

Chiswick Tower; 389 Chiswick High Road

Application P/2025/0794

Comments from the West Chiswick and Gunnersbury Society

1.Introduction

The West Chiswick and Gunnersbury Society (WCGS) has been campaigning for enhancement to access and capacity at Gunnersbury Station for more than 20 years. During this time we have engaged constructively with stakeholders, including through our participation in the Gunnersbury Station Action Team (GSAT), set up in 2013 at our request and chaired by successive MPs. We have achieved some improvements to the station environment including widening of the pedestrian crossing and an upgrade of the traffic signals <https://westchiswickgs.org/gunnersbury-station/>). However, we have been clear as to the inadequacy of the changes to the station approved in 2012 and partially delivered in 2018.

We believe that the current proposals for the redevelopment of Chiswick Tower and surrounding land present a unique opportunity to achieve the much-needed improvements to the station.

Failure to seize this opportunity risks the station remaining unfit for purpose for the foreseeable future. Once redevelopment goes ahead, future changes to the station will be very difficult to achieve.

2 Phased development

The Society supports the phased development which delays the development of the car parks (Plots 2 and 3) to provide for TfL and Network Rail to deliver the necessary improvements to the station - a second staircase and a lift to the island platform (see section 8 Gunnersbury Station). We understand that the owners are prepared to delay any proposals for redevelopment of the car parks and that the current application is therefore confined to Plot 1.

We support the site-wide strategy described in section 6.7 of the D & A document on Future station improvements which “facilitates the opportunity for TfL and Network Rail (NR) to comprehensively redevelop Gunnersbury station to improve capacity and introduce step-free access” We note that “In order to provide a longer-term solution for improvements to the station to be made, Chiswick Tower Limited, have provided TfL with an option on the land to the rear of the development. This two-year option allows TfL to consider appropriate improvements for the station.” We question how this option aligns with the illustrative time-lines provided in section 3.16 showing completion of Phase 1 of the development by 2029 but an unknown date for delivery of the station improvements.

We request a clause in the Legal Agreement of any planning permission requiring the submission to and approval by the Council of a phasing plan for the development of the whole Chiswick Tower site in order to prevent the premature development of the wider site in advance of delivery of the station improvements.

3 New Residential Annex

We strongly support the proposal that all the apartments in this building will be social housing for people on Hounslow Council’s waiting list.

3.1 Outdoor space for residents We question how usable by /attractive to residents the ground-floor space to the east of the building will be considering its proximity to the railway tracks as they enter the station.

3.2 Swift bricks Swift numbers are in serious decline due partly to loss/lack of suitable nesting sites. We note that swift nest boxes are proposed within the landscape plans but would additionally appreciate the inclusion of swift bricks at suitable locations within this building in accordance with RSPB guidelines.

4 Tower; Change of Use to Co-living

We have no objection in principle to the conversion of the tower to co-living accommodation provided the Council is satisfied that this is an appropriate, viable and sustainable use for this building and that it meets all the requirements of London Plan policy H16 and associated Guidance 2024 for Large-scale purpose-built shared living. We consider that unless and until the necessary improvements to the station are delivered the site will not provide “quality and ease of access to public transport” (para 2.1.1a of Guidance).

4.1 Light pollution We are concerned that the change of use from office to high-density co-living residential will give rise to a significant increase in light pollution. Given its height Chiswick Tower is highly visible from the surrounding residential streets and from further afield but as offices was mainly unlit at night. Tall residential buildings create light spillage and light glow since the operation of internal lighting and window covering is a matter for individual occupants. It is not amenable to control in the same way that the internal lighting of modern commercial buildings is by the use of intelligent lighting systems. We request the use of such systems in the communal areas and that lighting for the individual studios is designed and directed to minimise light pollution.

4.2 Outdoor space for residents We believe that a planted terrace on level 2 close to the station entrance (the Perch) would offer tower residents a pleasant outlook from the internal communal dining space and contribute to biodiversity. We question, however, whether it would offer a comfortable space for residents to use as an *al-fresco* dining and cooking area. The position of this terrace is such that it will receive little sun and will be exposed frequently to high winds (see section 5.1).

5. Landscaping and Public Realm

5.1 Station Plaza We welcome the proposed improvements to the public realm around the station entrance and the addition of a linear park and play space at the northern end of the western car park.

We are, however, concerned as to the impact of wind on the comfort level that may be experienced by users of these spaces especially the station forecourts. We are surprised that the Wind Report suggests that no wind mitigation is necessary, but we note that the report appears to be limited to a desk-based study. Users of the station are well aware that these spaces are frequently subject to high winds as the depth of the railway cutting together with the design of the station entrance creates a wind tunnel. While the glass doors across the pedestrian access to the western car park deck have provided some mitigation by preventing these winds from entering the station entrance under-croft under Chiswick Tower, this area is still a hostile environment. These doors were installed at WCGS request during GSAT

meetings chaired by Ruth Cadbury MP. We request a Condition on any planning permission that these doors are permanently retained and maintained.

