

Land at Chiswick Roundabout, Chiswick W4 5QL (“Holly House”)

00505/EY//P20 and 01578/2/AD4

Comments from the West Chiswick and Gunnersbury Society

Summary

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

Summary We do not consider that the proposed scheme addresses the constraints of the site adequately. These constraints include the sensitive heritage assets and residential communities in the surrounding area, the air pollution and noise generated by the major roads on the site boundaries, the capacity of these roads and of local public transport and the cumulative impact of other major developments recently completed, under construction or consented.

We believe that the proposed development does not comply with key policies of the NPPF, the London Plan and the Local Plan.

The Society considers that the proposed development fails to overcome the reasons why the Secretary of State dismissed the appeal on the Chiswick Curve in July 2019 (see extract below); this decision was upheld in the High Court in March 2020. WCGS considers that the proposed development would cause a similar level of harm to many of the heritage assets as would have the Chiswick Curve, while providing only a low level of public benefit.

Extract from letter of Secretary of State 19th July 2019 on APP/F5540/W/17/3180962 and APP/F5540/Z/17/3173208

38. The Secretary of State has considered whether the identified ‘less than substantial’ harm to the significance of the heritage assets is outweighed by the public benefits of the proposal. In accordance with the duty under section 66(1) of the LBCA Act the Secretary of State has had special regard to the desirability of preserving the buildings or their settings or any features of special architectural or historic interest which they possess, and attributes great weight to the assets’ conservation, as required by paragraph 193 of the Framework. The Secretary of State has also considered paragraph 194 of the Framework which provides that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. He does not consider that the required justification has been made out.

39. Overall, the Secretary of State disagrees with the Inspector at IR12.164, and finds that the moderate weight to be attached to the benefits of the appeal scheme in terms of housing provision, workspace provision and economic benefits, are not collectively sufficient to outweigh the great weight attached to the identified ‘less than substantial’ harm to the significance of the above heritage assets. He considers that the balancing exercise under paragraph 196 of the Framework is therefore not favourable to the proposal.

40. The Secretary of State concludes that the proposal is not in accordance with the development plan overall, and that there are no material considerations which indicate that the proposal should be determined other than in accordance with the development plan.

1. Heritage Assets and Townscape

1.1 We consider that the scale and height of the proposed development is far too great. While the Local Plan Review for the Great West corridor identifies this site as suitable for a landmark building, at 100.92m AOD the proposed building is very significantly taller than the 70m indicated in GWC Policy P3 (m) III. It is closer to the 120m height of the refused Chiswick Curve and like the Curve, the height and scale of the building would cause harm to the surrounding heritage assets, both built and natural and to the townscape of nearby residential communities.

1.2 The site is at the Chiswick Roundabout, the meeting place for several major roads and it should be considered 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)

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 Great West Corridor and that of the other routes. It should not brutally impose a structure at an inflated scale of “Golden Mile Plus”. As far as the Golden Mile is concerned, what we need is a full-stop, not an exclamation mark!

1.3 Although the site itself is not part of a high-quality townscape, the proposed building, because of its height, location and scale would sit within the settings that contribute to the significance of a wide range of heritage assets, which are sensitive to change. We would also emphasise that due weight must be given to the **cumulative harm** to heritage assets, to the existing townscapes and to the quality of life of the existing residential communities caused by the proposed scheme and others recently built, under construction or consented in the East Brentford/West Chiswick area.

1.4 We disagree strongly with the applicant’s conclusions concerning the impact and the cumulative impact of the development on heritage assets. His conclusions that the development will do no or very little harm to a range of heritage assets suggests that he has not engaged positively with the purpose and core principles of chapter 6 of the Local Plan as articulated in Our Approach to Policy CC1 and to Policy CC4 and in paragraphs 6.1, 6.12 and 6.13. His argument that the architectural quality of the design means that Holly House will have a beneficial, positive impact in many of the sensitive views into which it intrudes is as misguided here as it was in relation to the Chiswick Curve. As the Secretary of State made clear in his conclusions on the latter, design, however good, cannot mitigate for completely inappropriate scale. The massing and design of Holly House gives it a bulky, inelegant form which intensifies the harm on its immediate surroundings and adds to the incongruity when seen squatting on the skyline.

