

By email to Sunny Desai  
DC 9.

June 18 2019  
BCC859

Dear Sunny,

**Pre-Application Presentation: Hudson Square Development, Brentford East**

Thank you for presenting your proposals to us on June 10<sup>th</sup>. We noted:

**1. The Proposal.**

The scheme would include:

- A technical showcase for the automotive industry which would attract 1.5/2 million visitors annually.
- A hotel for 219 rooms
- 3 blocks of flats = 278 units
- Retail floorspace
- Parking for 350 cars, coach and cycle parking
- A central pedestrian square.

**2. Timing.**

B&Q lease expires 2023  
The site lies in the Great West Corridor Local Plan Review area. Revised proposals were approved for consultation by Hounslow cabinet in June 2019. A public inquiry is anticipated in 2020.

**3. Impact on Heritage Assets.**

Unresolved problems for Gunnersbury, Kew Gardens and Strand on the Green and local conservation areas.

BCC members considered **THE PROPOSALS** and concluded:

**1. The Technical Showcase Centre.**

The A4 has become an established location for car sales, which could support an innovative centre for the industry. However, a centre of this size (...m2 on 9 floors) attracting 1.5/2 million people could not be supported as it would place an impossible burden on the access arrangements in the area.

1.5/2 million annually = 5/5,000 visitors every day. If visits were concentrated at weekends this could equate with 10/15,000 visitors each day many

coinciding with visitors to the nearby Brentford Stadium (17,500 seats) and Kew Gardens (1.8 million visitors annually).

It was noted that the centre would be used to launch new products and to hold conferences. Both activities would tend to concentrate visitor flow.

As only 150 car spaces are to be provided on site for the centre and as parking nearby is constrained, virtually all visitors to this and the other attractions nearby would be by public transport.

Nearby Gunnersbury Station is already over-loaded with limited and dangerous stair access to a central platform. There are no agreed plans nor programmed funding for improvements. Kew Bridge Station has lengthened platforms and a 15 minute service to Hounslow and Waterloo. Access to the station is constrained. Proposals to connect central Brentford by a shuttle to Crossrail may be included in the Review plans if TfL has funding available.

***The BCC concluded that this was not an appropriate site for a centre which would attract large numbers of visitors.***

## **2. Hotel.**

A hotel would be a suitable use on this site as it could provide air-conditioned facilities for short term visitors who would not be unacceptably exposed to noise pollution or poor air quality.

It is noted that another hotel is to be built next to the stadium on the other side of the A4. It is anticipated that this will be built out before 2023, so that the viability of a hotel on this site can be tested.

It would be unfortunate if the hotel was granted consent and it was then found to be unsuitable as a change to residential would not be appropriate on this site. It is noted that the hotel project on the Gillette site was never funded.

***The BCC would wish to support a hotel on this site if its viability can be assured.***

## **3. Housing.**

The 3 housing blocks are sited on the A406 (North Circular Road), which is understood to be one of the most polluted roads in the UK. Pollution on this road may get worse at about the time this site could be developed as the Mayor is proposing to extend the ULEZ in Central London. For the period that the North/South Circular Roads are the ULEZ boundary it is likely that an

increasing amount of traffic would use these roads to avoid the fines imposed on vehicles travelling into Inner London.

It is noted that most of the flats will be small as the site is clearly unsuitable for family housing. The proportion of affordable units is welcome.

We do not accept that housing in standard tower blocks is an acceptable solution for sites close to polluted roads. We note that the award winning Byker Wall in Newcastle does provide a design solution for sites close to motorways.

***The BCC considers that if any housing is included in this scheme it should be single aspect development designed to shield the residential units and the central square from pollution.***

#### **4. Retail Floor Space.**

The proposal includes significant retail floor space which could serve visitors to the Technical Showcase and residents.

It is noted that a small supermarket is nearing completion in the L&Q site west of the A4 and this may meet the needs of the 278 flats. It is not likely that a further shop for residents would be viable.

