

Consultation on revised documents for planning application at Citroen Site, Capital Interchange Way, in the London Borough of Hounslow (LBH)

Capital Interchange Way, Brentford, London TW8 0EX

LBH ref: 01508/A/P6

Comments from the West Chiswick and Gunnersbury Society (WCGS)

1. WCGS objected strongly to the original planning application in January 2018 and supports the reasons LBH gave for its intended refusal of the scheme. Our comments on that application are provided as a separate document accompanying this statement.

2. WCGS agrees with the points made in the comments submitted to the Mayor on 25 June by the Brentford Community Council (BCC) and those submitted by the Kew Society. To avoid repetition, WCGS requests that our endorsement of the views of these two neighbouring residents' groups is taken into account.

3. WCGS has no objection to the developer's proposed revisions *per se*, with the exception of the increase in the number of residential units to be achieved by increasing the height of Core 3 by two storeys (see below). Since, however, the revisions address none of the issues which we raised in our January 2018 comments, those latter comments stand in their entirety. We request that they are taken into full account.

4. We recognise the need for housing, especially Affordable Housing, in London. However, this must not be achieved by permitting development which would not only provide a poor quality of life for its future residents but would also seriously diminish the quality of life of the established residential communities in the surrounding area. The proposed increase in the number of units and/or the height of Core 3 would increase the negative impacts identified in our January 2018 comments.

5. An increase in the height of Core 3, by two storeys, from 15 storeys to 17 storeys (from 62.63 metres in height to 68.93 metres) would amplify the overbearing nature of the scheme.

Cumulative impacts

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.

7. In commenting on Hounslow Council's Brentford East SPD the Society included the following:

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 consider that the starting point for the approach in this SPD should be that, so much damage has already been done by tall buildings or is "consented", the Brentford East area is in general an unsuitable location for any more. As noted above under Section 3, the permitted size of the residential blocks of the Brentford Stadium scheme already brings the scale of the buildings of the A4/M4 corridor to the north

much closer to the sensitive heritage areas to the south and east. 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. 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.

8. Without such a commitment irreparable harm will be inflicted on these heritage assets to the impoverishment of our lives and those of future generations. In addition our quality of life will be harmed by the cumulative deficit in infrastructure arising from all the relevant developments in the area.

Opportunity Area

9. The area has not been designated as an Opportunity Area. The draft New London Plan includes the Great West Corridor (6) as a nascent* OA within the Heathrow/Elizabeth Line area and states:

Heathrow/Elizabeth Line West

The area contains a range of opportunities to support London’s economic development and deliver new housing and environmental improvements. Policy T8 Aviation confirms that the Mayor will oppose any expansion of Heathrow Airport unless it can be shown that: no additional noise or air quality harm would result; the benefits of future regulatory and technology improvements would be fairly shared with affected communities; and that sufficient surface access capacity would be provided by the Government and/or the airport authority.

2.1.63 The Mayor will therefore review and clarify the area’s potential contribution to London’s growth when expansion proposals and their spatial and environmental implications are clearer.

***Nascent** – development potential – identified; infrastructure –options appraisal; timing - 15+ years

10. Hounslow Council is preparing the Great West Corridor Partial Review of the Local Plan. Within its Preferred Options consultation document, it states:

Without game-changing infrastructure particularly Brentford - Southall Crossrail Link, the Council will seek a lower amount of employment floorspace. This capacity is to be determined by the upcoming transport impact assessment being carried out as a part of the Local Plan Review evidence base.

11. WCGS and other resident groups, have objected strongly to the proposed designation of the Great West Corridor (GWC) as an Opportunity Area as we do not believe that it can sustain the quantum or type of development such a designation entails.

Gunnelsbury Station

12. Within our January 2018 comments we stated:

The overcrowding at the 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. The conflict is caused by the constricted size and shape of the ticket hall, the limited number of ticket gates and, especially, the narrow, two-way stairway to the single island platform, serving both Underground and Overground trains.

13. For clarification, for safety reasons these “control measures” comprise TfL staff holding those wishing to access the platform in a queue at the gate. This has a serious and disproportionately negative impact on local residents attempting to use the station to travel to work. During the morning peak, residents are now regularly missing trains by being denied access to the platform and are suffering the consequences of frequent late arrival for work.

AS referenced in the Comments from the Kew Society, Paragraph 48 of GLA planning report D&P/4279/01 state:

Gunnersbury Station is already suffering from overcrowding at peak hours and there are a number of developments coming forward in addition to this scheme which cumulatively will add further pressure. The Transport Assessment shows that the development would generate a significant number of passengers using Gunnersbury, notwithstanding the proximity of Kew Bridge National Rail station. A financial contribution may therefore be required to mitigate this impact and further discussions are required to confirm the impact and required contribution".

WCGS has been campaigning for improvements to Gunnersbury Station since the Chiswick Business Park was proposed over 20 years ago. The Society is a member of the Gunnersbury Station Action Group, set up at our request and now chaired by our MP, Ruth Cadbury. All major stake-holders are represented including TfL. It is recognised by the Group that what is required to overcome the serious access and capacity issues at the station is to provide a second means of access to the platform. Providing TfL with the financial resources to apply additional control measures will not provide a satisfactory solution. Holding more residents at the gate will mean longer queues and exacerbate an already unacceptable situation.

Conclusion

14. The Society requests that the Mayor refuse the amended application.

WCGS

25 June 2018