

Land at Chiswick Roundabout, Great West Road, Chiswick

00505/EY/P18 and 00505/EY/AD22

Comments from the West Chiswick and Gunnersbury Society

Introduction

1. It is recognised that the site may eventually be considered to be within the Great West Corridor (GtWC) and therefore subject to any new or modified policies that emerge from the Great West Corridor Partial Review. However, the boundary or extent of the GtWC has not yet been defined and the plan-making process has only just begun with an Issues Consultation*. The Partial Review is not expected to be completed before December 2017 (page 5 of Issues Consultation document). **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.”**

This wording was required in order to make the Local Plan sound. The Inspector in his report section on the Great West Corridor (paragraphs 47 – 56) concluded (paragraph 54) 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 applicant's Design and Access Statement (2.6) refers to the LBH Golden Mile Vision and Concept Masterplan (2014) as setting out the Council's vision and aspirations and outlining the opportunity to contribute to the ongoing regeneration of Brentford and Chiswick.

Many of the features of the proposed development, especially its height, scale and mixed use are then based on an assumption that all the controversial issues have been resolved and that the Council's aspirations will be translated into policy within the Local Plan. The Council has, however, not yet shared its vision or aspirations with residents (even the current Issues consultation issued at the end of December 2015 is not addressed to them but only to key stakeholders and community representatives). The majority of affected residents are, as yet, unaware of such a “Masterplan” let alone its implications for their quality of life. The applicant's assumption is therefore extremely premature.

With respect to this application, no weight should be given to this vision or to the underlying aspirations for significant development in the GtWC.

Meanwhile, any application for a site that may be within the GtWC should be assessed against the policies in the current Local Plan as adopted in September 2015 and should conform with the London Plan and the NPPF.

* Issue 9 of this consultation is the need for an Interim Planning Framework for the “Kew Gate” Area – the area of the GtWC in which the application site lies according to the proposed map shown in Issue 1. While the six-week consultation period for

Great West Corridor Plan Issues Consultation is due to end on 22 February, the key documents necessary to respond on this issue (Questions 22 and 23) were still not available on 9th February.

Note: 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.

Summary

2. The West Chiswick and Gunnersbury Society (WCGS) objects in the strongest terms to the development proposed within this application and requests that planning permission is refused.

3. The Society shares the overarching vision of the Local Plan that “The quality of life and health of residents will be improved by the provision of supporting infrastructure and high quality and responsive design that respect and enhance local character. Significant local character, natural and heritage assets will be protected and enhanced to maximise their benefits to local residents and businesses.” **We consider that the proposed development fails utterly to live up to that vision; it fails to meet many Local Plan and London Plan policies and does not conform to the central dictum of the NPPF that resultant development must be sustainable.** *Paragraph 7 of the NPPF states “There are three dimensions to sustainable development” and gives them as the economic, social and environmental role. The economic role includes the provision of infrastructure, the social role includes supporting strong, vibrant and healthy communities ... with accessible local services that reflect the community’s needs and support its health, social and cultural well-being and the environmental role includes contributing to protecting and enhancing our natural, built and historic environment.*

The Introduction to the Local Plan under Policy and Context states (1.6) “It is the role of the planning system to balance these three dimensions of sustainable development – economic, social and environmental and environmental - to ensure that new development has a beneficial impact on the local economy, environment and people’s quality of life, and to mitigate or protect the area from significant adverse impacts.” and (1.8) The London Plan is also part of the statutory development plan for the borough and has to be taken into account in the determination of planning applications.

4. WCGS considers that the proposed development would have a detrimental impact on the local economy, environment and the quality of life of existing residents and any future residents of the development. The social need for housing is understood but *Local Plan Policy SC1 Housing Growth requires that this is provided in a manner that is consistent with sustainable development principles and refers (para 5.3) to the central dictum of the NPPF. Para 5.8 describes some of the essential attributes of sustainability in relation to planning decisions for all new developments. These attributes are governed by other chapters of the Local Plan.*

Key objections include:

- 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

Unsuitability of site for Residential Use

5. WCGS considers that the constrained site surrounded by major roads in a highly polluted (air and noise) locality is, in principle, totally unsuitable for residential use. Any development on this site should be non-residential.

6. This site is at the junction of A4/overhead section M4 with Gunnersbury Avenue (N Circular) and is next to the Chiswick Roundabout. **It is in the most inappropriate place for residential use.** The local road network is already at saturation at peak times and there is frequent grid-lock at the roundabout. This heavy traffic is the major cause of air and noise pollution and makes for a very hostile environment for pedestrians and cyclists. The entire borough is an Air Quality Management Area (AQMA) for NO₂ and PM₁₀ and the Council's maps of Air quality and Noise (Context and Character Study, pages 29 and 30) shows that **the site suffers from some of the highest levels of air and noise pollution in the borough.** The serious health impacts of such pollution are well known and acknowledged in the Local Plan.

7. We consider that the cumulative impact of development in the area (completed, under construction and in the pipe-line) on the road network will give rise to severe congestion that will significantly increase air pollution in the vicinity of the Chiswick Roundabout (see section on Traffic below). The applicant's Environmental Statement ES (Section 7) includes data showing how bad the air pollution already is and that is likely to be getting worse. For example, the "objective level" for annual mean NO₂ (40µg/m³) has been significantly exceeded in all years shown from 2010 to 2014 with the most recent value (61.4µg/m³) being the highest. ES 7 argues that the development is acceptable in air quality terms because its projected addition to the existing high pollution will be negligible.

