

# Woodlands Area Residents

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## Objections from local residents to planning proposals for further development at Woodlands



View of the proposed development looking South East

## Summary

Woodlands Area Residents, on behalf of the communities of the North Kensington area in both the London Borough of Hammersmith and Fulham and the Royal Borough of Kensington and Chelsea, strongly object to and oppose the current proposals for the further development on the former Woodlands site at 80 Wood Lane, London W12 0TT, referred to in the planning application as Imperial West. (2011/04016/COMB)

The current hybrid planning application includes detailed plans for a 9-storey academic building, 12-storey office building and a 35-storey residential tower, with outline plans for a 13-storey hotel and two further 7-storey buildings.

The principal objections to the development are on a number of planning grounds:

- The height and massing of the proposed development is inappropriate and unsympathetic to the appearance and character of the surrounding predominantly low-rise residential area.
- The proposed development will have a detrimental impact on the character and setting of the neighbouring conservation areas, which it directly overlooks.
- The proposed 35-storey tower block is particularly inappropriate and will have an irreversible detrimental effect on the visual amenity of the area as a whole.
- The height of the proposed development will inherently cause issues of overlooking, overshadowing, microclimate effects and radio communication interference.
- The communications regarding the development by way of community consultation have misrepresented the scheme and the visualisations provided in support of the application are misleading and inadequate.
- The hybrid nature of the application is such that it is impossible to judge the merits of the buildings for which outline permission is effectively being sought without full plans and elevations.
- The density of the proposed development will have a detrimental impact on local infrastructure, particularly with respect to traffic and parking, and this will be cumulative with the effect of other nearby developments.
- The application is premature and prejudicial in the context of a draft planning framework that has yet to be published in final form, receive statutory consultation or indeed be adopted.

These objections are discussed in further detail in our representation. Given the limited time available to study the extensive planning application we reserve the right to make further representations before this application is considered.

We support the objections raised by other residents groups and associations in connection with this application.

In recognition of the profound objections of many residents, we request the relevant planning authorities consider whether the planning application under consideration is appropriate or acceptable.

We have provided accurate visualisations of the proposed development, based on digital models provided by the architects at our request, which demonstrate the serious detriment that this development would have on the surrounding predominantly residential environment.

We seek the opportunity to attend the relevant planning committee meeting and make a representation on behalf of the local residents.

In the event that it is not possible to reach a satisfactory resolution we will call upon intervention from the Mayor of London and the possibility of judicial review.

In the light of these serious concerns we strongly recommend that the planning application be refused, pending further consultation on the *White City Opportunity Area Planning Framework* and consideration of other development plans in the area.

## I Introduction

**1.1** The former Woodlands site of the proposed development was previously the international headquarters of BBC Worldwide. Although of dubious architectural merit, the previous low-rise office accommodation was sympathetic to the surrounding area in height and density. The land was acquired by Imperial College after BBC Worldwide relocated to the Media Centre at their White City campus as part of a wider rearrangement of the BBC property portfolio.

**1.2** Clearly the new owners saw opportunity in the plot. The previously viable buildings were demolished and the site was levelled. The first phase of development was begun without full planning permission for the rest of the site. The scale of the first phase dismayed many local residents, with buildings of three to five stories replaced with 10-storey student accommodation blocks. Many residents now feel that they were not adequately informed of the scale of the initial development, or the plans beyond this.

**1.3** The local council has made minimal effort to consult local residents who will be affected by the proposals for the second phase of development. The statutory notices served on residents provide minimal indication of the scale of the scheme.

**1.4** The promotional material circulated on behalf of the developers has been highly selective in its presentation.

**1.5** For this reason, the Woodlands Area Residents campaign was created on behalf of the local community to provide accurate information about the proposed development.

**1.6** The campaign aims to represent the views of the majority of residents from across a wide area, in a community that crosses the boundary of Hammersmith and Fulham with Kensington and Chelsea.

**1.7** Speaking to hundreds of residents by going door to door it became apparent that many were unaware of the scope of the proposals and were genuinely shocked and appalled when they saw elevations showing the height of the planned development. There was also a prevalent impression that Hammersmith and Fulham Council appears positively favourable to the development and indifferent to the views of the local electorate and residents of the neighbouring borough.

## 2 Context

**2.1** Unlike the light industrial and commercial areas to the south of the A40 Westway, the Woodlands site is directly adjacent to traditional residential streets that have provided family homes for over a century.

**2.2** The design of the proposed Phase Two of development is entirely out of context with the Edwardian residential streets to the north and the conservation areas to the west in the neighbouring Royal Borough of Kensington and Chelsea. These are distinct communities with traditional character that deserve to be preserved and protected.

**2.3** The quiet tree-lined streets of Shinfield Street, Nascot Street, Glenroy Street, Caverswall Street and Eynham Road in London W12 form a distinct neighbourhood that is highly valued by its residents. Consisting primarily of attractive Edwardian terraced houses and purpose-built maisonettes, most of these properties were constructed in the early years of the last century. A communal garden stretches along the railway embankment providing an important community amenity for residents.

**2.4** Directly across from the site lie the Oxford Gardens Conservation Area and the St Quentin Estate, bordered by Oxford Gardens, St Helen's Gardens, Latimer Road and St Quintin Avenue in London W10. This district contains many fine family homes.

**2.5** This charming area, known as North Kensington, has a strong residential character. There is clear architectural continuity between the residential streets on either side of the railway line that marks the formal border of Hammersmith and Fulham with Kensington and Chelsea. Irrespective of borough boundaries, these streets are served by the same shops and other amenities and have much in common.

**2.6** The community is served by two large public recreation areas, Wormwood Scrubs and Little Wormwood Scrubs, which are currently open spaces that are highly valued by the local residents from both boroughs. There are also extensive school playing fields within a few hundred metres of the development.

**2.7** The skyline is largely unobstructed and the evening sky is a significant feature as the sun sets in the west.

**2.8 We oppose the application on the grounds that it is fundamentally unsympathetic to and incompatible with the character of the surrounding predominantly residential setting and for this reason we oppose the application.**

## 3 Conservation Area

**3.1** This residential community includes the Oxford Gardens Conservation Area in neighbouring Kensington and Chelsea, directly overlooked by the proposed development.

**3.2 We object to the application on the grounds that it is in direct contravention of planning policies relating to the neighbouring conservation area.**

## 4 Opportunity Area

**4.1** The draft White City Opportunity Area Planning Framework covers the mainly commercial area to the south of the A40 Westway, which is appropriate for redevelopment and regeneration.

**4.2** It is highly questionable whether a similar scale of redevelopment should continue north of the A40 Westway, where it intrudes into a predominantly low-rise residential area.

**4.3** The owners of the former Woodlands site, and any subsequent leaseholders, already have every incentive to develop the plot, which is now largely levelled. There should be no need for special planning policy incentives to encourage speculative development that will directly affect neighbouring residential areas.

**4.4 We challenge to the assumption that the area to the north of the A40 Westway is appropriate for buildings of up to 35-storeys and for this reason object to this application.**

## 5 Scale

### 5.1 Height

**5.1.1** Many have been critical about the height of the planned buildings, not only of the 35-storey tower but also the other blocks, which would be significantly taller than the first phase of development on the site. There is also a concern that the tall tower could be the thin end of the wedge, leading to further blocks of a similar height in the area.

**5.1.2** We have spoken to hundreds of local residents and there is almost universal dismay at the prospect of a 35-storey tower block in this part of London. The proposed tower block is ten times the height of the immediately neighbouring two to three-storey housing. This is evidently overbearing, excessive and oppressive.

**5.1.3** While most people are not opposed to the principle of redevelopment and local regeneration, they are concerned about the density of the proposed scheme and in particular its height, which will dominate the entire neighbourhood.

**5.1.4** The suggestion that very tall buildings might even be acceptable at this location is entirely without justification, beyond the specious and spurious suggestions of the need for local landmarks or a gateway to London.

**5.1.5** This application and the planning policies that appear to encourage it, reflect a perverse sense of architectural ambition that is simply not shared by the majority of the residents that the council represents. If there is a place for tall buildings, it is not on this site. If there is a need for a gateway to London there is no evidence that this is appropriate location. Even if there were a need for such a gateway, which we dispute, this is simply a gatepost, designed in isolation, with no architectural linkage to other buildings, existing or proposed.

