

Planning Inquiry June 2018
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

Statement on behalf of the West Chiswick and Gunnersbury Society

Introduction

1 I am Marie-Louise Rabouhans, the Chairman of the West Chiswick and Gunnersbury Society (WCGS). I have been chairman of the Society since February 2013, having served on the committee since 2004. I have lived in Gunnersbury for over 35 years.

2 The Society has about 140 members and is governed by a constitution. The Society is active in a number of spheres affecting the quality of life of local residents including planning (building development and planning policy), and environment (streets, traffic and public transport) and citizen engagement. We respond to Council consultations and/or initiate activities.

3 In speaking today I am not only representing WCGS but also speaking on behalf of the following local groups:

Grove Park Group Residents Association
Chiswick High Road Action Group
Friends of Stile Hall Gardens

Background

4 In addition to responding to planning applications for developments which would have an impact on our area, WCGS engages constructively with the Council on planning policy. We have contributed significantly to:

the establishment and extension of Conservation Areas and their current appraisals
the Context and Character Study
the Local Plan, all stages, including attendance at the Public Inquiry
the Great West Corridor Partial Review
the Brentford East SPD
nominations for additions to the Local List (buildings of townscape character)

5 In addition to the appeal site itself, the areas covered by WCGS and of relevance to this Inquiry include the Thorney Hedge and Wellesley Road Conservation Areas. WCGS has recently made nominations for 20 buildings or groups of buildings within West Chiswick and Gunnersbury to be added to the Borough's Local List. Many of these are within the Wellesley Road CA. When they are added to the CA appraisal map, this will better reflect the quality of this CA. 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 and appreciate the delightful human-scale of its low-rise residential streets.

Appeals subject of this Public Inquiry

6 WCGS objected strongly to both planning applications. The Inspector has our detailed objections, based on planning policy, which were submitted to the Council in February and December 2016 and our comments on the appellant's statement of case submitted to the Planning Inspectorate in September 2017. [All WCGS comments on major developments and on planning policy are available on the Society's website: <https://westchiswickgs.org/>]

7 We maintain those objections and we fully support the Council's refusal of both Appeal A and B. We endorse the cases made by Historic England and the Royal Botanic Gardens, Kew with respect to the proposed building's impact on a range of heritage assets including the World Heritage site of Kew Gardens. We also endorse the case made by the Kew Society with respect to the living conditions and other matters.

Appeal A With respect to the main issues identified by the Inspector and mindful of his wish that we avoid repetition, I will focus on Issues 1 and 2 (the design and heritage issues) and on Issue 6 (other matters).

WCGS views on *Issue 4 (the living conditions issue)* are included in the statement made by Martin Case on behalf of all the local groups represented as 3rd Parties. To summarise, we consider that the constrained site surrounded by major roads in a highly polluted (air and noise) locality is, in principle, totally unsuitable for residential use. On this point, I would just like to offer one quote from our February 2016 comments. With reference to the measures proposed by the applicant to mitigate air and noise pollution for future residents of the development (in essence, encouraging them to remain confined indoors in their hermetically-sealed pods), we stated:

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?

Appeal B I will focus on Amenity.

Appeal A

Issues 1, 2 and 6

8 I will take these issues together as I believe that they are intrinsically related. As the Inspector will be aware, our submitted comments detailed our objections with reference to relevant planning policy.

9 Today, however, I would like to take a little time to explore the value of heritage assets and of townscape character and the impact of the proposed building from a human perspective - whether that of local residents or of the many visitors to the wider area. In doing so, I would suggest that maintaining and enhancing people's quality of life lies at the heart of the planning system. Certainly, the overarching vision of our Borough's Local Plan and of its Sustainable Community Strategy is "the aspiration for the borough to be a place where people enjoy living and choose to settle and stay." (Local Plan 1.12 -1.13). Our part of the borough is such a place – a place where people put down roots and become embedded in the community. In order for it to remain so, we need to nurture these vibrant and stable communities by protecting the attractive character and other positive attributes of the area.

10 Heritage and Townscape issues may seem somewhat academic and an analysis of visual impact on "receptors" may seem cold and abstract.

However, **Heritage is our inheritance – it is the visible link with our history – it connects us to where we live and contributes enormously to our collective sense of place.**

The Conservation Areas that would be affected by the proposed development have been designated 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 or Registered 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 their Outstanding Universal Value.

The townscape is where we live — our streets and homes and the ultimate "receptors" are people - us.

11 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 or visit the cemetery.

WCGS knows 'for real' how damaging a misplaced tall building can be as we have **Chiswick Tower** (the "BSI building") in our midst. 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."

12 Many of the streets within the western section of the Wellesley Road CA are very close to the appeal site. Let's take one *example* - Clarence Road.



View 7 from appellant's ES

Appellant's ES Having noted that "The Esso garage is low-profile and does not dominate", the ES finds that "The neighbouring large-scale traffic network is made visually manifest by the larger scale of the proposed development" and "The addition of an aesthetically pleasing form, making (*sic*) a change in the city scale, is a change of a positive nature."

WCGS view The major road structure is the most negative aspect of the setting of the CA. Drawing attention to it is precisely what we do not want – moreover, the intrusion of this massive building will have a profoundly negative impact. The outlook from all the "compact urban grid" streets in this area of public open-space deficit are important and views are therefore of high sensitivity.