7.1 It also states, however, that the proposed development's **transport emissions are above the relevant Air Quality Neutral benchmarks** and states (7.144) "While the development itself has no significant adverse impact on local air quality, the **road traffic movements predicted for the scheme cause the development to exceed the benchmark derived for an average development of this nature in outer London.** It calls for mitigation measures in addition to Travel Plans etc. in order to meet the requirements of the GLA's SPG. Some elements of the Travel Plans are, in any case, most unlikely to be effective and other are likely to give rise to negative health and social outcomes (see Paragraph 8 below).

7.2 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. They will therefore be exposed to the hostile environment of the site and will **need to negotiate the major roads surrounding the Chiswick Roundabout on foot on a daily basis.**

7.3 While **Public realm improvements** are proposed to try and mitigate some of the negative features of the locality, these are considered to be either impractical or

undeliverable or both. Those proposed for the site itself, while welcome, would do little to ameliorate the situation. The applicant is not in a position to deliver those proposed to the wider surroundings. TfL is responsible for the Chiswick Roundabout and the TLRN; any proposals which reduce traffic flow are likely to be ruled out. The safety problems arising from large numbers of people trying to cross busy main roads is one of the issues under discussion by GSAT.

Landscaping It is questioned whether the landscaping and type of planting proposed to improve the public realm would be viable and sustainable in this location, especially as it is intended to serve as the main route for football supporters between the new Brentford stadium and Gunnersbury station. (See Annex)

8. Meanwhile, measures proposed by the applicant to mitigate air and noise pollution for future residents of the development (eg locating residential on 6th floor and above and replacing balconies with winter gardens*) **only address the internal environment of residential units. Whenever residents leave the building they will be exposed to the unacceptable environmental conditions of this site.** This will militate against the residents adopting active, healthy lifestyles including active travel modes (walking, cycling) or engaging in social interaction. 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?**

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* *Standard 4.10.1 of the Mayors Housing SPG defines Private amenity space as outdoor space (ie private gardens, balconies and terraces). Winter gardens (enclosed balconies) do not provide outdoor space; they are, in effect, an extension of the internal space of residential units. We do not agree that “Enclosing balconies as glazed, ventilated winter gardens can be considered an acceptable alternative to open balconies”. The need to adopt such an alternative merely demonstrates the unsuitability of the site for residential use in terms of noise and air pollution.*

9. **We recognise that the Council, acting alone, cannot reduce the unacceptably high levels of air and noise pollution associated with the major road network in this area. It does, however, have the power, as the Local Planning Authority (LPA), to refuse permission for a development which would (i) increase the pollution due to increased traffic (see below) and (ii) introduce new “receptors” into such an unsuitable area.**

10. **We conclude that the proposed development is not “sustainable development” and, if the Council were to approve this application, the policies of the Local Plan with which it would not comply include (but are not restricted to):**

10.1 Policy SC1Housing Growth *see above*

10.2 Policy EQ 4 Air Quality:

We will achieve this by (b) Encouraging air quality-sensitive development to be located in the most appropriate places,

10.3 Policy EQ 5 Noise:

We will achieve this by (b) Directing noise-sensitive development to locations outside those areas identified where noise exposure is likely to cause adverse effects in terms of public health and well-being

10.4 Policy CI 13 Health Facilities and Healthy Places:

Our Approach *We will ... while making the borough an environment which encourages healthy living.*

We will achieve this by (c) promoting measures which help to prevent the health issues identified in the Hounslow JSNA or subsequent assessments and make the borough a healthy place to live.

We will expect development proposals to (d) Contribute to the health and well-being of the local community where possible, using guidelines such as Active Design; and (e) Where required, use the outcomes of a Health Impact Assessment (HIA) to mitigate negative impacts and health risks arising from the scheme.

Paragraphs 8.12 and 8.13 refers to the London Plan Policy with respect to HIA.

10.5 Policy CC2 Urban Design and architecture:

Paragraph 6.8 Urban design and architecture are also important contributors to health outcomes, particularly through the encouragement of more active lifestyles.

10.6 In addition, the Council, has public health duties under the **Health and Social Care act 2012**, which came into force on 1st April 2013. Section 12 of the 2012 Act introduced a new duty for all upper-tier and unitary local authorities in England to take appropriate steps to improve the health of the people who live in their areas.

Our objection is supported by the following:

10.7 A 15-storey residential development (264 units) (00505/EY/P7) was refused in 2004 and no Appeal was submitted. Amongst the reasons for Refusal was “4. The proposed location of the development on a busy road junction and in close proximity to a busy and elevated main traffic interchange road creates a poor noise and air quality environment that is unsuitable for residential development. This is contrary to [...UDP policies].” Since then traffic has increased together with the associated air and noise pollution; no subsequent applications for this site have included residential use.

10.8 Local Plan Inspector Report section on the Great West Corridor (see above). His report also states “However such residential development is not referred to in Policy ED3 or other Examination Plan policies and it has not been included in the public consultation on the Local Plan or assessed in the sustainability appraisal.”

