

Capital Interchange Way, Brentford, London TW8 0EX

01508/A/P6

Comments from the West Chiswick and Gunnersbury Society (WCGS)

1 Summary

1.1 The West Chiswick and Gunnersbury Society (WCGS) objects strongly to the proposed development with respect to *inter alia* density, height, harm to heritage assets and existing residential communities and unsatisfactory living conditions for future residents of the development. The proposals are a Departure from the existing Local Plan and incompatible with the draft Brentford East SPD. WCGS has submitted detailed comments on the latter document indicating our broad support for the principles therein.

1.2 We request that planning permission for this application is refused.

2 Density The proposed development is far too dense. The appropriate density range for this 'Urban' setting as referred to in the London Plan is 45–170 units per hectare (uph) and/or 200–450 habitable rooms per hectare (hrh). The applicant (PS) calculates the residential density as 445 uph and/or 1153 hrh which is 2.6/ 2.56 times greater than the London Plan *maximum*.

2.1 Such an excessive density complies neither with London Plan Policy 3.4 nor with Local Plan Policy SC4. The latter requires efficient use of land to be balanced with responding to and reflecting local context and character and protecting existing residents' amenity. It would be a "departure" from the Development Plan. The area has not been designated as an Opportunity Area.

3 Height The applicant proposes five tower blocks of 12 to 18 storeys with three of more than 50 metres and makes reference to the heights of consented schemes such as the residential blocks within the Brentford Stadium scheme. However, the stadium scheme was presented as an exception, a unique case; it must not be used as a catalyst for yet more large-scale development on neighbouring sites. What is needed in this area is modest development that seeks to mitigate the harm inflicted by the stadium scheme, that fully respects the sensitive, low-rise surroundings and heritage and seeks to redress the balance. The heights of schemes recently built or under construction on neighbouring sites (Volkswagen showroom at 23 metres and the "Wheatstone House" development at 28.6 metres) are much lower than those proposed in this application.

3.1 We support the setting of a general **maximum** height of 24 metres within Brentford East, as proposed in the draft SPD. We proposed clarification of the wording to state:

In Brentford East building heights for both commercial and residential should be within a general range of heights of between 12 to 16 metres (equivalent to 3 - 4 commercial or 4 - 5 residential storeys²) at the lower end and between 16 to 24 metres (equivalent to 4 - 6 commercial or 5 -8 residential storeys²) at the higher end.

3.2 We believe that, taking account of the number and height of existing and consented tall buildings within Brentford East and the acknowledged harm to the surrounding heritage, the

only sites within the study area where buildings *might potentially* be permitted to be above the maximum height of 24 metres are the three identified, namely the “Eastern Gateway Landmark” at Chiswick Roundabout and the two “Corridor Landmarks”. Buildings within the application site should be of varied heights stepping down from a maximum of 24 metres.

4 Housing type and size Policy SC3 of the Local Plan has identified the mix of units to meet the needs of the Borough in conformity with London Plan policy 3.10. The mix of units proposed in this scheme is not in accord with that specified in SC3. In particular the number of 3-bedroom units is lower than required and no 4-bedroom units are proposed.

5. Family housing and Nursery While there is a need for new family housing, we object to the proposal to locate five houses within this development and to the proposed location of the nursery. The houses would be dwarfed and overshadowed by the high-rise blocks around them and would not offer satisfactory family accommodation. Children living in the family houses and/or using the nursery would be exposed to **unacceptable levels of air pollution**, especially when engaging in outdoor play in either private gardens or community space (see under Outdoor amenity space below). We would welcome some family houses on this site as part of a mixed-use development, provided they were satisfactorily protected from the air pollution and noise of the A4/M4 by suitable non-residential buffer buildings.

5.1 The applicant’s Air Quality Assessment states that “all residential units to the ground and first floor levels, as well as the proposed ground floor nursery are classified between APEC - B and APEC - C in accordance with the London Councils Air Quality and Planning Guidance.”

5.2 APEC – C: Refusal on air quality grounds should be anticipated, unless the LA has a specific policy enabling such land use and ensure best endeavours to reduce exposure are incorporated. Mitigation measures must be presented with air quality assessment, detailing anticipated outcomes of mitigation measures.

