

**B&Q Site, 2 Larch Drive, Chiswick W4 5QL**

**Refs: (P/2019/3954 and 01578/2/P3)**

Demolition of the existing warehouse and erection of 5 buildings ranging from a maximum of 10 to 16 storeys in height (with a four storey podium) to provide a mixed use development comprising of Technology Showcase (sui generis), retail space (A1/A3), leisure (D2), 258 residential (C3) units (block A 83 units, block B 99 units and block C 76 units) and a 219 bedroom hotel (C1) with associated basement parking (350 spaces), amenity space, landscaping, re-arranged access and all associated works. Installation of two zones for internally illuminated advertising panels being 1) 32.5m x 17m and 2) 17m x 9.5m (Advertisement Consent)

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**Comments from Brentford Voice**

**Summary**

**Permission for this planning application should be refused.**

**The proposal would have adverse effects on climate change and should be refused on these grounds alone.** (see paras. 1-6 below)

**We have several concerns regarding the overall design concept for the scheme.** (paras. 7 - 12)

**The entire scheme is predicated upon the success of the Technology Showcase. Although, in this case, viability may not be a material consideration we have considerable doubts about the likely success of the scheme.** (paras. 13 -14)

**We have concerns regarding the potential impact of the proposed retail provision on the viability of Brentford and Chiswick town centres.** (paras. 15 -20)

**The provisions for play space and access to Gunnersbury Park are inadequate.** (para. 21)

**The visual impacts on heritage assets to the north and south of the site are unacceptable.** (paras. 22 - 23)

**Arrangements for pedestrian access to the site are poorly developed and unacceptable.** (paras. 24 - 27)

**Arrangements for access to the site for those with disabilities and reduced mobility are inadequately developed.** (paras. 28 - 29)

**The impact of the scheme on public transport services - overground, underground, and bus - would be profound and unacceptable.** (paras. 30 - 44)

**The implications of the proposed West London Orbital rail service are not addressed.** (paras. 45 -47)

**Air quality in the vicinity of the site is particularly poor but that very important issue is inadequately addressed.** (paras. 48 – 50)

## Climate Change Implications

- 1 Brentford Voice has adopted a statement on climate change:

“Brentford Voice believes that climate change represents a real and growing threat to our neighbourhoods, country and the planet. We accept that the science behind Climate Change is complex covering many different areas of research. However, we also believe that the effects are now proven to a level that is beyond reasonable doubt.

We believe that the people of Brentford are worried about Climate Change and the impact it is having on the planet. We believe they care for both societies and ecospheres that are at risk and would wish to help. We believe they would also wish to protect the planet for the benefit of future generations.

Our objective is to get Climate Change conditions incorporated into planning guidance so developers are aware of the needs to properly address the issue and for planning applications to be assessed against relevant criteria.

Hounslow Borough Council declared a Climate Emergency in June 2019. The proposed target is to be carbon neutral by 2030, and therefore use of natural gas in planning proposal energy statements is unacceptable.”

- 2 The Planning Statement that accompanies the planning application contains (paras. 7.222-7.223) a rather disturbing assessment of the implications of the development:

“A greenhouse gas emissions assessment has been undertaken for the proposed development. The purpose of the assessment has been to quantify the anticipated greenhouse gas emissions and define the project’s contribution to an existing carbon budget. Based on the assessment undertaken, the contribution of emissions in the context of the budget are deemed to be low. **The assessment demonstrates that the arising greenhouse gas emissions from the proposed development represent a small proportion of national greenhouse gas emissions and through mitigation measures, as well as continuing decarbonisation of the energy network, it is anticipated that emissions will be reduced over time.**”

- 3 The applicant proposes a payment to the Hounslow Carbon Offset fund, “in accordance with the London Plan and Local Plan Policy EQ1.” The total payment is calculated to be £389,065 (two separate payments of £353,435 and £35,630).

The Hounslow Energy Strategy that accompanies the planning application (Revision P01, 4<sup>th</sup> October 2019) states:

- A local heat network for the development is proposed that will consist of air source heat pumps and **gas fired boilers** to produce all heating and hot water requirements for the development. This heat network has been modelled to assume each heat source would provide 50% each to the total heating and hot water load of the development.

