

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

APP/G6100/V/19/3226914
LPA Ref: 01508/A/P6

Closing Statement on behalf of the West Chiswick and Gunnersbury Society

1. The fact that I have attended every day but one of this Public Inquiry attests to the importance that I and the residents I represent - who live in the surroundings of the Appeal site - attach to this matter.

2. Having studied the documents and listened attentively during the Inquiry, I wish to record that we fully support the cases made by the Council and the Rule 6 Parties (Historic England and the Royal Botanic Gardens Kew) and request that the Inspector record our endorsement.

3. Having listened attentively during the Inquiry, including to the responses given by the Appellant's and the GLA's planning witnesses to my questions, I would request that the Inspector take all these questions and responses into account.

4. In my short opening presentation (ID7) I provided an indication of how the proposed scheme would harm the quality of life of local residents in a number of ways with respect to our immediate environment (section 6 and 7). I wish to emphasise here that due weight should be 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.

5. In questioning Miss Randell, I drew attention to the error and omissions in her Proof of Evidence (8.29). The absence of any reference to the low-rise, high quality **townscape** within the Wellesley Road Conservation Area to the east of the site is a serious omission. Openness of outlook is a very important component of residential amenity in streets characterized as dense urban grid (as defined in the Council's Urban Context and Character Study) and within an area of public open space deficit.

6. I questioned the need for yet more **landmarks** (defined as something that stands out, helps orientation and sense of place). Promoting multiple landmarks debases this once useful urban design concept. We are in danger of getting lost in a dense forest of tall buildings - this will alienate rather than promote a sense of place. The scale of the Brentford Stadium and its surrounding residential towers is such that it will not require any aid to wayfinding.

7. I also questioned reliance on PTAL as a measure of **public transport** accessibility; it is an over-simplified tool. Whether one is 500, 50 or 5 metres from a station is of no practical relevance if, on arrival at the station, one is prevented from accessing the platform as happens at **Gunnersbury Station** during peak periods. The same applies to the purported 2021 improvement in PTAL due to increasing frequency of services. Indeed, without the necessary major upgrade of Gunnersbury Station, an increase in frequency could exacerbate the

situation by increasing the time one is held in a queue. Overground and underground trains in both directions share the same island platform. Increasing the frequency of service will shorten the gap between trains; it is the gaps which provide the opportunity to access the platform.

8. In considering the **planning balance**, the appellant and the GLA consider that the public benefits of the scheme outweigh the harm. The degree of harm has been fully covered by the other parties. I wish to re-iterate that the existence of intrusive tall buildings such as those of the Haverfield estate or those under construction around the Brentford Stadium, is not a justification for more. To add to the recognized harm caused by such buildings is to add insult to injury.

9. Turning to the weight to be given to the **claimed benefits** of the scheme, I would draw the Inspector's attention to the issues that I raised when questioning the planning witnesses and to the points made by Mr Baker.

10. While specific design aspects of the **housing** may be deemed acceptable by taking a flexible approach to standards for the residential units, in combination, such flexibility will provide accommodation of very questionable quality. For example, will future residents seeking to compensate for a lack of sunlight/daylight by using their balconies appreciate having to ascertain the ambient air pollution and noise in order to perform a risk/benefit analysis before stepping outside? Rather than argue that such compromises are necessary because of the high density and/or the hostile environment, I suggest that they demonstrate that the density is too high and that parts of the site are unsuitable for residential accommodation. These unsatisfactory aspects are indicative of over-development. The over-delivery of 1-bed units, especially in an area with a significant over-supply, will not produce a balanced development; the resulting "churn" will not lead to community cohesion. 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."

I raised further shortcomings of the scheme in relation to the **Climate Emergency** in my questions to Mr Connell. These included the additional energy demands for mechanical ventilation, air conditioning etc and the need for carbon off-setting. How can the UK Government hope to meet its carbon-reduction targets if it approves new buildings which will lock us in to unsustainable energy consumption for many years.

For Affordable Housing and Market Housing, I would ask the Inspector and the Secretary of State to take the cumulative shortcomings of the housing into account when considering the extent of the benefit and what weight should be given to it.

Moreover, since London is a single housing market, perhaps the GLA should consider lowering the London Plan housing targets for those boroughs such as Hounslow where many potentially available brown-field sites are located in heavily polluted areas.

11. In considering the weight to be given to the benefit of the provision of a **nursery**, I would ask the Inspector and the Secretary of State to take account of the points I raised on the health implications of its location, and that of the play space in a position exposed to high levels of air and noise pollution. I would draw their attention to Policy CI3 of the Local Plan and Policy GWC 3 of the Local Plan Review of the Great West Corridor (Reg 19). The latter

makes it clear that “Where we are now” is a very bad place in terms of air and noise pollution and very poor levels of physical activity.

12. In considering the weight to be given to the claimed benefit of Public Realm, Landscaping and Pedestrian connectivity I would draw the Inspector’s and the Secretary of State’s attention to the questions I put to Mr Connell and Miss Randell concerning the value and benefit of the public plaza. The plaza has been designed apparently for two conflicting purposes – as a public space to be enjoyed by residents of the new development and others with events taking place, market stalls etc *and* – to provide room for spill out before and after football matches /connection between Brentford Community Stadium and Gunnersbury Station. The appellant and the GLA appeared to be unaware that the latter is in direct conflict with the draft Local Area Management Plan for the stadium and undertakings by Brentford Football Club to direct supporters away from the residential streets to the east and south-east of the stadium/Capital Interchange Way. It appeared that no discussion had taken place between the appellant and the Club.

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**

14. In **conclusion**, I maintain that the public benefits that would be delivered by the scheme are not as substantial as claimed and would not outweigh the harm that it would cause.

The West Chiswick and Gunnersbury Society believes that the Appeal should not be allowed and we earnestly request the Inspector to report accordingly to the Secretary of State and for the latter to dismiss the appeal and refuse planning permission.

Marie Rabouhans
Chairman, WCGS

6 February 2020