10.9 1-3 Great West Road The Site by Site Analysis included in the Golden Mile Site Capacity Study (ED04 in Local Plan Library) states under Land uses for 1-3 Great West Road, just across the A4/M4 from the application site, “Given the sites proximity to the raised M4 the site should remain a non-residential use.” No entry was provided in this analysis for the application site, presumably because it was assumed that it would be occupied by the “Octopus”.

Lack of infrastructure

11. A mixed-use development of the scale proposed would add unacceptably to the pressure on infrastructure both community 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.

11.1 Such is the unmet need to provide community infrastructure (especially schools) for the existing borough population, the Council is permitting these to be built on the borough’s open spaces (public and private). The low child-yield predicted by the applicant is likely to be exceeded, as property prices are such that, in reality even small units are occupied by families with 1 or more children.

See below for issues relating to Transport infrastructure.

12. We conclude that the proposed development is not “sustainable development” and, if the Council were to approve this application, the policies of the Local Plan with which it would not comply include (but are not restricted to):

12.1 Policy IMP 1 Sustainable development:

Our approach We will take a plan-led approach to all growth and development within the borough that is considered to be in accordance with the principles of sustainable development as set out in the NPPF, with a balance of social, environmental and economic dimensions.

We will achieve this by (a) Implementing the Local Plan in accordance with the principles of sustainable development as set out in the NPPF.

12.2 Policy IMP 3 Implementing and monitoring the Local Plan:

Our approach We will implement the Local Plan working with strategic partners and the local community.... We will ensure that new development in the borough contributes towards the provision of infrastructure needed for growth.

We will achieve this by (a) Delivering the infrastructure needed to support the growth set out in the development plan...(h) Ensuring that development does not proceed unless the delivery of critical and necessary infrastructure to support the development is assured.

12.3 Policy SC1 Housing growth:

We will expect development proposals to (k) be completed in balance with existing and planned infrastructure and contribute to the provision of further infrastructure to achieve sustainable development and sustainable mixed communities.

Our objection/position is supported by the following:

12.4 Recent decisions of the **Cabinet** and **Planning Committee** in relation to new schools, eg Planning Committee, 3 December 2015.

12.5 Inspector's Report on Local Plan The need to fully co-ordinate development with improvements to public transport infrastructure resulted in several modifications to the Local Plan in order to make it sound eg MM7 modifying Policy ED1 and MM32 modifying IMP2 (now IMP3 – see above).

12.6 Threats in the Golden Mile Vision and Concept Master Plan (ED04b in Local Plan Library) show how the miss-match between development and infrastructure can lead to economic damage. Threats include:

“Failure to establish significant improvements to the public transport network within the area, stifling development potential and adding to the existing strain on the road infrastructure.” and

“Uncoordinated and not properly managed development activities may harm the functioning and viability of existing businesses in the area and drive out sources of employment.”

Impact on traffic and public transport

13. 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 businesses and residents are already struggling with the inadequacy of the existing transport network.** At a meeting on Plans for the Great West Road, on 10 February 2014, Urban Initiatives consultant director Kelvin Campbell stated "Hounslow has always been a focus for London's blue chip companies but the single biggest issue has always been the saturated road network and poor provision of public transport"

<http://www.greatwestmagazine.com/news.html>

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.

Traffic

14 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 forecast by TfL

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 very negative impact for all using this section of the TLRN.**

14.1 While restricted parking for the proposed development may reduce car ownership and result in fewer car journeys by residents, account needs to be taken of the resulting increase in journeys to and from the site by **delivery vehicles**, especially **as residents are to be encouraged to shop on-line rather than supporting local shops by visiting them on foot** (see paragraph 8).

15. **Construction phase** The scale and footprint of the development, together with the site characteristics, would lead to major disruption during the lengthy construction phase, especially as it will most likely coincide with the construction of other major developments in the area.

Public transport

16. **The applicant's expectation that residents and workers within the development will be able to rely on public transport is unrealistic.** See under *Policy EC2 Strategic Transport Connections below*. WCGS has a clear understanding of the current inadequacies of local public transport. We know, from our lengthy experience of constructive engagement* with key stakeholders including transport providers, the Council and major businesses and developers, how difficult it is to obtain any real improvements. **Even when improvements are recognised as essential, the time-scale for delivery together with lack of commitment by stakeholders can thwart progress.**

*WCGS has taken action on a range of transport issues; it is currently a member of the Gunnersbury Station Action Team (set up at our request) and of the Lionel Road Liaison Group.

17. **Bus** Additional bus services or increased frequency of existing services are most unlikely to be delivered in the short to medium term due to the congested road network. A recent TfL consultation <https://consultations.tfl.gov.uk/buses/routes-70-and-27> responded to a WCGS proposal to extend Route 70 beyond the northern end of the Chiswick Business Park by stating "Extending it would expose it to heavy traffic around Chiswick Roundabout which would affect reliability."