**5.1.6** We also note that the elevations and visualisations of the 35-storey building also show an approximately 18 metre high mast at the top, yet this is not referenced by height or the total height of the tower. We find this a curious omission. It would appear to take the total height of the structure to just under 140 metres above sea level. We presume that it would also require an aviation warning light at the top. This too does not appear to be mentioned in the application, another astonishing omission.

**5.1.7** One wonders whether planning permission would normally be approved for an 18 metre mast above the roofline of a residential property in Hammersmith and Fulham, let alone the neighbouring conservation area. For this not even to be specified on the planning application suggests a cavalier approach to the process. The application should also be considered invalid in this respect.

**5.1.8** The proposal for buildings of up to 12 storeys and a 35-storey tower on a site that directly overlooks a conservation area takes perverse advantage of the location of the site on the borough boundary.

**5.1.9** It is evident from the design iterations that the developers are highly aware of the potential negative impact of the height of the proposed development, not only on the surrounding area but also on their own site. The design solution has been to site the tallest tower at an angle in one corner of the plot. They do not appear to have considered the more fundamental question of whether a tall tower is at all appropriate in this location. This should be the central question for the planning authorities.

**5.1.10 We object to the application on the basis that the scale, massing and height are inappropriate to the site, neighbouring a conservation area, irrespective of any draft proposals for the White City Opportunity Area.**

### 5.2 Overshadowing

**5.1** The development would overshadow local homes, resulting in a significant loss of outlook and in some cases a 50% reduction in sunlight in the winter.

**5.2.2** Our own analysis, using computer models provided on request by the architects, suggests that there will be considerable overshadowing of homes across a wide area, particularly in the winter months, when the sun is low in the sky. For instance, the shadow studies that we have produced suggest that residents closest to the development will no longer be able to see the sun directly from their homes on Christmas Day.

**5.2.3** The shadow map in [Image 1](#) in this document was generated on behalf of Woodlands Area Residents from an accurately geolocated digital model. It shows the shadow produced by the sun on a map of the area on 21 March. It is broadly comparable to the study provided by the applicant in their *Technical Appendix 12*. Note that the central landscaped area of the site is shaded by the surrounding tall buildings for most of the day.

**5.2.4** Although the Spring Equinox is conventionally used as a representative day, during the winter months the sun is lower in the sky and the days are shorter. [Image 2](#) shows the shadows on 21 December. Note that the shadows from the tall buildings extend over much of the neighbouring area at different times of the day and some properties nearest the site are in continuous shade.

**5.2.5 We object to the application for reasons of overshadowing and recommend that the**

**planning authorities commission further studies to investigate these effects.**

**5.3 Loss of Light**

5.3.1 We believe that there are implications for loss of diffuse daylight to windows and loss of sunlight availability to windows for a number of properties, with potential loss of sunlight for some open spaces and gardens.

5.3.2 We are seeking expert opinion on this from specialist consultants and advising affected residents on their rights to light. This is a civil matter and residents will have the opportunity to take action accordingly.

**5.4 Solar glare**

5.4.1 We do not believe that issues of reflected light from the large expanses of glazing envisaged have been adequately considered. This has the potential not only to create further visual nuisance, but also needs to be considered in the context of highway safety, particularly with respect to the A40, running east to west directly adjacent to the site.

5.4.2 The planning authorities should require further detailed independent studies and simulations of solar glare and reflected light as it is not possible to assess this from the level of detail in the model provided to us by the architects.

**5.5 Light pollution**

5.5.1 There is also concern from residents about increased light pollution from the proposed buildings. The majority of the visualisations that have been submitted represent daylight conditions and insufficient consideration has been given to the visibility of the buildings in the evening and at night.

**5.5.2 We oppose the application due to the potential light pollution and request that the planners require further independent studies to investigate and visualise the effects of illumination from the proposed buildings.**

**5.6 Visual amenity**

5.6.1 Irrespective of the technical issues of loss of daylight and sunlight through shadowing, and conversely the solar glare from reflection, together with concerns arising from illumination at night, this development will result in a profound loss of amenity in terms of the otherwise unobstructed skies in this area of London.

5.6.2 Many properties to the west of the development will no longer see the setting sun in some months and the evening skies will be dominated by the silhouettes of an illuminated urban cityscape that will fundamentally change the character of the area.

5.6.3 The tall tower is specifically intended to act as a landmark. Despite any suggestions to the contrary, the tower will be clearly visible from homes in the surrounding residential streets. Its extensive glass windows will be illuminated at night, further increasing its visibility.

5.6.4 Many residents regard this as a devastating prospect and cite the otherwise uninterrupted horizon as one of the key amenity features of the area.

**5.6.5 We object to the proposed development as it will result in a significant loss of visual amenity and loss of outlook.**

**5.7 Overlooking**

5.7.1 The planned development, in particular the tallest tower, will overlook neighbouring residential properties. Although at some distance, due to its extreme height, it will offer previously unavailable views into local homes and gardens.

5.7.2 Many residents that have previously had quiet enjoyment of their homes and gardens will have unavoidable views of the tall tower, resulting in an unacceptable real and perceived loss of privacy and amenity.

**5.7.3 We object to the application on the basis of the potential for overlooking and the consequent loss of privacy.**

**5.8 Microclimate**

5.8.1 It is inevitable that the proposed development, and in particular the 35-storey tower, will have an impact on the microclimate of the area, with respect to temperature and air turbulence effects.

5.8.2 The implications of microclimate effects need to be independently analysed as it is unwise to rely upon any studies commissioned by the applicant.

5.8.3 We therefore recommend that the planning authorities require further evidence of the microclimate issues.

**5.9 Acoustics**

5.9.1 We are also concerned about the potential acoustic effects of the buildings with respect to road noise from the adjacent A40 and railway line. While the proposed buildings may serve to attenuate direct noise, they have the potential to reflect and focus environmental noise nuisance.

5.9.2 The acoustic effects have particular implications for the proposition that the central area of the development serve as an amenity for the site and the wider community. Together with potential microclimate issues, we believe that this feature may be less attractive as a recreational area than the developers suggest. The possible impact on neighbouring properties also needs to be explored more fully.

5.9.3 We therefore recommend that the planning authorities require further evidence of the acoustic issues.

**6 Representation**

6.1 While the developers claim to have engaged fully with the local community, their communication has been highly selective. Where there have been public meetings there has been vociferous opposition from many residents.

**6.2** Many local residents have lived in the area for years. Some are elderly and vulnerable. They are all too easily persuaded by professionally produced marketing messages. Even those that are concerned are overwhelmed by the extent of expensively produced material from commissioned consultants.

**6.3** In all the marketing communications employed by the public relations company on behalf of the developers, great emphasis has been placed on the role of Imperial College and the potential public benefits of the scheme. Less emphasis has been given to the significance of the largely commercial office and speculative hotel and apartment block development.

**6.4** Many residents feel that they have been misled over the nature and scale of the development. Notably, none of the printed collateral produced to promote the development showed a single elevation or provided any height information.

**6.5** Emphasis was instead placed on plan views showing a central public area and stressed public amenities such as restaurants and coffee shops, new local healthcare services and a nursery, all of which are prospective and not necessarily guaranteed to be available to local residents.

**6.6** The central landscaped area in the proposed scheme, promoted as the equivalent to a city square, is about the size of the roundabout at the end of St Quintin Avenue. It is located next to a major arterial road and will be largely overshadowed by the other buildings on the site.

**6.7** The suggestion that this development will therefore make a significant difference to the recreational amenities available to local residents is absurd, given that there are large areas of parkland nearby. Furthermore, the development will impinge on the skyline from these recreational areas as a constant indication of urbanisation, actually reducing the net amenity to residents.

**6.8** It would be unacceptable to advertise a product or service on the basis of the misrepresentation of information that has characterised the community consultation. Yet this developer rhetoric appears to go entirely unchallenged by the planning authorities that are most competent to judge these matters.

## 7 Visualisations

**7.1** One of the apparent justifications for a tall building is that it should provide a navigational landmark, which implies that it should be clearly visible for miles around. Yet the applicants appear to be careful to suggest that it will be hardly visible from key locations across two boroughs.

**7.2** Of the 29 view locations selected, 11 of them are from within Hammersmith and Fulham and 18 of them are from within Kensington and Chelsea. Only 4 of the views within Hammersmith are from less than half a kilometre, compared to 10 from within Kensington. Only one shows a view from the immediate vicinity in the residential area to the north within Hammersmith and Fulham, which is likely

to be most affected by the proposed development. There is only one view, from the middle of Wormwood Scrubs, at a considerable distance of 1.2 kilometres, which shows the impact of the proposed development from the large public recreational areas within Hammersmith.