1.5 At the **Public Inquiry** on the Chiswick Curve held in June 2018 the issue of harm to heritage assets was debated extensively. The chairman of WCGS participated in this Public

Inquiry. The Society endorses the cases made with respect to heritage issues at this Inquiry by Historic England, the Royal Botanic Gardens, Kew and the Council. Aspects of those debates are of direct relevance to the current application, in particular:

- the character and significance of the affected heritage assets including that of their settings
- the correct interpretation of cumulative harm
- the recognition that we are at a “tipping point” *and*
- the unacceptability of placing reliance on trees to mitigate harm

1.6 We request that account is taken of the cases made and the expert evidence provided on these aspects by the above parties at the Inquiry (summarised in the Inspector’s report for the Chiswick Curve). Consideration of heritage and townscape from a human perspective is also essential. 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 townscape is where we live — our streets and homes and the ultimate “receptors” are people - us. 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.

1.7 Royal Botanic Gardens, Kew A World Heritage Site is the highest order of heritage asset and must be accorded the highest degree of protection. We fully endorse the comments submitted by The Kew Society (letter dated 24 November 2021).

Being familiar from the recent Public Inquiries with the rigorous and robust approach taken by RBG, Kew and Historic England to the issue of harm to the World Heritage site and their unrivalled expertise in these matters, we would also wish to support any comments submitted by these organisations on this application.

1.7 Strand on the Green Conservation Area We consider that the development would have a significant negative impact on this very special and highly vulnerable CA. We fully endorse the comments submitted by The Kew Society (letter dated December 2021).

Being familiar from the recent Public Inquiries with the rigorous and robust approach taken by Historic England to the issue of harm to this CA and HE’s unrivalled expertise in these matters, we would also wish to support any comments submitted by HE on this application.

We would add that the Appraisal for this CA provides a detailed description of its significance and the threats posed by developments within the Great West Corridor. These need to be fully considered.

1.8 Gunnersbury Park Conservation Area; Gunnersbury Park and Gunnersbury Cemetery Gunnersbury Park is a major heritage asset - a Grade II* Registered Park and Garden containing a range of Listed buildings and features. It is undergoing a major regeneration and significant restoration of key Listed buildings and the heritage landscape has been completed during the first phases of the project. Both Hounslow and Ealing Councils are committed to this project; It is hoped to complete the work by 2026 – Gunnersbury’s centenary as a public park. It is thus very important to ensure that developments in the area do not undermine the significance of these beautifully restored assets.

1.8.1 Full attention needs to be paid to the revised appraisal for this CA published in 2018. We would draw attention to the SWOT analysis in the Appraisal, especially:

Strengths A great deal of effort has been put into the protection and enhancement of the significant historic views of the landscape in the restoration work.

The views and vistas in the Park are essential elements of the landscape design.

The following key views and vistas are among the views which are some of the strengths of the conservation area:

- The views from the Mansions over the designed landscape, including the Orangery and Horseshoe Pond.*

Opportunities Preservation of the Park's setting and views even where at some distance: not just heights but colour and materials can have an impact.

Great care is required to preserve what remains of key views from the **cemetery**. The existence of these and other views elsewhere in the conservation area should help determine the height of new buildings in adjacent areas, particularly around the Katyn Memorial.

Threats The higher ground to the north of the conservation area makes development along the Great West Road particularly visible from Gunnersbury Park and its mansions. Vantage West and adjacent properties that back on to the park, particularly those with light or reflective cladding, have a negative effect on its setting and skyline.

*View 4 in the THVIA shows the proposed building intruding into a view currently free from intrusion from modern development. As it was taken from the lawn below the mansion rather than from the terrace, it is, however, not possible to assess correctly the level of harm from this key position within the highly sensitive historic core. We request that such a view be provided.

1.8.2 Cemetery View 6 shows that this massive bulky building would have a major negative impact on the cemetery. The Council's planning committee recently resolved to approve the "4th Mile" development on the adjacent site at 2 Larch Drive. A view showing the cumulative impact of these two developments is needed. Holly House would rise above the latter scheme and intensify its harmful impact. The very different designs and materials of the two developments would preclude any coherence of built form between them.

