

Planning Appeals: Land at Chiswick Roundabout, Chiswick, London W4 5QB

APP/F5540/W/17/3180962 and APP/F5540/Z/17/3173208

LPA Ref: 00505/EY/P18 and 00505/EY/AD22

Comments from the West Chiswick and Gunnersbury Society (WCGS)

Introduction

A. As a society, WCGS not only tries to protect and enhance the quality of life for those who live in this area, but we also take a lively interest in the broader community and our shared environment. We love our part of London and wish all those who live and work here or visit to be able to enjoy and celebrate its rich heritage and natural assets (see our website: <https://westchiswickgs.org/>). We fully endorse the importance of the promotion of local character, including protection and enhancement of Conservation Areas, as set out in Chapter 6 of the Local Plan.

B. The West Chiswick and Gunnersbury Society maintains its strong objection to the proposed development (building and media screens) and fully supports the Council's refusal of the applications. WCGS requests that the appeals against refusal of planning permission and advertising consent by LB Hounslow be dismissed.

C. WCGS provided detailed grounds for our objections to the development within the comments we submitted to LB Hounslow on the application in February and December 2016. We appreciate that the Council will provide all comments that were submitted to them. However, should our original formatting and typefaces* be lost in transmission, the interpretation of our comments would be difficult. For the convenience of the Inspector, therefore, our comments are provided with this statement as attachments to the covering e-mail.

*[As noted in the comments: References to and quotations from the Local Plan, the London Plan and the NPPF are given in *italic*. Any underlining or **boldening** of text is our emphasis.]

D. We wish to emphasise that our objections related to a wide range of aspects of the proposed scheme including (not ranked in any order of priority):

- Unsuitability of site for residential use
- Lack of infrastructure
- Negative impact on traffic and public transport
- Negative impact of building on heritage and low-rise residential areas
- Negative impact of media screens on heritage and low-rise residential areas

E. We would also like to point out that, despite lengthy discussion with the Council, the amended proposals submitted by the applicant in October/November 2016 made only minor changes to the development. The amended proposals failed utterly to address the major objections raised by our Society and others, including statutory consultees. Many of these objections were based on the proposed development's lack of compliance with the policies of Hounslow's Local Plan, the London Plan and the NPPF.

F. The Society has considered the appeal documents and believes that the appellant has failed to provide any convincing grounds for allowing his appeals.

G. With respect to the appellant's Appeal Statement, the Society has the following comments; numbering reflects that of Statement of Case for the main appeal (APP/F5540/W/17/3180962) but also includes our comments on the media screens:

Appeal Statement

2. Site and surrounding area

2.1 Note site is in Turnham Green Ward; Gunnersbury Ward was abolished many years ago.

2.3 The appellant has omitted to make reference to other relevant Conservation Areas. As is clear from the application and the Council's Planning Officer Report (see eg 7.54), the height, scale and massing of the proposed development is such that it would have impact well beyond its immediate surroundings. These include the Strand on the Green Conservation Area, and Kew Green Conservation Area.

2.4 The boundary or extent of the Great West Corridor has not yet been defined and it has only been identified as a **potential** Opportunity Area/ Strategic Outer London Development Centre (see Introduction to WCGS February 2016 comments).

2.5 With respect to the planning history of the site, we would draw the Inspector's attention to the following:

- LPA ref:00505/EY/P7 Planning permission was refused in 2004 for a 15-storey mixed use development including 264 residential units. No appeal was submitted and no subsequent applications for this site have included residential use - until the one that is the subject of this appeal.

2.6 With respect to planning history of other sites in surrounding area, we would draw the Inspector's attention to the following:

- The maximum height of the two nearest consented schemes to which the appellant refers are approximately 29 metres for 9-storey mixed-use Wheatstone House and 45 metres for 8-storey commercial 250 Gunnersbury Avenue.
- The maximum height of the residential component of the Brentford Football Stadium scheme is approximately 61 metres. The exceptional scale and height of this latter development was justified by the LPA as being necessary to deliver the stadium with its perceived community benefit. The stadium scheme was presented as an exception, a unique case; it must not be used to set the context for other developments in the surrounding area.
- The maximum height of the appeal development at 120 metres is almost three times that of the nearest consented scheme at 250 Gunnersbury Avenue.

2.7 The development potential of Chiswick Roundabout and its environs is severely constrained by the extremely hostile environment (noise, air pollution, severance and visual intrusion) created by the major road network (especially A4/M4/N Circular) and by the sensitivity of the surrounding residential areas and heritage assets. The development potential of the appeal site itself is further compromised by its small size and “island” nature.

4. Planning Policy

4.3 and 4.4 As noted under 2.4 above, the boundary or extent of the Great West Corridor has not yet been defined and it has only been identified as a **potential** Opportunity Area/ Strategic Outer London Development Centre. Policy SV1 of the Local Plan commits the Council to “work with residents and stakeholders to explore and identify the potential capacity for additional employment-led mixed-use development along the Great West Corridor and co-ordinate its regeneration.” The Partial Review of the Local Plan, required by the Inspector during the Public Inquiry on the Local Plan, is intended to resolve these matters (see Introduction to WCGS February 2016 comments). Having submitted a detailed response to the Issues Consultation in February 2016, WCGS is awaiting the Preferred Options Consultation document.

5. Appellant’s Case – Proposed Development

Reason for Refusal 1 - alleged harm to heritage assets

5.2 to 5.4 (i) The starting point for any assessment of this aspect of the appellant’s case must be the statutory requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990. 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). The NPPF requires Local Planning Authorities to give great weight to the conservation of heritage assets of local, regional, national and international significance.