**7.3** This would seem to suggest that the applicants are more concerned about the views from the neighbouring borough than those within the area in which the development will take place and the planning application is being made and where homes will be most affected.

**7.4** In order to consider this application properly, the planning department should insist that further accurate visual representations be produced to demonstrate the impact of the development. At least a further seven views from within Hammersmith and Fulham should be provided, to match the number for the neighbouring borough. We would be happy to advise on suitable locations. These should include views from the north of Little Wormwood Scrubs, the south west of Wormwood Scrubs, and across the playing fields adjacent to Scrubs Lane.

**7.5** The so-called accurate visual representations that have been submitted by the developers are highly misleading and do not reflect the actual visual impression that the proposed development will create.

**7.6** Local residents have been sceptical of the images produced, given the evidence of their own eyes of the visibility of the first phase of the development on the site.

**7.7** The original photographs to support this application were taken in autumn and foliage obscures much of the proposed development from some of the selected viewpoints. However, at other times and from other locations the buildings will be very visible. The suggestion that a 35-storey building will be conveniently hidden behind a tree is clearly highly disingenuous.

**7.8** The photographs provided by the applicants have evidently been taken with a 24mm wide-angle lens on a 35mm camera. The use of an extreme wide-angle lens with a 74° horizontal field of view results in more distant objects appearing relatively small in the frame, minimising their visual impact. These are also indications that perspective control has been used to correct the converging verticals that would otherwise be seen when looking up at a tall building. This technique, which can only be achieved with a specialist lens or through computer manipulation, is often used in architectural photography but produces an image that simply does not correspond to normal human visual perception.

**7.9** It is generally accepted that a 50mm focal length standard lens on a 35mm frame produces a perspective that approximates that of normal human vision, equivalent to a 40° horizontal angle of view.

**7.10** Our own empirical photographic studies, combined with accurate visualisations produced using the digital model provided on request by the architects, allow the true scale

of the development to be seen and its actual visual impact to be more fairly assessed.

**7.11** Compare [Image 3](#) in this document, as submitted by the applicant, with [Image 4](#), produced by Woodlands Area Residents. Both images were taken at approximately the same location, at a camera height of 1.6 metres from the ground. Image 2 shows a cropped area equivalent to a 50mm lens, which represents the perspective of human vision.

**7.12** The description of the proposed view in the submitted *Townscape and Visual Impact Assessment* claims: "There is an obvious contrast in scale between Building F and the housing in the foreground. The composition of elements within the view would be ordered and pleasing. The distinctive form and high quality architecture of Building F would be apparent and it would be a high quality presence. ... The effect is beneficial." We profoundly disagree.

**7.13** Note that in [Image 5](#) a tree in full foliage conveniently obscures the proposed development. [Image 6](#), taken from approximately the same location, shows that the proposed development would be clearly visible at other times and from other viewpoints.

**7.14** The description provided by the applicants for this view claims: "Building F would have little effect on the view in the summer. In the winter months, it would form a distinctive focal point in the middle distance and the alignment is such that it would present a slender aspect in this view." Again, having verified the view, we disagree. It goes on: "The accumulation of these forms would not be perceived as a coherent townscape composition from this point". On that, we can at least agree. It concludes: "the adverse effect is mitigated by the high quality of the architecture". This is clearly subjective sophistry.

**7.15** We also note that the views are taken from the street at average eye level. Evidently, the intrusive effect of the development will be even more evident from the first or second floor windows of private homes. The design of Victorian and Edwardian bay windows is such that the proposed buildings will be visible even if homes do not directly face the development.

**7.16** We would be pleased to provide further visualisations with full methodology to enable verification of these views and the full impact of the scheme to be appreciated.

**7.17** In order to assess the true visual impact of the development, the planning authorities should request that any representations provided show an uncorrected perspective view equivalent to a standard 50mm lens on a 35mm camera.

**7.18** **We object to the application as it stands on the grounds that the visualisations submitted in its support do not provide representative views of the proposed development and the damage it will cause to the surrounding residential and recreational environment.**

## 8 Reception

**8.1** Television reception could also be affected as a result of the shadowing of the main transmitter for London at Crystal Palace and some satellite television reception could be blocked.

**8.2** Local residents have already experienced interference to digital terrestrial television reception as a result of Phase One of the development on the Woodlands site. In some cases these have been mitigated by replacing receiving antennae. These issues are likely to be exacerbated by the even higher and denser buildings proposed for Phase Two.

**8.3** The application shows the shadow effect of the proposed buildings with respect to the Crystal Palace transmitter. This shadow extends almost nine kilometres beyond the site towards Wembley. The study concludes "the development may have a major effect on full digital television signal reception to properties in the area north-west of the development site bounded by Wood Lane on the west, the Wormwood Scrubs Park to the north and the railway line to the east." It proposes that properties affected would therefore be obliged to employ cable or satellite to receive television services.

**8.4** The application shows that some properties close to the site would be unable to receive satellite television signals, notably those along Wood Lane from Shinfield Street to Glenroy Street. There is no practical mitigation for the loss of direct line of site visibility of satellites in geostationary earth orbit. Cable television services provided by Virgin Media are not a direct substitute for terrestrial or satellite reception.

**8.5** The applicants rely on a ruling that related to the construction of a building in an Enterprise Zone that was not subject to usual planning permission, prior to the adoption of digital television transmissions. It is now considered a planning matter.

**8.6** The relevant planning authorities therefore have a duty to consider the effect on television reception for affected properties. Rather than relying on the site visit and desk research provided by the consultants on behalf of the applicant, the authorities would be well advised to commission a full study from the BBC, which happens to be one of the major employers in the borough. The BBC Research and Development department has the relevant expertise and equipment and is conveniently located within half a kilometre of the proposed development.

**8.7** In view of the potential loss of satellite and terrestrial television transmission reception for a number of properties in the immediate area, it has been suggested that residents in the adjacent streets be provided instead with complimentary cable television and high speed broadband internet access for the lifetime of the proposed buildings on the site. Any such proposals for mitigation should be imposed as a planning condition.

**8.8 Given that the application concedes that there will be significant issues with television reception we object to the application on the planning grounds of potential impact on television reception.**

**9 Transport**

9.1 The density of the development is a concern for many, particularly with respect to increasing traffic congestion, parking problems and general pressure on public transport infrastructure. This will only be made worse by plans for further development in the vicinity.

9.2 Traffic on the A219 Wood Lane at the junction with the A40 Westway is already unacceptably congested during peak hours and it is inevitable that further development on the Woodlands site, with a single access road, will add considerably to traffic congestion. This will compromise the safety of pedestrians and cyclists, add further delay to existing public bus services and interfere with the passage of emergency vehicles, notably ambulances service nearby hospitals.

9.3 The transport assessment the applicants have submitted suggests that the contribution of the proposed development to local traffic will be negligible. We respectfully disagree. The nature and density of the proposed development represents a significant change of use from the former offices on the site, not least with the addition of a hotel and residential accommodation. We find it inconceivable that this will not generate significant additional traffic, not only in terms of private cars, but also in shuttle bus, taxi, delivery and service vehicle access. We suggest that this requires rigorous independent analysis rather than relying on the submissions of the developers.

9.4 While it is understandable that the applicants place great value on the local public transport infrastructure, they will be making no contribution to its capacity, other than through the fares from the additional passenger journeys they will create.

9.5 The development proposes only 239 car parking spaces. We note that this is just one fewer than were previously on the site when primarily provided office accommodation. While the constraint on parking and the intended reliance of public transport is in many ways admirable, it is unrealistic to believe that it will be adequate for the numbers of workers, visitors and residents expected to use the site, with associated deliveries and service vehicles. While it may be intended to influence behaviour with respect to private cars, the inevitable practical consequence will be additional pressure on local roads and parking.

9.6 The residential streets to the north within Hammersmith currently have metered parking with up to two parking permits per address. This is already inadequate for the local population, particularly during local sporting events, when residents often find it impossible to park in the relevant zone or anywhere near their own homes.

9.7 We believe that the proposed development will result in additional pressure on parking in neighbouring streets. At the very least this must be mitigated by imposing a residents only parking policy, with permits provided only to residents of the neighbouring streets and appropriate provision for their visitors.

