones would, in any case, be highly visible from many locations in the area surrounding the site and have a damaging effect on townscape character, residential amenity and heritage assets, including Conservation Areas and Registered Parks. Both zones would be raised above ground level like the Chiswick Towers at the roundabout but would be very much larger. We know from experience how damaging the Tower screens at 7.2m tall x 4.8m wide with a base of 11.5m are. They dominate the roundabout, impact on the amenity of nearby residential properties in the Wellesley Road Conservation Area and appear as incongruous discordant elements in views from as far away as Chiswick Bridge (a Listed structure, and gateway to the borough) and the adjacent Thames towpath.

**2.4.1 Signage Zone A** (9.5 m wide x 17 m high) would introduce an intrusive commercial element and light pollution into established residential areas to the south of the roundabout, including some within the Wellesley Road Conservation Area. No reliance should be placed on shielding that might be provided by a future development on the neighbouring site to the south that has been vacant for 20 years. Signage Zone A would also be highly visible from some residential units within new developments such as Wheatstone House and the schemes on Capital Interchange Way under construction or consented. The Society has raised concerns as to the impact on residential amenity and townscape character of the signs currently on the roof of the near-by building at 3 Great West Road (on the opposite side of

the A4). These signs provide evidence of how widely signs in this nearby location are visible and how damaging they are.

**2.4.2 Signage Zone B** (17m wide x 32.5m high) would occupy almost the entire end façade of the building which faces Gunnersbury Cemetery and Gunnersbury Park. In commenting on the draft Brentford East SPD WCGS endorsed the need to pay full respect to these very sensitive areas of Metropolitan Open Land. The signage would be harmful to both the cemetery and the park not only in terms of their setting but also in terms of their natural assets and biodiversity. See also section 4.3 below.

**2.4.2.1 Gunnersbury Cemetery** is a place where most visitors come for quiet contemplation and in times of bereavement and remembrance. The huge, illuminated façade towering over the cemetery would be totally out of place here. It would respect neither the primary purpose, nor the context and character of the cemetery. Local Plan GB 9 7.18 states, "... cemeteries and churchyards also provide green, quiet areas for passive recreation and walking (often forming part of Green Chains and Corridors) and for biodiversity." View 4 shows "that the north side of the Proposed Development will be clearly visible above the bushes along the southern edge of the Cemetery" and refers to "the sleek architecture of the Technology Showcase". Signage Zone B, however, is not shown in the illustration. View 5 shows the Technology Showcase appearing as a discordant element in relation to the Katyn Memorial. Were this façade to be an illuminated advertisement, the impact would be very negative.

**2.4.2.2 Gunnersbury Park** The negative impact on the historic landscape south of the mansions would be similar to that on the cemetery (see also comments from the Friends of Gunnersbury Park, submitted in January 2020, which we endorse). We refute the applicant's suggestion that this signage zone "will be predominantly shielded by an established tree-line from the park". Reliance cannot be placed on the screening provided by the existing **tree cover** as, apart from the effectiveness of the screening being seasonal, a significant proportion of the mature boundary trees within the MOL may be removed within the next 15 – 20 years. Some have already been felled and others may need to be removed due to disease or because they are reaching the end of their natural life span. The incidence of disease may increase and the life span of trees may decrease due to the impact of pollution and climate change. Replacement trees will not provide the same amount of screening.

The unacceptability of placing reliance on trees to shield or screen a development has been established at the Public Inquiry on the Chiswick Curve and was confirmed by the Royal Botanic Gardens, Kew, Historic England and the Council at the recent Public Inquiry on the Citroen site on Capital Interchange Way (see Closing Statements within Inquiry documents). The Inspector at the Chiswick Curve Inquiry said "trees have a limited lifespan, they can be destroyed or damaged by high winds ...and there are many reasons, including disease why they sometimes need to be modified or removed completely, and that, as such "[i]t would be wrong, therefore to rely on the presence of a tree or trees to justify impact."

As a broader principle, where mitigation for the harm caused by a development is needed, it is unacceptable to place responsibility for such mitigation onto the party suffering the harm.

**2.4.2.3 Railway** We question whether there might be a safety issue for train drivers approaching from the west; see page 224 of D&A statement.

### 3. Residential

#### 3.1 Quality of accommodation, private and community amenity space

We object in principle to the proposal to provide residential accommodation in dense blocks bordering the North Circular Road. The location of Block A (but not its size) is acceptable but not that of either Block B or C. This stretch of the North Circular is recognised as the most congested road in the UK; the air pollution and noise levels are such that it is unsuitable for residential development. We endorse the comments submitted by on air quality.

Policy P3 (f) of the Reg 19 version of the Local Plan Review for the Great West Corridor states: “requiring new residential development to be designed to mitigate any noise and air quality issues and is sensitively located away from the A4/M4 and *North Circular* roads.” This is reflected in the site allocation for this site (35). Any residential elements of buildings along this boundary of the site should be confined to the inner elevations facing the central open space; see Section 1 above.

