

Kew Bridge Road - 00657\_P\_P13 - 00657\_P\_CA1.txt

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To : <planningcomments@hounslow.gov.uk>  
Subject : Kew Bridge Road - 00657/P/P13 - 00657/P/CA1  
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The following comments are made about the proposed development on Kew Bridge Road alongside Kew Bridge - the ex Scottish widows site.

#### Accuracy of submission

The application documentation contains references to the 2004 version of the London Plan which is no longer the development plan, because the latest GLA regional development strategy is dated February 2008. That makes invalid some of the arguments about policy conformance that are presented in the application to residents, officers and elected members.

#### Height and bulk

In fact, assessed against the latest London Plan (LP), the proposed scheme is too tall and too dense in its housing content. It should respect the surroundings and the setting on the Thames to meet the criteria of LP Policies 3A.6, 4B.1, 4B.8, 4B.10 and 4B.14 but it does not appear to do so.

The proposed development would not respect the setting of the listed bridge and of the views through from the station to the river.

#### Housing provision

It does not meet the GLA's requirement for units with four bedrooms or more - see Policy 3A.3, the Housing SPG and the Mayor's Annual Monitoring Reports.

It would deliver less than the 50% expected of affordable housing. The extra costs used by the developer to justify that in the Three Dragons Toolkit will need to be explained by the case officer to committees, so that it can be seen that there are no extra weightings given to the S.106 contributions or to the costs of building conformance to the latest standards for energy efficiency. This is a site owned by the applicant and the Inspector of the last appeal wrote that :-

"No suggestion has been put forward that the site would be uneconomic if it were required to offer a 50% affordable provision of which 70% was rented, or that this site has any peculiar development costs. Indeed, given that it is a vacant site on the riverside, the reverse could be argued." (Para. 9.72)

#### Density

The proposed density is much higher at 659hr/ha than should be allowed. For this site the hr/ha should be around 400hr/ha if it was in the lower quartile (as the KBR1 Inspector reported that it should be, in his paragraph 9.64), based on a site of part PTAL 3 (which is now 200-450hr/ha) & part PTAL 4 (200-700hr/ha) in an Urban environment. The "appropriate" figure is lower than at the time of KBR1 inquiry because the latest LP has reduced the bottom of the PTAL3 range, following the decision of the Mayor to remove consideration of the amount of on-site parking and the distance from a town centre. The only places that 659hr/ha is deemed by the London Plan to be appropriate are in a location with a PTAL figure of 4 to 6, greater than for this site, or in a Central London location with a PTAL of 3. The mayor has indicated that only 5% of "exceptional" developments in London should have a density above the appropriate range.

#### Amenity space

The development would lack the children's play facilities and amenity space required by the LP Policy 3D.13 and the related Guidance.

#### Impact of RBGK WHS

Visitor's to Kew Gardens now have the advantage of further views around and from the World Heritage Site because of the tree walk. That would make it more unacceptable to have a building like that proposed for this site in the views from the RBGK because of its height in relation to nearby buildings and because its east 'finger' is too close to the bridge and would present a cliff face of elevation to the river without an acceptable stepping down to the Thames that LB Hounslow requirements and the Thames Landscape Strategy have indicated.

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Conclusion

LB Hounslow should seek reductions in bulk and other improvements for this scheme. The development should not need to be so tall now that the applicant has purchased the site of the wagon & Horses pub and there is more room for an acceptable development. The current application should be refused.

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