5.3 The applicant adds that “It should be noted that a significant area of London would fall under APEC - C due to high NO₂ concentrations throughout the city. As such, a presumption against planning consent in these locations may result in large areas of land becoming undevelopable and prevent urban regeneration. The inclusion of suitable mitigation measures to protect future users is therefore considered a suitable way to progress sustainable schemes in these locations and has been considered within this assessment.”

5.4 The applicant’s Air Quality Assessment states (Note: **bold emphasis** and *comments in italic* added by WCGS):

Based on the dispersion modelling results the implementation of mitigation measures is required to protect future residents from **poor air quality at ground, first, second and third floor level**.

Whilst it is noted that the development will provide mechanical ventilation within each individual residential unit, there is in some cases a requirement for NO_x filtration units to be installed **as a number of units are unable to supply clean air**. With this in mind, the inclusion of NO_x filtration should be included in the building design **for all residential units and the nursery on the ground and first floor**

levels (see Figures 8 and 9) and the residential units located within an area classified as APEC - B on the second and third floor levels (see Figures 10 and 11). For the second floor, this comprises all residential units in Core 3,4 and 5, as well as the one bedroom plot in Core 2. For the third floor, this comprises all residential units in Core 4 and 5 and the two bedroom plot in the northeastern corner of Core 3. **The inclusion of mechanical ventilation with NOx filtration at these sensitive uses should ensure the supply of clean air for future site users.** *How will the ventilation and filtration systems be monitored and their continued effective functioning be assured? The need for such systems for all/many of the units will add significantly to the energy consumption of the development.*

Additionally, a high specification of air tightness on the windows and doors should be incorporated at all residential units on the ground and first floor levels, and the specific residential units identified in the above paragraph on the second and third floor level. This ensures that the windows will remain openable at the affected areas and **provides freedom of choice over whether natural ventilation is preferable during certain periods.** *Freedom to choose between polluted air or over-heated, stuffy rooms will not of great value to future residents. How and by whom will such choices be made for the nursery?*

The high specification of air tightness will also ensure that when the windows are shut, the nursery and the aforementioned residential units will be well ventilated by the mechanical ventilation systems. **The key to reducing exposure using this method is to ensure occupants are informed over the potential risks associated with prolonged exposure to elevated pollution levels. As such, it may also be possible to provide future users with a welcome pack containing air quality information which will allow them to follow appropriate advice on protection against high concentrations during certain periods.** *Are future residents expected to perform a risk/benefit analysis before opening windows? How and by whom will decisions be made for the highly sensitive occupants of the nursery? If this level of control is necessary to maintain satisfactory air quality within the units, access to gardens and outdoor play space will need to be similarly restricted.*

6 Outdoor amenity space A significant number of units will have no private *outdoor* amenity space due to the high levels of air pollution and noise. Having a slightly extended internal living area (a winter garden) is no compensation. The communal and public outdoor spaces at ground and podium level will all be exposed to these high levels without the possibility of mitigation. This will have a negative impact on the quality of life and health of future residents by preventing them from adopting active, healthy lifestyles. This will be especially detrimental for children who should be encouraged to play outdoors but who are at greater risk from air pollution, both in terms of development and immediate and long-term health.

6.1 Capital Interchange Way is currently a busy cut-through from the South Circular to the A4/M4 and will be heavily used by vehicles and pedestrians in connection with the stadium (including supporter coach parking) and associated residential towers. This will diminish severely any benefit from the proposed public space; the reality of the streetscape will be far removed from that depicted on page 4 of the D&A statement.

7 Impact on Neighbours; visual amenity The proposed residential towers are totally out of character with the townscape to the east and south east in terms of scale, form, massing and density. The change in scale from the 2-3 storey buildings of this existing townscape is brutal. In these areas much of the local townscape comprises the residential streets of the several Conservation Areas (see comments under Heritage). The proposed development should seek to mitigate not increase and intensify the influence of the consented Lionel Road Scheme. Instead it introduces 5/6 more towers of similar heights to those in the latter scheme, into the settings of these Conservation Area. The towers by virtue of their height and bulk, would be highly visible from many locations within these areas and would impinge on views from well beyond them. The towers would be visible from many locations in the Wellesley Road CA, including homes, gardens and streets within this residential area of predominantly 2-storey Victorian houses. They would demean and belittle the intimate, human scale of our neighbourhoods and destroy our sense of place.