We endorse the detailed comments submitted by The Kew Society on air quality.

3.1.1 The residential density at 1517 hr/ha is more than twice the upper limit of the relevant range in the London Plan – 200-700 hr/ha. This high density leads to various negative outcomes indicative of over-development as discussed below.

3.1.2 More than half (52%) of the residential units are single aspect and while “many units benefit from good outlook towards Gunnersbury Park” such outlook will be from the predominantly north-facing elevations with a lack of sunshine.

3.1.3 Large-scale events in Gunnersbury Park will also impact negatively on residential amenity (see 3.3 below). These events are currently located in the southern part of the park, close to the cemetery, in recognition of the sensitivity of the historical landscape in the north and the existing residential communities along Popes Lane and Lionel Road South. Experience indicates that no reliance can be placed on the mature boundary trees within the park to shield residents to the south and east from the noise.

3.1.4 The applicant indicates that “Due to noise concerns and the need for restrictors, the windows are expected to be inoperable.” In addition, the apartments lack **any private outdoor amenity space**; winter gardens are an inadequate substitute. The 34 studios are lacking even this amenity and half of them are single aspect, north facing.

3.1.5 The lack of “fresh air”/natural cooling and of private outdoor space is compounded by the serious shortfall in the amount of **outdoor community space** provided – it is less than half the amount specified in local Plan Policy SC5. While the applicant considers that the level of amenity proposed is appropriate for the location, it is noted that SC5 states “This additional outdoor space is an essential characteristic of suburbia and the borough and the reason why people wish to live in the borough” See also 3.3 below.

3.1.6 As far as its quality is concerned, a significant proportion of the outdoor spaces will receive inadequate sunlight. The sunlight study states:

“The analysis demonstrates that, individually, four out of seven of the amenity spaces meet

the BRE Guidelines for sunlight amenity in the opening day baseline whilst overall 37%\* of the amenity space receives at least two hours of sunlight on March 21<sup>st</sup>; in our opinion this represents a very good level of amenity given the urban nature of the local environment. In the cumulative surrounding context, three out of seven of the amenity spaces meet the BRE Guidelines for sunlight amenity whilst overall 25%\* of the amenity space receives at least two hours of sunlight on March 21<sup>st</sup>. Given the close proximity of the Citadel immediately to the south of the site in the cumulative surrounding context, this remains in our opinion a good level of sunlight amenity given the constraints of the site.”

\*The BRE Guideline is for at least 50% of an amenity area to receive at least two hours of sunshine on March 21<sup>st</sup>.

Reporting the results in this way does not allow for a clear understanding of the distribution and size of the “well-lit” areas nor the degree to which the poorly-lit areas fall short of the BRE Guideline. Drawing 09-27 shows that, while some of the small community spaces at 3<sup>rd</sup> floor level and some of the landscaped areas on the outer edge of the site will meet the Guideline, Hudson Square, the main open space, accounting for approximately 44% of the total open space, will not. The diagram shows that most of the square will receive less than 0.5 hours of sun on March 21<sup>st</sup> with small parts receiving between 0.5 to 1 hour.

We question whether the proposed 2m green wall will adequately shield the section of the communal garden space adjacent to the North Circular from the noise and pollution generated by this very busy road. How will the external face of this long wall appear in relation to the streetscape?

3.1.7 The elevation of the Technology Showcase facing the square will present a fussy, brightly-lit steel and glass industrial structure at odds with the more restrained “calm” brick facades of the residential blocks (see D&A page 163). Sharing the central amenity space (Hudson Square) with users of the Technology Showcase, hotel and retail will not provide a comfortable residential experience.

### **3.2 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 being largely compliant with policy as claimed by the applicant. In particular, the proposed mix would represent a significant excess of one-bed units (52% of total, taking studios and one-bed apartments together). This large excess of one-bed units would be particularly problematic given the over-provision of one-bed units in neighbouring schemes. Such a mix of Build to Rent (BtR) units targeted at “an ever more mobile / transient workforce” is likely to result in “churn”; it would not promote community cohesion or sustainable, inclusive and mixed communities. Significant proportions of other residential schemes in the area, such as that associated with the Brentford Stadium, are BtR.

### 3.3 Quality of and access to open space

3.3.1 There is a serious cumulative deficit of open space within the high-density developments under construction, consented or in the pipeline in the Great West Corridor. This will not only undermine Borough strategies concerning health and well-being but will also put existing public open spaces such as Gunnersbury Park under great pressure. This trend to “off-load” the delivery of open space for relaxation and informal activities to existing public spaces such as parks is inconsistent with policies in the Local Plan and the draft Great West Corridor Local Plan review. See, especially GW3 and GW4.