The wind is such at times that cycling westbound on the Chiswick High Road is risky. As some local residents will remember, Gunnersbury station's roof was torn off by a twister in December 1954.

5.2 New pedestrian/cycle route We strongly support the provision of a pedestrian and cycle route from the Chiswick High Road entrance of Gunnersbury station across the western car park top deck to Wellesley Road; this would be a significant improvement in permeability.

We request a clause in the Legal Agreement on any planning permission that secures public access in perpetuity along this route. The route should be outlined on a plan attached to the Legal Agreement and the clause should secure unimpeded access for the public along the route 24 hours a day, 7 days a week in perpetuity and require the provision, operation and maintenance of street lighting along the route during hours of darkness in perpetuity.

5.3 Art-work We would appreciate being involved/consulted on any art-work proposed for the public realm. We request that this is covered by Condition.

5.4 Tower and Annex Frontage The provision of active frontages and hard and soft landscaping at the front of both parts of the development on the Chiswick High Road will be a significant improvement to the public realm. We request that such landscaping is extended eastward as far as the railway bridge and that, as discussed at our meeting with the developer in July 2024, the developer work together with WCGS to design a scheme for the area currently occupied by our “Meanwhile Garden” – the community garden established and maintained by the Society*. We request that this is covered by a Condition.

Including this important corner in the landscaping scheme would improve the eastern approach to the residential block, complement the welcoming landscaped entrance to the Chiswick Business Park opposite and enhance the attractiveness of the surrounding Conservation Areas. Providing a joined-up public realm from bridge to station would give a real uplift to the local environment. This would be of great benefit not only to the future occupants of the residential annex and tower but also to the local community.

We would be very happy to work with the developer, the Council, Hounslow Highways and others to achieve this. A recent example of a successful collaborative local landscape improvement scheme is that of Ginkgo Corner at the junction of Chiswick High Road and Linden Gardens. <https://talk.hounslow.gov.uk/redesigning-ginkgo-corner-have-your-say>
<https://www.createstreets.com/ginkgo-corner-carving-out-new-public-realm-in-chiswick/>

* We established our Meanwhile Garden in 2019 when, although approved (P/2017/1489), conversion of part of the Annex to Chiswick Tower into a cafe/restaurant was not carried out. As we said in 2019 “Why a *meanwhile* garden? Well, local residents are still waiting for much needed improvements to Gunnersbury Station and its surroundings. So, meanwhile, its great to be doing something to brighten up this neglected corner of the High Road near the station with the help of our friends at Abundance and Cultivate.”

<https://westchiswickgs.org/green-up-gunnersbury/>

5.5 Wellesley Road Access Route Once the proposed new western access route (section 5.2) is implemented this would allow for the eventual closure of the unsuitable long footpath

between the rear entrance to Gunnersbury Station and Wellesley Road. This is currently unadopted highway and in a poor state of repair. It is only lit by lighting columns on the applicant's land and which are currently only in operation at the discretion of the applicant.

In the meantime the opportunity should be taken to regularise the maintenance and lighting of this footpath. It is currently cleaned by Hounslow Highways at their discretion under an informal arrangement. Regularisation could be through adoption of the land as public highway and/or a clause in the Legal Agreement. WCGS has raised the physical condition and safety of the alley with Andy Slaughter MP who is also concerned.

As a minimum, clauses should be added to the Legal Agreement on any planning permission:

- requiring the improvement of the boundary treatment between the eastern car park and the alley which is currently defined by a steel mesh fence topped with razor wire. Any new boundary treatment should be perforated rather than solid to allow for passive surveillance of activity in the alley from the Wellesley Road bridge and from the top deck of the eastern car park (see Annex 1 for photos provided during 2017 discussion with former Chiswick Tower owner and management).
- to secure the retention of the existing lighting columns on the top deck of the eastern car park that light the alley, their maintenance and their continued operation during the hours of darkness.

These matters are within the gift of the applicant and would represent an offer of goodwill to local residents who are concerned that these may be removed or switched off when Chiswick Tower is vacated prior to the implementation of any planning permission.

The provision of CCTV in the alley would be welcomed as there is a poor line of sight from one end to the other due to the curve in the pedestrian path.

5.6 Grange Road Access Route The footpath to the rear entrance to Gunnersbury Station from Grange Road should remain open as that is short, is lit by street lighting columns and has a good line of sight from one end to the other.