18. **Underground and rail.** The applicant makes reference to the proximity of various means of public transport such as stations and to the good PTAL of the site. However, PTAL values only reflect proximity and frequency of service; station access and capacity are of equal importance. **Both Gunnersbury Station and Kew Bridge Station have significant access problems and Gunnersbury Station also has severe capacity problems.**

18.1 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 7000 workers rising to approx 10,000 on 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 supporters from the new stadium.

18.2 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.**

19. Active travel modes The immediate environment is such that uptake of these is unlikely to be significant (see paragraphs 7 & 8 above).

20. We conclude that the proposed development is not “sustainable development” and, if the Council were to approve this application, the policies of the Local Plan with which it would not comply include (but are not restricted to):

20.1 Policy EC1 Strategic Transport Connections:

Our approach We will work with partners

We will achieve this by (a) to (j) all these are expressed as “Promoting” or “Supporting”

The way that this policy is worded makes it clear that the Council does not have the power to deliver the necessary improvements to the strategic transport connections to support the scale of development proposed in this application and that it is dependent on other bodies.

Only two improvements in Table EC1.1 are “planned”. One is the Piccadilly Line upgrade for which the start date is to be confirmed (anticipated early 2020s). The other is the current District Line upgrade; although in principle an improvement, the increased train capacity may well exacerbate the station capacity problems at Gunnersbury.

20.2 Policy EC2 Developing a sustainable local transport network:

*We will expect development proposals to (f) Demonstrate they are located appropriately with regard to public transport accessibility and capacity, road capacity and access to good quality walking and cycling networks.
(g) Demonstrate that adverse impacts on the transport network are avoided.*

Our objection is supported by the following:

20.3 GLA Planning Report D&P/3111a/02:18th February 2014

In commenting on the Brentford Football Stadium scheme, **TfL** stated:

63 Given the level of predicted vehicular trips within an already congested highway network, the applicant was advised to undertake area wide modelling. Using TfL's corridor VISSIM model, the applicant was recommended to consider the morning and evening network peak periods for a match day and non-match day, although only the latter was modelled. The modelling results indicate that the proposed non-stadium elements of the scheme will produce significant and noticeable increases in journey times on non-match days on the Transport for London Road Network (TLRN) at Kew Bridge, Kew Bridge Road and Gunnersbury Avenue. For example, the time for an evening peak journey along a kilometre section of Gunnersbury Avenue, Chiswick roundabout to Chiswick High Road would increase from 3.52 to 7.39 minutes; more than double. If the cumulative impact of committed development is modelled, the impact on journey times through the Kew Bridge area is greater and overall will have a significant impact on journey time reliability and on bus performance. (our emphasis)

64. Subsequent discussions with the applicant have led to some acknowledgement that the proposals will increase highway congestion. In response, they have offered a S106 contribution of £35,000 to fund a study investigating potential improvements that could address the traffic consequences of comprehensive development in Brentford. Whilst such measures and obligations are a step in the right direction, they are only a minor element of what would be required in order to minimise additional congestion on this part of the network. No physical highway mitigation has been identified nor is any likely to be accepted given TfL's desire to improve this part of the network for cyclists.

65 Given the scale of this development and the existing conditions of the road network in this part of west London, impacts on the operation of the highway network are unavoidable. It has already been noted that match day congestion would be acceptable due to its infrequent* and temporary nature which usually occurs outside the peak periods, and can also be mitigated through the STP and LAMP. The non-stadium uses (the enabling development) however, raises concern.

*based on the stadium only having permission for football but proposals are expected to follow in due course for rugby and other events as the Club's business plan depends on these additional sources of income (our addition).

20.4 Chiswick Business Park The continuing absence of the footbridge between the business park and Bollo Lane and the time taken to extend bus services to the business park provide stark evidence of the Council's inability to deliver essential infrastructure in a timely manner. The need for the footbridge was recognised as early as 2001 and planning permissions have been granted in 2007, 2002 and 2015. See, for example, Report to Planning Committee for 10 December 2015. Extension of the Route 27 bus service, originally announced for Spring 2009, finally started in late 2012; there is still (Feb, 2016) no convenient bus stop at the Chiswick High Road end of the park. Extension of Route 70 was delayed from May 2015 until January 2016 because the bus-only barrier was wrongly sited.

Impact on surrounding heritage and low-rise residential areas

21. WCGS considers that the development would inflict severe and lasting harm on the natural and built environment of the area compromising its current qualities and undermining strategies for its enhancement. In addition to the harm to the visual amenity of the area caused by the scale of the building and the number and size of the digital media screens (see paragraphs 28 et seq), the negative impact on traffic and public transport would be detrimental to the quality of life of local residents and to the visitor experience and hence to the viability of the visitor attractions. We love our part of London and wish all who live and work here or visit to be able to enjoy and celebrate its rich heritage and natural assets and appreciate the delightful human-scale of its residential streets.

22. Heritage is our inheritance – it is the visible link with our history – it connects us to where we live. The Conservation Areas that would be affected have been designated by this Council or by neighbouring Richmond in recognition of their value and the contribution their character makes to the context and quality of people's lives. Buildings, parks and gardens are Listed in order to ensure they continue to educate, intrigue and delight us. World Heritage sites are designated by UNESCO in recognition of their international significance. **The townscape is where we live — our streets and homes and the ultimate “receptors” are people.** The views assessed in the ES provide snap-shots from a specific point but the impacts would be felt over a wide area. People move and how they experience their surroundings is dynamic; **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.** (See paragraph 25).