Gunnersbury Park is expected to compensate for the lack of adequate open space within the dense residential developments under construction around the Brentford Stadium and other consented/proposed schemes in Capital Interchange Way. At the same time the CIC responsible for the park has embarked on a strategy of holding large-scale, commercial events (for example, Lovebox and Citadel, Gunnersville and Secret Cinema) in order to generate much-needed income for the park. By occupying significant parts of the park for considerable periods of time, these events reduce the capacity of the park and its value to local residents. In addition the quality of life of local residents is negatively impacted by the noise and other negative consequences of these events.

3.3.2 With reference to the proposal that children of 12+ years are expected to use the **play and recreation** facilities in the nearby Gunnersbury Park, we endorse the comments submitted in January 2020 by the Friends of Gunnersbury Park.

The promotion of Stonehill and Harvard Hill recreation grounds as potential play areas for children of 12+ from the development (Planning Statement 7.109 and map on page 302 of the D&A statement) smacks of desperation and/or a serious lack of knowledge of the area and of the severance caused by the road and rail network. Stonehill recreation ground is a very small play area located on Wellesley Road where it is crossed by the overhead section of the M4. It contains very limited play equipment for young children and nothing for children of 12+. The unsuitability of this space for play is such that the Society has previously proposed that the play equipment be relocated within the Stonehill estate and the current small plot be planted to provide visual mitigation, improve air quality and biodiversity. Harvard Hill recreation ground, while larger and undergoing improvements, also suffers from its proximity to the A4; it runs alongside the west-bound carriageway of the A4 east of the Chiswick Roundabout <https://www.goparks.london/park/harvard-hill-recreation-ground/> . It is used mainly by residents of the Grove Park area of Chiswick to the south since access to it from West Chiswick/Gunnersbury to the north is via an inhospitable A4 underpass. Pedestrian access to either play area from the application site is not straightforward and would involve negotiating an extremely hostile environment.

Policy GB 9 7.17 states that “Play areas are particularly important in high density urban areas where families may not have access to private outdoor space and should be planned for in areas of major development and intensification, to cater for additional children and young people, to tackle existing deficiencies and ensure they are not made worse by new development.” The absence of any dedicated play space (other than Stonehill) in the entire West Chiswick/Gunnersbury area, together with the cumulative deficiency within new developments (*see 3.3.1*) dictates that no further deficit should be permitted.

**3.3.3 Hudson Square** is promoted as a generous, vibrant public square and as offering residents an oasis of calm. This central square is small in relation to the size and multiple uses of the development. It will be overlooked by tall buildings on all sides and in shade much of the time; *see 3.1.5 above*.

The type and amount of usage envisaged for this space together with its lack of sunshine has led to a design with very little soft landscaping. It is difficult to imagine how it will successfully accommodate all the competing functions:- exhibitions spilling out from the Technology Showcase, hotel and retail frontages, acting as the ‘welcome mat’ to the development as visitors emerge from the basement onto the square, the multiple temporary structures and activities envisaged (see illustration on page 134 of the D&A statement) and doorstep playable space for 0-5yrs within “a raised lawn area and movable seating”. This raised lawn will also accommodate a mature tree. There is no indication of how this public space would be managed and it is seriously doubted whether it could serve all these different purposes satisfactorily. It seems likely that it would become an over-crowded, dis-functional space giving rise to conflict between the different users. It will of little benefit to residents or as a public space.

The London Housing SPG 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.”

**3.3.4 Conclusion** Taking all these issues together, leads to the conclusion that the residential accommodation and public space provision within the scheme would be of poor quality and of less than moderate benefit. It might be argued that these compromises with respect to the quality are necessary because of the high density and/or the hostile environment. We suggest, however, that these unsatisfactory aspects demonstrate that the density is too high and that parts of the site are unsuitable for residential accommodation. They are a clear indication of over-development. The aggressive pursuit of housing targets appears to be leading to an approach that might be characterized as “Never mind the quality, feel the width.”

#### **4. Impact on surrounding heritage, townscape, low-rise residential and wildlife**

**4.1 Heritage** As a general point, we would emphasise that the topography of the area and the open nature of the surrounding historic landscapes means that, although the Great West Corridor may sit in the backdrop, tall buildings are highly visible and their impact felt over wide areas. Although the site itself is not part of a high-quality townscape, the proposed buildings, because of their height, location and scale would sit within the settings that contribute to the significance of a wide range of heritage assets, which are sensitive to change. We would also emphasise that due weight must be given to the **cumulative harm** to heritage assets, to the existing townscapes and to the quality of life of the existing residential communities caused by the proposed scheme and others recently built, under construction or consented in the east Brentford/West Chiswick area.

4.1.1. We disagree strongly with the applicant’s conclusions concerning the impact and the cumulative impact of the development on heritage assets. His conclusions that the development will do no or very little harm to a range of heritage assets suggests that he 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.

