



Development Management
London Borough of Hounslow
The Civic Centre, Lampton Road
Hounslow TW3 4DN

28 September 2015

Dear Gemma,

TOWN AND COUNTRY PLANNING ACT 1990

Application Reference: 00703/A/P13

LAND AT LIONEL ROAD SOUTH BRENTFORD LONDON TW8 9QR

Reserved Matters application for access, appearance, landscaping, layout and scale in relation to Central Eastern, Capital Court, and Central Southern sites comprising 648 residential units, A Class and D Class floorspace, vehicular and pedestrian circulation areas, car parking, cycle parking, associated hard and soft landscaping and private amenity space pursuant to planning permission of 00703/A/P11 dated 12/6/2014.

The Kew Society objected to the original hybrid application for this major development. In particular, we objected to the enabling development of residential tower blocks and an hotel because of their adverse impacts on the nearby historic buildings, visual perceptions from Kew Green and the Royal Botanic Gardens and their significant unmitigated traffic and pollution consequences. Notwithstanding our, and others', objections, outline consent was granted to 00703/A/P11.

Our objections to this reserved matters application include:

1. That this application is only for part (648 residential units) of the 910 units and hotel consented in outline. As a result it is not possible to form a clear, comprehensive view of the totality of design for the whole proposed scheme. The developer should be required now to submit a comprehensive design for approval even if the intention may be to complete elements in phases.
2. That the application does not appropriately reflect the "Design Code" principles incorporated within the outline consent. For example, and with particular reference to the views of the scheme from the south (Kew):

- The residential angular “tombstone” blocks presented in the application scheme differ substantially in colour, edge and roof treatment from the illustrative material and views used for the original outline consent and to the Design Code. The result is a new design which is in marked contrast with its surroundings and with no effort to reduce its adverse impact. Indeed these new structures seek attention, rather than blending with their surroundings and camouflaging themselves against the sky. The opportunities to soften and/or step roof designs do not seem to have been taken to the advantage anticipated.
- The Design Code illustrations provided “2. *Surface treatment.Elevations must not be reflective, over-glazed.*”

Whereas the application scheme incorporates a high proportion of glass and shiny metals in vertical and horizontal lines accentuating the rectangular tower buildings’ heights and mass.

- The Design Code illustrations provided “7.7 *Corners and Balconies Figure 7.12 opposite illustrates the strategy for the acceptable positioning of balconies and facade openings in the elevations. The images displayed give examples of what would be considered an appropriate approach for the provision of balconies and give an idea of quality of finish desired.*”

We do not consider the application scheme appropriately reflects these principles and examples.

- The Design Code illustrations specified for the critical perspective from Kew Green, the Royal Botanic Gardens and the south: “Axis of Kew Bridge Road. 1. *The architectural approach as defined in the massing parameters provides a physical and visual gap between residential towers (blue lines). The massing create a framed glimpse of the stadium (pink). The architectural treatment of the facades that define the gap should reinforce the visual legibility of this key massing move.* 2. *From this view the intent is that this massing creates a focus of the composition in the form of a tower. The architectural treatment of the buildings should reinforce this visual effect. The proposed massing avoids creating a symmetrical composition about the axis of Kew Bridge. High points of composition must not be equal*



and must decrease from East to West. 3. The gap in the massing on the axis of Kew Bridge is framed by two facades which follow the alignment of Lionel Road South (yellow). The architectural treatment of these should reinforce this alignment. The facade parallel to Lionel Road South (yellow) and nearest the junction with Kew Bridge Road should be scaled to meet Rivers House (dashed red line).”

We do not consider the application design meets these parameters and should be reconsidered and revised properly to comply with the outline consent.

- The critical importance to local, national and international communities of the historic settings of local listed buildings (Kew Bridge itself, Kew Steam Museum and water tower, Kew Bridge station, Kew Green Conservation Area and the Royal Botanic Gardens) seems to have been overlooked in the current proposal whose intention seems to be to stamp its identity into a setting and skyline which the outline consent claimed to be seeking to respect.
- We have noted with concern suggestions in the current application that residential unit design standards (e.g. daylighting, privacy, ventilation, space etc) may be being compromised in the reserved matters application. We do not have the resources adequately to check these issues individually and would call upon LBHounslow fully to investigate and verify these matters at both design and post-construction to ensure that living conditions do not create future demands on the wider community.
- During and after the process leading to the grant of outline consent, we contended with evidence that there will be significant traffic generation consequences of the enabling development and, in turn, adverse local air pollution consequences. In Para. 9.455 of the 5 December 2013 Officers Report there is reference to the need for mechanical ventilation from the top of the buildings to residential units to “reduce exposure of future occupants to a satisfactory level” and further mitigation with pollution-absorbing trees. It is not clear how this is reflected in the current application proposals and how conditions with regard to pollution both within the scheme and amongst the wider community is to be monitored



going forward. We would suggest that such monitoring should be conditioned in any consent.

- We understand that since the outline consent was granted the developer has decided to make many of the residential units available through the new institutional “Private Rented Sector” (PRS) as distinct from sale to private individuals. Although this sector may not yet be recognised as a special use for Town Planning purposes, some of the detail building design factors may be optimised differently for the different uses. In the interests of the long term sustainability of the local community, these factors should be examined now and consent considered only when a clear strategy and tactics for appropriate long term management of institutional rented units alongside privately occupied flats have been established.

The Kew Society objects to this reserved matters application for reasons including the above and it should be rejected. In the event that a resubmission is made incorporating appropriate responses to the above points we would be pleased to reconsider acquiescence to proposals which better reflect the outline consent.

Yours sincerely,

Caroline

Caroline Brock
Chair & Planning Trustee
The Kew Society