

***Town & Country Planning Act 1990 (as amended) and
Town and Country Planning (Mayor of London) Order 2008.***

***Presentation by John Ricketts of
The Kew Society
At the
Representation Hearing dated 20 July 2018***

in relation to

Citroen Site, Capital Interchange Way, in the London Borough of Hounslow

GLA reference: D&P/4279

Hounslow Council reference: 01508/A/P6

My name is John Ricketts and I am speaking on behalf of The Kew Society.

We wish to object to the proposed development and support the cases of Historic England, the Royal Botanic Gardens, Kew and other local resident groups who support the London Borough of Hounslow's refusals of planning permission for the proposed Citroen Site development.

Our key reasons for objecting are as follows:

- The proposed scheme contributes to the massive overdevelopment of this small area of Brentford
- We see little evidence that the aggregate effect of the Citroen Site and other adjacent developments has been considered, and think that this needs to be addressed. Other proposed developments adjacent to this small, half-mile stretch of the South Circular between Kew Bridge Station and the Chiswick Roundabout include the Brentford Community Stadium with its associated dense cluster of tower blocks at the western end and the 120m, 32 storey Chiswick Curve development at the eastern end which has just been the subject of an exhaustive Planning Inquiry. In between these are the likely Fountain Leisure Centre redevelopment in front of the Citroen Site, a possible reapplication of the Capital Interchange Way bus garage development and the Hudson Square development behind the Chiswick Curve site.
- This results in a cluster of tall and frankly, in aggregate, unattractive tower blocks.
- There is the prospect of a material and exponential increase in traffic congestion and air pollution where the South and North Circular arteries– and the A4 and M4 leading westwards – are already frequently heavily clogged. Pollution levels are already in excess of legal limits in the proposed area and the Government has recently announced consultation on a new Clean Air Policy likely to lead to adoption of significantly tighter World Health Organization standards. We also think that the Ultra Low Emissions Zone has the potential to increase traffic on the North/South circular roads as vehicles use it to avoid entering the Zone.
- A big strain on public transport, particularly at local train stations
- A deleterious effect on vistas eastwards and northwards from Kew Gardens, its buffer

zone Kew Green Conservation Area and the historic river front

- It seems to us that there has been insufficient attention devoted to the adequacy of health and other services given the large proposed increase in local population

In regard to **Pollution**, we think the proposed development contravenes a number of planning policies, and would draw your attention to the Mayor of London's Policy SI1 in the draft London Plan (2017): "London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced: Development proposals should not: (a) lead to further deterioration of existing poor air quality, (b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits.

In regard to **Building Height and Massing**, we consider these inappropriate for the location, and there would be materially adverse effects on Local Heritage Assets. This contravenes for example Hounslow Local Plan paragraph 6.10, which states "Due to the relatively flat topography of the borough and its low, open landscape, tall buildings are generally inappropriate as they can dominate the skyline over a very wide area"; it also contravenes Hounslow Local Plan Policy CC3 Tall Buildings, which states "We will expect tall building development proposals to

- be designed to give full consideration to its form, massing and silhouette, including any cumulative impacts, and the potential impact of this on the immediate and wider context; and to
- take opportunities to enhance the setting of surrounding heritage assets, the overall skyline and views".

We note also, for example, National Planning Policy Framework Clause 132, which states that "Significance [of a heritage asset] can be harmed or lost through alteration or destruction of the heritage asset or development within its setting".

In conclusion, we believe that the benefits of the additional residential accommodation units do not outweigh the adverse implications for local residents of the Citroen Site development with regard to traffic, congestion, pollution and adverse effect on heritage assets, and ask that the application as amended should be rejected or referred to the Secretary of State for an independent decision to be made.

Thank you.