4.1.2 The application site is immediately north of that of the “Chiswick Curve”. While the maximum height within the proposed development is less than that of the Curve, as a cluster of tall buildings, the massing and layout of the development could give rise to greater harm to heritage assets than the recognised harm that would be caused by the Curve (see below). This is especially so with respect to all three elements of the Gunnersbury Park CA (cemetery, park and residential estate) since the application site is significantly closer than that of the Curve.

4.1.3 At the **Public Inquiry** on the Chiswick Curve held in June 2018 and at that on Citroen, Capital Interchange Way held in January – February 2020, the issue of harm to heritage assets was debated extensively. The chairman of WCGS participated in both these Public Inquiries providing Opening and Closing statements and asking questions of some of the appellants and GLA witnesses. The Society endorses the cases made with respect to heritage issues at those Inquiries by Historic England, the Royal Botanic Gardens, Kew and the Council. Aspects of those debates are of direct relevance to the current application, in particular:

- the character and significance of the affected heritage assets including that of their settings
- the correct interpretation of cumulative harm *and*
- the recognition that we are at a “tipping point”
- the unacceptability of placing reliance on trees to mitigate harm

We request that account is taken of the cases made and the expert evidence provided on these aspects by the above parties at the Inquiries (summarised in the Inspectors report for the Chiswick Curve and in the Closing Statements of these parties at the Citroen Inquiry). The importance of heritage and townscape from a human perspective, as described in the Society’s Opening Statement (ID7) at the Citroen Inquiry, should also be taken into consideration; an extract is provided as Annex 2 to this statement. *See also extract from WCGS Closing statement under 4.1.7 below.*

**4.1.4 Gunnersbury Park Conservation Area; Gunnersbury Park and Gunnersbury Cemetery** It should be noted that a revised appraisal for this CA has been published (2018). We would draw attention to the SWOT analysis in the Appraisal, especially:

**Strengths** A great deal of effort has been put into the protection and enhancement of the significant historic views of the landscape in the restoration work.

The views and vistas in the Park are essential elements of the landscape design.

**Opportunities** Preservation of the Park’s setting and views even where at some distance: not just heights but colour and materials can have an impact.

Great care is required to preserve what remains of key views from the cemetery. The existence of these and other views elsewhere in the conservation area should help determine the height of new buildings in adjacent areas, particularly around the Katyn Memorial.

**Threats** The higher ground to the north of the conservation area makes development along the Great West Road particularly visible from Gunnersbury Park and its mansions. Vantage West and adjacent properties that back on to the park, particularly those with light or reflective cladding, have a negative effect on its setting and skyline.

Gunnersbury Park is a major heritage asset - a Grade II\* Registered Park and Garden containing a range of Listed buildings and features. We fully endorse the comments submitted in January 2020 by the Friends of Gunnersbury Park. In the absence of a view from the terrace, it is not possible to assess correctly the level of harm from this key position within the highly sensitive historic core. We request that such a view be provided.

The benefits of open outlooks over Gunnersbury Cemetery and Park for residents must not be at the expense of harm to the character and value of either of these areas. Both cemetery and park are within the Conservation Area and are designated as MOL. Large-scale development on the boundary of such areas can be as damaging as inappropriate development within. Views 4 and 5 show that the massing and height of the proposed cluster of tall residential buildings would have a major negative impact on the cemetery which would not be mitigated by their design. The Technology Showcase would intensify this harmful impact and its very different design and materials would detract from any coherence of built form across the development; it would stick out like a sore thumb. See also comments under 2.4.2.1 and 2.4.2.2.

#### **4.1.5 Gunnersbury Park Conservation Area; Gunnersbury Triangle estate**

The comments under 4.1.6 are also relevant to this CA. View 21 gives a better idea of the impact on the southern part of the estate than view 16.

#### **4.1.6 Wellesley Road Conservation Area and Thorney Hedge Conservation Area**

It should be noted that revised appraisals for these CAs have been published (2019) and several buildings or groups of buildings within the Wellesley Road 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.

We consider that the development will have a negative impact on the setting of these two Conservation Areas. The streets within these CAs are relatively close to the application site and the cluster of tall buildings is totally out of character with the townscape in terms of scale, form, massing and density; see for example the image on page 212 of the D&A statement. The change in scale from the 2-3 storey Victorian and Edwardian houses of the existing townscape is brutal. The development would be visible from locations, including homes, gardens and streets within the Conservation Areas. They would appear alien - demeaning and belittling the intimate, human scale of our neighbourhoods and destroying our sense of place.

The design and materials chosen for the external facades of the Technology Showcase would have an additional negative visual impact on the townscape to the south/south west.

