

Chiswick Curve: Public Meeting – 27th April 2016

Don't be left behind the Curve

The groups organising this meeting have invited local MPs, some GLA members, local councillors and the four “main” candidates for Mayor of London. We are also publicising the meeting widely.

Mayor of London WCGS wrote in March to four of the candidates asking for their support in opposing this development. Our letter included:

“We recognise that the current situation with respect to housing in London is highly unsatisfactory and we are aware that housing features in your campaign and that of other candidates. We would hope that, as a prospective Mayor of London, you would, however, agree that:

- Allowing residential development in such a highly polluted location is completely unacceptable.*
- Inflicting such severe and lasting harm on the natural and built environment of the surrounding area would compromise its current qualities and undermine strategies for its enhancement.*
- London is of national and strategic importance as our capital city. Its natural and historic environment is too important to be treated in this cavalier fashion. It should be conserved and enhanced in accordance with the NPPF.”*

Reply from Sadiq Khan: “It is important that all major developments in London take into consideration the concerns of local residents and the Chiswick Roundabout plans are no different. As Mayor Sadiq will work closely with all London’s boroughs to make sure developments deliver for the local community. Over-development in the wrong place – including buildings which tower over the surrounding areas – need very careful consideration given how intrusive they are. I will be looking carefully at future plans to make sure they fit with the character of London, particularly so in the outer London boroughs where there are fewer tall buildings.”

Reply from Zac Goldsmith: “I want new developments to compliment the communities they exist within, rather than towering over them. They should enhance, rather than undermine existing communities. In many cases, low-rise, high-density streetscapes would generate enough new quality housing to cater for our needs for many years to come. My policy is that everyone should be able to live in homes they are proud to call home. Tall buildings have a role in parts of central London but, otherwise, should only be allowed where there is clear community consent and where they are the only way to ensure higher densities.”

Response to the planning application

Unlike most London councils, Hounslow Council does not publish the comments it receives on planning applications on its website. We believe that this lack of transparency should be addressed in the interests of proper community engagement. The community has the right easily to know the issues being raised and the strength of the arguments being made for or against proposed developments, especially major schemes with significant impact. A request from resident groups for the Council to remedy this democratic deficit has, so far, fallen on stony ground.

Meanwhile, we have been able to publish some of the public comments on the Chiswick Curve on the Brentford Community Council website: <http://www.brentfordcc.org.uk/> These comments, which can therefore be read in full, include significant objections from Historic England, the Royal Botanic Gardens, Kew, neighbouring boroughs and several of the local resident groups.

We have also visited the Civic Centre to view the comments received. As of early April the Council had received between 550 and 600 individual letters of objection, one letter of support and approximately 200 “carbon copies” of a generic letter of support.

Many objections are based on the proposed development’s lack of compliance with the policies of Hounslow’s Local Plan, the London Plan and the NPPF.

The major themes that emerge from the objections (not necessarily in order of priority) are:

- Unsuitability of site for residential development – at highly polluted, grid-locked roundabout
- Visual impact – on built and natural heritage and residential communities
- Lack of infrastructure
- Traffic and public transport
- Cumulative impact*
- Media screens for advertising

****Lionel Road Development Ltd (Brentford Football Club):*** Concerned to protect the future of the Club and its imminent move to the new Brentford Community Stadium at Lionel Road South. Wish to ensure that the construction and operational phases of the scheme have no adverse impact on the safety and efficiency of the Club’s match day operations. Concerned that cumulative impacts of development inadequately assessed.

Some other important issues raised include those raised by

Thames Water: Concerned by the inability of the existing waste water infrastructure to accommodate the needs of the application. Their letter requests an impact study as “sewer network downstream from this development may be approaching capacity.” Similar comments were made about the water supply.

Highways England: raised issues with potential for adverse effect on motorists on M4 elevated motorway and adjacent slip road, including solar glare, wind effect, construction (piling, craneage, scaffolding etc)- concern for safety of motorists and integrity of elevated motorway.