**9.8 In view of the density of the proposed development and the dubious claim that its impact on transport infrastructure will be negligible, we object to the application on the basis that it will have a detrimental effect on local traffic and parking, particularly when considered in conjunction with other proposed developments in the area.**

**10 Design**

10.1 Consideration of architecture and design quality is necessarily highly subjective. What might be a striking landmark to one may be a carbuncle to another.

10.2 It is evident that the specialist architects responsible for the design of the 35-storey tower have been sensitive to the potential impact of such a building and to minimise this through form and placement. But does it represent "exceptional design"?

10.3 A key consideration for exceptional architecture is how it relates to its setting. It seems that the proposed 35-storey tower has very little consideration for its environment. The design parameters appear to have been that it should be at least a hundred metres tall and that it should be acceptable to the local council, with no consideration for the local community.

10.4 The design clearly represents an intelligent response to a brief, but that does not necessarily make it desirable or significant. It is evidently intended as a landmark building, but that does not imply the need for such a landmark. The proposed tower is of exceptional design only in the sense that it represents an exception to the prevailing streetscape.

10.5 The proposed tall tower offers no response to its surroundings. While not without architectural merit, it has no special relationship to its setting. The architects appear to be more concerned with maximising the views from the property than considering views of the building and its relationship to the existing built environment.

10.6 Functionally it provides high-quality accommodation in a high-rise building, but is there any evidence of demand for this in an area of predominantly terraced family homes? Can such a building be justified by the views that it gives to those that live at the top, at the expense of the views of those that must look at it from their homes at street level?

10.7 The key consideration, which has yet to receive full public consideration, is whether this is an appropriate location for such tall buildings. This area of London is predominantly low-rise, with the exception of some high-rise tower blocks that represent the worst manifestations of planning from the 1960s and 1970s. The Trellick Tower

remains controversial decades later. To some it is the apogee of Brutalist architecture, which they see as a good thing. To others it remains an eyesore and an example of planning policies that failed a generation and continue to blight the urban landscape.

**I.08** It is suggested that the quality of the architecture will enhance the skyline. This is not only highly subjective but an arrogant assertion. Many of those that have chosen to live in the area have done so partly because the skyline is largely uninterrupted. They are able to live in a major city without feeling that they are part of a towering metropolis. If they wanted to live in such a setting there are many other opportunities to do so in the capital and other major cities. That is not currently a defining characteristic of Hammersmith and Fulham, or Kensington and Chelsea.

**I.09** The scheme appears to have been designed entirely in isolation from its surrounding environment, which indeed it was. No local residents were consulted on the plans until the original scheme was proposed.

**I.10 We object to the application on the grounds that irrespective of any architectural merit it demonstrates little sympathy or respect for the surrounding predominantly residential environment.**

## **II Density**

**I.1.1** The total density of the proposed development is inappropriate for the site. Architects we have consulted have questioned the density and pointed to the extraordinary difference between the density of the proposed scheme and the surrounding residential streets, with a consequent lack of integration and coherence.

**I.1.2** It is difficult to see how the applicants could have fitted more onto the site. Maximisation of the site is clearly an objective, but we feel that this is at the expense of an appropriate balance between the needs of Imperial College for an academic campus and a commercial desire for speculative property development.

**I.1.3 We object to the proposed masterplan scheme on the basis that it represents an over-development of the site that is out of relation with the surrounding predominantly low density residential area.**

## **12 Use**

**I.2.1** The applicants emphasise that this is primarily a development for the Imperial College West campus, comprising student accommodation and academic buildings. However, it is clear that the development will be largely funded by speculative commercial development including office accommodation, a hotel and private apartments.

**I.2.2** We note it appears that Imperial College stands to receive substantial financial benefits from the development, as do the commercial partners Voreda Capital with which they are developing the scheme. This planning gain is clearly

predicated on the assumption that they will be successful in gaining planning permission for their proposals.

**I.2.3** We object to the suggestion that the office, hotel and apartment buildings are commercially necessary for the construction academic buildings and student residences. That is a funding issue for the owners of the site, not a planning consideration.

**I.2.4** We therefore recommend that planning permission for each of the buildings is judged on their respective merits, not as a commercially necessary part of a proposed mixed use scheme.

## **13 Housing**

**I.3.1** The developers state that a third of the apartments will be reserved for "key workers" although these are not defined and the intention actually appears to be to provide accommodation for Imperial Staff. There is no indication or commitment that the development will provide affordable family housing for the local borough. Indeed, there is no commitment that any proportion of the apartments will be rented rather than sold, that mechanisms will be in place to ensure that housing is affordable, or even available on the open market.

**I.3.2** We note that the housing unit reserved for these so-called key workers will be allocated from the lower floors, at the level of the A40 Westway, leaving the higher floors available for private sale, no doubt to speculative investors. Nothing in this proposal speaks to any genuine concern to integrate with the local community. As such it fails to meet the very real housing needs of the area, save the self interest of the owners of the site.

**I.3.3 On the basis that the residential element of the development fails to comply with local planning requirements for housing we object to the application.**

## **14 Hybrid**

**I.4.1** This combined detailed and outline application includes full plans for a number of buildings but only indicative outlines for other buildings on the plot. As a result it is impossible to judge fairly and fully the final impact of the proposed scheme.

**I.4.2** The development is promoted on the merits of buildings that may never be built, such as the proposed hotel, for which there is currently no client.

**I.4.3** It is also convenient that the applicants omit from visualisations key buildings for which outline planning permission is sought in order to illustrate views that may never exist if they are built.

**I.4.4 We object to this hybrid application on the basis that the progressive approach to seeking full planning permission for building on the site has not allowed for adequate consideration of the site in its entirety.**

## 15 Revision

**15.1** There is a cynical view that suggests while the applicants appear unwilling to consider any further changes to their proposals, they have built in concessions that could be made in response to inevitable challenge. There is even a view that the tall tower could be sacrificed in order to allow the other aspects of the development. Alternatively, the height of the tall tower block could be reduced somewhat. The mast could be sacrificed. Minor modifications could be made.

**15.2** This is unlikely to be acceptable to local residents. Many object in principle to any building on the site that is significantly higher than the surrounding properties. The precedent has already been set on the site at over ten storeys, which many believe is already too high. The consultation and approval process for Phase One was highly questionable and many residents feel that the existing buildings should never have been allowed.

**15.3** There is some sympathy for further development on the site, providing that it is of high quality and appropriate density with respect to the surrounding residential streets. Imperial College is seen as a potentially good neighbour that may bring benefits to the area.

**15.4** What is particularly objectionable is the take it or leave attitude that the construction of an academic building is necessarily predicated on building a largely commercial office block, a hotel and a large block of flats.

**15.5** We therefore object to any possible trading between developers and planning authorities on elements of the scheme.

**15.6** The applicants have clearly taken a commercial risk in submitting such a bold proposal and it should be judged as a whole. We therefore request that any revisions should be subject to a new application and formal public consultation.

## 16 Policy

**16.1** The 2011 *London Plan* published by the Mayor specifically states with respect to tall buildings that they should “only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building” (7.7C), “should not impact on local or strategic views adversely” (7.7D) and the “impact of tall buildings proposed in sensitive locations should be given particular consideration” including “conservation areas” (7.7E).

**16.2** The *Core Strategy Local Development Framework* adopted by Hammersmith and Fulham in 2011, specifically policy BE1, states that “Development within the borough which includes tall buildings which are significantly higher than the generally prevailing height of buildings in the surrounding area, particularly where they have a disruptive and harmful impact on the skyline, will generally be resisted.”

**16.3** The policy goes on to say that tall buildings may be appropriate “In parts of White City Opportunity Area to be identified in a Supplementary Planning Document (SPD),

and in masterplanning which is consistent with the SPD”. We understand that this document has yet to be published and therefore fail to understand how it can be adopted as current planning policy.

**16.4** These plans have been submitted in the context of the draft *White City Opportunity Area Planning Framework*. Any immediate decision on this planning application would therefore anticipate formalisation of the planning framework and effectively set the policy for the area.

**16.5** The draft *White City Opportunity Area Planning Framework* 2004 states “North of the A40 building heights and massing must respect the surrounding residential area”.

**16.6** Since no further version of the *White City Opportunity Area Planning Framework* has yet been published or adopted, residents and council tax payers should be entitled to rely on this as a matter of policy.

**16.7** While the applicants rely upon references to the *White City Opportunity Area Planning Framework* they fail to engage with this core premise. The proposed development clearly does not respect the surrounding residential area. Phase One already impinges on the residential streets and the proposals for Phase Two would completely dominate the area.