- 4 The GLA Carbon Emissions Calculations, (Revision P01, 27<sup>th</sup> November 2019) shows that prior to offsets domestic emissions from the development will be over 350 tonnes of CO<sup>2</sup> per year and for the non-domestic development over 1,000 tonnes of CO<sup>2</sup> per year.
- 5 The Hounslow Carbon Offset Fund document states that:

- Hounslow Council is committed to reducing carbon emissions where ever possible
- We fully support the Mayor's "Zero Carbon" Homes Policy, a blueprint for all major residential developments to reduce carbon dioxide emissions on site
- The CO<sup>2</sup> reduction targets set out in the Local Plan policy EQ1 are expected to be met through on-site design measures
- where it is clearly demonstrated that the required CO<sup>2</sup> reduction standards cannot be fully achieved on-site, any shortfall in carbon dioxide emissions may be provided off-site through an associated financial contribution to the Hounslow Carbon Offset Fund

6 The proposed development should be refused as:

- It is possible to reduce carbon emissions further by removing the use of gas fired boilers from the proposal
- The development is not zero carbon. The mayor's policy is that all developments are zero carbon from 2019
- There are measures to reduce CO<sup>2</sup> emissions on site, so it is not valid to use financial contributions to the Hounslow Carbon Offset Fund as an offset
- It has not been clearly demonstrated that the required CO<sup>2</sup> reduction standards cannot be achieved on site. Removal of gas boilers from the proposal would reduce carbon dioxide emissions
- It will be much cheaper to develop a truly zero carbon development now, than come back later and modify it later

### **The Overall Design Concept**

- 7 Generally, the proposal is little changed from the pre-application scheme presented in June 2019. The applicants state that they wish to reflect the Brentford Community Stadium development but they appear to have failed to achieve this.
- 8 The business and retail floorspace proposed is very much more than that suggested as the "minimum development quantum" in the Draft West Corridor Local Plan: 33,054 m<sup>2</sup> (sui generis) compared to 1,770 m<sup>2</sup> (business) and 11,788 m<sup>2</sup> (retail) compared to 1,570 m<sup>2</sup> (retail).
- 9 Part of the residential scheme faces directly on to the North Circular Road, counter to the objectives of the Draft Great West Corridor Local Plan in which development on this site is required to present "a consistent and visible frontage against the Great West Road and North Circular".
- 10 The illustrations for the scheme use The Citadel development as a backdrop. It is likely that The Citadel is no longer viable and it would have been more instructive to incorporate the Chiswick Curve, which is the more likely scheme.
- 11 It is likely that the internal part of the proposed layout (Hudson Square) would be in shade for much of the time, particularly if the Chiswick Curve were to be completed.
- 12 The very large advertisement panels would be particularly unacceptable and contrary to Policy CC5 of the Hounslow Local Plan and Policy GWC3 of the Draft Great West Corridor Local Plan. Light pollution and light spillage from buildings and advertisements will lead to loss of amenity over a wide area and will have an adverse impact upon a wide range of fauna.

### **The Technology Showcase**

- 13 We have concerns regarding the viability of the Technical Showcase. The Showcase may be in direct competition with existing car showrooms along the A4 (Volkswagen, Audi, Mercedes-Benz etc.). The planning application presents very little evidence to support the demand for the Showcase facilities.
- 14 A more appropriate use may be a “green technology centre” which would reflect the history of the site and provide a link to Gunnersbury Park.

### **Retail Provision**

- 15 The planning application is accompanied with a Retail Impact Assessment, as required by national and local planning policy.
- 16 The retail provision is designed to meet local needs generated by those living and working on the site, and within the other new developments coming forward in the area. In addition the “Fourth Mile will incorporate a branded specialist destination retail offer. The intention is that this will focus on lifestyle retailers, potentially linked to key brand flagships”.
- 17 “Examples of ‘Brand Flagships’ include the Apple, Microsoft, Bose, SMEG and Pinarello. These share a number of common features; including an emphasis of presenting the ‘brand’ in a ‘one off’ concept store, and the opportunity to view and try the full product range in a large ‘showcase’ unit. These would not typically locate in smaller town centres such as Chiswick High Road and Brentford.”
- 18 Estimates are presented on the impact of this retail model upon retail turnover for comparison goods in Chiswick and Brentford town centres. The Retail Impact Assessment concludes that these impacts “will be negligible”.
- 19 The applicant presents a “fall-back option”. This option would see the existing B&Q store being converted to perhaps two units which would be attractive to operators such as Lidl, Aldi and B&M. Another version of this option would be the subdivision of the building into 10-12 smaller units occupied by such as JD Sports, Sports Direct, Superdrug, Tiger, Holland and Barrett etc.
- 20 The “fall-back” option is presented as having a substantially greater impact on Chiswick and Brentford Town Centres.