Note: In considering **cumulative impacts** on various aspects including heritage and daylight, sunlight, light spill and glare, the applicant for 2 Larch Drive assumed the presence of the much lower Citadel on this Chiswick roundabout site.

1.9 Wellesley Road Conservation Area It should be noted that a revised appraisal for this CAs was published (2018) and several buildings or groups of buildings within the CA have now been included in the Borough's revised Local List (2019). When these buildings are added to the CA appraisal map, this will better reflect the quality of this CA.

We consider that the development will have a negative impact on the setting of this Conservation Area. The streets within this CAs are close to the application site and the tall building is totally out of character with the townscape in terms of scale, form, massing and density; see view 11 in the THVIA. The appraisal for this CA states:

7.4 Streets which are oriented in the direction of areas subject to major developments, particularly involving tall buildings, constitute visually sensitive axes. Though the views along these axes may not be character-defining they are of considerable visual importance to the integrity of the overall character of the area.

The outlook from all the compact grid streets in this area of public open-space deficit is important and views are therefore of high sensitivity. The change in scale from the 2-3 storey Victorian and Edwardian houses of the existing townscape is brutal. The development would be visible from locations, including homes, gardens and streets within the Conservation Area. They would appear alien - demeaning and belittling the intimate, human scale of our neighbourhoods and destroying our sense of place.

1.10 Thorney Hedge Conservation Area The application provides no visuals for the residential element of this CA. It is requested that a view from within the CA similar to that provided for the Chiswick Curve Public Inquiry is produced; see Viewpoint 6 on page 23 of Inquiry document LBH2/B5.2.

1.11 Townscape and low-rise residential areas Most of the surrounding residential areas are within the Conservation Areas discussed above and the impact of large developments on townscape and residential amenity, including the visual impact of tall buildings, is addressed in paragraph 1.6 above.

The proposed 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 buildings of the Great West Corridor and the M4 flyover to be the defining features of their neighbourhood.

2. Traffic and Transport

We endorse the comments submitted by Brentford Voice and The Kew Society on Transport.

We disagree with the applicant’s assertion that the site has good road connectivity and good access to public transport. Existing businesses on the Great West Road and local residents are already struggling with the inadequacy of the existing transport network. This issue also affects other local businesses, including many SMEs, major employment sites such as the Chiswick Business Park and major visitor attractions.

While restricted parking for the residential element of the proposed development may reduce car ownership and result in fewer private car journeys by residents, account needs to be taken of the resulting increase in journeys to and from the site by taxis, mini-cabs and delivery vehicles.

2.1 Public transport The site is not well served by buses. There is no bus route along the North Circular and only one bus route (91) along the A4. Access to all other local bus routes will require pedestrians to negotiate the extremely hostile environment of the Chiswick roundabout. 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 and to TfL’s financial situation.

The applicant makes reference to the proximity of rail and underground stations. Station access and capacity are of equal importance. The nearness of a station is immaterial if it cannot cope with demand. Both Gunnersbury Station and Kew Bridge Station have significant access problems and Gunnersbury Station also has severe capacity problems.

2.1.1 Gunnersbury Station The overcrowding at the station is such that before the covid pandemic TfL was operating crowd control measures during peak hours. This was 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. Major enhancement is needed now to accommodate the significant increase in usage over 15 years due to the development of the Chiswick Business Park (now 10,000 capacity) and other significant developments in the area.

From discussion at the recent Hearing for the Examination in Public of the Local Plan Reviews there appears to be very little possibility of the major improvements needed to this station being delivered within the plan period.

3. Climate Change WCGS supports the comments submitted by Mr Tony Firkins.

4. Claimed benefits of the Development

With respect to the claimed benefits of the proposed development we believe strongly that the public benefits that would be delivered by the scheme are not as substantial as claimed by the applicant and would not outweigh the significant and extensive harm that the development would cause.