Site Context: Great West Corridor

Another very significant aspect of development on this site is that the Council has recently embarked on a “Partial Review” of its Local Plan in relation to an area called the Great West Corridor. The extent of this area is, as yet, undefined but this site at the Chiswick Roundabout would likely fall within it.

http://www.hounslow.gov.uk/index/environment_and_planning/planning/planningpolicy/local_plan/greatwest_corridor_plan_review.htm What is permitted at this site in terms of scale, density and use could therefore set the context for the corridor.

This Partial Review was called for by the Inspector who conducted the Public Inquiry/Examination of the Local Plan in order to make the Local Plan sound. In his report he concluded that “this Partial Review is necessary to settle locally controversial issues such as the provision of adequate transport and other infrastructure, suitable locations for taller buildings, and the area's suitability or otherwise for large scale residential development.”. The Partial Review is not expected to be completed before December 2017.

We are very concerned that the Council's aspirations for the Great West Corridor include its designation as an Opportunity Area within the London Plan. This would allow development on a massive scale at high densities. In order to achieve this designation it would be necessary for an area much larger than the “Golden Mile” along the A4 to be included in the Great West Corridor. Large parts of the surrounding residential communities of Brentford and Chiswick would be engulfed within the regeneration corridor (see map of proposed area under Issue 1 of the Council's consultation document).

A more detailed summary of objections including direct quotes is provided as an Annex for additional background information.

Marie Rabouhans, Chairman WCGS, 20 April 2016

on behalf of: Brentford Community Council, the Kew Society and the West Chiswick and Gunnersbury Society

supported by a wide range of other local resident groups including: Bedford Park Society, Chiswick High Road Action Group, Friends of Stile Hall Gardens, Friends of Turnham Green, Grove Park Residents Association, Isleworth Society, Strand on the Green Association, Thornton-Mayfield Residents' Association

Annex: Summary of objections

Note: The significant objections from Historic England, the Royal Botanic Gardens, Kew, neighbouring boroughs and several of the local resident groups can be found on the Brentford Community Council website: <http://www.brentfordcc.org.uk/>

The major themes that emerge from the objections (not necessarily in order of priority) are summarised below with some [direct quotes given to illustrate issues](#).

- **Unsuitability of site for residential development – at highly polluted, grid-locked roundabout**

– air quality, noise, traffic, hostile public realm, density*, inadequate/unsuitable amenity space

** Note on density based on GLA information:* London Plan Policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, design principles set out in London Plan Chapter 7 and public transport capacity. Table 3.2 provides the density matrix in support of this policy. Based on the characteristics of the location the site could be regarded as having an 'urban' setting with a moderate PTAL rating. Based on its current 'urban' setting, the matrix suggests a residential density in the region of 200-700 habitable rooms per hectare, and for a 'central' setting (this would apply if Great West Corridor were to be designated as an “opportunity area”) the density range suggested is 650-1,100. The net residential density of the proposed development is 3442 habitable rooms per hectare. The development therefore represents a high density development in the form of a tall, building with two residential cores on a constrained site.

[“I can’t think of a more unsuitable development”](#)

[“We conclude that this is an isolated site, which has not been developed over many years because investors appreciate that it is a poor development location.”](#)

[“If it is proposed that the residents of many of the flats are to live in some form of air conditioned sealed units, to protect them from the damaging effects of the external air quality, how will their exhaled gases be disposed of? If these noxious substances will be removed by some form of air extraction system then the report should say what it would be, how it would operate, how it would be monitored and serviced. Also what would happen if it broke down? ... to expect human being to live in an artificially air controlled and sealed environment is a somewhat horrifying thought. The Local Authority would have to pick up on the longer term health aspects if it were to approve this proposed development. It has a clear responsibility of protecting and promoting the health and well-being of its residents under the Health and Social Care Act of 2012. I suggest that to ignore this statutory responsibility to promote the interests of a developer to the detriment of residents \(both present and future\) will be an abrogation of its public health duty and put it at risk of legal challenge.”](#)

