

HOUNSLOW LOCAL PLAN REVIEW: EXAMINATION IN PUBLIC

Matter 8: design, Tall Buildings and Heritage (Thursday 29th January)

Statement of Marie Rabouhans on behalf of the West Chiswick and Gunnersbury Society (WCGS) (REP48)

12th December 2025

Background

1.The reason for a Partial Review of the Local Plan for the Great West Corridor arose from the commitment given in Policy SV1 of the Local Plan. The addition of this policy together with the removal of policy ED3 was required by the Inspector during the 2015 Examination in Public of the Local Plan in order to make the Local Plan sound. The partial review of the Local Plan for the Great West Corridor and its incorporation into this consolidated Local Plan has thus been in preparation for over 10 years.

2.The surge of developer interest in the East section of the GWC made the need for the GWC review urgent and led the Council to draft an East Brentford Planning and Design SPD (published for consultation in October 2017) to provide interim guidance. Most regrettably, this draft SPD was not progressed in light of developer objections. Further delays to providing the GWC partial review have seriously undermined its effectiveness in providing policies for development in the corridor, especially in GWC East. Development on several major sites in this area has already been completed or is under construction and others are consented.

Issue

We are generally supportive of the policies on Context and Character in the Plan and consider them justified, especially considering the rich heritage assets of the borough and its neighbours, including the WHS Kew Gardens. To be effective they need to be as clear and strong as possible as the questionable public benefits of schemes are frequently deemed to outweigh recognised harm to heritage (see example provided in Appendix).

Questions

With respect to the Great West Corridor East, there has already been so much development in the last 10 years that there is not much left for the policies in Chapter Six of the consolidated Local Plan to apply to. Developments already built, under construction or with permission granted fail to meet many of these policies.

Question 2

Tall buildings Table CC3.2 gives maximum permitted heights for a range of locations. With respect to the Great West Corridor East, development has already occurred at several of the listed locations with building heights often exceeding those in this table.

For example, **Holly House** has been consented at the Citadel site (FB7) with a height of 89.9m (100.92m AOD). I drew attention to the excessive height when spoke in objection to

this development at the planning committee meeting in January 2023; My speaking notes are provided as an Appendix.

WCGS

12th December 2025

.....

Appendix: Holly House: Speaking notes

Councillors, I ask that in considering this application, you think very carefully: as Hounslow Councillors do you wish to be responsible for giving permission to such a flawed development — a development which will cause harm to surrounding heritage assets and to existing communities whilst providing seriously compromised residential accommodation?

While Holly House may be 8 stories shorter than the Chiswick Curve — dismissed at appeal by the Secretary of State — it is 30 metres (10 stories) taller than the recommended height for this site in the Council’s Great West Corridor Master Plan. It would cause a similar level of harm to many of the heritage assets as would have the Chiswick Curve.

The applicant’s 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. The Planning Officer’s Report states (para 8.38) “At **Strand on the Green**, Holly House would appear prominently in the skyline above the historic river frontage in the view from the opposite towpath (para 8.38)”. In this iconic view the detail of the vertical gardens will be lost – reduced to a fussy outline.

Note that the Planning Officer Report (para 8.41) fails to describe the harm identified by the Council’s Conservation Officer to several of the borough’s Conservation Areas, including **Gunnelsbury Park a major heritage asset undergoing significant restoration**.

Note that an adverse health effect is identified in relation to healthcare (para 8.278). In addition, how can this development possibly provide “a positive health impact to future residents and those that live in the surrounding area (para 8.279)”.

We understand that planning decisions are taken by balancing the public benefits of a scheme against the harm it would cause.

In discussing the **planning balance**, the Planning Officer Report (section 9) places great weight on the provision of the residential element of the building as a public benefit. However, many aspects of quality have been compromised by the excessive density on this small and highly constrained site.

Councillors, I ask

—Are you happy to approve a major residential development on this small island site surrounded by major roads – it sits at the junction of the A4/M4 with the North Circular Road?

—Are you happy to approve homes where:

- a sizable minority will be single aspect – this includes all studios on floors 12 to 22 – with negative consequences for light, outlook, privacy and air quality/temperature.
- many rooms will have inadequate daylight/sunlight
- there will be no private **outdoor** space
- there will be a seriously inadequate amount of communal open space
- what communal space there is (other than at level 23) will be subject to unacceptable levels of noise and air pollution
- some Affordable homes will be located on Levels 3 and 4 - the lower office/plant floors?

—Do you consider it wise to approve a development on this site with such ungenerous public realm that:

- the building’s footprint extends almost to the site boundary
- the public realm is confined to a strip of land surrounding the building and running alongside the outline of the site
- all those walking or cycling along the North Circular (to access Gunnersbury Park, for example) will need to use the shared pedestrian/cyclist pavement [residents of the 400+ flats at 2 Larch Drive will also need to use this pavement to access public transport]

—Do you consider it acceptable to dismiss the GLA’s “strong encouragement to remove on-site car-parking” and their concerns about pedestrian and cycle movement (para 6.12).

Councillors, in conclusion:

What weight can you give in the Planning Balance to the provision of such poor-quality residential accommodation to set against the recognised harms that this building would inflict?

We respectfully ask that you refuse this application and that for the digital advertising screen.

Marie Rabouhans

WCGS 12th January 2023

.....
WCGS 12th December 2025