### **Play Space and Connections to Gunnersbury Park**

- 21 The Design and Access Statement (page 302) states that play space would be provided within the development for children aged 1-5 and 5-11. Children aged 12 and over would be expected to play in Gunnersbury Park: the journey there along the pavement of the A4 or A406 is polluted and dangerous and there are in any case no play facilities for this age group within the Park.

### **Impact on Heritage Assets**

- 22 At least one of the comments from the applicant is misleading: If some flats have view of Gunnersbury Park then those flats must be visible from the Park. One of the photographs in the application purports to be taken from the front of Gunnersbury House but it is taken from the bottom of the slope (see p. 168 of the EIA). The development will be clearly visible from the top of the terrace.
- 23 The height of buildings within the proposal are in excess of those proposed in the *Great West Corridor Appendix: View Assessment (July 2019)* which forms part of the evidence base for the GWC Plan. This suggests that the appropriate heights of buildings on this site would range from 35 to 51 metres above ground. This proposal is for building heights from 57.7 to 70.5 metres

**(Await further comments from WC&GS, Kew Society, and SOGA)**

**Pedestrian Access**

- 24 The Transport Assessment (Table 8.8) assumes that 10% (about 196,000) of annual visitors to the showcase and retail components will arrive on foot. On the assumption that those arriving on foot will use the same mode to depart, this suggests 392,000 pedestrian movements per annum.
- 25 On the assumption that those visitors who make the larger part of their journey by Overground or Underground will make the “final leg” and “first leg” of their journey on foot this suggests a total two-way pedestrian flow in the vicinity of the site of about 1.9 million per annum plus those who walk from the nearest bus stop.
- 26 Proposed improvements to pedestrian access from outside the site are:
  - the creation of a signal-controlled pedestrian/cycle crossing on Gunnersbury Avenue. This will provide connections to Chiswick High Road and Power Road.
  - a pedestrian access from the Great West Road with the potential for a future pedestrian crossing linking to Capital Interchange Way beneath the elevated M4. “The applicant remains committed to continue working alongside LBH and TfL to progress the development of future crossing proposals across the A4 Great West Road”.
- 27 At present there are signalised pedestrian crossing facilities on every arm of the Chiswick Roundabout, while there are routes across the central island of the roundabout itself. Pedestrians who use any of these routes face a very hostile, dangerous and polluted environment.

**Access for those with Disabilities and Reduced Mobility**

- 28 The *National Planning Policy Framework* (para.110) states that “applications for development should address the needs of people with disabilities and reduced mobility in relation to all modes of transport”.
- 29 The proposal pays adequate attention to those needs in relation to the design and internal circulation within the site. However, the Transport Assessment makes no reference to those needs for those who wish to travel to the site by public transport and via the local streets.

**Impact on Overground and Underground Services**

- 30 The following relates only to the Showcase and to the retail component of the development. No account has been taken of the impact of the proposed hotel and residential elements of the development.
- 31 The total annual entries and exits at the two nearest stations in 2017/18 were as follows (from the Office of Road and Rail – **update for 2018/19 to be published on 14 January 2020**):

	Entries and exits per annum	% Increase 2010/11 to 2017/18
<b>Gunnersbury Station</b>	2.53 million	82%
<b>Kew Bridge Station</b>	1.19 million	36%
<b>Total</b>	<b>3.72 million</b>	<b>64%</b>

- 32 For the planning application for The Fourth Mile (Tables 8.6 & 8.7 of Transport Assessment) the assumed average weekday visitors to the showcase and the retail component would be 5,896 per

weekday and 8,279 per Saturday, an annual total of about 1.96 million visitors. It is also assumed, based on data from the 2011 Census, that 40% (784,000) of those visitors would arrive by underground or train. This equates to a combined total of over 1.5 million additional entries and exits per annum at Kew Bridge and Gunnersbury Stations (unless a significant number arrive via Chiswick Park, Acton Town).