The application provides no visuals for the residential element of the **Thorney Hedge CA** (View 16 Princess Avenue is within the Gunnersbury Park Conservation Area not the Thorney Hedge Conservation Area) but judging by View 22 Power Road, impact on the CA is likely. It is requested that a view from within the CA similar to that provided for the Chiswick Curve Public Inquiry is produced; see Viewpoint 6 on page 23 of Inquiry document LBH2/B5.2. <http://www.hwa.uk.com/projects/land-at-chiswick-roundabout-public-inquiry/>

View 22 shows the massive bulk of the hotel and the two largest residential buildings dominating the skyline and the very significant change in scale from the low-rise townscape to the east. We consider this to be a very negative impact. For the cumulative view 22 the text

states “The scheme at 250 Gunnersbury Avenue will dominate the foreground of this view, matching the scale of the Proposed Development, illustrating how the scale and density of the area is undergoing transformation. The similarities of scale serve to effectively embed the proposed and consented development into the emerging context.” We question the basis for this statement and the accuracy of the outline shown for 250 Gunnersbury Avenue. The building consented for this site is an 8-storey office building and no further application has been submitted for this site.

**4.1.7 Strand on the Green Conservation Area** We consider that the development would have a significant negative impact on this very special and highly vulnerable CA. Being familiar from the recent Public Inquiries with the rigorous and robust approach taken by Historic England to the issue of harm to this CA and HE’s unrivalled expertise in these matters, we place reliance on its comments on this application.

We would add that the Appraisal for this CA provides detailed description of its significance and the threats posed by developments within the Great West Corridor. The WCGS Closing Statement at the Citroen Public Inquiry included text relevant not only to this CA but to the heritage assets of the area more generally. The relevant text is reproduced in Annex 3.

**4.1.8 Royal Botanic Gardens, Kew** A World Heritage Site is the highest order of heritage asset and must be accorded the highest degree of protection. Being familiar from the recent Public Inquiries with the rigorous and robust approach taken by RBG, Kew and Historic England to the issue of harm to the World Heritage site and their unrivalled expertise in these matters, we wish to place reliance on the comments submitted by these organisations on this application..

**4.2 Townscape and low-rise residential areas** Most of the surrounding residential areas are within the Conservation Areas discussed above and the impact of large developments on townscape and residential amenity, including the visual impact of tall buildings, is addressed in Annex 2.

4.2.1 We are concerned with respect to the impact of the development on **sunlight and daylight** to neighbouring properties and the applicants dismissal of these issues; Planning Statement (7.105) “Seen within the context of an urban environment, where the BRE guide is intended to be used flexibly, the impact upon neighbouring properties is considered acceptable and the proposed standard of accommodation high.” Our concerns relate in particular to the residential properties in Thorney Hedge Road, Surrey Crescent and Wheatstone House (the “Gateway”).

4.2.2 The high level of **light spill** is also of concern because this will have an impact beyond the mainly commercial buildings assessed in the study. Account need to be taken of the increasingly residential nature of the surrounding area. In addition to the residential properties on Chiswick High Road, there are established and recently built properties on Surrey Crescent and Wheatstone House is nearing completion. We believe that the applicable Environment Zone for this site is E3/ E2 rather than E4; the site is not in a town/city centre with high levels of night-time activity and the northern part of the site is next to a relatively dark, unlit area of MOL.

Spillage is likely to impact the residential properties within the surrounding area east and south-east (Thorney Hedge and Wellesley Road CAs) of the buildings in Views 2 and 3

which are shown as being subject to very high levels of spillage (major adverse impact). Reflection by other buildings can intensify the impact. The advertising screens on 3 Great West Road shown in View 4 are now reflected in the shiny façade of the newly constructed Robins and Day car showroom (View 2). This light intrusion will impact on visual amenity, the night sky and garden wildlife.

4.2.3 Account needs to be taken of the additive adverse impact on any one receptor (effect interactions). While each of the several impacts may be considered marginal or negligible, in combination they can give rise to a serious degradation of the quality of life for residents.

**4.3 Wildlife and Biodiversity** Both Gunnersbury Cemetery and Park have importance for wildlife and biodiversity. Inflicting harm on these important green spaces would be in conflict with Local Plan Policy GB7 and the strategic objectives of Policy GW4 of the Local Plan Review and of the approach to achieving them; see especially (a) and (g). Protection and enhancement of such spaces is also part of the Council's emerging **Climate Action Plan**.

4.3.1 The park is designated as a Site of Borough Importance for Nature Conservation Grade II (SINC). The contiguity of the two areas of MOL (both were originally parts of the Gunnersbury estate) provides an extended area for wildlife and a relatively dark corridor. The area of the park around the Potomac Lake and southern boundary mature trees is one of the most important in terms of nature conservation and biodiversity. In addition, the railway embankments along the line running between the site and the cemetery are designated as a SNCI and provide an important wildlife corridor. The current B&Q building at less than 20 metres tall and with little lighting is a sympathetic neighbour which maintains the openness, tranquillity and darkness of the MOL/SINC. The scale, height and uses of the proposed scheme are very different and we consider that it would be a hostile neighbour.