6 Traffic and Transport

6.1 Impact on station While change of use of the tower and the addition of an apartment block may not represent a significant change to the total numbers of people using the station, the movement of new occupants will be in the opposite direction to workers in the former offices. New occupants will increase the number of residents wishing to leave from the station in the morning peak and returning in the evening. This is the direction of travel most adversely affected by the current inadequacies of the station (see under section 8, Gunnersbury Station). In recognition of this negative impact on current users of the station and in order to benefit fully from the development's proximity to the station, we request that the developer make a substantial financial contribution, secured by Legal Agreement, to the station improvements to be carried out by TfL/Network Rail. As noted above (section 4) "Unless and until the necessary improvements to the station are delivered the site will not provide "quality and ease of access to public transport".

6.2 West-bound Bus Stop In line with WCGS requests, we support moving the bus-stop a short distance west to allow the 440 bus to stop outside the station, provided that there is no

reduction in the size of the bus shelter. The longer shelter was provided in 2017 in response to the need identified by WCGS.

7 Construction Management Plan

7.1 Construction traffic route We agree that Wellesley Road should not be used by construction traffic. We question the proposal to turn off the A4 at the Sutton Lane North junction and to join Heathfield Gardens via the mini-roundabout. Turning at this roundabout is tight and Heathfield Gardens is a residential street with on-street parking on both sides. This, together with the presence of the fire station makes it unsuitable for construction traffic. We suggest that Sutton Court Road should be used instead.

7.2 Hours of operation Is it not usual for Saturday hours (4.23) to finish at 13.00 rather than 17.00? The two-hour slots for excessively noisy works (4.28) should fall within the allowed work hours.

8 Gunnersbury Station

8.1 Introduction Gunnersbury Station is of strategic importance to the development potential of the whole Borough of Hounslow, given that it acts as a transport hub, providing a railhead to the District Line and London Overground via TfL bus services and Sky TV shuttle buses from a wide area across Brentford, Isleworth and along the Great West Corridor. Station users are not simply residents from and workers in the local (800 m) area.

Major enhancement is needed now to accommodate the massive increase in usage due to the development of the Chiswick Business Park (now 10,000 capacity), the Brentford Football Stadium and other significant developments under construction or in the pipeline. The importance of improving Gunnersbury Station to the Council's ambitions for the Great West Corridor was recognised by the Inspectors at the aborted Examination in Public of the Local Plan reviews in November 2021. The statement provided by the Council's planning policy team at the Inspectors' request (Annex 2) is provided as a separate pdf. The single consolidated Local Plan is yet to be submitted to the Secretary of State; the Inspector(s) appointed to examine it will no doubt question what progress has been made.

Station access and capacity at Gunnersbury are severely compromised 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. As all users of the station are well aware, this set-up gives rise to serious congestion and conflict between those entering and leaving during peak periods. At such times TfL (who manage the station) may, for safety reasons, operate with the stairs as one-way exit only from the platform, preventing access for those intending to catch a train. In addition the station operates a one-way system - enter from Chiswick High Road, exit via Wellesley/Grange Road - after football matches at the Brentford Football Club stadium. This necessitates a lengthy walk for those wishing to enter or exit from the opposite direction. The lack of inclusive access to the platforms is also a significant barrier to using the station for many people including the disabled, the elderly and those with small children or luggage.

So what we need now is for TfL, Network Rail and the Council to "pull out all the stops" to seize this unique opportunity to provide the necessary improvements to the station. A station

with satisfactory capacity and access would support the sustainability (economic, environmental and social) of developments in the surrounding area.

8.2 Funding We recognise that amassing sufficient funding is the main impediment to delivering the necessary station improvements. In addition to the s106 funding contributions already secured, we request that the Council, TfL and Network Rail actively seek funding from all possible sources including, but not limited to, the following:

- s106 transport contribution from the Chiswick Tower applicant (see section 6.1)
- Council's CIL funds – CIL should be awarded to deliver this strategically important project, especially since significant CIL will have been generated by the large-scale developments within the area.
- GLA and Government grants
- Contributions could be invited/requested from organisations which will benefit from the station improvements including Brentford Football Club and local businesses, for example, tenant companies in Chiswick Business Park, businesses at Chiswick Roundabout and those on the Great West Road including Sky.
- The public benefits of delivering the essential improvements to Gunnersbury Station are such that we consider that any cash-in-lieu payment for off-site C3 affordable housing that might be due in relation to the co-living use of Chiswick Tower should be put, instead towards the station improvements. We note, in this context, that the lack of any affordable housing within the first phases of the residential element of the Brentford Football Stadium scheme (740 units) was justified on the grounds of the public benefit of providing a football stadium. Construction of the final phase on the Duffy site will deliver 42 Affordable units out of a scheme total of 1015 residential units.