(ii) By isolating the development site and narrowly defining the context, the appellant has sought to take cues from, and respect and respond to, only one aspect of the character of the area, that of the Golden Mile. The site is in a very sensitive location being surrounded not only by established residential communities but also by architectural and natural heritage assets of local, regional, national and international significance.

(iii) The location of the site and the scale, height, massing and design of the proposed development are such that it would be prominently visible from within the surrounding area. The historic landscape and townscape of this area contains a wide range of designated heritage assets including listed buildings within Gunnersbury Park and along the River Thames and its environs, the World Heritage Site at the Royal Botanic Gardens Kew, Grade II* Registered Park and Garden at Gunnersbury Park 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.

(iv) It is evident from the Statement of Case and from the application that the developer has not engaged positively with the purpose and core principles of chapter 6 of the Local Plan as articulated in Our Approach to Policy CC1 and to Policy CC4 and in paragraphs 6.1, 6.12 and 6.13. Attempting to claim that the clearly significant impact is beneficial on the basis of the architectural quality of the design and the scheme's contribution to urban intensification conflicts with these core principles. Development within this part of the Borough should be heritage-led and should showcase innovation without descending into "theme-park anarchy" with each new building competing to be the most prominent, showy or wacky iconic "landmark" or "gateway". Promoting multiple gateways and landmarks debases these once useful urban-design concepts.

(v) The Society refutes absolutely the applicant's claim that the quality of the proposed development both in terms of design and the public benefits that they will secure, are such that they "would outweigh any harm to the significance of any designated heritage asset".

(vi) In addition, we maintain that the harm to heritage assets would be compounded by the harm caused to the quality of life of local residents by the proposed development. It would appear alien - demeaning and belittling the intimate, human scale of our neighbourhoods and destroying our sense of place. The change in scale is brutal and the impact would be inescapable for the many people who live in the long established communities within the surrounding streets.

(vii) WCGS is familiar with the negative impact that inappropriately located tall buildings has. In commenting on the Council's draft Context and Character Study in 2013, we stated:

No-one in West Chiswick or Gunnersbury can ignore the presence of this alien building* or be unaware of its negative impact on the amenity of the area. WCGS plea at the "Chiswick West" public inquiry in 2004 still stands (as does the building, unfortunately). "Please do not compound the errors of the 1960s by seeking to extend its hostile influence – that would be to add insult to injury. Let us retain the BSI building in splendid isolation as a monument to inappropriate development - a negative singularity."

***Note** that the building in question is the 18-storey Chiswick Tower (informally known as BSI building), 389 Chiswick High Road and that the "Chiswick West" Appeal (LPA ref: 00248/BX/P2) for a high-density, mainly residential development at 391 to 409 Chiswick High Road was dismissed by the Secretary of State in 2005.

(viii) We would draw the Inspector's attention to the section "Impact on surrounding heritage and low-rise residential areas" (paragraphs 21 to 27) of WCGS comments of February 2016.

Reason for Refusal 2 – design

5.5 to 5.6 (ix) See comments under Reason 1 above. A building of this scale might be a welcome addition within an intensely urban, central London location. It is entirely inappropriate, however in an outer London area characterized by significant heritage landscapes and a beautiful stretch of the River Thames which, together with its predominantly low-rise buildings give much of it a generous, open, almost rural feel. (x) We consider that the detailed design of the proposed development is not of exceptionally high quality and would not mitigate the impact of a development of this height, bulk, and form on the surrounding area or heritage assets. The excessive height and bulk of the proposed development represents a gross over development of a small site and, combined with the form of the proposed development, the effect would be to emphasise rather than mitigate its impact on the surrounding area and heritage assets.

Reason for Refusal 4 – amenity space

5.11 (xi) While improvements to the public realm would be welcome, they would not provide additional or satisfactory outdoor amenity space. The public space within the atrium will be enclosed and the surrounding public realm is located within an extremely hostile environment.

5.12 and 5.13 (xii) While the sites location renders the provision of acceptable outside amenity space within the development highly problematic, it also jeopardises safe access to nearby open spaces. This will militate against the residents adopting active, healthy lifestyles important in a borough with significant health problems (eg diabetes and obesity) linked to inactivity.

(xiii) It is questioned whether the communal external amenity space provided (on the 5th, 25th and 32nd floors) will be of high quality or successful as communal open space. In addition to noise and wind effects, these areas, especially those on the 25th and 32nd floors will not be “overlooked by the households that share the space, engendering a sense of ownership among residents” as advised by the LHSPG.

(xiv) In relation to both these aspects, we would draw the Inspector’s attention to the section “Unsuitability of site for Residential Use” (paragraphs 5 to 10) of WCGS comments of February 2016.

7. Conclusions

Advertisement screens (xv) WCGS disagrees strongly with the conclusion of the appellant (last bullet point) that the proposed advertisement screens would not harm visual amenity or the character of the area and its surroundings including the settings of designated heritage assets. The size of the proposed advertisement screens, the intensity of the LED illumination and their location at high level would be visually intrusive and would result in visual clutter in the streetscene.

(xvi) The addition of large, LED-lit advertising screens on three façades of the proposed building would detract from and seriously compromise its design quality, “landmark status” and legibility. Such screens would conflict with the building’s

predominantly residential use. They would also increase the harm of the proposed development in views from the cemetery and the Katyn Memorial, especially in winter.

(xvii) WCGS knows from experience how damaging media screens in this location are; those on the roundabout are to the detriment of the public realm and the quality of life of residents in the surrounding areas.

(xviii) We would draw the Inspector's attention to the section "Media Screens" (paragraphs 28 to 34) of WCGS comments of February 2016.

In Summary WCGS disagrees fundamentally with the overall position of the appellant that the development would deliver public benefits that would outweigh the harm.

WCGS
10 September 2017