

## **Land at Lionel Road South, Brentford London TW8 9QR**

**00703/A/P17 and P18; P/2017/3891 and 3892**

### **Comments from the West Chiswick and Gunnersbury Society**

#### **Stadium**

1 The West Chiswick and Gunnersbury Society endorses the comments submitted by The Kew Society on 5<sup>th</sup> November 2017; the significant changes to the stadium and to the provision of ordinary supporter and community benefits necessitates a revised viability assessment.

#### **Residential**

##### **Impact on surrounding heritage assets, including Conservation Areas and listed buildings and on the amenity of existing residential communities**

2 We have attempted to ascertain whether the revised appearance/design of the residential components of the scheme as proposed in the current application would inflict more harm, less harm or about the same amount of harm as that inflicted by the previously consented scheme.

3 The many negative impacts were detailed in the Planning Officer Report (POR) in respect of the Outline scheme presented to the Planning Committee in December 2013. WCGS objected to the Reserved Matters application relating to residential elements of the scheme (00703/A/P13) in September 2015 on the grounds that the scheme did not minimise the recognised harm. Many of the detailed comments submitted at that time are equally applicable to the current scheme.

4 Unfortunately, the analyses/views supplied in support of the current application do not enable one to judge whether the new scheme would inflict more damage, less damage or about the same as the previously consented one as they compare the proposed scheme with the Outline scheme. While not being able to make such direct comparisons, we had tentatively concluded that the changes in design and materials of the residential blocks might slightly lessen the harm to the neighbouring residential areas and surrounding heritage assets. It was not possible to work out the impact of the re-orientation of the buildings on the Southern Central site.

5 However, from the Summary tables of Mitigation Measures appended to the applicant's Planning Statement, it would appear that the revised scheme will inflict greater harm in comparison to the 2013 scheme. For "Conservation Areas and Listed Buildings" the table gives the magnitude of residual change for the current proposals as "resulting in **Moderate to Major Negative**, Minor to Moderate Negative, and Negligible significant effects" whereas the 2013ES indicated "resulting in Minor to Moderate Negative, Minor Negative and Negligible significant effects."

## Quality of accommodation

6 Many of the comments WCGS provided in September 2015 in relation to the previous scheme are equally applicable to the current proposals. Many of the problems in delivering suitable housing and public realm stem, of course, from the nature and quantum of overall development permitted in the OL permission. The current scheme will provide a significant number of units with poor quality of accommodation with respect to issues such as privacy, overlooking and daylight.

**7 Central Southern** As far as the quality of life for future occupiers of the 256 units in residential Blocks E and F are concerned, the opening of the space between them and its conversion to shared pedestrian/vehicle public space and gateway to the stadium is, in our view, likely to have a serious negative impact. The various coding diagrams provided show this space as the route for “Public Pedestrian Circulation over Concourse”, “cycling route” and “Pedestrian Concourse-Emergency vehicles, refuse, delivery and car park access”. It will also be used by team coaches on match days.

8 The residents of Blocks E and F will have no "defensible space" and how they will enter/leave their homes during match arrival and departure times is unclear. The depictions of this area in the D&A statement (2.1.4.6) show this area as a generous public space with people strolling with children and bikes past the pavement cafes. The post-game crowd flow analysis in Appendix Q shows this space as being highly congested.

3.1.6 The large area of LoS F\* (red) is caused by spectators waiting for Kew Bridge Station. The queue will need to be managed to ensure it does not block access to Lionel Road South and interfere with concourse circulation. Although the maps represent the busiest 5 minutes overall, the queue is longer outside of the peak 5 minutes. The length of queue depends on the time the egress starts compared to the train timetable and the frequency of trains. The results show the queue does not block back into the concourse circulation area at any time. Stewarding will be required to maintain an access route through to Lionel Road South for non-passengers in this area.

\*LOS a measure of pedestrian comfort; F complete breakdown in pedestrian traffic flow with many stoppages

9 With permission having been granted for both football and rugby, a total of 42 – 50 matches per season will be played, mainly at weekends. Residents' freedom of movement will thus be circumscribed on many Saturdays or Sundays throughout the season. These will be non-working days for many of the likely occupants, when such freedom is precious.

10 In addition the Delivery Service Management Plan permits vehicles to service the stadium between 06.00 and 23.00 on match days, providing little respite from disturbance.

**11Central Eastern** It is clear from the post-game crowd flow analysis in Appendix Q that similar issues concerning match-day congestion will apply to the area around these blocks. There will queueing at the stairs to access the overbridge to Capital Interchange Way.

### **Match Day Transport**

12 The 161 spaces for stadium match-day use are to be provided on the Capital Court site. It is understood that this site will be built out in a later phase of the scheme. How, therefore, will such parking be provided in the interim?

13 It is three years since consent was granted for the stadium. What progress has been made in securing the 1000 off-site parking spaces that will be needed for match days? Reference is made to having identified potential suitable sites. Which, if any, local employers have agreed to any such arrangement? How many of the potentially suitable commercial sites on the A4 have permission for conversion to residential use removing the possibility of off-site supporter parking?

WCGS November 2017