13 From this and many other locations within our area, the Chiswick Curve would appear alien and alienating - 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. 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 a massive, 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 our streets; we do not want the A4/M4 and its flyover to be the defining feature of our neighbourhood. Unlike Jane Mansfield in 1959 we do not see the latter as "a cute little flyover". Others* have described the vicinity of the M4 flyover at Brentford as a "spectacle of shuddering ugliness" and suggested that "For the pedestrian, the scene only instils a feeling of desolation. This is a 'carscape' at its bleakest and most uncompromising."

*Road to Redemption, Jack Watkins, The Independent, 1 December 2012

14 In addition to the hugely negative impact of the proposed development on the streets where we live - where our lives and their stories unfold, its multiple negative impacts on the heritage assets of the wider area will also diminish our quality of life. This wider area is the “setting” to our lives and is of immense significance to us. Many local residents take great pleasure from, and pride in, living near to such gems as Strand on the Green, Gunnersbury Park and the jewel in the crown that is Kew Gardens.

15 The *Chiswick Timeline, a history in art and maps* is the newly-installed mural under the railway bridge at Turnham Green Station. Its concept and creation by local individuals with the enthusiastic support of the Chiswick community are testament to the importance to us of our history and heritage. It includes several works of art depicting the river.

16 We are aware of the privilege of having a unique stretch of the River Thames on our doorstep. I would like to quote briefly from The Arcadian Thames Framework:

- The Arcadian Thames is one of this country’s greatest treasures. No capital city in Europe has anything like it. Today it is a democratic landscape, open, for the most part – for everyone to enjoy.
- Within it lie two of the country’s top visitor attractions – Hampton Court and the Royal Botanic Gardens, Kew.
- This is the birthplace of the English Landscape movement.
- The Arcadian Thames arguable forms one of the most important designed river landscapes in Europe.

17 While we agree that the Great West Corridor/Golden Mile is to be celebrated, it is not, and must not become, the defining feature of the wider area. The big attraction of this wider 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.**

18 The appellants approach 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. 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. 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.

19 We would emphasise that 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. The topography of the area and the open nature of the surrounding historic landscapes means that, although the

Great West Corridor may sit in the backdrop, tall buildings are highly visible and their impact felt over wide areas.

I would now like to make some observations on some points that have arisen during the Inquiry thus far.

20 Opportunity Area For clarification, WCGS and, I believe other resident groups, have objected strongly to the proposed designation of the Great West Corridor (GWC) as an Opportunity Area as we do not believe that it can sustain the quantum or type of development such a designation entails.

21 Cumulative harm In commenting on the Brentford East SPD the Society included the following:

We fully endorse the Key Townscape Issues spelt out under Building Height Approach in the Brentford East Capacity Study Report [box on page 67] and recommend that they are reproduced in full within the SPD.

We consider that the starting point for the approach in this SPD should be that, so much damage has already been done by tall buildings or is “consented”, the Brentford East area is in general an unsuitable location for any more. As noted above under Section 3, the permitted size of the residential blocks of the Brentford Stadium scheme already brings the scale of the buildings of the A4/M4 corridor to the north much closer to the sensitive heritage areas to the south and east. There should be a clear acknowledgement of the damage done by recent tall buildings such as Kew Eye in the Central Section of the Great West Corridor. There should be both a recognition that we are at a “tipping point” and a strong commitment to valuing and protecting the surrounding heritage assets.

Without such a commitment irreparable harm will be inflicted on these heritage assets to the impoverishment of our lives and those of future generations.

22 Modernity WCGS has never, to my knowledge, objected to a proposed development on the grounds of “modernity”. Modern buildings of a scale and design sympathetic to their surroundings may well be seen as having a positive impact. The new café in Gunnersbury Park is a recent example.

As a Patron of and frequent visitor to Kew Gardens, I see modern buildings such as the Alpine House as attractive and appropriate additions to the Gardens for the reasons given by the RBG, Kew expert witnesses. As to the Hive – I am bee-sotted!

23 Landmarks and Gateways In commenting on the Brentford East SPD the Society included the following:

Promoting multiple landmarks debases this once useful urban-design concept. Getting lost in a dense forest of tall building clusters will alienate rather than promote a sense of place.

and I might add that with so many gateways we will soon not know whether we are coming or going.

24 **The Citadel** I do not subscribe to the notion that the issue before the Inquiry is a binary choice between the Chiswick Curve or the Citadel (consented in 2002). If the Secretary of State were to dismiss the Appeal, this would provide an opportunity for fresh thinking with respect to this site.

In commenting on the proposed development at this site in February 2016 we suggested that:

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!

Appeal B

25 We would draw the Inspector's attention to the WCGS comments of 10 September 2017 on the Appellant's Statement of Case (Section7). In summary, we believe that the proposed advertising screens would harm visual amenity and the character of the area and its surroundings including the settings of designated heritage assets. The size of the proposed screens, the intensity of the LED illumination and their high level locations would render them visually intrusive and would result in visual clutter in the street scene. They would also seriously compromise the buildings design quality, landmark status and legibility and conflict with the building's proposed predominantly residential use.

26 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 (see photos below). Even though the intended target of these media screens was stated to be drivers of vehicles on the overhead section of the M4, they impact on the amenity of nearby residential properties and appear as incongruous discordant elements in views from as far away as Chiswick Bridge and the adjacent Thames towpath.



From flats on Stonehill Road



From approach to roundabout

Conclusion (both appeals) We request that both appeals are dismissed.

WCGS disagrees fundamentally with the overall position of the appellant that the development would deliver public benefits that would outweigh the harm. What is at stake is what will be lost - an open skyline, a river view – or diminished - the essence and spirit of a place – and these will be lost or diminished forever.

Marie-Louise Rabouhans,
WCGS
20th June 2018