**16.8** The draft *White City Opportunity Area Planning Framework* suggests (4.4.1): “There may also be limited opportunity for new housing in taller buildings; these will be expected to be of exceptional design, have an elegant form and feature a limited number of units per core to ensure that they have a positive impact on the townscape.”

**16.9** Irrespective of how well the architects may have responded to this as a brief, we question whether there is a need for the type of homes envisaged and whether a tall tower of high specification apartments with views out across London addresses the very real need for affordable family homes in the borough.

**16.10** In the context of the draft framework (4.4.2) the term tall buildings designates those over 15 storeys. The proposed tower block of 35 storeys clearly considerably exceeds this definition.

**16.11** For general guidance the plan states that: “The majority of new buildings should be medium-rise (6-9 storeys), with some elements of lower-rise (3-5 storey) terraces, particularly in areas close to existing neighbourhoods.”

**16.12** The plan states “There are limited locations within the OA that are likely to be suitable for taller buildings.” It goes on to say that “Taller buildings (12-15 storeys) may be appropriate along the Westway”. Again, 35 storeys is between two and three times this height. It states “Towers of approximately 20-30 storeys (up to 100 metres) would be appropriate along the Westway at the gateway to central London.” Whether or not that is indeed appropriate is highly

disputable, but nevertheless a tower of 35 storeys clearly considerably exceeds even this guidance.

**16.13** The original masterplan for the area (4.4.3) proposed up to three towers of approximately 30 stories or 100 metres. Whether or not such structures would have been considered acceptable, the current proposal again exceeds this at 35 storeys and 110 metres, excluding the 18 metre mast at the top.

**16.14** It is suggested: "The proposed locations have been selected to limit the impact of overshadowing on existing and future communities". Nevertheless, it is clear from our own studies that the proposed buildings, in particular the plans for a 35-storey tower, significantly overshadow the immediate residential neighbourhoods.

**16.15** With respect to tall buildings in longer views (4.4.6) it is suggested that from most conservation areas and local streets "the buildings are not visible as most views would be obstructed by trees and other buildings in the foreground." This is categorically false, as our own visual studies have determined. On the contrary, the proposed buildings, in particular the tall tower, are very visible from every street in the surrounding neighbourhood. Indeed, if it were not so evident it would not function as a "landmark".

**16.16** An evident flaw in the draft framework was the inclusion of questionable computer generated views that fail to represent the impact of tall buildings on local streets, in particular the conservation area in neighbouring Kensington and Chelsea. It was also extremely surprising that there were no views from the adjacent residential streets in Hammersmith. The planning application provides one view from Eynham Road, added at our request, although our studies have shown that this fails to represent the full impact on the local streetscape.

**16.17** In terms of residential development (6.4.1), the planning framework speaks of "creating human scale" and states that "schemes must be designed in context, to link with surrounding areas and respect the surrounding character, so that they help to knit together what has, in places, become a fragmented urban area." The proposed 35-storey apartment block is clearly entirely out of context and character with the local Edwardian terraced housing.

**16.18** The draft replacement version of the White City Opportunity Area Planning Framework was published for consultation in 2011. Many objections were submitted in response to the suggestion that tall buildings would be appropriate along the A40 Westway as a "gateway to London". The revised version of the planning framework has yet to be published and no statutory consultation on it has yet taken place.

**16.19** The application therefore pre-empts such consultation or the adoption of any planning policy that would formally permit tall buildings in the area.

**16.20** Given the clear contradictions between the draft planning framework and elements of this application, it

appears that the application is effectively prejudicing or even determining planning policy. This is evidently improper.

**16.21** Consideration of this application is therefore premature, since it relies for its justification on matters that have not yet been published or consulted on and are not yet adopted as planning policy.

**16.22 We object to this application on the grounds that it relies upon a draft planning framework that has not yet been adopted and prejudices the proper planning and consultation process.**

## **17 Combined effect**

**17.1** The proposals for the former Woodlands site must be considered in the context of other planned development at nearby sites. That indeed is surely the purpose of the *White City Opportunity Area Planning Framework*, which has yet to be finally consulted on or formally adopted.

**17.2** The White City Opportunity Area certainly represents a major opportunity for urban regeneration, which we support. However, it is clearly inappropriate to consider each of these proposals in isolation.

**17.3** The cumulative effect of development on the Woodlands site, together with that on land to the immediate south as far as the Westfield centre, will undoubtedly have a significant impact on the area.

**17.4** This is particularly relevant to infrastructure issues, where each applicant may rely on consultancy opinion that the impact of a specific development may be marginal. It is self evident that the cumulative effects may be substantial. This applies not only to traffic and transport infrastructure, but also to water supply, drainage and sewerage.

**17.5** To accept the application for Phase Two development on the Woodlands site without major revision would pre-empt the planning policy and public consultation that should enable appropriate and proportionate development and strategic regeneration.

**17.6** There is a suspicion that a number of schemes in the borough are being fast-tracked for reasons of political and financial expediency and that insufficient consideration and consultation is being given.

**17.7** If the planners are minded to accept applications on the basis of draft policies that have not received full public consultation, enabling speculative development to take advantage of the situation without full consideration of the cumulative effects of such development, then what is the purpose of planning?

**17.8 We object to this application on the basis that it pre-empts formal adoption of the draft White City Opportunity Area Planning Framework and the opportunity to consider the proposed development in the context of other neighbouring schemes.**

**18 Conclusion**

18.1 While welcoming the general principles of regeneration in the borough, the extension of the proposed White City Opportunity Area north of the A40 fails to recognise and respect the residential streetscapes that make this area a desirable place to live. The apparent indifference of the borough council to this is quite extraordinary. Clearly there is a balance to be struck between the need to preserve traditional lifestyles and the requirements for regeneration and investment to drive economic growth. Yet the demands of developers should not be permitted at the expense of the lives of the residents that the council ultimately represents. To allow a development of this scale and density adjacent to residential streets is clearly unacceptable.

18.2 The Royal Borough of Kensington and Chelsea has previously raised its concerns with the London Borough of Hammersmith and Fulham about the scale of developments in the proposed White City Opportunity Area on its border.

18.3 Unless these apparent border tensions can be resolved, we will be calling on the Mayor of London to intervene in this planning process to ensure an appropriate outcome for London as a whole.

18.4 In the event that it transpires that planning policies have been inappropriately applied the whole matter could be subject to judicial review.

18.5 **For all the reasons stated, on behalf of the local community we strongly object to the planning application for the proposed development. We call for it to be refused in its current form, pending further consideration of and consultation on the proposed White City Opportunity Area Planning Framework in the light of strong objections from local residents.**