4.1 Housing/Affordable Housing Providing new housing, including affordable housing is only a public benefit if it is of a satisfactory quality. Consideration of the points below leads to the conclusion that the residential accommodation and communal open space provision within the scheme would be of questionable quality and therefore this benefit can only be accorded moderate weight in the planning balance.

4.1.1 Environment We maintain our objection in principle (expressed in detail with respect to the Chiswick Curve proposal) to providing residential accommodation on this constrained site surrounded by major roads in a highly polluted (air and noise) locality. Policy P3 (f) of the Reg 19 version of the Local Plan Review for the Great West Corridor states: “requiring new residential development to be designed to mitigate any noise and air quality issues and is sensitively located away from the A4/M4 and *North Circular* roads.” Planning Statement (PS) 7.34 stating that the draft site allocation promotes the site for residential use is misleading; the allocation specifies an office-led development with some residential (120 units).

4.1.2 While the *internal* environment of the residential units may be controlled by a suite of measures including winter gardens, triple-glazing, mechanical ventilation and active cooling systems, such measures come at a cost (materials and energy), deprive residents of private outdoor space and reduce their agency in relation to their home environment. We would emphasise that residents will still be exposed to the hostile environment whenever they use

the *outdoor* spaces of the communal terraces/garden bridges and whenever they need to negotiate the major roads surrounding the Chiswick Roundabout on foot or cycle to access local amenities and/or public transport. These negative attributes of residential development at this location would have a significant harmful impact on health and well-being.

4.1.3 The applicant states (D & A 3.1.1) “The environmental conditions that result from the heavily trafficked site context means that residential development will only be considered above an appropriate height.” The applicant appears to consider Level 05 as the appropriate height at which residential use can begin as he describes the set-back Levels 03 and 04 as “articulating the joint between the office world below and the residential uses above”.

However, several affordable residential units are located on Levels 3 and 04 “in the north eastern section of the floor plate, furthest from the M4 and roundabout” (D & A 4.6.4). We would point out that this location is likely to be heavily exposed to pollution as this section of the floor plate borders a section of the North Circular Road recognised as the most congested road in the UK and Larch Drive, a busy cut-through from the east-bound M4/A4 to the North Circular; these roads will see increased traffic from this development and that at 2 Larch Drive (significant visitor numbers, 350 parking spaces). These affordable residential units will be isolated from the rest, sharing a floor plate with offices and/or plant and they will have no view of, or direct access to, the communal open space. We consider them to be of very inferior quality.

4.1.4 Aspect While the dual-aspect residential units located in the wings around the lightwell would benefit from deck access to the communal terrace or to planted walkways and views of the garden bridge across the lightwell, approximately half of the units on each level are single aspect. These would have no views of the building’s planted areas and, for those on the Larch Drive elevation, their only view will be restricted by the tall buildings of the 2 Larch Drive development across this road, which the Planning Committee recently resolved to approve.

4.1.5 Community amenity space; Quality and quantity It is seriously questioned whether the environmental conditions experienced at the outdoor spaces would provide satisfactory spaces for either people or plants. How would these gardens be protected from air pollution, noise and wind? For how long would trees survive in these hostile conditions and would those planted on the garden bridges represent a safety hazard to residents and pedestrians on the ground? Maintenance would also be an issue; the applicant’s expectation that this would be carried out by the people in the building taking “ownership” (suggested in response to questions during public on-line presentation) is not considered realistic. It is debateable whether these spaces would be able to make a meaningful contribution to biodiversity.

The ability of these spaces to serve their multiple purposes (including play) would be compromised by the very serious shortfall in the amount of community amenity space provided - a deficit of 68.4% according to the figures provided in PS 7.58. As the figures given are for “community amenity floorspace” it is not clear whether they include outdoor and indoor amenity space. The deficit for *outdoor* communal space as specified in Local Plan Policy SC5 may therefore be even greater.

The garden bridges of between 120 and 150 m² (dimensions given during presentation) are to be shared by around 40 units on 3 levels – providing less than 4 m² per unit. The “generous” terrace at Level 05 (320 m² we understand) is to provide “accessible gardens and play space for residents occupying levels 03-10” ie the 83 Affordable units. These units also have a garden bridge at Level 8 so there would be a total of 470 m² or 5.7 m² per unit. These

provisions are woefully inadequate, especially considering the needs of the larger family units. We strongly disagree with the applicant's attempt to justify the deficit (PS 7.59 – 7.63).