Tall residential buildings – assuming they are occupied – create light spillage and light glow since the internal lighting of residential buildings is a matter for individual occupants. It is not amenable to control in the same way that the internal lighting of modern commercial buildings is by the use of intelligent lighting systems. The proposed function of the Technology Showcase suggests that the building will be a lit structure 24/7 with illumination of the showcases and the proposed signage zone B. We believe that the combined light pollution caused by the development would be significant.

4.3.2 Biodiversity can be negatively impacted by loss of light/sun during the day (the large-scale development is south of the cemetery) and/or light pollution at night; the latter would be detrimental to wildlife, especially invertebrates, bats and birds. These environmental impacts can affect the microclimate and ecology of the area, alter the behaviour of animals in ways that undermine their reproductive fitness and lead to a loss of biodiversity.

In assessing sunlight (overshadowing) and light spill the application focuses on buildings and their human occupants, assessing, for example, these impacts on the chapel and toilet block in the cemetery. BRE Guidelines are similarly focussed; they consider that *either* “not less than 2 hours of sunshine on at least 50% of an area on March 21<sup>st</sup>” *or* “no more than a 20% reduction in its well-lit area” indicates that adequate “amenity sunshine” will be delivered (to human receptors) throughout the year. The before and after analysis for overshadowing of the cemetery (ES 10.150) simply shows that in both cases the sunshine will meet this BRE threshold. It does not allow for a real comparison of before and after. The analysis for light

spillage is limited to the impact on buildings and is based on misassignment of the site to environmental Zone 4 (*See Section 4.2.2 above*). Unlike human receptors, plants cannot chase the sun and neither plants nor animals can mitigate the impact of light pollution by closing their curtains.

We request that the overshadowing of the cemetery and light spillage onto it is examined with reference to the impact on its wildlife and biodiversity by an independent nature conservation/biodiversity expert.

## **5. Traffic and Transport**

We disagree with the applicant's assertion that the site has good road connectivity and good access to public transport. 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 those mentioned above under section 2.2.

We endorse the detailed comments submitted by Brentford Voice on Transport.

**5.1 Traffic** We object strongly to the provision of 300 parking spaces for the technology centre and retail. We consider that such a high number is unjustified for this use and unacceptable for this site. Parking spaces should be significantly reduced from the current 244 provided for B&Q. The local road network is already at saturation; TfL data presented in the application shows that the major roads leading into and out of the Chiswick roundabout are already operating above capacity at peak times. 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 development will have a negative impact for all using this section of the TLRN.

While restricted parking for the residential element of 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.

**5.2 Public transport** The site is not well served by **buses**. There is no bus route along the North Circular and only one bus route (91) along the A4. Access to all other local bus routes will require pedestrians to negotiate the extremely hostile environment of the Chiswick roundabout (heavy traffic, noise and air pollution). Additional bus services or increased frequency of existing services are most unlikely to be delivered in the short to medium term due to the congested road network. A recent TfL consultation <https://consultations.tfl.gov.uk/buses/routes-70-and-27> responded to a WCGS proposal to extend Route 70 beyond the northern end of the Chiswick Business Park by stating "Extending it would expose it to heavy traffic around Chiswick Roundabout which would affect reliability."

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 -4 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.

5.2.1 As the Council is well aware, the overcrowding at **Gunnersbury 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. Whether or not there is spare gate capacity is not the key issue as the conflict is caused mainly by the narrow, two-way stairway to the single island platform, serving both Underground and Overground trains. The Council is working with TfL, Network Rail and the owner of Chiswick Tower to explore how the much needed major improvements to access and capacity might be delivered. We are aware from our participation in the Gunnersbury Station Action Team, that no such improvements are likely in the short to medium term.

Even if the majority of visitors to the technical showcase are expected to arrive after the morning peak, they would likely add to the evening peak and residents from the development would be travelling during peak times. Pedestrian routes from the site to both these stations involve negotiating the Chiswick roundabout with the problems noted above.

**5.3 Conclusion** We believe that 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. 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 made and the delivery of proposed improvements has not been secured (*see WCGS comments on Great West Corridor Local Plan Review provided as Annex 4 below*).

**6. Climate Emergency** As noted above under 2.1 the Council has declared a **Climate Emergency** and is preparing a Climate Action Plan. In addition to our questions relating to the purpose of the Technology Showcase, we question the energy efficiency of the development, in particular the use of gas fired boilers for heating. The need for mechanical ventilation (as windows are expected to be inoperable) will add to the energy requirements.

How can the Council, the Mayor of London or the UK Government hope to meet their carbon reduction targets if new buildings are approved which will lock us into unsustainable energy consumption for many years?

As a general point, it is to be regretted that there are no current heat networks in the vicinity and we suggest that provision of one or more district heating systems should be a priority for the Great West Corridor.