9 Legal Agreement We would welcome a meeting with officers to discuss the Heads of Terms and detail of any Legal Agreement in due course.

10 Conclusion Our comments on the development and on the station are intended to be constructive and we trust that they will be considered in this light.

With respect to the station improvements we recognise and approve the progress made in Pre-app discussions with Council officers and in workshops with TfL and Network Rail. We request that a collective effort is now focussed on obtaining the necessary funding to deliver them.

We are convinced that, with a concerted effort, Gunnersbury Station could change from having a negative impact to making a very positive contribution to the quality of life for all those living in, working in and visiting the area. Our wish is for all interested parties to work together to facilitate real progress at this important transport hub on the Chiswick/Brentford boundary. Provision of a second stairway and a lift, together with public-realm improvements to the station frontage, would deliver a station fit for purpose and a welcoming gateway to the area. This would be to the significant benefit of residents and businesses both local and those located along the Great West Corridor.

Annex 1 Chiswick Tower: Station Approach

E-mail from WCGS following meeting with Chiswick Tower owners and management December 2017. We have given further thought to Tim's welcome suggestion of improving the car-park boundary along the approach to the station from Wellesley Road.

On reflection, we feel that replacing the mesh fencing between the eastern car-park and the public footpath with metal railings might not be the best solution. A long stretch of metal railings along this path might feel oppressive given the narrow width of the footpath and the required height of the fencing. The following features are illustrated in the photos provided within the attached pdf; our comments are followed by a possible solution/improvement.

- *Existing mesh fencing* has the advantage of "lightness" and provides a clear view across the car-park to the residential buildings on the other side of the tracks (photo 1) - perhaps simply give it a fresh coat of green paint?
- *Barbed wire running along the top* is a very negative feature (photo 2) - is a more "decorative" security measure possible?
- *Concrete edge to the car park* is in poor condition and a negative feature (photo 3) - perhaps concrete could be painted (white) and the wells filled with a robust decorative element such as pebbles?
- *Concrete wall and mesh gate* (photos 4 and 5) - wall is oppressive and both wall and gate are in poor condition - perhaps a green wall could be installed and/or the wall be painted (white) and the gate replaced?
- *Corner near station entrance* this whole area is a mess - can the corrugated iron fence be replaced and the area decluttered?

We appreciate that some of these features may not fall within Chiswick Tower's responsibility but we would welcome your response to these comments and suggestions.

NB We received a positive response but no further action was taken.

Features of Public footpath to/from Wellesley Road and Grange Road



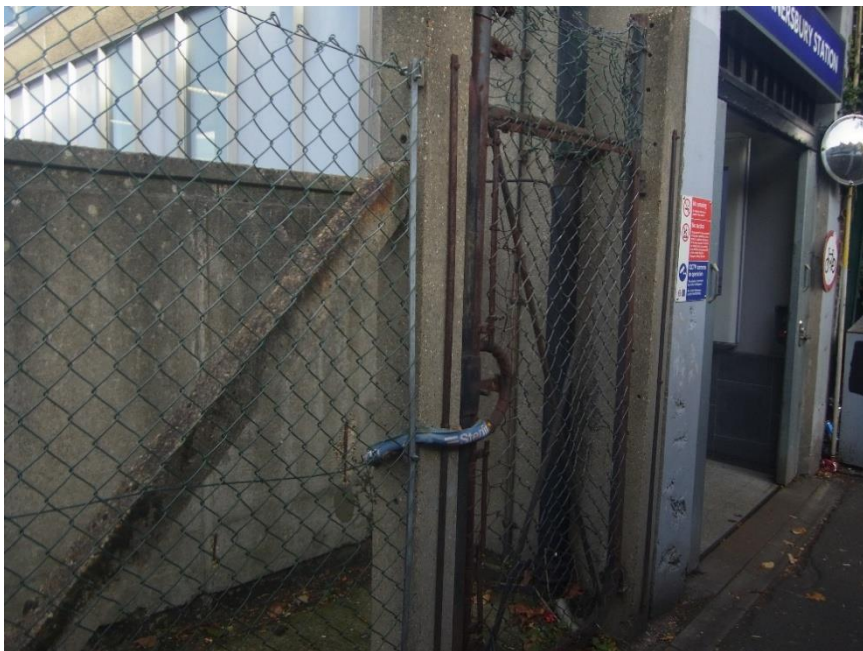
1. open view through mesh - good



2. barbed wire – bad



3. concrete edge to car-park – poor condition



4. concrete wall and gate near station entrance – poor condition



5. concrete wall – poor condition and oppressive



6. corner near station entrance – a mess

Annex 2 Statement provided by the Council’s planning policy team in November 2021 at the Inspectors’ request - see separate document provided as pdf attachment to our covering e-mail.