

Sir Edward Lister,  
Chief of Staff and Deputy Mayor:

from Denis Browne, Chairman,  
Planning Consultative Committee  
Brentford Community Council

By email to Edward.Lister@london.gov.uk

January 10 2014  
Ref: BCC 665 dmb

Dear Sir

**DRAFT**

### **Lionel Road Stadium**

I am writing on behalf of the Brentford Community Council.

The BCC is an organisation which was originally set up in 1988 by the London Borough of Hounslow to contribute local views to their borough Planning Committee.

The BCC is now independent and non political. It has continued to contribute local views on policy papers and application in the Brentford area of Hounslow.

The Brentford Community Council has consistently supported the re-location of the Brentford Football Club Stadium from Griffin Park to Lionel Road, and has also consistently opposed the enabling development as proposed in application no P/2013/1811

In our letter Ref: BCC 643 of July 15 2013, (copy attached for easy reference) we set out in detail the reasons why the present proposals are unacceptable.

We are now asking you to direct Hounslow Borough Council to refuse the current application.

Refusal would enable a revised scheme to be put forward, that unlike the current application accords with the London Plan guidelines and the Borough's development plan.

In writing to you may we bring to your attention the decision by the Secretary of State to accept the recommendation of his inspector to refuse consent for the development of the Kew Bridge site which is very close to the Lionel Road site.

The appeal decision was written on December 1<sup>st</sup> 2005 and the application references are: APPF5540/A/05/1189177 and APP/F5540/E/05/1180179.

The Secretary of State, in his decision letter of 9th March 2006, made specific references which are directly relevant to the current application for the development of the Lionel Road site. The paragraph references are those of the Secretary of State's letter, unless prefixed (IR) in which case they refer to the Inspector's report.

#### Area of Historic Interest

*12. The Secretary of State agrees with the Inspector that the overall character and appearance of the KBCA is not singular but is derived from the inter-relationship between its three main parts (each including a listed building): Kew Bridge, the Steam Museum and Campanile, and the domestic scale buildings leading up to and including the railway station building. He agrees with the*

*Inspector that the enduring characteristics of the KBCA are the settings of the listed structures, together with the road, rail and river patterns which connect them (IR9.12).*

The character and feel of the KBCA as a whole would be greatly affected by views of the proposed buildings at Lionel Road.

#### Thames Riverside

*18. The Secretary of State has had regard to the fact that this section of the 'Thames Path' is identified in the Royal Botanical Gardens Kew Conservation Area special interest as "one of the more remarkable stretches"; and that the proposals would be seen for significant distances up and down the Thames, well beyond the KBCA (IR9.40).*

The proposed buildings at Lionel Road would be clearly visible from many positions on both sides of the River, bringing the inner city to what is currently a suburban and historic setting.

#### Housing Density

*31. The Secretary of State agrees with the Inspector that, for the reasons in IR9.66-9.67, a judgement on whether the density proposed is appropriate for this site depends on the effects of the proposals on their environment and context (IR9.67). He considers, like the Inspector, that density should not be the determining factor but that, in accordance with the Development Plan, the design should seek to maximise density whilst being acceptable in all other regards (IR9.70). In this particular case, the Secretary of State agrees with the Inspector that the design does not overcome the challenges presented by high density and would compromise the quality of the built environment, for the reasons in IR9.70 and, as mentioned in paragraph 13 above, harm the KBCA.*

*32. The Secretary of State has had regard to the Greater London Authority's support for the proposal, and he agrees that the provision of additional housing adds considerable weight in favour of the proposal. However, he agrees with the Inspector that dismissing this appeal would not prevent additional housing being built on the site, and that while it would cause some delay, this would be considerably shorter than the length of time the proposed housing would be expected to stand for if allowed (IR9.68).*

The density of this proposal is far higher than that of the Kew Bridge scheme, rejected by the SoS, and the shortcomings of its built environment are greater.

#### In conclusion

*49. However, the appeal site is in a highly sensitive and prominent location. Given the very few physical constraints and excellent opportunities the site offers, the quality of the design of the appeal scheme would fall very far short of what could reasonably be expected for the site and would cause considerable harm to the Kew Bridge Conservation Area and further harm to other conservation areas, listed building settings, the World Heritage Site and the riverside. Additional harm would be caused because of some poor living conditions, and increased risk to highway safety. The policy requirements for open space would also not be met. For these reasons, the appeal scheme would conflict with many UDP and London Plan policies, and this conflict is not outweighed by the benefits of additional housing and other benefits of the scheme.*

We would suggest that many of the reasons which led the Inspector to recommend refusal of the Kew Bridge application on appeal apply to the current application for the nearby Lionel Road site.

We would, therefore, ask the Mayor to direct the London Borough of Hounslow to refuse this application.

Yours faithfully,

Denis Browne  
For the Brentford Community Council.

**Contact details**

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