[“The concept of a development where residents are encouraged to remain confined indoors is reflected in Travel Plans that are *inter alia* designed to... try to reduce the need for people to travel in the first place \(by provision of broadband internet to every](#)

dwelling to enable home working, online shopping). Leading the sedentary, socially isolated lives thus envisaged will be detrimental to the physical and mental wellbeing of residents and to community cohesion. How can our Council reconcile such a dystopian forecast of life in the 2020s with the vision of our recently adopted Local Plan?”

“A greedy 32-storeys in the middle of one of the most congested roundabouts in London cannot be seriously contemplated by a planning committee worthy of the name.”

- **Visual impact – on built and natural heritage and residential communities**

– from height and bulk of building and from digital media screens (see below) – cause harm to Gunnersbury Park, Gunnersbury Cemetery, the Royal Botanic Gardens, Kew (a World Heritage site), the River Thames, Conservation Areas, residential communities

“The height of the building not only has a severe negative visual impact over a wide area, including many sensitive environments and two London boroughs, but also impacts on the local sense of place, heritage and landscape character. The height of the building is entirely out of keeping with the low-rise nature of Chiswick (2-3 storey in line with the Borough’s Urban Context and Character Study).”

“The application site is surrounded by designated Conservation Areas, mostly consisting of low rise residential buildings. The proposed building will be visible from many points inside these conservation areas and by virtue of its nondomestic scale would clearly cause harm. There are already examples in Brentford where tall buildings have caused harm to distant conservation areas or Historic landscapes. One example is the view of the Great West Quarter 22 floor tower from Syon Park. It is likely that the impact of this building would affect the quality of protected areas many miles from the site.”

“The inspector at the Kew Bridge PLI ruled that the impact of a tall new building on its immediate surroundings was a serious indicator of overdevelopment. Clearly the impact on buildings south and east of Chiswick High Road would be over-powering.”

“This very tall building will not suddenly disappear as people move from the chosen view point to walk down their street, relax in their garden, look out from their window, stroll through the park, across the green, along the river tow-path or visit the cemetery. 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.”

“avoid repeating mistakes of the past [Chiswick Tower (“BSI” building), Empire House]”

“We are spending so much money making Gunnersbury Park a beautiful place to be again, and this disproportionate development is set to wreck all of that good work.”

“A significant part of the “pull” of London is the great variety of what it has to offer in terms of its built and natural environments. It is essential that development enhances and maintains this rich tapestry rather than leads to an homogenised city of poorly distinguished areas, sterile neighbourhoods and an assortment of high-rise follies, competing for attention as they dominate the skyline.”

- **Lack of infrastructure - sustainable communities require adequate social, medical, educational and community infrastructure**

“this development will exacerbate existing infrastructure shortage”

“Housing has been built in Brentford faster than the supporting infrastructure. On this isolated site there appears to have been no thought how the 800 residents will get to shops, doctors schools etc nor where these might be located.”

- **Traffic and public transport**

“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. Existing businesses and residents are already struggling with the inadequacy of the existing transport network.”

“Both Gunnersbury Station and Kew Bridge Station have significant access problems and Gunnersbury Station also has severe capacity problems.”

“The site is correctly described as an “isolated island”. The proposals to link the site across the North Circular Road and the A4 with pedestrian crossings, which will be the only access for the 400 office workers and the 800 residents will inevitably affect the traffic flows on the radials leading to the Chiswick roundabout and will increase the delays there and at Kew Bridge. These areas are already grid-locked at peak times, even before the 910 BFC flats and the 20,000 stadium fans become part of the problem.”

- **Cumulative impact**

“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.”