We endorse the detailed comments submitted by Brentford Voice on this issue.

## **7. Planning Balance**

For the reasons given above, we consider that little weight can be given to any benefits claimed for the speculative Technology Centre and associated retail and hotel, for the residential elements of the scheme or the associated public realm. We conclude that the benefits associated with the proposed scheme are completely outweighed by the multiple negative

impacts of the scheme detailed in these comments including the harm and cumulative harm to a wide range of heritage assets that the development would inflict.

The Society requests that planning permission is refused.

*Annexes 1 to 4 attached below*

### **Annex 1**

**Extracts from WCGS comments in December 2017 on:**

#### **Great West Corridor Local Plan Review and on Brentford East SPD**

[SPD] We fully endorse the **Key Townscape Issues** spelt out under Building Height Approach in the Brentford East Capacity Study Report [box on page 67] and recommend that they are reproduced in full within the SPD.

We also fully support the conclusions in the section of this Report on the Sensitivities to Tall Buildings, *for example* (1) “Given the world importance of **The Royal Botanic Gardens**, it is unacceptable that tall or over-scaled developments should continue to invade the setting through a process of accretion following “one off” decisions.” and (2) “continued building at such a scale, adding to the Brentford Stadium bulk would be extremely damaging. It would threaten to swamp the delicate relationship of water, buildings and sky. Future development should allow the [**Strand on the Green**] Conservation Area to retain this lyrical relationship.”

[GWC LP review] **P3 Great West Corridor East Place Policy; Our approach** (f) We request that this paragraph is amended to read:

Supporting new development with building heights that respond to... a general range of heights of between 12 to 16 metres at the lower end, between 16 to 24 metres at the higher end; at the two sites designated within the East Brentford SPD a Corridor Landmark building of maximum height 48 metres and an Eastern Gateway Landmark building of not more than 60 metres. Design of landmark buildings ... exemplary standard (and follow ...CC3).

These maximum heights are supported by the East Brentford Capacity Study

#### **P2 Great West Corridor Central Place Policy**

**Overview/vision** Is promoting a cluster of car showrooms the appropriate response to the “car-dominated” and hostile nature of the area? Does this not detract from the key objective of weaning people from their cars and encouraging them to adopt an active mode of travel? Perhaps Brompton Bikes could be persuaded to renew a presence in the borough with an “iconic” bike showroom - displaying a golden Brompton for the Golden Mile.

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*Annex 2*

*Extract from WCGS Opening Statement at Citroen Public Inquiry, January – February 2020*

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.

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*Annex 3*

*Extract from WCGS Closing Statement at Citroen Public Inquiry, January – February 2020*

13. In cross-examining Mr Baker, reference was made to section 10 of the Appraisal for Strand on the Green Conservation Area and to the tensions between a conservation area adjacent to an Opportunity Area in a world city. I would like to point out that 10.3 of this section states.

The bar for public benefits to exceed heritage harm is rightly set high and very hard to reach, particularly where such development also impacts on Kew Gardens World Heritage Site. Development should not seek to use public benefits as an excuse for unimaginative consideration of planning context, but rather demonstrate exceptional and innovative heritage-respecting design, which also provides significant public benefit.

I think that we can all agree that **London** is a **world city**. It is of national and strategic importance as our capital city. Its natural and historic environment is too important to be treated in a cavalier fashion. It should be conserved and enhanced in accordance with the NPPF. While regeneration of the Great West Corridor is important, the corridor is not, and must not become, the defining feature of the wider area. The big attraction of this area for visitors as well as those who live and/or work here is that, while easily accessible from Central London, it has significant heritage landscapes and a beautiful stretch of the Thames which, together with its predominantly low-rise buildings give much of it a generous, open, almost rural feel. This is complemented by its compact townscape of predominantly Victorian and Edwardian terraces, providing homes to its well-established, thriving residential communities. The special appeal of both is that they provide respite and retreat from the urban environment.

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 an homogenised city of poorly distinguished areas, sterile neighbourhoods and an assortment of high-rise blocks, competing for attention as they dominate the skyline.

So, my plea is that, as a **world city**, **London**

- provides its residents with homes of genuine high quality,
- understands the true value of its historic environment *and*
- pays full respect to its **world heritage**”

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#### *Annex 4*

*Extract from WCGS comments in September 2019 on:*

### **Great West Corridor Local Plan Review: Volume 4 Pre-submission Regulation 19 Consultation**

#### **Transport Infrastructure [04 Strategic Policies; GWC6]**

**9. Policy GWC6 is not positively prepared or justified and will not be effective; the draft LPR is therefore unsound.** A major shortcoming of the draft LPR 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 (the Brentford to Southall Crossrail link and the West Orbital Line) 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. This is reflected in the strategic objectives given under GWC6.

