

DRAFT POINTS FOR BCC PRESENTATION DOCUMENT AT THE PI ON THE CHIWICK CURVE AS AT 09/05/18 – On sight of the presented papers this will be reworked accordingly.

## **ACCESS**

We have looked at the problems of connecting this site to Brentford and Chiswick.

The application states, this is an isolated site, and we do not believe that 1200 people can enter and leave it at street level without disrupting the traffic. Access for the cars parked on the site and service vehicles would present further disruption.

The severe traffic problems in the area are such that the applicant is expecting a high proportion of the residents to rely on local public transport. They will therefore be exposed to the hostile environment of the site and will need to negotiate the major roads surrounding the Chiswick Roundabout on foot on a daily basis.

The proposals to link the site across the North Circular Road and the A4 with pedestrian crossings, which will be the only access for the 400 office workers and the 800 residents will inevitably affect the traffic flows on the radials leading to the Chiswick roundabout and will increase the delays there and at Kew Bridge. These areas are already grid-locked at peak times, even before the 910 BFC flats and the 20,000 stadium fans become part of the problem.

If the application does proceed it would require a multi-level solution to provide easy access for pedestrians, services and parking which do not impede traffic flows.

Currently there is no clear strategy to deal with ever increasing volume of traffic and other similar issues, unless route owners (TfL/HE), GLA, DVLA and the Government act in a strategic and cohesive manner.

It is understood that the PTaL is medium (3 to 4). The scheme would be served by bus services and by trains at Kew Bridge station, giving access to Hounslow and Waterloo. These trains are already full at peak times. It would also be serviced by Gunnersbury where TfL do not own enough land to improve an over-used station. It is noted that other developments (like earlier Alpha Laval applications) on the A4 have proved to be unviable as access was too poor.

Access by public transport to this site is clearly inadequate.

The land around Chiswick roundabout and in particular the small foot space proposed for the Chiswick Curve is an unsuitable site for residential use. The proximity of the major arterial routes of the M4 and A4 make this a hostile area for people to live in. As local residents ourselves who live near these busy roads we feel it is highly unsuitable for residential use and if development is to take place then this should be for non-residential purposes only.

## **AMENITY SPACE**

Hounslow is a suburban borough, where residents expect to have at least part of their amenity space on site out of doors. The Council require 5-7m<sup>2</sup> private amenity space plus 25m<sup>2</sup> of communal space per dwelling. This proposal offers only enclosed winter garden balconies or a covered community space. This proposal does not meet the required standards. The communal amenity is sub-standard as the proposal is in the most polluted area of the borough.

The constrained site surrounded by major roads in a highly polluted (air and noise) locality is, in principle, totally unsuitable for residential use. Any development on this site should be non-residential.

It is in the most inappropriate place for residential use. The local road network is already at saturation at peak times and there is frequent grid-lock at the roundabout. This heavy traffic is the major cause of air and noise pollution and makes for a very hostile environment for pedestrians and cyclists. The entire borough is an Air Quality Management Area (AQMA) for NO<sub>2</sub> and PM<sub>10</sub> and the Council's maps of Air quality and Noise shows that the site suffers from some of the highest levels of air and noise pollution in the borough. The serious health impacts of such pollution are well known and acknowledged in the Local Plan.

Measures proposed by the applicant to mitigate air and noise pollution for future residents of the development (eg locating residential on 6th floor and above and replacing balconies with winter gardens\*) only address the internal environment of residential units. Whenever residents leave the building they will be exposed to the unacceptable environmental conditions of this site. This will militate against the residents adopting active, healthy lifestyles including active travel modes (walking, cycling) or engaging in social interaction. Leading the sedentary, socially isolated lives thus envisaged will be detrimental to the physical and mental wellbeing of residents and to community cohesion.

Winter gardens (enclosed balconies) do not provide outdoor space; they are, in effect, an extension of the internal space of residential units. We do not agree that "Enclosing balconies as glazed, ventilated winter gardens can be considered an acceptable alternative to open balconies". The need to adopt such an alternative merely demonstrates the unsuitability of the site for residential use in terms of noise and air pollution.

External play areas, facing onto main roads???

## **AIR QUALITY**

The proximity of the major arterial routes of the M4 and A4 make this a hostile area for people to live in. As local residents ourselves who live near these busy roads we feel it is highly unsuitable for residential use and if development is to take place then this should be for non-residential purposes only.

There are no official readings for the area under the M4 flyover where the A4 is at its heaviest and pollution is less easily dispersed???

The ULEZ is likely to end on the other side of the North/South Circular road, and we believe this will displace more traffic in to using the circular roads to avoid paying emissions charges. Traffic is already highly congested along the A4 running through the residential section in Brentford and even more so at the Chiswick roundabout. The idea that this should become somewhere that people call their home is perverse. We believe that people should be able to have access to fresh air in their homes, by opening their windows, hanging out their washing and take in clean air.

Air pollution is known to cause heart and lung disease, dementia and cancer and limit both health and life in humans. Living in an area with high air pollution and noise pollution has a detrimental effect on mental health and discourages a cohesive and healthy community environment. It's unacceptable to impose high density housing to be built in these conditions and as such we oppose the Chiswick Curve development.

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We consider that the cumulative impact of development in the area on the road network will give rise to severe congestion that will significantly increase air pollution in the vicinity of the Chiswick Roundabout. The applicant's own Environmental Statement ES includes data showing how bad the air pollution already is and that is likely to be getting worse.

The proposed development's transport emissions are above the relevant Air Quality Neutral benchmarks and states "While the development itself has no significant adverse impact on local air quality, the road traffic movements predicted for the scheme will cause the development to exceed the benchmark derived for an average development of this nature in outer London.

### **LIVING CONDITIONS**

Brentford needs family homes, 50% affordable, in mixed communities with easy access to all the facilities they need.

This scheme proposes 320 (30% affordable) mostly in 1 bedroom flats with few facilities on site or nearby.

The typical floor plan appears to show 1 3br, (10%) 2 2br (20%) and 7 1br (70%) flats. This mix will not meet the need for family housing. The Council has not welcomed residential development on the A4 sites.

It is noted that the previous applications for towers on this site have all been for offices.

As the area is highly polluted both from noise and air quality, which is the worst in the borough, the site should be reserved for offices.

The space between parallel 2 floor terrace houses should be 21m, in this scheme the two parallel wings, rising to about 24 floors are only 12m apart. All the rooms in the 3 BR single aspect flats are denied privacy as the glazed public access corridor on the other wing has direct views into all the rooms.

This is not acceptable.

The atrium faces SE so it will only enjoy sunshine early in the day. Most of the 320 flats are single aspect and many face only north or east. We have not yet seen projections of the shadows which would be cast by this tower on nearby buildings and public spaces.

The concept of a development where residents are encouraged to remain confined indoors is reflected in Travel Plans that are inter alia designed to... try to reduce the need for people to travel in the first place (by provision of broadband internet to every dwelling to enable home working, online shopping). Leading the sedentary, socially isolated lives thus envisaged will be detrimental to the physical and mental wellbeing of residents and to community cohesion.