*Dr William Cooper*

For and on behalf of Woodlands Area Residents

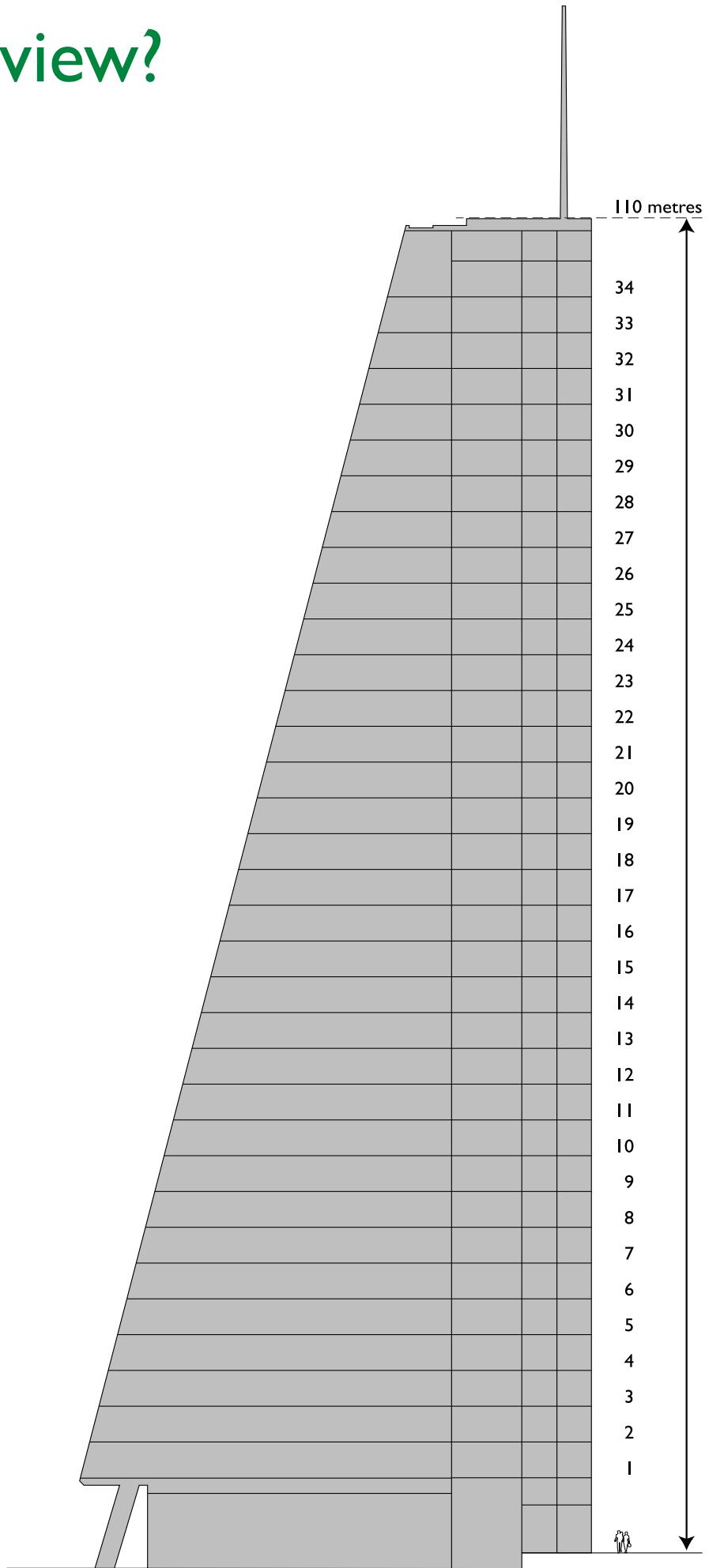
[info@woodlandsarearesidents.org](mailto:info@woodlandsarearesidents.org)

7 March 2012

# What's your view?



Local houses to the same scale



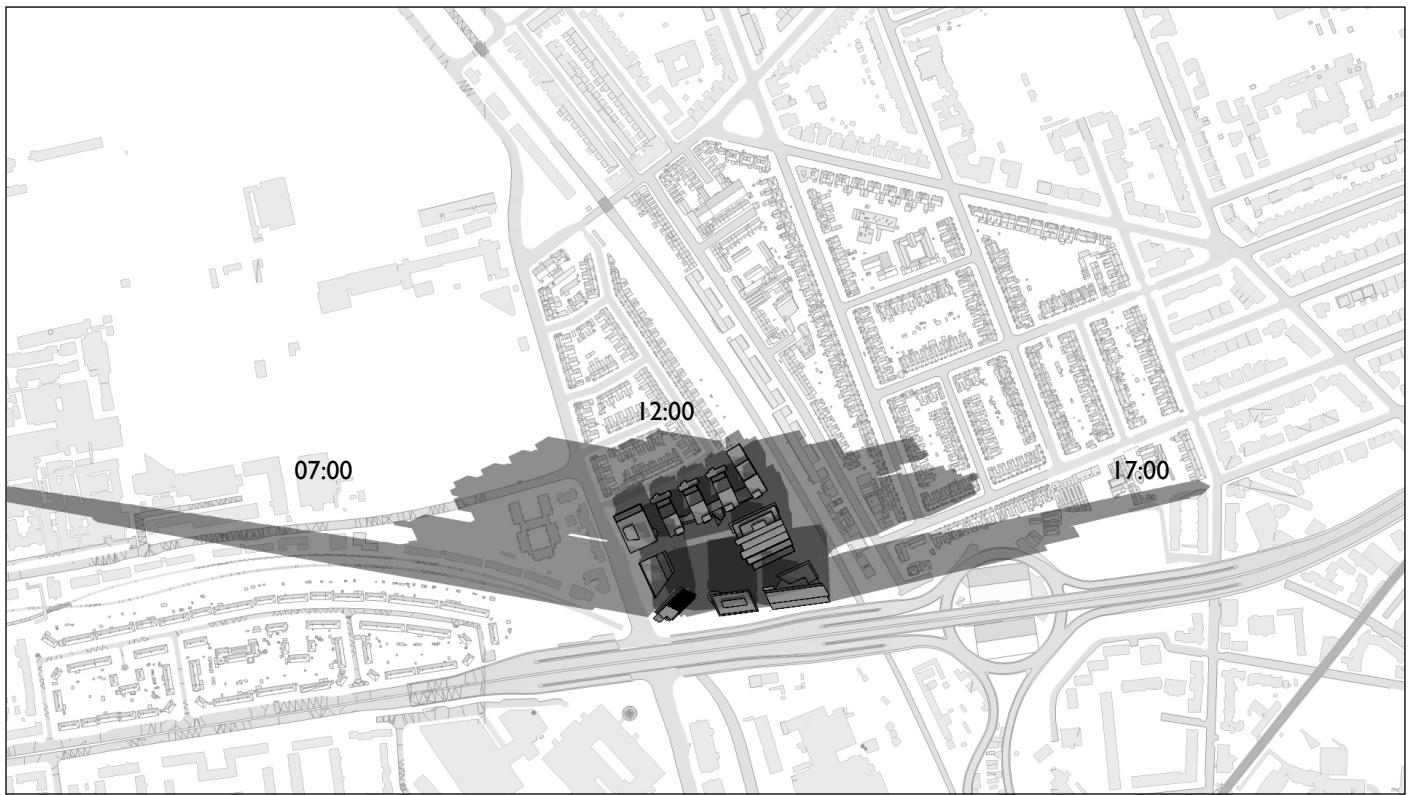


Image 1. Digital model showing sun shadows at 07:00, 12:00 and 17:00 on 21 March

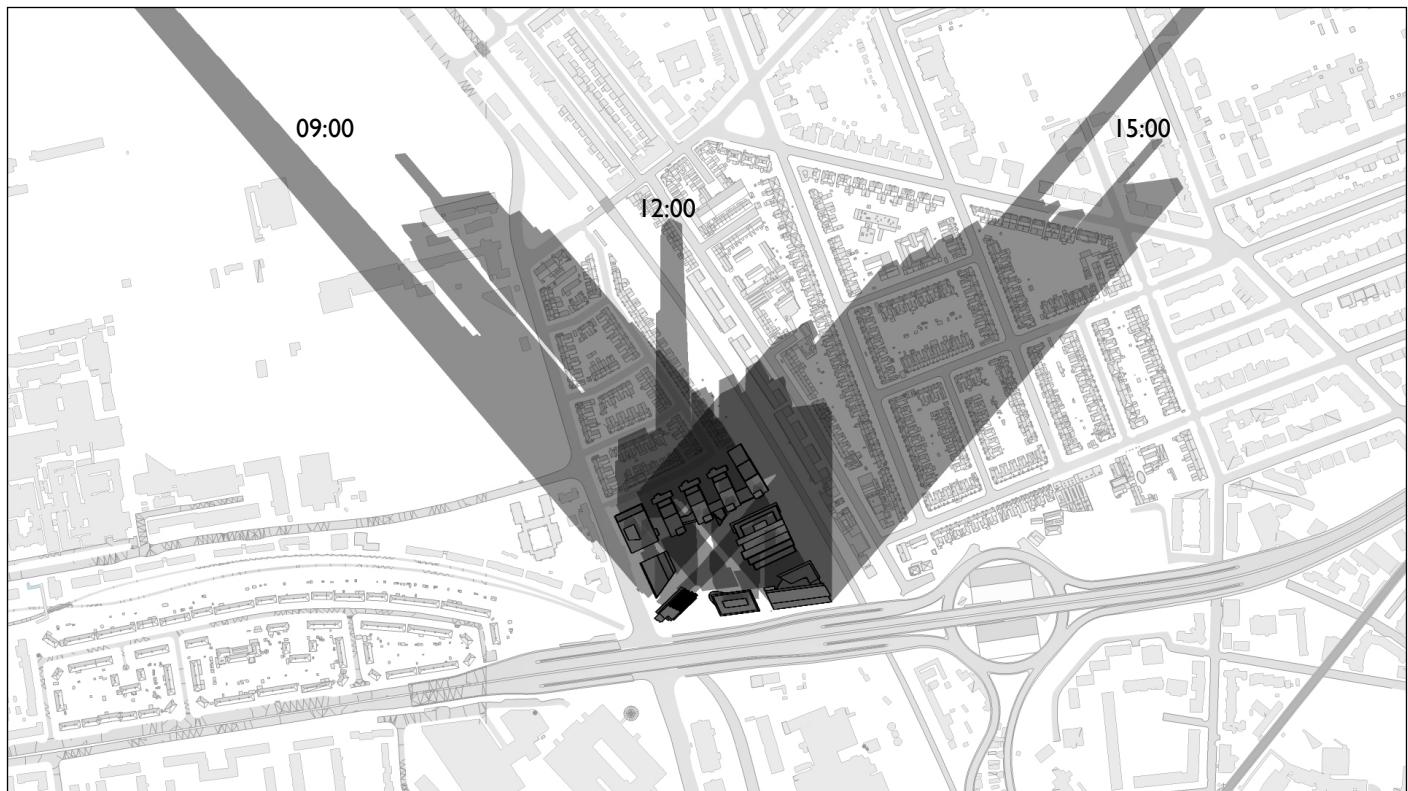


Image 2. Digital model showing sun shadows at 09:00, 12:00 and 15:00 on 21 December

