

West London River Group

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Borough Planning Office,
London Borough of Hounslow,
The Civic Centre, Lampton Road,
HOUNSLOW TW3 4DN.

F I N A L W L R G D R A F T

14th July 2008.

For the attention of Mr George Murphy.

Dear Mr Murphy,

Land at Kew Bridge Road, Brentford. Refs 00657/P/P13 & 00657/P/CA1.

Thank you for your letter dated 20 JUN 08 inviting us to comment on these applications.

1. Inadequate information.

The applications as currently submitted contain too many mistakes, and omit significant details, and therefore are NOT yet ready to form a sound basis for reasoned decisions by the Council. The Council is respectfully urged to use its powers under the Planning Acts to request such further details, including corrections, as may be necessary to enable it to determine the applications.

Examples of mistakes are:

- a) The statement that the site is in “close proximity to Gunnersbury Station”. The site is about 0.92km (2/3rds of a mile, or 1,164 yards) from Gunnersbury Station.
- b) The statement that the site is “620 metres east of Brentford Town Centre”. The site is about 1,377 metres from The Beehive at Half Acre, and quite a bit further from the Market Place. Even the Watermans Centre is more than 620 metres from the site.
- c) The statement that there are 3,294 sq. m. of private amenity space on the roof of Block F, with 1,143 sq. m. of affordable amenity space around it. The application drawings do NOT show any of the necessary safety netting that roof space in such use would require, The claim should be corrected, or the drawings amended.
- d) The references to The London Plan fail to distinguish the current 2008 edition from its predecessor, with consequent confusion.

Examples of omissions are:

- e) The drawings do NOT give proposed (and therefore verifiable) roof heights above Ordnance Datum, and are therefore unenforceable in this respect. On the Kew Riverside site on the other side of the River, the tallest building was built about two metres higher than permitted on Appeal because of just such a discrepancy within the application/appeal drawings.
- f) The proposals omit the restoration of the boathouse, with provision of facilities for a rowing club.

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Because of the above matters, the Council is respectfully urged to defer consideration of these applications until all defects have been made good, in order that reasoned decisions, taking into account all material considerations, can be made by the Council.

2. Grounds for Refusal.

The Council is respectfully urged to REFUSE these applications on the following grounds:

- a) The proposals fail to preserve and enhance the Brentford and Strand on the Green Conservation Areas, by ignoring their setting and site-context.
- b) They ignore their Thames Policy Area location and context, by having no regard to River and Riverside views and landscape, for example the view upstream from above Kew Railway Bridge; and take no account of the Kew Gardens World Heritage Site Buffer Zone.
- c) They fail to conform to the Blue Ribbon Network principles of The London Plan.
- d) They damage the settings of neighbouring Listed Buildings, Kew Bridge and the Kew Steam Museum.
- e) They block most landward views of the Steam Museum building and ‘campanile’, for example leaving only two narrow vision slots from Strand on the Green.
- f) They ignore the traffic context of the site, on the very complex road junction of Kew Bridge/Kew Road, Kew Bridge Road, Chiswick High Road and Strand on the Green. The proposals impose a large extra traffic load without making any contribution whatsoever to fitting the new traffic into the existing pattern, let alone seeking any improvement to an already overloaded traffic junction.
- g) They fail to maintain the existing vehicular access and parking for the existing businesses in the arches under Kew Bridge.
- h) They fail to restore a boathouse to this site. We welcome the addition of a pontoon. Detail of its construction and operation is not available, so if the Council were to approve these applications we would expect there to be conditions requiring the provision of such information, and for it to be assessed and approved by the Port of London Authority, the Amateur Rowing Association and any other relevant authority. However the provision of suitable pontoon arrangements is not sufficient in itself. The two arches do not provide adequate storage facilities for boats. The spaces are not long enough for racing VIII's, and a Club would need rack storage for several boats of differing sizes. Nor is there any provision for changing rooms, shower facilities, and a club room. Without such facilities, a Rowing Club is not sustainable.

3. If the Council is minded to approve the applications.

The Council is respectfully urged to impose Conditions on any Permissions, including the following matters:

- a) The proposed pontoon should be included in the Section 106 Agreement, with a requirement that the pontoon must be installed, operational and available to all without charge or other condition, BEFORE any of the residential units are occupied.

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b) Existing vehicular access and parking on the upstream side of Kew Bridge for the existing businesses in the arches under Kew Bridge, and for the two boats ‘Van Tromp’ and ‘Jacarna II’ berthed upstream of Kew Bridge, should be maintained free of charge at all times.

c) Pedestrian access along the Tow Path/Riverside Walk between the site and the River should be maintained free and unobstructed at all times.

d) The existing trees and plants along the Riverside between the site and the River should be Protected throughout the works, and should NOT be pruned, pollarded or felled.

4. Conclusion.

The West London River Group supports the comments made on these proposals by our member-Groups and Associates, the Brentford Community Council, the Brentford Waterside Forum, the Strand on the Green Association, the Chiswick Protection Group and others.

The West London River Group respectfully urges the Council to REFUSE these applications on the grounds described above; or if minded to approve the applications, to impose conditions including those described above.

Yours sincerely,

Peter Makower. Hon. Planning Adviser. For the West London River Group.

C.c. London Borough of Richmond upon Thames.

Thames Landscape Strategy – Hampton to Kew.

Greater London Authority.

Environment Agency.

Royal Botanic Gardens Kew.

Brentford Waterside Council.

Brentford Chamber of Commerce.

The businesses under the arches, and the canoe club.

Strand on the Green Association.

The Kew Society.

Thames Strategy – Kew to Chelsea.

St George West London Ltd.

Local Councillors.

Port of London Authority.

English Heritage.

Brentford Community Council.

Green Dragon Lane Residents Association.

Transport for London.

Chiswick Protection Group.

The River Thames Society.

John Thompson & Partners.

Local Members of Parliament.