10. While the Council now seems to be even less sure of delivery of major transport infrastructure than it was in 2017, it is committing to more development. The GWC6 section of the draft LPR has been “watered down” from the corresponding section (GWC5) in the Regulation 18 consultation. This is presumably in response to comments from TfL (see para 14 below). The Regulation 18 document emphasised the need for “game-changing infrastructure” and stated that without it the amount of employment and residential development would be reduced from that stated as the “preferred option”. Now, however, rather than a reduction, the figures for employment growth and housing growth given in policies GWC1 and GWC2 in Regulation 19 draft LPR are significantly higher than those of the preferred option.

11. 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. This will have a negative impact for all using this section of the TLRN. The current traffic and transport situation in the GWC is so poor that, if development of the corridor goes ahead without significant strategic transport improvements, it will be impossible to meet the LPR’s strategic objectives.

12. Furthermore, such an outcome would have a negative impact on the viability of existing businesses on the GWC. During preparation of the Local Plan poor transport was already recognised as a limiting factor in attracting new and retaining existing businesses. This has contributed to the GWC “under-performing”. [At a meeting on Plans for the Great West Road, on 10 February 2014, Urban Initiatives consultant director Kelvin Campbell stated "Hounslow has always been a focus for London's blue chip companies but the single biggest issue has always been the saturated road network and poor provision of public transport"]

13. Such an outcome would also lead to a serious further deterioration in the environment to the detriment of the health and well-being of existing residents in the surrounding areas and of existing and new residents and workers within the GWC itself. Account must be taken of the current infrastructure deficit. This deficit is due to the amount of consented development completed or under construction, especially in the Brentford East and wider Brentford area that has taken place without the provision of supporting transport infrastructure (see page 3 of Appendix 1).

14. It is essential that any development in the GWC complies with Local Plan Policy IMP 3 (h) Ensuring that development does not proceed unless the delivery of critical and necessary infrastructure to support that development is **assured**.” Our view that the essential transport infrastructure will not be delivered within the plan period is based on bitter experience and on the comments from TfL on the Regulation 18 document (taken from the Council’s Consultation Statement):

TfL considers the conclusion that the proposed Golden Mile Station linking the GWC to Southall Crossrail and the Lionel Road Station linking the GWC to Old Oak Common as the most important infrastructure provision for the GWC is premature. TfL consider the role of the STS is to identify a package of transport measures and future connections needed to support growth. TfL consider that the draft GWC plan should clarify that these stations are at this stage neither committed nor funded, and funding and deliverability challenges associated should be highlighted, and reiterate the importance of investigating and supporting alternative interventions within the plan to reduce the reliance on supporting growth through infrastructure projects that the Council may find challenging to deliver.

15. Other interventions, while necessary and welcome, are not alternatives; they are ancillary to and dependent on these major infrastructure improvements. Many of them would not be possible without the reduced traffic congestion that would result from significantly improved public transport by rail. For example, the congested road network precludes improving public transport by means of additional bus services or increased frequency of existing services. A 2014 TfL consultation <https://consultations.tfl.gov.uk/buses/routes-70-and-27> responded to a WCGS proposal to extend Route 70 beyond the northern end of the Chiswick Business Park by stating “Extending it would expose it to heavy traffic around Chiswick Roundabout which would affect reliability.”

16. Attention is drawn to the following extracts from Draft London Plan July 2019 (underlining is ours) with which GWC6 does not appear to be consistent. The putative designation of the GWC as an Opportunity Area is also undermined by TfL’s comments on the Regulation 18 document.

***Draft London Plan July 2019  
Chapter 1***

1.2.4 Making the best use of land means directing growth towards the most accessible and well-connected places, making the most efficient use of the existing and future public transport,

***Policy GG2 Making the best use of land***

AA prioritise sites which are well-connected by existing or planned public transport.

## ***Chapter 2***

2.0.4 (Opportunity Areas) Infrastructure is key to this delivery and will require major investment in transport, with Opportunity Areas clustered into growth corridors; and proper planning of utilities and communications capacity and the social infrastructure that supports the day-to-day lives of Londoners, well in advance of new development. Opportunity Area Planning Frameworks and Local Plans should have clear strategies for their delivery.

### ***Policy SDI Opportunity Areas***

A To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will: 4) ensure that his agencies (including Transport for London) work together and with others to promote and champion Opportunity Areas, and identify those that require public investment and intervention to achieve their growth potential.

2.1.10 The Mayor's Transport Strategy seeks to ensure that public transport and walking and cycling provision are at the heart of planning for Opportunity Areas. It sets out that the Mayor will support growth in Opportunity Areas through transport investment and planning, and commits to the setting of ambitious mode share targets.

2.1.11 ...Where development proposals are emerging and transport investment is not yet fully secured, delivery of the long- term capacity for homes and jobs will need to be phased in a way that maximises the benefits from of major infrastructure and services investment whilst avoiding any unacceptable effects on existing infrastructure before schemes are delivered.