23. 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. The proposed scheme does not accord with the NPPF's concept of sustainability. Paragraph 9 indicates that *“Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including ... improving the conditions in which people live, work, travel and take leisure...”*

23.1 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.

23.2 London's heritage visitor attractions (such as **Royal Botanic Gardens, Kew, Gunnersbury Park, The London Museum of Water and Steam**) are vital to the UK tourist industry. It is therefore essential that they and their surroundings are treated in an exemplary fashion and their universal value and global appeal are fully protected and conserved.

24. The proposed development site is not in Central London, it is in a part of West London that spans two Outer London boroughs (Hounslow and Richmond). The site is in Chiswick, close to the border with Brentford and Kew.

While the Golden Mile is indeed to be celebrated, it is not, and must not become, the defining feature of the wider area. The big attraction of this area for visitors as well as those who live and/or work here is that, while easily accessible from Central London, it has significant heritage landscapes and a beautiful stretch of the Thames which, together with its predominantly low-rise buildings give much of it a generous, open, almost rural feel. This is complemented by its compact townscape of predominantly Victorian and Edwardian terraces, providing homes to its well-established, thriving residential communities. The special appeal of both is that they provide respite and retreat from the urban environment.

25. Having studied the application, including the Townscape, Heritage and Visual Impact section of the Environmental Statement (ES), the **Society refutes absolutely the applicant's claim (D&A 2.14) that "the final proposal balances sensitivity to heritage assets with a strong positive visual marker to celebrate the eastern gateway of the Golden Mile" and the conclusion of the Environmental Statement "that the development will do no harm and that no likely effects have been assessed as having a negative impact".**

25.1 By isolating the development site and narrowly defining the context, the applicant 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. What is dismissed is the harmful, alienating impact on the surrounding heritage and on local residents in terms of the overall character of the local environment, visual amenity and light pollution/spillage. **This bias has led to the conclusion that all the Major and Moderate impacts identified in the ES are Beneficial on the basis of the architectural quality of the design and the welcome urban legibility it contributes.** See further comments under 26 Examples below.

This is tantamount to saying that the despoiling of the wider historic area is justified because its time this heritage was 'put in its place' and made to offer homage to the grand urban gesture of the Golden Mile and the major road infrastructure.

25.2 WCGS is opposed to any development at the Chiswick Roundabout that would increase the influence of the character-deforming presence of the M4 flyover and the rest of the major road infrastructure. In the **Conservation Area Character Appraisal for the Wellesley Road Conservation Area (2006)**, attention was drawn to the

negative impact of the 20th century roads on the Victorian residential estates. In seeking to protect and enhance this CA, which has, never-the-less, retained much of its original splendour and its fine variety of Victorian properties, **it is therefore essential to prevent “urban encroachment” and to mitigate rather than increase the influence of the major road network including the flyover.** See further comments under **Examples** below.

25.3 We do not deny the design quality and that the building has some architectural merit. **The issue that must be addressed here, however, is whether it is in the right place.** The development might be seen as “an interesting addition” by those to whom it is a brief encounter on a motor journey. To those of us “groundlings” who would have to live with it constantly in our faces, it would be seen as an alien and alienating, out-of-scale, overbearing intrusion (as it would to those for whom it would appear as a totally incongruous element on the skyline). **Many people live in the long established communities within the surrounding streets; they do not want the A4/M4 and its flyover to be the defining feature of their neighbourhood.** See further comments under **Examples** below.

25.4 The proposed residential use, together with the digital media screens would compound and extend the building’s malign influence by creating a massive brightly-lit structure. Unlike commercial premises, high-rise residential buildings – assuming they are occupied – create **light spillage and light glow.** (see below)

25.5 The bias referred to above stems from only seeing the site as the Gateway to the Golden Mile on the Great West Road, A4/M4. **Since the site is at Chiswick Roundabout, it is the meeting place for several major roads and should be seen in its full context,** namely (going clock-wise), **as the Gateway** to:

- **Gunnersbury Park and Ealing** (Gunnersbury Avenue, North Circular, A406)
- **Chiswick** (Chiswick High Road, A315)
- **Brentford and Kew** (Chiswick High Road, A315/A406 leading to Kew Bridge Road and Brentford High Street, A315 and Kew Bridge, A205)

25.6 The large green space of the roundabout with its informal tree cover is a positive feature and performs an important function of **signalling a change of scale and character to those approaching from the high-rise commercial sector of the Golden Mile to the West. At the roundabout, one is entering a different zone - a mosaic of low-to-medium rise commercial/light industrial properties and mainly Victorian residential properties (including two conservation areas) leading towards Chiswick town centre.**

25.7 What is needed at this site in terms of built form is a landmark* building that fully respects its context and its multiple “gateway functions”. It should serve to mediate between the very different scales of the Golden Mile and that of the other routes. It should not brutally impose a structure at an inflated scale of Golden Mile x 2. **A building based on the footprint design of the current application but with the two main elements of the building being no more than 36 and 48m (9 and 12 commercial stories) with perhaps a slim, elegant element of no more than 60m might fit the bill.**

As far as the Golden Mile is concerned, what we need is a full-stop, not an exclamation mark!