- 33 This can be compared with about 2 million visitors per annum to Kew Gardens and with estimates of the numbers, by travel mode, who may attend Brentford Community Stadium (BCS).
- 34 It is thought that about 9,000 people now work at Chiswick Business Park. If we assume that 40% of journeys to work are made by Overground or Underground then this would equate to about 1.8 million entries and exits per annum, a similar figure to the estimate of 1.96 million for The Fourth Mile.
- 35 The proposal for The Fourth Mile would therefore increase the combined annual total entries and exits at the two stations by about 40%.
- 36 In relation to Gunnersbury Station the Transport Assessment (paras. 10.4.7-10.4.8) concludes that “A substantial level of spare capacity exists on the District Line at Gunnersbury Station during then AM and PM peak periods – the effect of generated trips on the underground capacity are therefore considered to have a negligible impact on the District Line services.”
- 37 The Transport Assessment (para. 10.4.11) draws similar conclusions for Gunnersbury Overground services: “the proposed development is anticipated to have a negligible effect on local Overground capacity” and (para. 10.5.3) for Kew Bridge Station where there will be “negligible impact on South Western Railway service capacity”.
- 38 The proposed opening hours for the showcase and the retail component are 10.00 a.m. to 8.00 p.m., Monday to Saturday, and the Transport Assessment therefore makes the questionable assumption that the development will have no impact upon the weekday AM peak (6.30 a.m. to 9.30 a.m.).
- 39 Gunnersbury Station already faces significant problems with overcrowding although the opening of the footbridge from the northern end of Chiswick Park towards Chiswick Park Station may have provided some respite (is there any statistical or anecdotal evidence on the usage levels for the footbridge?).
- 40 With regard to Gunnersbury Station LB Hounslow are working with TfL, Network Rail and the owner of Chiswick Tower “to explore how development in this area could deliver improved access from the street to the platform, including lifts”. This suggests that upgrading of facilities is quite a way off, as no feasibility study has yet been carried out. Mobility assistance at Gunnersbury Station is currently limited to the provision of a ramp and staff assistance if required.
- 41 Kew Bridge is set to benefit from accessibility improvements when the new Brentford stadium opens. The London-bound platform is to be made step free and LB Hounslow is working with SWR and NR to explore how step-free access from the country-bound platform to the street can also be delivered. An outline feasibility study for Kew Bridge Station has already been completed and part of the £750,000 fee for this had been set aside for 2018/2019. There is currently no mobility assistance at the station.

### **Impact on Bus Services**

- 42 The proposal will have a coach / bus drop off and pick up “to promote sustainable modes of transport” (Design and Access Statement page 243). A bus stop is also located adjacent to the A4 at the pedestrian route through the Technology Showcase.
- 43 The Transport Assessment (Table 8.8) assumes that 11% (about 216,000) of all visitors each year will arrive by bus, minibus or coach. No separate estimate is available for public service buses. On the assumption that those arriving will use the same mode to depart, this suggests an additional 432,000

passengers per annum. Again, it is assumed that these journeys will have no impact during the AM peak hours.

- 44 The Transport Assessment (para. 10.3.5) that “it can be considered that the predicted increase in bus trips as a result of the proposed development will have a marginal effect on the total local bus capacity” and (para. 10.3.5) and that “it can be considered that the predicted increase in bus trips as a result of the proposed development will have a marginal effect on the total local bus capacity”.

**The West London Orbital (the WLO)**

- 45 In June 2019 Transport for London published a Strategic Outline Business Case for the WLO. A more detailed business case is to be developed by the end the end of 2020. The cost of the scheme is currently estimated to be £273 million and consideration is still being given to the sources of funding.
- 46 Construction of Phase 1 of the WLO, which may include a new station at Lionel Road, may begin by 2023 and be completed in about 2026. Phase 2, which may include the re-opening of the abandoned platforms at Kew Bridge Station is very unlikely to be completed before 2028/29.
- 47 Despite the critical importance of the WLO to the acceptability of the Fourth Mile proposal, the Transport Assessment provides no more than an acknowledgement that feasibility work is in progress.

**Air Quality**

- 48 The Air Quality Appendix that accompanies the planning application appears to pay insufficient attention to the needs of those who will live and work on the site and those who would travel on foot and by public transport to the site.
- 49 The A406 North Circular Road between Chiswick Roundabout and Hanger Lane has been identified as the most congested stretch of road in the UK. This is reflected in the very poor air quality in the area surrounding the site of this proposal.
- 50 Recent evidence suggests a reduction by one-third in levels of air pollution within the current London ULEZ. The planned extension of the ULEZ in October 2021 to the eastern edge of the A406 will almost inevitably divert many vehicles that do not meet Euro standards on to the A406 and roads to the west in Brentford.