

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

00505/EY/P20 and 01578/2/AD4

Additional documents posted November 2022

Comments from the West Chiswick and Gunnersbury Society (WCGS)

Please note that these comments are supplementary to, and should be read in conjunction with, those that WCGS submitted in January 2022.

Having examined the additional application documents posted in November 2022, the Society maintains its strong objection to the development proposed within the amended application. The Society requests that planning permission is refused.

We note the minor changes to the design, the reconfiguration of a small number of Affordable units and the additional documentation. We believe that neither the changes proposed nor the additional documentation supporting the application respond adequately to the objections raised in our comment nor to the questions posed by the Local Planning Authority (document labelled “Applicant response”).

The following comments on the documentation recently made available illustrate some of the issues we have already raised and/or address additional aspects of the application.

1. Heritage Assets and Townscape

The focus of the Design and Townscape Addendum [DTA] is the experience of motorists on the major road network surrounding the site. It pays little attention to the experience of those living in the surrounding residential areas. As far as motorists are concerned, we question the advisability of “The building will have a dazzling appearance” DTA 5.20].

Many of the views show how out-of-scale the proposed building is. Quality of design should be able to provide a landmark building without resorting to excessive height.

As shown in views 3, 4 and 5, the building on the M4/A4 side of the development at 2 Larch Drive reduces in height from north to south, that is towards the roundabout site. This was considered necessary to reduce the harm to the Royal Botanic Gardens, Kew.

With reference to the statements under DTA 5.41, the experience of the locality, endured by both pedestrians and motorists were Holly House to be built, would be of a massive, out-of-scale, fussy, potentially brightly-lit building adding negatively to the assault on the senses “of the monumental mass of the motorway and the volume, speed, noise and pollution emanating from vehicles travelling in multiple directions, with car lights and traffic lights”. We do not consider that Holly House “will bring a high degree of humanity to the location”.

With reference to the comments under DTA 5.42 “In terms of the immediate townscape, while the new Warwick Wright showroom may be *somewhat lower* than Holly House, its mass is compatible and there is a powerful yet positive relationship between the two.” We would point out that this showroom is of three storeys (12 m) to the front of the site with

the fourth (16 m) set back towards the rear in recognition of the sensitive residential surroundings of the Wellesley Road CA.

2. Quality of Accommodation

Internal space “The residential element is lifted above the busy roundabout and the motorway to provide high quality living conditions, distanced from the noise and pollution below” (DTA3.3) yet several affordable residential units are still located on Levels 3 and 04.

The additional commentary in the Applicant Response [AR] in relation to the queries about the measurement of **Air Quality** are not at all convincing and should be pursued further by the Planning Authority.

The further [AR] explanations in relation to **Noise** levels do not appear to have improved standards which largely continue to fail published standards. The developer should be pushed further to meet requisite standards else the entire development should fail the test of “good development” creating substandard living conditions for the majority of intended residents.

The further [AR] explanations of reasons why many rooms fail adequate **Sunlight and daylight standards** still leaves much of the development with many rooms failing sunlight standards. There are no new remedial actions. This failure is a result of the physical orientation of the site, together with the developer’s ambition to maximise rather than optimise the quantum of development. It is a further demonstration that neither the location nor orientation of the site is suitable for a residential development.

The cumulative effects of the poor and failing standards of Air and Noise pollution, and Sunlight /daylight provision suggests strongly that the development does not fulfil the requirements under the London Plan to provide “good development”.

External space “while large cut-outs allow the integration of large amenity spaces for residents with ample greenery away from the motorway” (DTA3.1) yet the terrace providing a significant proportion of the outdoor amenity space, including the play space, is at Level 05, the lowest level deemed by the applicant to be suitable for *enclosed* residential units that require high levels of adaption to protect from air and noise and pollution. How will users of this outdoor space, including young children, be protected from “the volume, speed, noise and pollution emanating from vehicles travelling in multiple directions”?

3. Affordable Housing

A key factor is whether the “affordable” housing provision will satisfy the requirement that it be genuinely affordable to those households needing to be housed by the Council at ‘social rent’ levels. There appears to be no proper calculation of total housing costs to social renters (or to those securing ‘intermediate’ level homes). A significant omission is the level of Service Charges. For example, the response to queries in relation to the proposed landscaping completely omits any reference to COSTS. The Planning Authority asks about detail and resources but the developer is silent on costs. It can be anticipated that a complex development with such ambition for landscaping and greening at the development will give rise to significant annual servicing costs. These in turn will likely be recharged to all

residential occupiers yet such service charges levied on the social rented homes quite likely will render them unaffordable. Much clearer analysis of total costs and the planned distribution across all occupiers and identifying by tenure is an absolute requisite else the Council will not be able to meet its own test of affordability for nominated tenants.

4. Offsite Landscaping and Biodiversity

While some additional ground cover and understorey planting on the Chiswick Roundabout* would be welcome, its benefit would be primarily visual. However “dense the nature of this planting typology” we question what type of wildlife would be likely to “shelter, forage and flourish” on the Chiswick Roundabout. Furthermore, any educational benefit would be completely undermined by the inadvisability of encouraging people, especially children, to spend any time in this inhospitable location.

A major problem with these public realm proposals is that they would require permission from TfL, as landowners of the roundabout and authority responsible for the surrounding TLRN network. Unless such permission is secured in advance, no benefit can be ascribed to these proposals. A financial contribution without TfL’s permission to carry out the work is of no value.

*If any such planting scheme were to be taken forward, it should include the small areas of open space at the junction of Clarence Road and in front of Surrey Crescent. All existing trees on the roundabout and on these areas must be retained and protected.

5. Water and Waste

We note with concern the issues raised by Thames Water and are not reassured by the applicant’s response. Account needs to be taken of the cumulative additional water and waste requirements of the significant surrounding developments, completed, under construction or consented. Both this proposed development and that at 2 Larch Drive rely on deep basements for parking etc; the construction of these may well have a deleterious impact on the existing water and waste networks.

WCGS December 2022