This proposal is supported by the following:

Wheatstone House (00248/U/P7) Granted on Appeal May 2015

3, 7 and 9-storey elements - 29m max height

250 Gunnersbury Avenue (00535/250/P12) approved by PC December 2015
30m 7-storey

1-3 Great West Road The Site by Site Analysis included in the Golden Mile Site Capacity Study (ED04 in Local Plan Library) states under **Views, landmarks and marker buildings** for 1-3 Great West Road, just across the A4/M4 from the application site, “The site has the potential to mark the entrance to the Golden Mile when travelling east along the raised section of the M4. The site is also on a prominent corner of the Chiswick Roundabout. As such it is deemed appropriate for this corner to be identified as a landmark. *This, in this case, does not translate as a tall building, rather a building of high architectural quality or distinctiveness.

Heights: Building heights of 5 to 8 storeys are deemed appropriate, The scale and massing of the development should pay regard to the adjacent conservation area.

No entry was provided in this analysis for the application site, presumably because it was assumed that it would be occupied by the “Octopus”.

26. Examples: Below are three examples chosen to demonstrate the issues raised above in paragraphs 21 – 25 and to be read in conjunction with them. The VS assessment of other views take the same approach (paragraph 25.1). For example, there are Major impacts on views 21 and 34 from Kew Green, a destination in its own right and part of the arrival experience for the Royal Botanic Gardens, for which the ES records:

View 21 Qualitative Change *The design of the development has much to commend it in this view. Its organic form makes it a gentle companion to the existing group of buildings, while being distinct enough not to be confused with them. Its sculptural form, surface texture and subtle colouration enables it to be appreciated as a high quality building, worthy of its position and prominence in a way which a simpler form would not. This special form and the ‘personality’ it expresses is appropriate in marking a future important place at a major traffic node. It provides, therefore, welcome urban legibility.*

In the following examples *ES text is in italic* followed by any additional WCGS comment in Roman. Any underlining or **boldening** of text is our emphasis.

A.View 7 Clarence Road

Existing *Clarence Road leads towards the South Circular Road, and then immediately on to Chiswick Roundabout. The view point is therefore very close to the site, amongst the two and sometimes three storey Victorian houses of the Wellesley Road Conservation Area. The perspective of the houses in the street draws the eye north towards the end of the street, where there is a red horizontal fascia of the Esso*

Chiswick Flyover petrol station. The left side of the street is enhanced by mature trees.

- The Esso Garage is low-profile and does not dominate.

Sensitivity of the View *This view is considered to be of low sensitivity, despite its location within a conservation area. There is openness in the townscape which leads on to areas of a larger scale including the major road infrastructure at Chiswick Flyover.*

- The outlook from all the compact grid streets in an area of public open-space deficit are important and views are therefore of high sensitivity.

Quantitative Change *The neighbouring large scale traffic network is made visually manifest by the larger scale of the proposed development. The mass is, however, broken down into a number of smaller scale elements.*

- Drawing attention to this is precisely what we do not need – it will have a profound impact -see paragraphs 25.1 – 25.4 above.

Magnitude of Change *The change is of a high magnitude.*

Qualitative Change *The building is of high quality design both in sculptural form, surface texture and colouration. The addition of an aesthetically pleasing form, making (sic) a change in the city scale, is a change of a positive nature.*

- **Our assessment Negative**

Residual Effect *The residual effect takes into account both the low sensitivity of the view and the high magnitude of change, giving rise to a ‘moderate’ effect that is ‘beneficial’ in nature. Moderate; Beneficial.*

- **Our assessment Major; Negative**

Cumulative Effect *(See page 101) The Wheatstone House scheme is shown in a dotted red outline but is not sufficiently prominent to form a cumulative effect of any substance with the proposed development. No cumulative effect.*

- Perhaps not from that specific point but see comments above under 24; cumulative effects likely in real world

B. View 4 Gunnersbury Cemetery

Existing *Gunnersbury Cemetery is not a place where people come to appreciate views, but there is an axial view looking south-east from the (unlisted) chapel. The foreground of the view includes gravestones and memorials, but none are designated. The chapel building occupies the middle ground. The background includes mature trees, although development beyond is visible, beyond the cherry tree in the right foreground, for example. While the cemetery is within the conservation area, it is not part of the registered Gunnersbury Park, immediately to the north.*

Sensitivity of the View *Given the nature of the place and its location within the Gunnersbury Park Conservation Area, this is considered to be a view of medium-high sensitivity.*

Quantitative Change *The proposed development and its three articulated volumes can be seen rising behind the chapel building. A fourth element, the ‘bridging’ element that connects them, can just be seen above the winter treeline.*

Magnitude of Change *The magnitude of change is ‘high’.*

Qualitative Change *The articulation of the three main volumes of the scheme successfully break down the scale of the building while the detailing of the facades, including the fins, carefully chosen materials and subtly changing colour palette all*

result in a building which does not impede on the open quality of the view but uplifts it by introducing an object of beauty into the view.

