

LAND TO THE REAR OF KEW BRIDGE - P/2020/3393



From John Ricketts <johnricketts@blueyonder.co.uk>
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Priority Normal

FYI I have just submitted this objection, via the LBH planning website, to the above planning application on behalf of The Kew Society.

For the record: Submission reference is 543161:

The Kew Society objects to this application.

The Design and Access Statement mentions the 'significantly higher sky line that has emerged since the consented scheme was granted approval' in 2018, and states that 'a 9-storey building in this location is now of a scale that compliments and responds to the emerging developments in the surrounding areas'. This is the context in which the application has been submitted.

The Kew Society believes that a large number of the surrounding developments have a materially adverse effect on the vistas from, and setting of, the Royal Botanic Gardens Kew World Heritage Site, and we have submitted objections to this effect over the past few years.

The additional three floors proposed in the application would take the height up to around 29 metres. The building would probably be mostly shielded from Kew Gardens and vistas south of the river by the existing St George's development at the northern end of the bridge (6-9 storeys, 23-37 metres), and will be overshadowed by the substantially taller buildings around Brentford Stadium behind it. However, it is likely the building will be visible above the Express Tavern looking northward across Kew Bridge, adding to the overwhelming wall of buildings visible as one crosses the bridge.

We object in principle to this request to increase the height of the building by 50%, which will breach the recommended density levels for a PTAL 4 location. This appeal to precedent, given the much taller buildings now going up and planned around it, is opportunistic and should be resisted, else we risk developers arriving at the unacceptable assumption that since 17 storey blocks have been approved around the Brentford Stadium, future similarly tall blocks should therefore be approved in adjacent schemes.

In addition, we are objecting on the following grounds:

- 1) That the densities of the proposed nine-storey block would exceed the recommendations associated with a PTAL level of 4, which we do not consider is acceptable, particularly given the concerns we have about the local transport infrastructure (see below).
- 2) That the additional 15 units, whilst not overly significant in themselves, will increase the pressure on the local transport infrastructure, particularly Kew Bridge Station, which will also be the local station for many commuters from the surrounding developments that are under construction or in the pipeline (e.g. the enabling

developments around the Brentford Community Stadium, 1-4 Capital Interchange way, the Citroen site development etc). Kew Bridge Station still lacks any step-free access. Visitors to the adjacent Brentford Stadium will also increase commuter volumes. The Transport Assessment states that 'the route to the station is step-free however the station itself does not provide step free access. The station is set to benefit from accessibility works, with the London bound platform to be made step-free'. We understand that Kew Bridge Station received some funding from the Access for All programme, announced around nine months ago, but we have not heard when step free access is likely to be implemented. We believe that the provision of timely step-free access to the west-bound platform is urgently required; and that further measures to increase capacity at the station need consideration.

3) Again, whilst an additional 15 units is not overly significant and the number of car parking spaces remains at 5, the additional traffic in terms of taxis, deliveries etc for both this building and the surrounding developments can only add to the already heavy traffic volumes coming to and from the North and South Circulars and over Kew Bridge. This contravenes section 109 of the NPPF (2019) which states that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

4) This will only add to the already heavy pollution levels generated by gridlocked traffic on this area of the South Circular, which is already set to be greatly exacerbated as the surrounding developments come on stream. This contravenes section 180 of the NPPF (2019) which states that "Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development".