7.1 Impact during construction The applicant suggests that the negative impacts (including visual, air pollution, dust and noise) on the existing community (residents and nearby school) during the construction are acceptable because they will be temporary. However, taken together with the construction works for the Lionel Road South scheme, including the stadium, this “temporary” period will be very long.

8 Impact on surrounding heritage The starting point for any assessment of the application must be the statutory requirements of the Town and Country Planning (Listed Buildings and Conservation) Act 1990 including the requirement for the Local Planning Authority to give great weight to the preservation of the setting of the adjacent designated heritage assets. The NPPF (Section 12) sets out how planning authorities may fulfil their statutory duties with respect to the Act. These are elaborated in the policies of the London Plan (Chapter 7) and Hounslow’s Local Plan (Chapter 6).

8.1 The location of the site and the scale, height and massing of the blocks of the proposed development are such that they would be prominently visible from within the surrounding area, especially from the north-east, east and south-east. As the applicant acknowledges, the historic landscape and townscape of this area contains a wide range of designated heritage assets including Gunnersbury Park, the River Thames and its environs, the World Heritage Site at the Royal Botanic Gardens Kew and several Conservation Areas in both the London Borough of Hounslow and the London Borough of Richmond. These assets are of immense architectural and historic significance. They contribute enormously to the cultural richness and quality of life of this part of London. They are valued and enjoyed by large numbers of people including local residents and visitors from other parts of the borough, London and further afield. These are precious, irreplaceable assets to be treasured, protected and enhanced in conformity with national, London and local planning policy.

8.2 The artist’s impression on page 4 of the D&A statement, the neighbourhood views within this document and the CGIs provided within ES Volume II clearly show the negative impact and the brutal change in scale and character from the surrounding Conservation Areas. There is a major negative impact on the Wellesley Road CA. See also comments under Height above.

9 Lack of infrastructure A mixed-use development of the scale proposed would add unacceptably to the pressure on infrastructure – health, education, community/social and

transport. So much major development has recently been built or is in the pipe-line in Brentford and Chiswick, that no more should be built until the necessary community and transport infrastructure is in place. There is a now a critical need for an “infrastructure catch-up” before any more development is allowed.

9.1 In assessing infrastructure needs, it is essential to consider the cumulative deficit arising from all the relevant developments in the area.

10 Impact on public transport and traffic Adding more vehicles to the strategic and local road network and more users to the local public transport system will have significant negative economic, social and environmental impacts. The Council is well aware of the negative impact on the local transport system arising from the increase in commuters in recent years and of the pressure that will be exerted by other major developments in the pipeline, in particular the Brentford Football Stadium and its 910 residential units. Despite the very large amount of committed development in the area (recently completed, under construction and in the pipe-line), no significant transport improvements have been obtained. Existing local residents and businesses on the Great West Road are already struggling with the inadequacy of the existing transport network. This issue also affects other local businesses, including many SMEs, major employment sites such as the Chiswick Business Park and major visitor attractions including the Royal Botanic Gardens, Kew and the London Museum of Water and Steam.

10.1 Public transport 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. The applicant makes reference to the proximity of various means of public transport such as rail and underground stations. However, the PTAL of the site at 3 is only moderate and, in any case, PTAL values only reflect proximity and frequency of service. Station access and capacity are of equal importance. The nearness of a station is immaterial if it cannot cope with demand. Both Gunnersbury Station and Kew Bridge Station have significant access problems and Gunnersbury Station also has severe capacity problems.

As the Council is well aware, the use of Gunnersbury station has increased significantly in recent years due to the Chiswick Business Park (currently approx 8000 workers rising to approx 10,000 on full occupation of Building 7) and other significant developments in the area. These numbers will be augmented by residents from other consented developments including the 910 units in the Brentford Football Stadium scheme in Lionel Road South and the station is also expected to handle large numbers of football and rugby supporters from the new stadium.

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.

10.2 Traffic The local road network is already at saturation at peak times and there is frequent grid-lock at the roundabout. The cumulative impact of committed development in the area is such that congestion of the road network is expected to increase with significant impact on journey time reliability and on bus performance. Any increase as a result of this

large-scale mixed-use development will have a negative impact for all using this section of the TLRN.

10.3 While restricted parking for the proposed development may reduce car ownership and result in fewer private car journeys by residents, account needs to be taken of the resulting increase in journeys to and from the site by taxis, mini-cabs and delivery vehicles.

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