- **Gunnersbury Cemetery is a place where most visitors come for quiet contemplation and in times of bereavement and remembrance. A special feature within the cemetery is the Katyn Memorial. The ES makes no mention of this important monument and provides no view to assess the impact. However “beautiful” a building of this scale and nature may be considered, it is totally out of place here. It respects neither the primary purpose, context or character of the cemetery.**
- Also Local Plan GB 9 7.18 Cemeteries, ... *cemeteries and churchyards also provide green, quiet areas for passive recreation and walking (often forming part of Green Chains and Corridors) and for biodiversity.*

Residual Effect *The residual effect would be ‘major’ and ‘beneficial’ owing to the above described enhancements to this view out of the conservation area. Major; Beneficial.*

- **Our assessment Major; Negative**

Cumulative Effect: (See page 93) The proposed development would make a ‘major’ and ‘beneficial’ contribution to the cumulative effect with the other committed developments (shown in red) in this view. Major; Beneficial.

- **Our assessment Major; Negative**
- In addition, it should be noted that a similar impact would be felt in many locations in the adjoining part of **Gunnersbury Park**. No relevant views have been provided

C. View 12 River bank, looking N towards Strand on the Green.

Existing Strand-on-the-Green includes a group of listed houses which front directly onto the Thames, creating a charming walkway on the north bank. Its western most part is seen in this view, looking beyond the western tip of Oliver’s Island. They form a coherent group and are located in the Strand-on-the-Green Conservation Area. The river provides a wide and reflective foreground of significant scale, more so when the tide is in. Looking further west, beyond the centre of the view, the coherence of the development on the riverbank breaks down, with later development set back from an immediate relationship with the river. In the background Vantage West and River House are experienced by the viewer as large horizontal elements in the view. The viewing place is a pleasant place to walk and those enjoying its views northwards are likely to be sensitive to the quality and visibility of new development.

- Indeed they are – so why only medium-high sensitivity?

Sensitivity of the View This is a view of medium-high sensitivity.

Quantitative Change The proposed development will rise above the western part of Strand on the Green, its articulated elements clearly apparent. The kinetic nature of this view will emphasise the distance between the proposed development and the viewer, by the speed with which it moves in relationship with the strand on the green listed buildings is as the viewer moves west. Moving east from this point causes the development to be shielded by the trees on Oliver’s island.

Magnitude of Change The change is medium in magnitude.

- Why only medium?

Qualitative Change The current views, where the smaller scale buildings at the edge of the river are seen in the context of later, larger buildings of poor quality in the background, will receive a further backdrop building, but one of very high architectural quality. This will be identified in its sculptural form, its texture and its colouration.

Residual Effect The effect is moderate in relation to the openness of the view and is beneficial to it as a building of high quality with a landmark purpose.

Moderate; Beneficial

- **Our assessment Major; Negative**
- **This impact on this view is catastrophic – see paragraphs 22 – 25, especially paragraph 23. How does this impact be reconciled with London Plan policies and the Thames Landscape Strategy?**

Cumulative Effect (See page 119) Already consented schemes, including Wheatstone House and West London Volkswagon close to the application site and the large Brentford FC development further west, create a more profound and continuous backdrop to the view, but the proposed development is singular, identifiable and separate, by design, in cumulative terms. It remains a **Moderate; Beneficial effect.**

- **Our assessment Major; Negative**
- **While the additional negative impact made by this development may seem minor in comparison to that of the consented schemes, the latter is such that no further negative impact should be contemplated**

27. We conclude that the proposed development is not “sustainable development” and, if the Council were to approve this application, the policies of the Local Plan with which it would not comply include (but are not restricted to):

Chapter Six: Context and character:

We consider that the proposal has failed to positively engage with the purpose and core principles of this chapter, as articulated in **Our Approach to Policy CC1 and to Policy CC4 and in paragraphs 6.1, 6.12 and 6.13.** Rather than attempt to list all the relevant policies, we draw attention to some key examples:

Policy CC1 (ii) Responds to the wider context and history of the area, its communities, its natural landscape and its urban structure, form and function.

Policy CC2 (i) Create places that are easy to get to and through, foster active lifestyles, are easy to understand and navigate and feel safe during the day and night with a particular focus on pedestrians and cyclists;

Policy CC2 (j) function well in themselves and in their effect on the surrounding areas, having a positive impact on the amenity of current and future residents, visitors and passers-by and help create Lifetime Neighbours that foster social interaction and capital;

Policy CC3 Tall Buildings, especially paragraphs 6.10, 6.11 and criteria (i), (k), (l) (m) (o) (p) (q)

Policy CC5 see below

Media Screens

00505/EY/P18 and 00505/EY/AD22

28. WCGS objects strongly to the proposal to locate four very large digital media screens on the lower five floors of this building. Our objections are on amenity grounds, although we would suggest that there **might also be public safety grounds** in view of the complex nature of the road network and the proximity of existing large digital advertising screens, especially the Chiswick Towers (CT) on the roundabout itself (granted on appeal in 2012). The applicant himself notes (6.1.1) that six roads converge at Chiswick Roundabout but suggests that this means that “There is the potential to provide advertising in **four locations on the facades to maximise the amount of viewing exposure on each of these roads.**”

29. In terms of amenity, media screens of the size and position proposed would compound/intensify many of the negative visual impacts resulting from the size and height of the development as described above. **We point out that all four screens are taller than those on the roundabout (7.8m v 7.2m) and between approx. 2 to 5 times wider (25m, 15m and 2 @ 10m v 4.8m).** They would be position at varying heights with the base of screens between 3.9 and 11.5 m above ground.