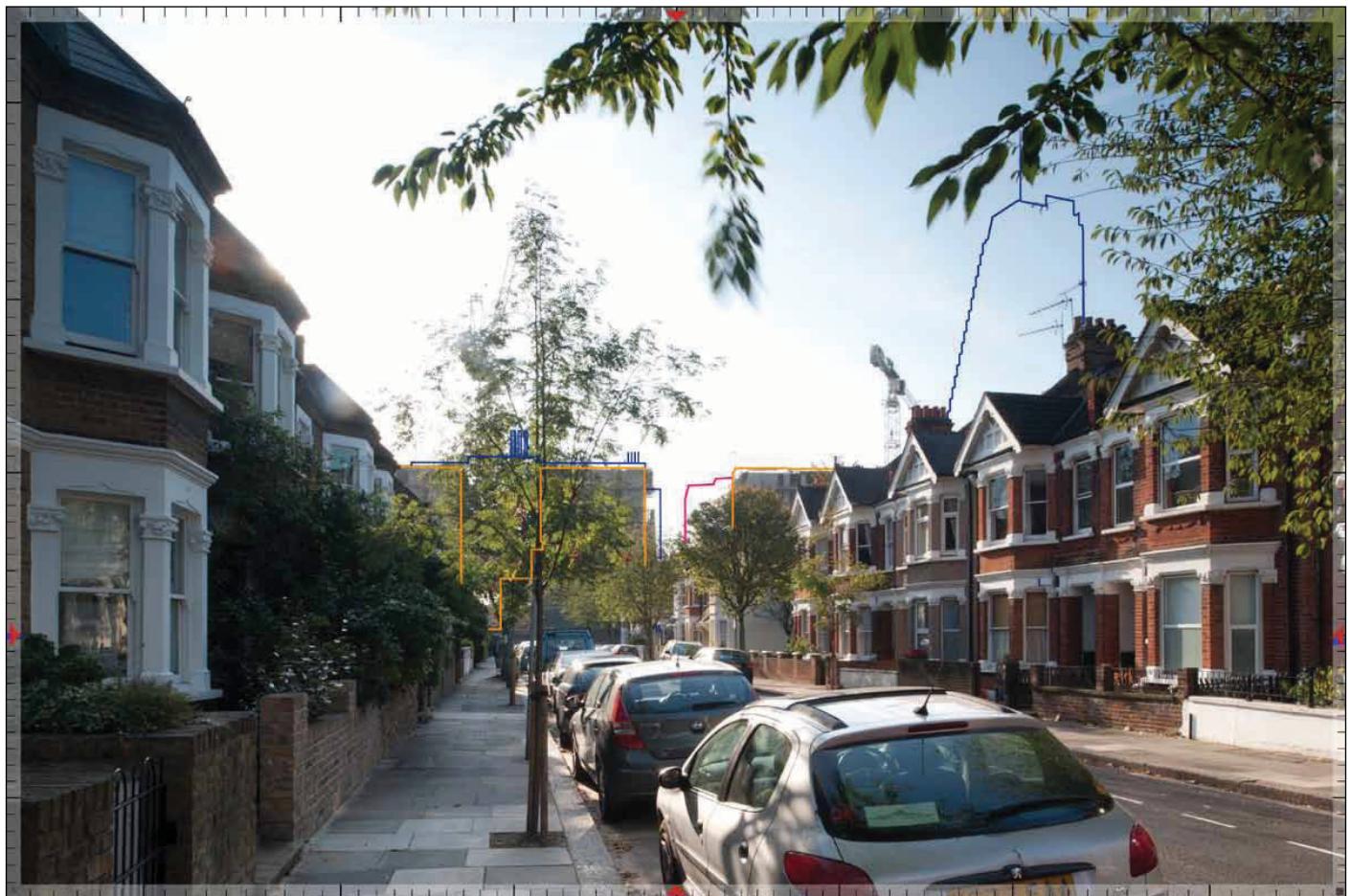


Image 3. Application visualisation 16 of development from Eynham Road, October, Perspective Control 24mm lens

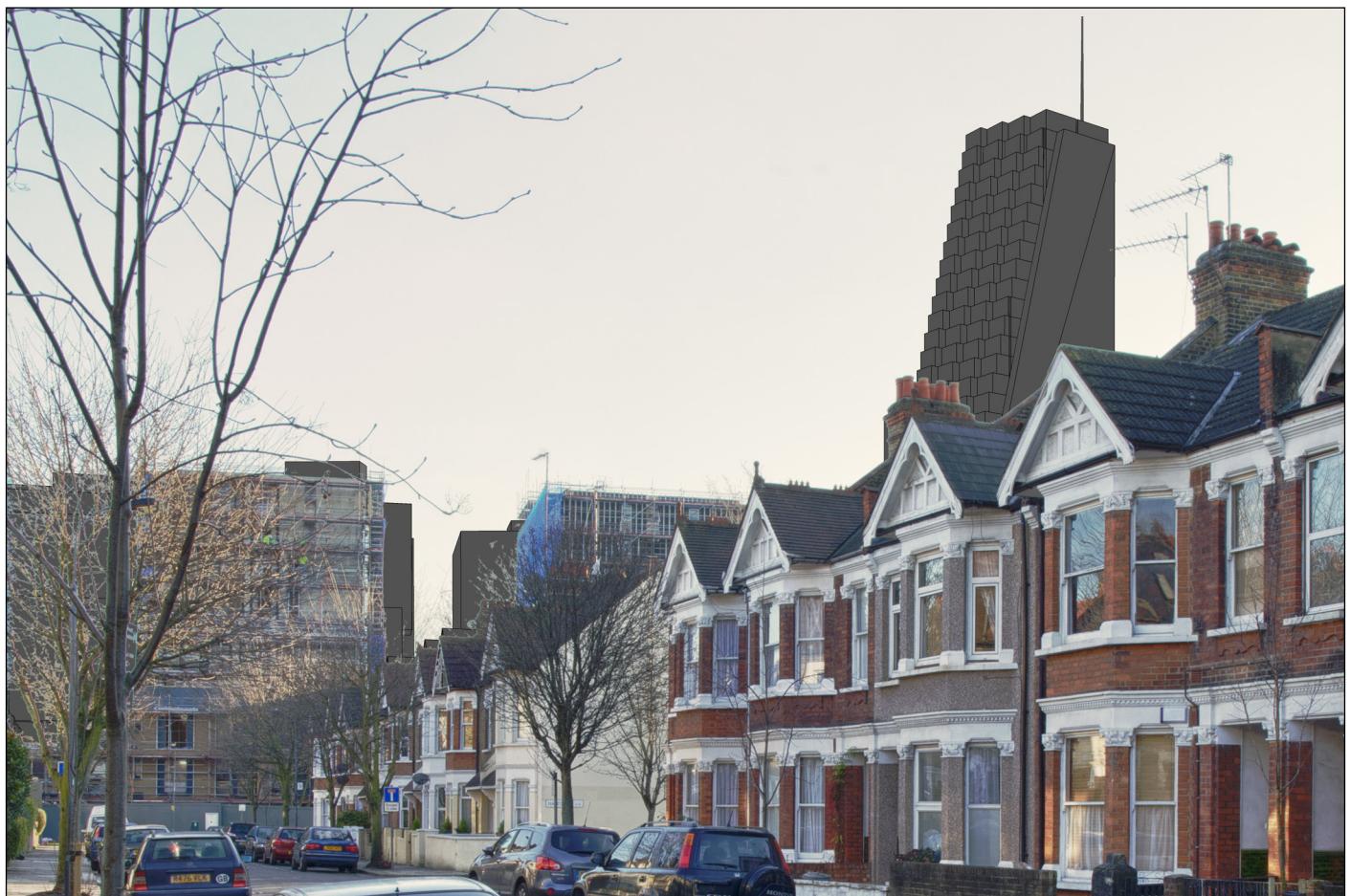


Image 4. Woodlands Area Residents visualisation of development from Eynham Road, February, 50mm lens crop