“time to call a halt”

Lionel Road Development Ltd (Brentford Football Club): Concerned to protect the future of the Club and its imminent move to the new Brentford Community Stadium at Lionel Road South. Wish to ensure that the construction and operational phases of the scheme have no adverse impact on the safety and efficiency of the Club’s match day operations. “in this regard it is noted that the supporting transport assessment (TA) and Environmental Statement (ES) provide little analysis of committed

developments in the local area and the associated cumulative impacts. Table 13.7 within ES Chapter 13 only includes a summary of trip generations associated with a number of committed developments (of which the Brentford Community Stadium development is listed) but no formal cumulative assessment or consideration of match day operations appears to have been undertaken. It is therefore not clear whether the ES adequately considers the cumulative impact of the proposed scheme and the associated match day operations of the Brentford Community Stadium. The Club would welcome clarification from the council and applicant on this matter.”

- **Media screens for advertising**

“Advertising on this scale will not positively contribute to the area’s character or amenity of residential areas - indeed it will cause severe harm in terms of townscape, amenity and public safety. The increased level of lighting, combined with its changing images and colours will impact adversely on the area character and the living conditions of residents.”

“The skyline will be significantly and adversely impacted by proposals on this scale whilst direct upward and spill light from the panels will further contribute adversely to general light pollution in the immediate area and wider West London. The Arcadian Thames is also at risk.”

“Current digital advertising at Chiswick roundabout is visible from the Thames towpath and north facing upper floors of residential and other property in Kew.”

“The elevated section of the M4 already exerts extreme pressure for high-rise advertising on buildings or structures to the detriment of the public realm and the quality of life of residents in the surrounding areas. We know from experience how damaging the CT screens, with a base of 11.5m are. They dominate the roundabout, impact on the amenity of nearby residential properties in the Wellesley Road Conservation Area and appear as incongruous discordant elements in views from as far away as Chiswick Bridge (a Listed structure, and gateway to the borough) and the adjacent Thames towpath.”

“We would request that all the media screens are removed for the reason given above and because, in addition, they would detract from and seriously compromise the legibility and landmark status of the building.”

- **Other important issues raised:**

Thames Water: Concerned by the inability of the existing waste water infrastructure to accommodate the needs of the application. Their letter requests an impact study as “sewer network downstream from this development may be approaching capacity.” Similar comments were made about the water supply.

Highways England: raised issues with potential for adverse effect on motorists on M4 elevated motorway and adjacent slip road, including solar glare, wind effect, construction (piling, carnage, scaffolding etc)- concern for safety of motorists and integrity of elevated motorway.

Wind tunnel effects – not only affect residents and other pedestrians and cyclists but also high-sided vehicles on overhead section of M4.

“There is a long history of unusable public spaces, which have been created close to tall buildings. It has yet to be demonstrated that turbulence will not be a problem here.”

Construction impacts - concern about deep pile excavation for basement car parks so close to ageing M4 flyover (cf emergency repairs in Hammersmith).

“The baseline data used in the environmental Impact Assessment and reported in the Environmental Statement are incorrect leading to vastly underestimated negative impact of the development....Importantly this relates to the visual impact assessment and to the impact of the development on local traffic and transport infrastructure. The visual impact assessment uses the underlying assumption that development is of high quality in every way and therefore has a positive effect on any location from which you can see the development. This is a fundamentally flawed and incorrect assumption that has not been based on community consultation or community views. The very fact that this assumption has been made (contravening the requirements of such an assessment) in such an important part of the EIA calls into question the quality and validity of the entire Environmental Statement.

The public transport assessment uses 2011 census data to analyse travel to work by Hounslow residents. However the extensive development that has occurred in Brentford and along the Golden Mile since 2011 has been considerable. The current experience ...in the last five years. This has not been taken into account and calls into question the conclusions of the EIA.”

“This is not a high-value location and I doubt the building will be afforded the necessary budget for a building of such visual prominence.”