There is a serious cumulative deficit of open space with Gunnersbury Park expected to compensate for the lack of adequate open space within the dense residential developments under construction, consented or in the pipeline in the Great West Corridor. The 2 Larch Drive scheme immediately to the north provides less than half the amount specified in Policy SC5. This cumulative deficit will not only put existing public open spaces such as Gunnersbury Park under great pressure but will also undermine Borough strategies concerning health and well-being. This trend to “off-load” the delivery of open space for relaxation and informal activities to existing public spaces such as parks is inconsistent with policies in the Local Plan and the draft Great West Corridor Local Plan review. See, especially GW3 and GW4.

The absence of any dedicated play space (other than the very small and unfit-for-purpose Stonehill recreation ground on Wellesley Road) in the entire West Chiswick/Gunnersbury area, together with the cumulative deficiency within new developments dictates that no further deficit should be permitted.

4.2 Redevelopment of a key gateway location As a key gateway location, this site needs a development that fully respects its context and the character of its surroundings, including the many heritage assets. As the proposed development fails catastrophically to do this (see Section 1 above) no weight can be given to this benefit.

4.3 Catalyst for the regeneration of the Great West Road So much development has already been built, is under construction or consented in the Great West Corridor East that no further catalyst is needed. Very little weight can therefore be attached to this benefit.

4.4 Delivery of a new building of the highest quality As is clear from our comments, we do not consider the proposal to be of the highest quality and would assign little weight to this claimed benefit. 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 Great West Corridor to be the defining feature of their neighbourhood.

4.5 Provision of high-quality workspace/Active ground-floor uses Such provision is welcome but is to be expected/ is a given for any mixed-use development; this benefit is therefore of moderate weight only.

4.6 Significant Public realm improvements/Potential for the provision of public artwork While Public realm improvements are proposed to try and mitigate some of the negative features of the locality, the proposals do not provide sufficient detail to be able to assess them. We question what would be either practical or deliverable considering the function and ownership of the public realm in this area. TfL is responsible for the Chiswick Roundabout and the TLRN; any proposals which reduce traffic flow are likely to be ruled out.

Note: Larch Drive Any changes to the public realm here need to account for future use by the two major developments on either side and of the road's current use as a cut-through from

the east-bound M4/A4 to the North Circular. Close co-ordination will be essential. fully co-ordinated

WCGS is opposed to any development at the Chiswick Roundabout that would draw attention to, and increase the influence of, the character-deforming presence of the M4 flyover and the rest of the major road infrastructure. See the comments submitted by WCGS in 2012 on the hard and soft landscaping and material proposals for the roundabout associated with the erection of two advertising towers by TfL (attached as an annex to this document).

The large “natural” green space of the roundabout with its informal tree cover is a positive feature which helps to lessen the impact of the flyover and the traffic. It 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. When approaching the roundabout along Chiswick High Road the tree cover merges with that of this tree-lined street and partially screens and softens views of the overhead M4 and the high-rise buildings beyond. We are fully aware of the damaging impact of the TfL advertising towers. Additional street furniture and/or a large sculpture on the roundabout would therefore be most unwelcome. We would, however, welcome the provision of suitable public artwork within the application site.

We would also point out that a large structure on the roundabout would compete with the building on the application site detracting from the latter’s landmark status.

We consider that the current proposals for public realm improvements and the *potential* for public artwork do not represent key public benefits and can be assigned very little weight.

5. Planning Balance

5.1 We would draw attention to Section 10 of the Appraisals for the Conservation Areas discussed above. Section 10 addresses the tensions between a conservation area adjacent to an Opportunity Area in a world city. We wish to point out that 10.3 of this section states.

The bar for public benefits to exceed heritage harm is rightly set high and very hard to reach, particularly where such development also impacts on Kew Gardens World Heritage Site. Development should not seek to use public benefits as an excuse for unimaginative consideration of planning context, but rather demonstrate exceptional and innovative heritage-respecting design, which also provides significant public benefit.