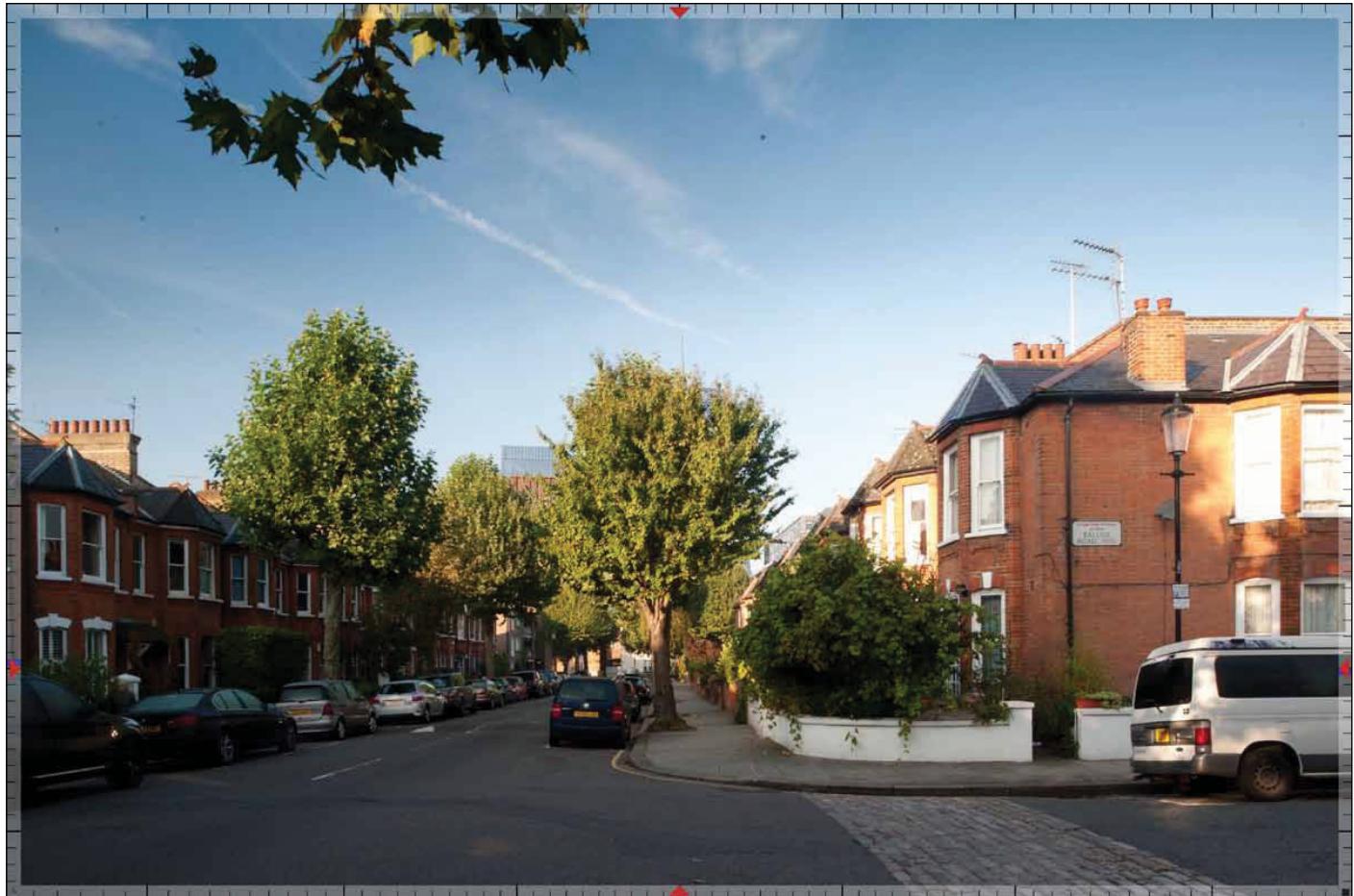
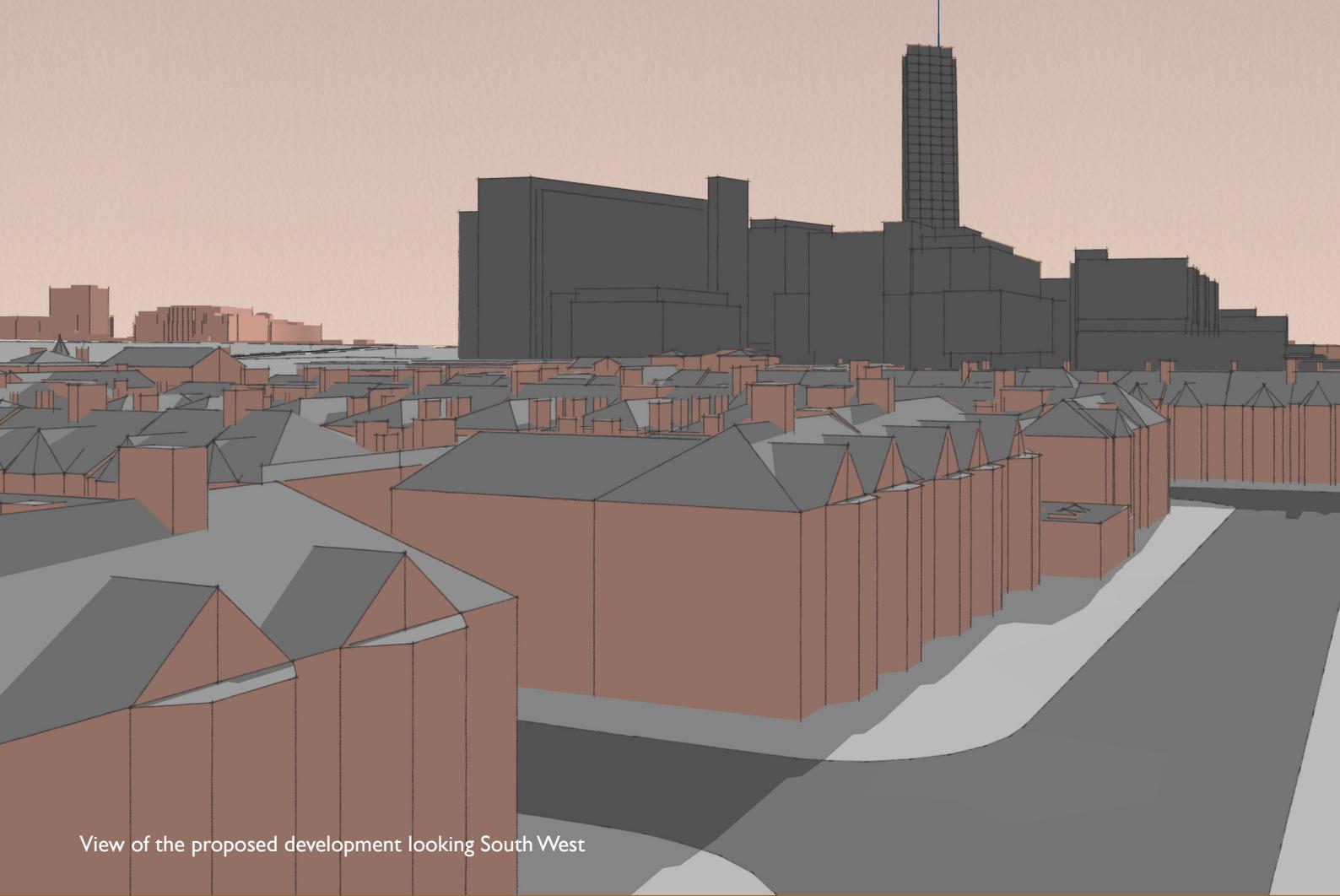


Image 5. Application visualisation 4 of development from Oxford Gardens, September, Perspective Control 24mm lens



Image 6. Woodlands Area Residents visualisation of development from Oxford Gardens, February, 50mm lens crop

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View of the proposed development looking South West