Retail space related to the Technical Showcase would increase the floor space attracting visitors travelling to the site by public transport.

***The BCC considers that retail space for residents is unlikely to be viable. Retail space for visitors to the site would depend on the acceptability of the Technical Showcase.***

#### **5. Parking and Access.**

We were advised that so far TfL had only completed a "technical assessment" of these proposals and that they will have to model all the developments in the area before reaching a clear view on this scheme.

The applicant said that they hoped that bus routes could be altered to take in this site. It would certainly appear that this will be necessary to link the site to the proposed Shuttle to Cross Rail and to Brentford Town Centre. We note that TfL are very reluctant to alter established bus routes.

The proposal does include welcome spaces for coaches on site which could be linked to park and ride schemes.

About 300 cycle spaces will be required for residents. Additional cycle spaces will be required for visitors.

The 150 parking spaces for visitors to the centre will only provide for about 250 people who amount to 4.5% of the estimated daily average. This leaves over 95% who would require public transport. Most of these people would come by train, when facilities are eventually improved. They would then walk onto the site.

In evidence given at the public inquiry for the adjacent Chiswick Curve site it was demonstrated that pedestrian access is difficult. Access over the dual carriageway A406 will inevitably slow traffic designed to flow at 30/40mph. Access across the six lane dual carriageway A4 will be even more difficult.

### **TIMING**

It was noted that the B&Q lease expires in 2023. By that date Hounslow would expect to have adopted a Local Plan Review for the Great West Corridor, including a Transport Review carried out with TfL.

The Review is about to go out for consultation. It is anticipated that it will either include "game-changing" transport improvements, which will significantly improve the PTA for development sites or it will propose more modest development targets and lower densities.

After the consultation, plan amendment and the public inquiry the Review plan should form a firm basis for development.

Before that date planning applications are departures from the approved Local Plan (2015)

In view of the need to ensure that major developments within the Review Area are an integral part of this area of urban redevelopment, it would be desirable to postpone a decision on this application until the Review has been adopted.

***The BCC considers that the present application is premature.***

### **IMPACT ON HERITAGE ASSETS**

The site next to this one has a live planning consent for a scheme called the Citadel. The inspector was advised at the recent public inquiry that the applicant did not wish to build out this scheme, but preferred to develop the Chiswick Curve design, now with the Secretary of State.

The applicant for Hudson Square stated that if the Citadel were built it would hide the silhouette of this scheme from critical points in the Strand on the Green Conservation Area.

While this may be true, the “harm” caused by inappropriate new development has to be seen in the round. It is not clear that the application would not cause any unacceptable harm.

The impact on Gunnersbury Park, Kew Gardens and the numerous CAS in Brentford, Chiswick, Kew and Ealing has yet to be demonstrated.

It is noted that the Secretary of State has yet to make a decision on the application for the Chiswick Curve and has now decided to call in applications for the Citroen site and the Watermans site. In each case “harm” to Heritage Assets is likely to be a central issue.

***The BCC is opposed to the proliferation of high buildings in Brentford East.***

#### **INTEGRATED PLANNING.**

The BCC supported the initiative taken by Hounslow to commission work which led to the production of the draft Brentford East SPD. There was great regret when the council decided not to adopt this SPD; but it is hoped that much of the integrated thinking in the draft will appear in the Great West Corridor Review Plans. Consultation is about to start on these documents, followed by any necessary revisions, a public inquiry and adoption.

We understand that the site will be available for development in 2023.

***In view of the imminent arrangement to forward the Local Plan Review we would ask the Council to reject this application as premature.***

We would hope that a comprehensive development of this site and the Chiswick Curve site could be progressed. If such a scheme included a housing element we request that the design follows the concept adopted in the Byker Wall scheme, which was specifically designed to shelter residents from adjacent polluting roads.

Yours sincerely

Denis Browne (Chairman)