30. 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.**

31. The proposed much larger media screens, encircling the building would have an even more damaging impact over a wider area. They would be harmful not only in terms of the setting of the surrounding historic parklands but also in terms of their natural assets and biodiversity (light levels at night which would be detrimental to wildlife, especially invertebrates, bats and birds).

32. 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:

Screen 2 at low level aimed at drivers on the A4 travelling east towards the roundabout; this would have **a very negative impact on visual amenity for pedestrians and cyclists and the public realm**, especially in conjunction with Screen 1 above it.

Screen 3 aimed at drivers travelling south on Gunnersbury Avenue; this would have a **negative impact on Gunnersbury Park, the cemetery and the residential areas** on the east side of this road.

Screen 4 aimed at west bound traffic leaving London on the M4, this high level screen **on the front of the building and facing the roundabout would have a major negative impact on its surroundings, especially when seen together with the CT screens on the roundabout itself.**

Screen 1 aimed at drivers arriving into London on the elevated M4. If retained, this screen should be significantly reduced in width.

32.1 When considering these digital media screens that are proposed to be located on the building, little weight should be given to any temporary adverts or structures that have been in place, with or without permission, from time to time around the empty site.

33. It is recognized that there are already lit structures along the M4/A4 corridor; their negative impact should not be intensified. The proposed media screens are massive and the building would be close to **Gunnersbury Cemetery** and a very sensitive area - the south-western part of **Gunnersbury Park**. The regeneration plan for the park recognizes this area, around the Potomac Lake and southern boundary mature trees, as one of the most important in terms of biodiversity. The maintenance of “dark corridors” is an important aspect of bat conservation.

33.1 The Society is actively supporting the current regeneration project for Gunnersbury Park being managed jointly by the London Boroughs of Hounslow and Ealing. We welcome the real attempt to restore it to its proper status as a valuable public amenity and realize the full potential of its unique combination of historic buildings and landscape, its natural habitats and its municipal park and sports facilities. Blighting the park’s skyline with illuminated structures such as might be found in Piccadilly Circus or down-town Las Vegas is not the way to ensure the park’s successful restoration and regeneration.

34. We conclude that the proposed development is not “sustainable development” and, if the Council were to approve this application, the policies of the Local Plan with which it would not comply include (but are not restricted to):

34.1 Policy CC5 Advertising:

The entire policy for the reasons explained in its paragraph 6.14. The Society has been working with the Council for years to achieve these objectives, supporting the Council at several public inquiries, and advocating for their retention and reflection in the policy in the Local Plan. The location of the borough and the location and nature of its strategic road network are such that advertisements have the potential for major negative impacts on the built and natural heritage assets, the public realm and the residents of the borough (and those of neighbouring boroughs). We were gratified that the Local Plan Inspector endorsed our view that Policy CC5 should be confined to ensuring that any advertisements etc are acceptable in terms of amenity and public safety. See especially, criteria (g), (h), (i), (j) (k) (l) (n).

Our objection is supported by the following:

34.2 Open Letter from Council Leader, 20 January 2016 to the Planning Inspectorate to complain about the removal of the iconic Lucozade advertisement at York House, Brentford, in which he states:

Overall, I am concerned there is a lack of consistency with decisions for advertisements on the Great West Road. I appreciate there is a real pressure from advertisers to locate here, as one of the most valuable stretches of land for advertisements in the country. But it is mainly a residential area and local people are not happy about the brightness of the LED screens, which is completely different to the old style illuminated advert hoardings.

34.3 Local Plan Inspector Report section on report states (163) Main modification MM19 would therefore amend Policy CC5 to make it sound by concentrating on amenity and public safety to ensure consistency with national policy and the scope of the advertisement regulations.

34.4 Various appeal decisions dismissing appeals relating to advertisement proposals on nearby sites along the elevated section of the M4.

Examples: the appeal for digital media screens at Multimedia House, Kew Distribution Centre, Lionel Road, Brentford, TW8 9QR (APP/F5540/H/13/2201090) which was dismissed on amenity grounds on 22 January 2014. The application was for a blanket permission to replace the end glazed elevations of the consented building with media screens "larger than the current largest advertisement located along the M4 / GWR corridor".

The appeal decision of 1 March 2012 (Ref APP/F5540/ H/11/2165003) concerning Land at Stonehill Road, Chiswick, London W4 2AH, where the appeal was dismissed on grounds of having a materially harmful effect on the character and amenity of the area and on highway safety. It is noted that Transport for London, lodged objections to the Stonehill Road proposals on highway safety grounds. The report by LB Hounslow indicated that "TfL are concerned that the advertisement panel would distract drivers whilst travelling down the A4 off-slip approach towards the Chiswick Roundabout.

The existing off-slip road is relatively free of signage with the exception of directional signage at present. It is considered that the proposal, which has the potential to distract drivers, would adversely impact on public safety."

Note: Landscaping: An annex containing comments contributed by a member of the Society is provided as a separate document.

WCGS 10 February 2016