London is a world city. It is of national and strategic importance as our capital city. Its natural and historic environment is too important to be treated in a cavalier fashion. It should be conserved and enhanced in accordance with the NPPF. While regeneration of the Great West Corridor is important, the corridor 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.

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 blocks, competing for attention as they dominate the skyline.

So, our plea is that, as an important part of this world city, Hounslow

- provides its residents with homes of genuine high quality,
- understands the true value of its historic environment *and*
- pays full respect to the world heritage on its doorstep

5.2 Conclusion From the above assessment of the public benefits claimed for the proposed scheme we conclude that they are completely outweighed by the multiple negative impacts of the scheme detailed in these comments including the harm and cumulative harm to a wide range of heritage assets that the development would inflict.

The Society requests that planning permission is refused.

Advertising 01578/2/AD4

WCGS objects strongly to the proposal to locate a large embedded digital media screen on this building on amenity grounds. Advertisements are inappropriate on a building which is primarily residential and which is located in an area which is increasingly residential in nature with several large residential buildings built, under construction or consented. Adverts in such a context are inimical to residents’ sense of place and their sense of home as a retreat. Furthermore using the building to display adverts would detract from and compromise the legibility and landmark status of the building.

The Society requests that the media screen is refused.

WCGS

January 2022

Annex attached

Annex to WCGS Comments on Holly House

Chiswick Roundabout Ref:00505/GD/AD1(4,5)

Comments from the West Chiswick and Gunnersbury Society

The West Chiswick and Gunnersbury Society has the following comments on the hard and soft landscaping and material proposals for the roundabout associated with the erection of two advertising towers by TfL.

It is requested that hard landscaping, street furniture and lighting is kept to a minimum and that the tree cover and planting is maximised in order to try and preserve and enhance the “natural” feel of the roundabout. This is important in order to mitigate the negative influence of the major road network including the flyover. The target for the permitted advertising screens is the traffic on the overhead section of the motorway. Their influence and that of their support structures should be confined as much as possible to this upper level.

Hard Landscaping/materials

Lighting Bollards It is requested that there is a reduction in the number of bollards and that a less industrial design is used. While using the same material for the bollards as for the support towers is understood, we would request a more organic (cylindrical) form to complement that of the attractive street lighting columns.

It is questioned whether any bollards are necessary along “secondary pedestrian access” paths. If any one of these paths is to be lit, it is considered that the north east section of path between the Chiswick High Road and the North Circular would be far more appropriate than the section proposed (see annotated plan). The NE section is the most useful to cyclists allowing them to bypass the roundabout when travelling from Chiswick towards Ealing. The proposed section leads from the traffic island in the Chiswick High Road to that between the East and West carriageways of the A4/M4- an unlikely choice for either pedestrians or cyclists.

Up-lighting and down-lighting The amount of lighting proposed under the motorway between the support towers is considered excessive. Such lighting would increase the visual impact and dominance of the flyover and support towers. This would add to the urban feel at ground level. The stained and aging concrete underside of the motorway is not a thing of beauty to which attention should be drawn.

Soft Landscaping

Green Living Walls WCGS welcomes the proposal to clad the 3 outer faces of outer columns of the flyover in green living walls. We request that all 6 outer columns are thus clad rather than just 4 as is proposed (see annotated plan). The two eastern concrete columns are visible from the north east and south east of the roundabout and are the nearest to residential properties (Stonehill Road and Surrey Crescent).

Trees and shrubs WCGS notes with concern that several of the trees on the roundabout have already been severely lopped and pruned and all the understorey shrubs and bushes removed. The trees partially screen and soften the overhead structure and traffic and the understorey

added to the natural feel of the roundabout, when viewed from the residential streets. It is requested that any future tree pruning is confined to that strictly necessary on safety grounds. It is also requested that new native shrubs and bushes (including evergreens) are planted (eg holly, yew, blackthorn, dog rose, bramble).

Wildflower planting This is welcomed provided that TfL intend to plant appropriate native species and maintain them as indicated in the detailed proposals.

WCGS

October 2012